

# HUB

Risk & Insurance | Employee Benefits | Retirement & Private Wealth

# RxDC Reporting Series

## Part 3: Submitting RxDC Reports in HIOS



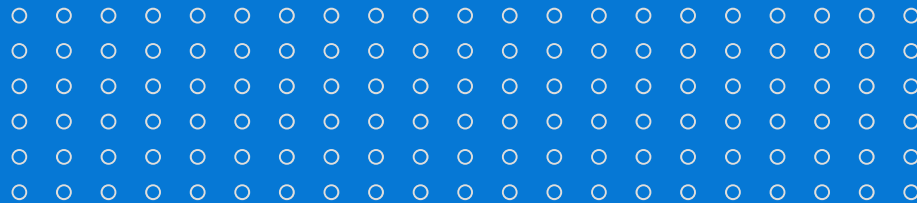
## Sonya Gordon, Esq.

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Compliance Manager, Pacific Region,  
Employee Benefits

**HUB International**

# 3



## Submitting RxDC Reports in HIOS

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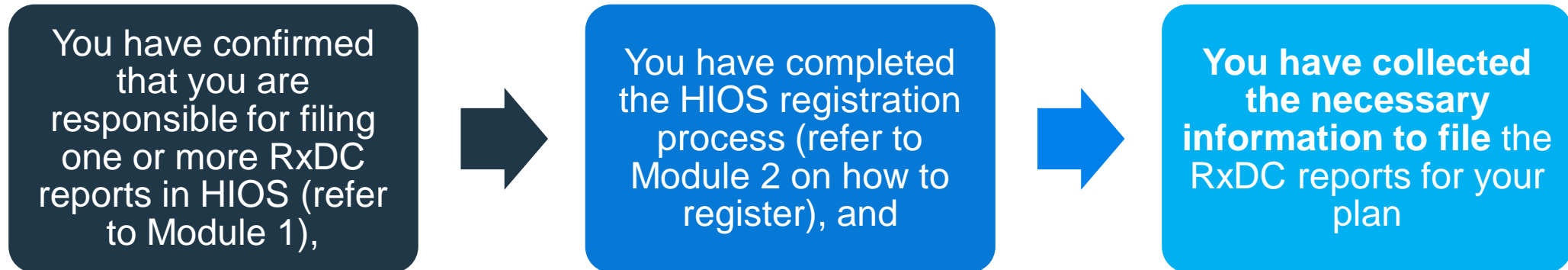
# Agenda

Submitting RxDC Reports

Next Steps

# Submitting RxDC Reports in HIOS

# Getting Ready to Submit Reports in HIOS



# Getting Ready to Submit Reports in HIOS



ALL plans file:	Some plans file:	Where to obtain these files:
<ul style="list-style-type: none"> <li>○ <b>P2 plan information files are required for all employer-based group health plans</b> that are not Federal Employee Health Benefit (FEHB) plans</li> </ul>	<ul style="list-style-type: none"> <li>○ D1 – D8 reports are required for plans with medical and pharmacy benefits</li> <li>○ D1 and D2 are required for plans with only medical benefits (exclude pharmacy coverage)</li> <li>○ D1 and D3 – D8 are required for plans with pharmacy benefits only</li> <li>○ Narrative is required for all plans</li> </ul>	<ul style="list-style-type: none"> <li>○ D1 information: The information is available in an employer's HRIS/payroll system (e.g., percentage of premiums paid by member vs. employer, stop-loss premiums, TPA fees, premium equivalents, etc.)</li> <li>○ D2 information will come primarily from the TPA and, in a minor role, from the PBM for POS discounts and rebates.</li> <li>○ D3 - D8 information will come from the PBM</li> <li>○ Narrative information will come from the insurance carrier, TPA, and/or PBM.</li> </ul>

# Submitting RxDC Reports in HIOS



Login Login with PIV Card

CMS.gov | Enterprise Portal

User ID

Password

I agree to the [Terms & Conditions](#)

Login

Forgot your [User ID](#) or your [Password](#)?  
Need to [unlock](#) your account?

