

Updated on
November 1, 2022



CAA Section 204 Submission Responsibilities for Reports Due 2022

Key:
BSC - Blue Shield of California
EG - employer group/group plan sponsor
This matrix outlines responsibilities for reference years 2020 & 2021 reports due on December 27, 2022.
Reporting responsibilities for reference year 2022 due on June 1, 2023 are still under consideration.

		Market Segment							
		Individual & Family Plans (On-Ex, Off-Ex, & GF)	Small Group	Large Group (Core and Premier)					
Group Characteristics	Funding	Fully-Insured	Fully-Insured	Fully-Insured/ Flex-Funded		Self-Funded - ASO		Self-Funded - Shared Advantage/ Shared Advantage +	
	Pharmacy Carved In/Out Status (In = with BSC, Out = with another carrier)	In	In	In	Out	In		Out	Out
Reporting Data Elements	Stop Loss Carved In/Out Status (In = with BSC or No Stop Loss, Out = with another carrier)	N/A	N/A	N/A	N/A	In or No Stop Loss	Out	In/Out	In, Out, or No Stop Loss
	P2 Group-Health-Plan-List	N/A	BSC	BSC	BSC/EG/Carve Out Carrier*	BSC	BSC/EG/Carve Out Carrier*	BSC/EG/Carve Out Carrier*	EG or Carve Out Carrier*
	D1 Premium-and-Life-Years	BSC	BSC	BSC	EG	BSC	EG	EG	EG or Carve Out Carrier**
	D2 Spending-by-Category	BSC	BSC	BSC	BSC	BSC	BSC	BSC	EG or Carve Out Carrier**
	D3 Top-50-Most-Frequent-Brand-Drugs	BSC	BSC	BSC	EG or Carve Out Carrier**	BSC	BSC	EG or Carve Out Carrier**	EG or Carve Out Carrier**
	D4 Top-50-Most-Costly-Drugs	BSC	BSC	BSC	EG or Carve Out Carrier**	BSC	BSC	EG or Carve Out Carrier**	EG or Carve Out Carrier**
	D5 Top-50-Drugs-by-Spending-Increase	BSC	BSC	BSC	EG or Carve Out Carrier**	BSC	BSC	EG or Carve Out Carrier**	EG or Carve Out Carrier**
	D6 Rx-Totals	BSC	BSC	BSC	EG or Carve Out Carrier**	BSC	BSC	EG or Carve Out Carrier**	EG or Carve Out Carrier**
	D7 Rx-Rebates-by-Therapeutic-Class	BSC	BSC	BSC	EG or Carve Out Carrier**	BSC	BSC	EG or Carve Out Carrier**	EG or Carve Out Carrier**
	D8 Rx-Rebates-for-the-Top-25-Drugs	BSC	BSC	BSC	EG or Carve Out Carrier**	BSC	BSC	EG or Carve Out Carrier**	EG or Carve Out Carrier**

Notes:

*The plan list identifies all the plans submitting any data. Any entity submitting any data elements D1 - D8, must also submit P2 and a narrative response.

**Carve out carriers may submit data directly to the CMS. It is up to the group plan sponsor to discuss reporting responsibility with the carve out carrier.

BSC only submits data files for which BSC provides all coverage within the data file.