



## RxDC Reporting Update - CMS Filing Guidance Issued

### **RxDC Reporting Update – 2025 Submission Due June 1, 2026**

Under the transparency provisions of the Consolidated Appropriations Act, 2021 (CAA), health plans are required to submit annual prescription drug and health care spending data to the Departments of Labor (DOL), Health and Human Services (HHS), Treasury, and the Office of Personnel Management (OPM).

This reporting, known as the Prescription Drug Data Collection (RxDC), is submitted to the Centers for Medicare & Medicaid Services (CMS).

### **For Your Information - No Action Required**

At this time, no action is required on the employer group's part. CMS has released the RxDC reporting resources for the year 2025 reference. No substantive changes were made to the reporting instructions or templates.

CMS will begin accepting RxDC submissions for the 2025 reference year in mid April 2026, with a submission deadline of Monday, June 1, 2026.

### **What Health Net of California, Inc. Is Doing**

Health Net has historically submitted RxDC data on behalf of its fully insured employer groups and will continue this approach for the 2025 reporting year.

Health Net of California, Inc. ("Health Net") confirms the following:

- Will meet all regulatory obligations for 2025 RxDC reporting, due June 1, 2026.
- Will complete Plan List (P2) and Data File (D1) submissions on behalf of employer groups without requiring employer data, unless materially required by future CMS guidance.
- Will not issue member or employer communications confirming RxDC filing or compliance, as this is not required by regulation.
- Will not establish contracts or charge fees to employer groups related to RxDC reporting.
- Confirms that employer groups incur no cost and have no reporting obligations related to RxDC.

## Additional Information – FAQ

### What will be submitted?

RxDC data files D1 through D8, including a required Narrative Response.

### Will reporting be aggregated?

Yes. Data File D2 will be reported in aggregate under Health Net's EIN, and all related data files will follow the same aggregated approach.

### Will employer groups need to take any action?

No. Employer groups are not required to take any action for the 2025 RxDC data submission.

## Reporting Timeline

- RxDC reporting is required annually, beginning December 27, 2022 (for reference years 2020 and 2021).
- Each subsequent annual submission is due by June 1.
- The 2025 RxDC report (based on 2025 data) is due June 1, 2026.

## Questions

If you have any questions, please contact your Health Net Representative.

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