[New User Registration](#)

Once the New User Registration has been completed and an approval from CMS:

- Enter User ID & Password
- Click agree to Terms & Conditions
- Click Login

# Submitting Information on HIOS



## Submitting information on HIOS

From the home page, select “Prescription Drug Data Collection (RxDC)” to submit the reporting files (e.g., P2, D1, D2, etc.).

A screenshot of the Health Insurance Oversight System (HIOS) home page. The page has a dark blue header with the title "Health Insurance Oversight System" on the left, a user profile "Welcome, [redacted]" and "Logout" on the right, and navigation tabs for "Home", "Knowledge Center", and "Help". The main content area is titled "Home" and includes a sub-header "My Work" and a "Notifications" link. A list of modules is shown, with "Prescription Drug Data Collection (RxDC)" selected and marked with a green flag. Below the list is a green "Launch This Module" button. At the bottom, there is a blue banner with a star icon, the text "DON'T SEE WHAT YOU'RE LOOKING FOR? Check out our list of functions and request access", and a "VIEW ALL FUNCTIONS" button.

# Submitting Your Reports on the Module



## Downloadable RxDC Resources:

- [RxDC Reporting Form Instructions](#) - These instructions describe the data and methods you must use to fill out your plan list and data files. The instructions also describe the information you must include in the narrative file.
- [RxDC Templates & Data Dictionary](#) - groups can use their own CSV files or can select 'Download Templates' to use the CMS-provided Excel templates. *Note – once you have entered data, it must be saved in **CSV format** before submitting.*
- Select the '**Start New Submission**' button on the Prescription Drug Data Collection Home Page to begin the submission process.

**Submissions** Start a new submission

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**How to submit to RxDC**

Read the reporting form instructions and prepare your data before starting your submission. Note: These are the same files as found on the [CCIIQ RxDC website](#).

<b>1. Download the instructions</b>	<b>2. Prepare your data</b>
<a href="#">RxDC Reporting Form Instructions</a> [PDF - 831KB]	You can generate your own .csv files or you can use the Excel templates. If you use the templates, save your files in .csv format before uploading.
<a href="#">RxDC Module User Manual</a> [PDF - 722KB]	<a href="#">Templates &amp; Data Dictionary</a> [ZIP - 225KB]
	<a href="#">Drug Name &amp; Therapeutic Class Crosswalk</a> [XLSX - 8MB]

# Submitting Your Reports on the Module

## Step 1 of 5: Select the ‘Submitting Organization’ and Reference Year

- Use the drop-down boxes to select the submitting organization name and the reference year of your data submission as a group health plan.
- **NOTE:** the “reference year” requested throughout the instructions is **the calendar year for which you are reporting**, regardless of the employer’s actual plan year dates (2023).
- After selecting the submitting organization and reference year, the **‘Save and continue’** button will become active. By pressing the Save and continue button, a submission for the selected Company and Reference year is saved and the submission will proceed to Step 2.

### 1 Select the submitting company

The submission name, in combination with the submitting organization and reference year, will create a unique submission. There may only be one submission per submission name, organization name, and reference year combination.

All fields are required.

#### Company name

Select the company that’s submitting the data

Please select an option

#### Reference year

Select the year of the data that’s in your submission

Please select an option

#### Submission name

Provide a unique, user-friendly name so you can more easily find and reference your submission. The name can be anything you want, but must be less than 150 characters.

Save and continue

# P2 Group Health Plan List



## Plan List: Part 2

Included in D1 Premium and Life Years?	Included in D2 Spending by Category?	Included in D3 Top 50 Most Frequent Brand Drugs?	Included in D4 Top 50 Most Costly Drugs?	Included in D5 Top 50 Drugs by Spending Increase?	Included in D6 Rx Totals?	Included in D7 Rx Rebates by Therapeutic Class?	Included in D8 Rx Rebates for the Top 25 Drugs?
(1= Yes; 0 = No)	(1= Yes; 0 = No)	(1= Yes; 0 = No)	(1= Yes; 0 = No)	(1= Yes; 0 = No)	(1= Yes; 0 = No)	(1= Yes; 0 = No)	(1= Yes; 0 = No)

### Included in D1 – D8 Location: P2 | Valid Values:

- 0 or 1 | Must not be blank
- Enter 1 if a plan’s data is included in the respective data file in your submission.
- Enter a 0 if the plan’s data is not included in the respective data file in your submission.

