

Per earlier communications from Diversified Group (attached), below you will find the machine readable file URL for placement on your public website per the transparency in coverage rules passed in October 2020. Additionally, there is information on how to place the link.

For all Employers with public facing websites (i.e. that do not require log-in credentials), publishing your MRF's is relatively simple. You will choose where on your website you would like to publish access to your MRF's and hyperlink the URL we provide to you to where the files are hosted. You must do this only once; the same link will always lead to the most current monthly MRF's and never changes. The actual MRF's are quite large (sometimes > 1 terabyte) and must be updated monthly and this will be done behind the scenes for you. The machine readable files contain network pricing data – in network negotiated rates between networks and providers and out-of-network historical allowed amounts. These are mostly intended for health care analysts and health care policy people to gain access for research with the thought that they may develop better healthcare systems. There is no specific employee information in the files and nothing identifiable.

Our recommendation to Employers:

- 1. Send this FAQ and the unique URL to the person who manages your website.
- 2. Have your web manager let you know when your site has been updated and confirm that your MRF's are publicly accessible by clicking that link on your website.
- 3. The links will be live on July 1st which is the deadline for these files to be published; if you click the link below before July 1st, you won't see any data, only the landing page with reference to the files.

FAOs

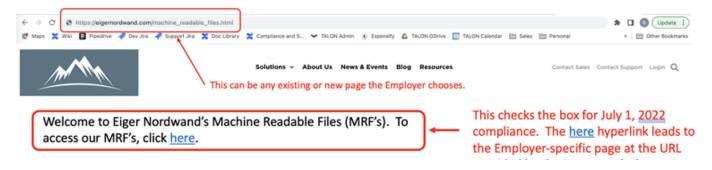
As an Employer, where should I put my MRF's so I'm in compliance on July 1, 2022?

The link to access your MRF's must be placed on a public-facing website. This would be your main company website. The link CANNOT be placed anywhere access needs to be granted. The two machine-readable files, in-network negotiated rates and historical out-of-network billed and allowed amounts, when appropriate, must be published by law. The third machine-readable file, negotiated rates and historic net prices for prescription drugs, has been put in delayed enforcement pending further rulemaking including format definition.

You may place access on any publicly accessible web page on your site. You may want to add some explanatory information for anyone who views the page.

Below is an example for an employer called 'Eiger Nordwand'





Example of what an Employer web page for MRF's might look like. Page content is in black. Notes for illustration are in red

Do I have to tell anyone once the MRF's are published?

No. There is no requirement to tell your Employees, Members or anyone else that you've published your MRF's. If you're audited, you'll need to be able to navigate to them in the public domain.

How many month's worth of history will you maintain for each Employer?

We currently plan on maintaining historic files indefinitely. There isn't clear guidance that we can find about how many months of history should be displayed on the Employer-specific site. We're currently considering 3-6 months. The files will live on TALON maintained servers. When someone clicks on the 'click here on an Employer-specific link, they are routed to a unique Employer-specific exclusive web page.

What if a group doesn't have a public-facing website?

Diversified Group and TALON will provide the URLs for all groups/plans. *In the event you do not have a public-facing website, please let us know as soon as possible by responding to this email (if you haven't already responded to an earlier email)*. In this case, we can post the links on our Diversified Group website which will link to a searchable landing page and still ensure that you are compliant.

Your unique URL:

Thank you,

Laura A. Williams, CFBS
Business Development and Compliance Consultant
369 North Main Street
Marlborough, CT 06447
Direct Phone/Fax: (860) 612-8644
Main: (888) 322-2524 x 310
lwilliams@diversifiedgb.com