

Ohio PPO Connect Transparency In Coverage Implementation Guidelines

Version 1.2

Updated 6/23/2022

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General Summary

Background of the Transparency in Coverage Rules

The background information below is taken from <https://github.com/CMSgov/price-transparency-guide>.

The Departments of the Treasury, Labor, and Health and Human Services (the Departments) have issued the Transparency in Coverage final rules (85 FR 72158) on November 12, 2020. The final rules require non-grandfathered group health plans and health insurance issuers in the individual and group markets (plans and issuers) to disclose certain pricing information. Under the final rules a plan or issuer must disclose in-network negotiated rates, and billed and out-of-network allowed through two machine-readable files posted on an internet website.

Plans and issuers are required to make these files public for plan or policy years beginning on or after July 1, 2022.

Ohio PPO Connect Overview

Ohio PPO Connect is a partnership of three separate PPO Networks. As such, Ohio PPO Connect is not directly required by the Transparency in Coverage final rules to post publicly available machine readable files. However, Ohio PPO Connect as a rental network needs to support its partner Third Party Administrators (TPAs) and Health Insurance Issuers by making available to them the appropriate In Network Negotiated Rates information.

Ohio PPO Connect File Summary

On the first of each month, Ohio PPO Connect will make available via HTTPS the various files with negotiated rate information. Each of the three partner networks will post In Network Rate files on their own separate HTTPS sites. A single combined Table of Contents files will be created by Ohio Health Choice for each individual TPA or Health Insurance Issuer that will specify the locations of the relevant In Network Rate files for all three partners. The TPA or Health Insurance Issuer will be responsible for downloading the necessary files from the appropriate FTP and HTTPS sites.

Getting Started

New Implementations

These are the general steps to get started:

- TPAs new to Ohio PPO Connect will cover this topic as part of the onboarding process.
- Existing TPAs should contact Ohio PPO Connect (see section later in this document) when ready to use/reference Ohio PPO Connect's In Network Rate files.
- TPA and Ohio PPO Connect will decide on Table of Contents files:
 - Will Table of Contents files be used? (see Technical Details section below)
 - Whose FTP site will be used for transfers?
- TPA and Ohio PPO Connect will discuss timing and other details (refer to Technical Details section below)
- TPA will ensure MRF process is working properly and sign off on implementation

Testing prior to July 1, 2022

Ohio PPO Connect expects that beginning July 1, 2022, In Network Rate files and supporting files will be posted on an ongoing monthly schedule as detailed in the Technical Details section below. Prior to July 1, production url locations for the In Network Rate files will be available in the Table Of Contents files to allow TPAs to set up their MRF processes.

Technical Details

Table of Contents Files

File Format Details: <https://github.com/CMSgov/price-transparency-guide/tree/master/schemas/table-of-contents>

Files Location: <ftp.ohiohealthchoice.com/OHC/TIC/12345>

- “12345” corresponds to an internal Client ID used by Ohio PPO Connect to identify the TPA
- Only the particular TPA will have access to their specific ftp folder
- New files posted on the first of each month
- An alternative FTP/SFTP site may be used, if requested by the TPA

File Names: yyyy-mm-01_Ohio-PPO-Connect_12345_index.json

- yyyy-mm is the current month and year
- “12345” corresponds to an internal Client ID used by Ohio PPO Connect to identify the TPA

Additional Details:

- Ohio Health Choice is the entity responsible for creating and posting the combined Table of Contents file.
- Each Table of Contents file will contain 3 separate In Network Files for each of the 3 Ohio PPO Connect partner networks.
- A TPA may receive multiple Table of Content files from Ohio PPO Connect, in multiple ftp folders, if they utilize various network configurations involving different network partners, such as the NWOHP network combined with Ohio PPO Connect.
- It is assumed that the TPA will only use this Table of Contents file to find the relevant In Network Rate files from Ohio PPO Connect. The TPA would not publicly publish this Table of Contents file.
- Field “plan_id_type” will be “EIN” or “HIOS”.
- Field “plan_id” will be :
 - HIOS for the plan, if that has been supplied to Ohio PPO Connect
 - EIN for the employer group, if that has been supplied to Ohio PPO Connect
 - Otherwise, will be a dummy EIN value of 123456789
- Field “plan_market_type” will always be “group”.