For example, if an employer is submitting D1 and D2 on behalf of a plan, the employer should enter 1 in “Included in D1” and “Included in D2” and enter 0 for “Included in D3” through “Included in D8.” *CMS will use this information to reconcile submissions when more than one reporting entity is submitting on behalf of a plan.*

# Submitting your Reports on the Module - P2



## Step 2 of 5: Upload Plan List(s)

- In the Plan List section, upload your Group Health Plan List(s) P2 file (all filings must include a P2 file) by either dragging the files to the appropriate box or by selecting the 'choose from folder' link.
- Once you have uploaded the CSV file, the system indicates if it was successful or if there were errors. Successful files receive a **green check mark** by the file name with a date and time stamp. If an incorrect file was provided, select the 'Delete' button to remove any previously uploaded files.

1 Select the submitting company ✓ Completed [Edit](#)

2 Upload plans

To identify the plans in your submission, upload one or more plan list. Upload files in .CSV format. You must upload at least one type of plan list.

P1. Individual and student market plan list

Drag files here or [choose from folder](#)

P2. Group market plan list

Drag files here or [choose from folder](#)

P3. Federal market plan list

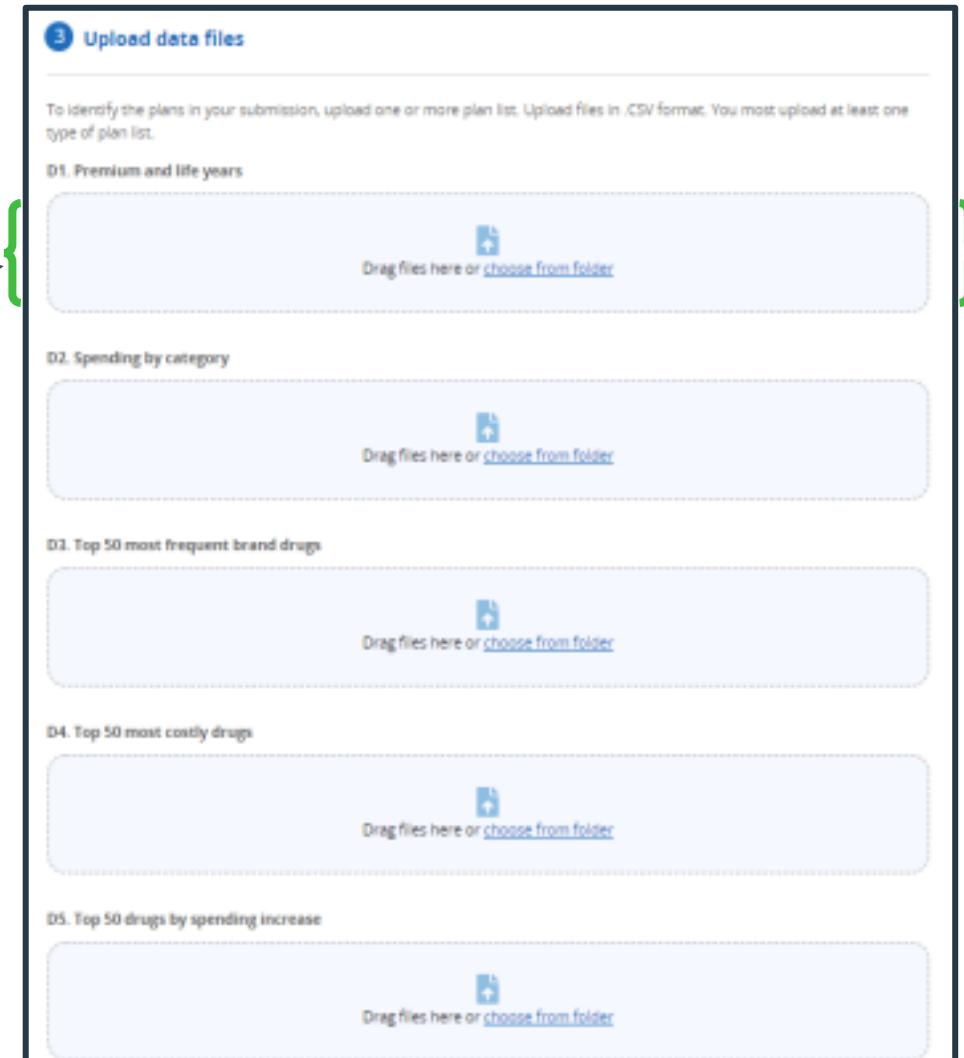
Drag files here or [choose from folder](#)

