



**TO: Our Valued Clients and Brokers**  
**FROM: Health Plans, Inc.**  
**DATE: June 22, 2022**  
**RE: Compliance eBlast: Additional Update on Machine Readable Files**

Health Plans, Inc. (HPI) is issuing this Compliance *eBlast* to notify you of HPI's continued good faith efforts to meet the 7/1/2022 timeframe for Machine Readable Files (MRF), pursuant to the federal Transparency in Coverage Final Rule (TiC). HPI's basic approach has not changed since being detailed in the 8/31/2021 *Compliance Update*, found [here](#), and the 5/16/2022 Compliance *eBlast*, found [here](#).

HPI's network partners are actively providing links to their MRFs that Blue Book (HPI's vendor partner) will host for HPI. The HPI MRF public website is now accessible but remains a work in progress as Blue Book continues the process of finalizing the formatting of the MRFs. The HPI MRF website can be accessed [here](#), or by visiting [hpitpa.com](http://hpitpa.com) and clicking the "Transparency in Coverage – Machine Readable Files" link located under "Privacy Policy" at the bottom of the homepage.

Our MRF website will be fully operational by 7/1/2022 and will include posted MRFs we have received from the major networks, such as Harvard Pilgrim Health Care, United, CIGNA, as well as additional networks our clients use. However, while over the past year HPI has been working with and reaching out to our network partners to gain access to their MRFs, some networks have only recently been able to provide us with the exact plan and/or source for obtaining the MRFs, while others have reported that their MRFs will not be available until right before, or on, 7/1/2022. As such, by 7/1/2022, HPI will publically post the MRFs we have been provided by the networks to date, and we will continue to work to obtain and post the MRFs for all other networks. It is important to note that HPI believes the work we have conducted over the past year, and continue to perform, constitutes as a "Good Faith Effort" for our clients' plans to be in compliance with the TiC.

MRFs must be made accessible free of charge, without having to establish a user account, password, or other credentials, and without having to submit any personal identifying information. To ensure the privacy and security of Protected Health Information and Data, the files will conform to a non-proprietary, open standard format. The content of the files is formatted to technical standards in guidance published by the Centers for Medicare & Medicaid Services (CMS).

Additionally, CMS has confirmed it is the self-funded account's (client's) responsibility to post a link to the MRFs on their own public website. Fortunately, CMS has also confirmed that the client can link to the MRFs that are on their plan administrator's site. This means that HPI clients can simply copy the provided HPI URL for the MRFs (<https://hpitpa.com/transparency-in-coverage-machine-readable-files/>) and paste it on their company website at a location compliant with the accessibility requirements (being free of charge, without having to establish a user account, password, or other credentials, and without having to submit any personal identifying information).

**Please do not reply to this email.** Please contact the HPI Account Service Team directly if you have questions regarding MRFs.

Regards,

**Andrew H. A. Meggison**

Director, Regulatory Affairs

HealthPlansInc.com

1500 West Park Drive, Suite 330

Westborough, MA 01581

**The information in this Compliance *eBlast* is intended to provide a summary of our understanding of recent regulatory developments which may affect our clients' plans. It should not be construed as specific legal advice or legal opinion.**