

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.



DISCLAIMER: *Brown & Brown, Inc. and all its affiliates, do not provide legal, regulatory or tax guidance, or advice. If legal advice counsel or representation is needed, the services of a legal professional should be sought. The information in this document is intended to provide a general overview of the topics and services contained herein. Brown & Brown, Inc. and all its affiliates, make no representation or warranty as to the accuracy or completeness of the document and undertakes no obligation to update or revise the document based upon new information or future changes.*



How Brown & Brown Can Help

Connect with your Brown & Brown service team to learn more about how we can help find solutions to fit your unique needs.



Find Your Solution at [BBrown.com](https://www.BBrown.com)

DISCLAIMER: *Brown & Brown, Inc. and all its affiliates, do not provide legal, regulatory or tax guidance, or advice. If legal advice counsel or representation is needed, the services of a legal professional should be sought. The information in this document is intended to provide a general overview of the topics and services contained herein. Brown & Brown, Inc. and all its affiliates, make no representation or warranty as to the accuracy or completeness of the document and undertakes no obligation to update or revise the document based upon new information or future changes.*