P2. Group market plan list			
	Rx RepoForm202... .csv	1019 Bytes	08/18/2022 11:13 AM <a href="#">Delete</a>

# Submitting Your Reports on the Module

## Step 3 of 5: Upload Data File(s)

- In the Data Files section, you may upload up to eight separate files. **NOTE:** If the group needs to self-report, most likely they will only be filing the D1 report, however other reports can also be submitted if the TPA or PBM will not file on the plan's behalf.
  - **D1. Premium and Life Years**
  - D2. Spending by Category
  - D3. Top 50 Most Frequently Dispensed Brand Drugs
  - D4. Top 50 Most Costly Drugs
  - D5. Top 50 Drugs by Spending Increase
  - D6. Rx Totals
  - D7. Rx Rebates by Therapeutic Class
  - D8. Rx Rebates for the Top 25 Drugs
- The specific data being requested within each of the files can be found within the RxDC Reporting Form Instructions on the RxDC Home Page. **Reminder:** The system will only accept CSV files.



The screenshot shows a web interface titled "3 Upload data files". Below the title is a paragraph: "To identify the plans in your submission, upload one or more plan list. Upload files in .CSV format. You must upload at least one type of plan list." Below this are five sections, each with a title and a dashed border containing a file upload icon and the text "Drag files here or choose from folder":

- D1. Premium and life years
- D2. Spending by category
- D3. Top 50 most frequent brand drugs
- D4. Top 50 most costly drugs
- D5. Top 50 drugs by spending increase

See Module 1 for more guidance on completing the D1 report.

# Assembling Your Narrative Response for the Module

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**Step 4: Upload Narrative and Supplemental Files** - Please note that most TPAs and PBMs are handling the narrative response. The narrative response will likely address the following topics:

- **Employer size**
- **Net payments from federal or state reinsurance or cost-sharing reduction programs**
- **Drugs missing from the CMS crosswalk**
- **Prescription drug rebates included or excluded in the D1 Rx Totals**
- **Medical benefit drugs and bundled/alternative payment arrangements**
- **Allocation methods for prescription drug rebates**
- **Impact of prescription drug rebates on premium and out-of-pocket costs**

# Submitting Your Reports on the Module


## Step 4: Upload Narrative and Supplemental Files

- The system allows only one narrative document and up to thirty supplemental documents to be uploaded. Once all files have been uploaded, click the 'Save and continue' button and go to Step 5.

### 4 Upload narrative and supplemental files


The narrative response file is required. The files must be in .PDF, .DOC, or .DOCX format.

**Narrative response**

  
Drag files here or [choose from folder](#)

Upload one or more supplemental documents. Upload files in .PDF, .DOC, or .DOCX format. You must upload at least one supplemental document. Maximum of 30 files can be uploaded.

**Supplemental documents**

  
Drag files here or [choose from folder](#)

[Save and continue](#) [Save and exit](#)

# Submitting Your Reports on the Module



## Step 5 of 5: Review Submission

- This is the last opportunity to review what you uploaded. If any section requires edits (e.g., the organization information, uploaded files, or other documents), click the Edit button located within the banner of all previous steps.
- The Review Submission page lists all successfully uploaded files and indicates which ones were not included in the submission. When you have finished your review, you'll press the **'Submit'** button.

