

COMMITMENT TO TRANSPARENCY

Supporting our clients' compliance with Machine-Readable File Requirements

Meeting the Machine-Readable File Requirements

At Cigna, we are committed to complying with all applicable laws, rules and regulations. We are actively preparing for the upcoming requirements as part of the Transparency in Coverage Rule. We understand the implications and have established a rigorous compliance implementation program in connection with these requirements. In addition, Cigna understands the impact of the Transparency in Coverage Rule to our clients, and we are in the process of establishing programs and tools to support you.

Cigna is treating transparency and customer protection mandates not just as a compliance obligation but also as a multi-year strategic imperative that will enable us to create more value for our customers and clients. With our relentless focus on improving the affordability of health care, we are using this opportunity to build out our existing portfolio of solutions to protect customers from unexpected costs.

Under the Transparency in Coverage Rule, issued in 2020 by the US Departments of Health, Human Services, Labor and Treasury, enforced beginning July 1, 2022, health plans and health insurers must publish two separate machine-readable files (MRFs) as follows:

- ▶ **In-Network:** Negotiated rates for all covered items and services between the plan or issuer and in-network providers.

- ▶ **Out of Network:** Allowed amount paid to, and billed charges from, out-of-network providers for all covered services within a 90-day period.

The rule allows plans to use third parties to comply with this requirement.

Support for Our Clients

Cigna will host the MRFs we provide, on each client's behalf and at no cost to the client, on **Cigna.com**.¹ This is the standard option for self-funded (ASO) and fully insured clients and will include in- and out-of-network medical MRFs for applicable clients. This includes behavioral claims.

If a client does not have their own public website (see table on the next page), we will build a website with a link to the **Cigna.com** MRF subpage at no cost to the client.

Clients who choose to host their own files or have another third party do so on their behalf can download applicable MRFs through **CignaForEmployers.com**, customize them with their EIN/name and post them on their own website.

Cigna will not be providing a service to intake MRFs provided by non-Cigna carriers.

Cigna's hosting approach applies to standard US Commercial clients and Taft-Hartley SAR clients. Allegiance and Payer Solutions are excluded.

Together, all the way.®



	REQUIREMENT	APPROACH
Cigna Self-Funded (ASO) Clients	<ul style="list-style-type: none"> ASO clients are required to comply with the regulation and hold the compliance burden. Cigna will help them comply. 	<ul style="list-style-type: none"> Cigna will create and host the MRFs for in- and out-of-network claims at no additional cost.* Clients will need to add a link to their publicly available website that points to the files on Cigna.com. For clients without a publicly available website, Cigna will build one specifically for this purpose at no additional cost. Upon request, clients may choose to host their own files or have another third party host them on their behalf. In this case, clients will need to customize their files (e.g., adding EIN/name) before posting them on their own website.**
Cigna Fully Insured Clients	<ul style="list-style-type: none"> For fully insured clients, Cigna is required to comply as the insurer. 	<ul style="list-style-type: none"> Cigna will create and host the MRFs for in- and out-of-network claims at no additional cost. Clients will need to add a link to their publicly available website that points to the files on Cigna.com. For clients without a publicly available website, Cigna will build one specifically for this purpose at no additional cost.

* No cost for effective dates through 2022, but this is subject to change in the future.

** There are significant system requirements to download the files as well as long download times. To download and decompress a single file may require up to approximately 2.5 TB of free hard drive storage.

Cigna’s work to comply with the transparency requirements is well underway and will evolve as the effective and enforcement dates near and additional federal guidance becomes available. We will keep you informed as we continue the development, implementation and rollout of these tools.