Sample File Notes:

- There are 3 separate in_network_files objects representing the 3 partner networks.

```
{  
  "reporting_entity_name": "Ohio PPO Connect",  
  "reporting_entity_type": "PPO Network",  
  "reporting_structure": [  
    {
```

```

"reporting_plans": [
  {
    "plan_name": "Some Group Name",
    "plan_id_type": "EIN",
    "plan_id": "123456789",
    "plan_market_type": "group"
  }
],
"in_network_files": [
  {
    "description": "Ohio Health Choice In Network Rate file for Network Design ID 10",
    "location": "https://www.ohiohealthchoice.com/TIC/OHC_in-network-rates_10.json"
  },
  {
    "description": "QCP In Network Rate file ",
    "location": "https://www.Claimsbridge.net/TIC/OPPOC/QCP_in-network-rates.json"
  },
  {
    "description": "OSU In Network Rate file ",
    "location": " https://mrf.healthcarebluebook.com/TrustmarkHB/7"
  }
] }
]
}

```

Alternative to Table of Contents Files

There may be TPAs with one or few employer groups using the Ohio PPO Connect network who would prefer to avoid using Table of Contents files.

It may be feasible in these cases to use the same file locations for the In Network Rate files from month to month.

Below is the necessary information for each of the In Network Rate files for the three networks included in Ohio PPO Connect:

Ohio Health Choice

The location/file names will have this pattern:

https://www.ohiohealthchoice.com/TIC/OHC_in-network-rates_21.json

The number at the end of the file name (21 in the example above) is important as it reflects the correct network configuration for the particular group. If a TPA has multiple groups, each group could have a different network configuration.

The particular number in the file name for each group will be communicated to the TPA during implementation.

Also, it is possible, although not probable, that the network configuration for a group could change. If a TPA decides not to use a Table of Contents file, then an audit will need to be created on the Ohio Health Choice side to check if the network configuration is changed in the future.

Quality Care Partners

The location and filename will always be:

https://www.Claimsbridge.net/TIC/OPPOC/QCP_in-network-rates.json

Ohio State University

The location will always be:

<https://mrf.healthcarebluebook.com/TrustmarkHB/7>

Provider Reference Files

File Format Details: <https://github.com/CMSgov/price-transparency-guide/tree/master/schemas/provider-reference>

Ohio Health Choice will be using separate Provider Reference files to specify the providers associated to specific rates in the In Network Rate MRF. The details provided below are only for informational purposes and are not necessary for file processing.

Ohio Health Choice

Files Location: <https://www.ohiohealthchoice.com/TIC/>

File Names: OHC_prov-ref_XXXXX.json

- “XXXXX” corresponds the integer Provider Group ID value

Additional Details:

- Ohio Health Choice has many distinct agreements with various specific providers, and also within those agreements are various network arrangements. This results in a large number of Provider Reference Files. A single In Network Rate file might reference hundreds or thousands of separate Provider Reference files.
- The set of Provider Group IDs will change each month, as the complete set of Provider Reference Files will be recreated each month. TPA’s cannot reuse Provider Reference files from month to month.
- Refer to the “provider_references” array in the In Network File Object in the In Network Rates file to determine exactly which provider reference files should be used

In Network Rates Files

File Format Details: <https://github.com/CMSgov/price-transparency-guide/tree/master/schemas/in-network-rates>

There will be 3 separate In Network Rates files for each employer group as specified in the Table of Content file.

TPAs will receive a Table Of Contents file on the 1st of each month. The corresponding files below will be available also on the 1st of each month.

Ohio Health Choice

Files Location: <https://www.ohiohealthchoice.com/TIC/>

File Names: OHC_in-network-rates_xx.json

- “xx” corresponds to an integer value representing the particular Ohio Health Choice network design

Additional Details:

- There will be more than 20 files available at the Ohio Health Choice HTTPS location
- Refer to the “in_network_files” object array in the Table of Contents file to determine exactly which file(s) should be downloaded for specific plans.

Quality Care Partners

File Location/Name: https://www.Claimsbridge.net/TIC/OPPOC/QCP_in-network-rates.json

Ohio State University

File Location: <https://mrf.healthcarebluebook.com/TrustmarkHB/7>

Ohio PPO Connect Contacts

Diana Jacobs

Project Lead

Manager, Programming and Repricing – Ohio Health Choice

330-996-8205 / 800-554-0027

jacobsd@ohiohealthchoice.com