### 5 Review submission

If the information is correct, select the Submit button to complete your submission.  
If you need to make a change, select the Edit button in the previous steps.

#### Submitting company information

Submission ID	27190	<a href="#">Edit</a>
Submission name	Test Submission Name	
Reference year	2022	
Company name	Emily's First	
Federal EIN	075632489	

#### Plan list(s)

	Date / Time	<a href="#">Edit</a>
<input checked="" type="checkbox"/> P1. Individual and student market plan list		
Rx Reporting Form 2021-P1-allValidData_new.csv (860 Bytes)		
<input type="checkbox"/> P2. Group health plan list		
<input type="checkbox"/> P3. Federal employees health benefits plan list		

#### Data files

<input type="checkbox"/> D1. Premium and life years	<a href="#">Edit</a>
<input type="checkbox"/> D2. Spending by category	
<input type="checkbox"/> D3. Top 50 most frequent brand drugs	
<input type="checkbox"/> D4. Top 50 most costly drugs	
<input type="checkbox"/> D5. Top 50 drugs by spending increase	
<input type="checkbox"/> D6. Rx totals	
<input type="checkbox"/> D7. Rx rebates by therapeutic class	
<input type="checkbox"/> D8. Rx rebates for the top 25 drugs	

#### Other documents

<input type="checkbox"/> Narrative response	<a href="#">Edit</a>
<input type="checkbox"/> Supplemental documents	

#### Please note

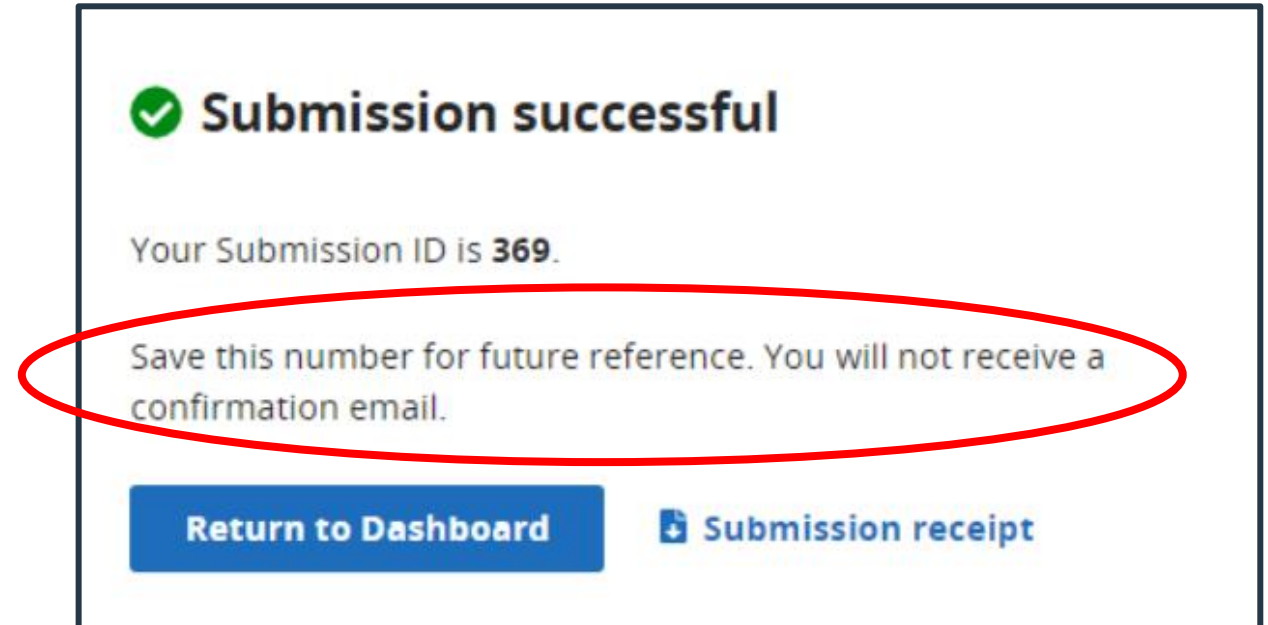
You won't be able to make edits after selecting the Submit button. For corrections, email the helpdesk at [cms\\_feos@cms.hhs.gov](mailto:cms_feos@cms.hhs.gov).

