

## EMPLOYEE BENEFITS

## RxDC 2020/2021 Reporting Relief: Deadline Extended to January 31, 2023

On Friday, December 23, 2022, the US Departments of Labor, Treasury, and Health and Human Services (the Departments) jointly issued FAQ guidance ([Affordable Care Act and Consolidated Appropriations Act, 2021 Implementation Part 56](#)) offering relief to health issuers, health plans, Third-Party Administrators (TPAs) and Pharmacy Benefit Managers (PBMs) that are struggling to complete Prescription Drug Data Collection (RxDC) reporting by the December 27, 2022, deadline. The new guidance provides several pieces of relief.

Notably, the FAQ provides good-faith relief. The FAQ states, in part, that: “for the 2020 and 2021 data submissions that are due by December 27, 2022, the Departments will not take enforcement action concerning any plan or issuer that uses a good faith, reasonable interpretation of the regulations and the Prescription Drug Data Collection (RxDC) Reporting Instructions in making its submission.”

The guidance also establishes a grace period for completing the reporting requirement to January 31, 2023, from an original deadline of December 27, 2022. The grace period relief is granted to health issuers, health plans, and third parties reporting on their behalf “provided that a good faith submission of 2020 and 2021 data is made on or before that date.”

Finally, the FAQ provides several pieces of specific relief related to more technical issues, including multiple submissions by the same reporting entity, submissions of the same data file type by multiple reporting entities, etc.

[Other FAQs](#) related to the RxDC reporting requirements can be found on the CMS regtap.info website.



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