

What Data May Employers Have to Furnish to the Reporting Entities?

- **Plan-Level Data—To Complete the P2 Data File, Employers May Be Asked to Provide:**
 - Identifying information such as plan name; plan number(s); plan sponsor; plan sponsor EIN; and issuer, TPA, and PBM names and EINs;
 - Beginning and end dates of the plan year that ended on/before the last day of the reference year;
 - Number of participants and beneficiaries (“**members**”) covered on the **last day of reference year**; and
 - Each state in which the plan or coverage is offered
- **To Complete the D1 Data File, Employers May Also Be Asked to Provide:**
 - **Premium amounts, including—**
 - Average monthly premium amount paid by employers and other plan sponsors on behalf of participants and beneficiaries;
 - Average monthly premium amount paid by participants and beneficiaries; and
 - Total annual premium amount and the total number of **life-years**. (See over.)
 - **Life-Years:** The total number of members covered on a given day of each month of the reference year, divided by 12
 - **Note:** For premium data, enforcement relief offered for 2020 and 2021 reference years