[Submit](#) [Print](#)

# Submitting Your Reports on the Module

## Successful File Submission

- If the submission was successful, you will receive a Submission successful alert. Write down your submission ID number and take a screenshot of the confirmation message for your records. You will not receive a confirmation email.
- After recording your submission ID number, select the 'Return to Dashboard' button to return to the RxDC Home Page, or select the 'Submission receipt' to prompt a printable version of the Submission successful page.



# Submitting Your Reports on the Module



## Viewing the Submission Dashboard with existing data

- Once you've submitted your files to the system, the Dashboard page will be updated to show a table listing out all existing 'In Progress' and 'Completed' submissions. You can sort the items within the table or select the Submission ID of a particular submission to view or resume it on this page.

**Prescription Drug Data Collection (RxDC)**

Welcome to the Prescription Drug Data Collection (RxDC) platform. Here you can upload your Section 204 data submission about prescription drug and health care spending. The Section 204 data submission is required under the Consolidated Appropriations Act, 2021 (CAA).

**Submissions** [Start a new submission](#)

Showing 1 to 5 of 7 submissions  submissions per page

Submission ID	Submission name	Company name	Year	Created date	Last updated	Last updated by	Status
<a href="#">741</a>	Emily Update U M	Emily's Non Insurance Company	2022	06/27/2023 05:37 PM	06/27/2023 05:43 PM		Complete
<a href="#">582</a>	Test 200mb Text	Emily's Non Insurance Company	2022	05/19/2023 12:47 PM	06/21/2023 09:11 PM		Complete
<a href="#">576</a>	Emily 7625	Emily's Non Insurance Company	2022	05/19/2023 12:34 PM	05/19/2023 12:37 PM		Complete
<a href="#">577</a>	Emily 7635	Emily's Non-Fed Gov Plans	2022	05/19/2023 12:34 PM	05/19/2023 12:36 PM		Complete
<a href="#">578</a>	Emily 1754	Emily's Other Org Type	2022	05/19/2023 12:34 PM	05/19/2023 12:36 PM		Complete

Previous 1 2 Next

# Submitting Your Reports on the Module - Error Message



## File Submission Error Window

- If your file upload contains errors, the system will show a red banner with additional details on which fields need attention.
- If you receive an error message, make corrections and re-upload the file.

D2. Spending by category


Drag files here or [choose from folder](#)

Rx Reporting Form 2021-....csv

Field	Error
totalCostSharing[2]	Entered value out of bounds for field. Expected value between -9999999999999999.99999999 and 9999999999999999.99999999
amountNotApplied[2]	Entered value out of bounds for field. Expected value between -9999999999999999.99999999 and 9999999999999999.99999999
spendingCategory[2]	Enter a valid spending category. The spending categories are Hospital, Primary Care, Specialty Care, Other Medical Costs and Services, Known medical benefit drugs, and Estimated medical benefit drugs.
totalSpending[2]	Entered value out of bounds for field. Expected value between -9999999999999999.99999999 and 9999999999999999.99999999

## Return to Home Page

- This safeguard warning appears if you are about to navigate away from an active submission and alerts you to save your work.

 **Warning** ✕ Close

You are leaving the RxDC submission application. By continuing, you will lose any unsaved work. To stay in the application, select "Close & stay on page" below, or to leave the application select "Continue".

Next Steps

# Next Steps: Key Takeaways for Employers



## IMPORTANT:

Retain copies of the information you filed and confirmation that your submission was accepted

Discuss responsibilities for filing reports for upcoming calendar years with your insurance carrier, TPA, and PBM

Remember that RxDC reports are due on **June 1<sup>st</sup> of each calendar year** for the prior reporting year.

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# Thank you.