

FAQS ABOUT AFFORDABLE CARE ACT IMPLEMENTATION PART 75

October 7, 2026

Set out below are Frequently Asked Questions (FAQs) regarding implementation of certain provisions of the Affordable Care Act (ACA). These FAQs have been prepared jointly by the Departments of Labor, Health and Human Services, and the Treasury (collectively, the Departments). Like previously issued FAQs (available at <https://www.dol.gov/agencies/ebsa/laws-and-regulations/laws/affordable-care-act/for-employers-and-advisers/aca-implementation-faqs> and https://www.cms.gov/marketplace/resources/fact-sheets-faqs#Affordable_Care_Act), these FAQs answer questions from stakeholders to help people understand the law and promote compliance.

Transparency in Coverage Machine-readable Files

The Departments published the Transparency in Coverage Final Rules (2026 TiC Final Rules) on October 6, 2026.¹ The 2026 TiC Final Rules amend the Transparency in Coverage Final Rules that were published on November 12, 2020 (the 2020 TiC Final Rules),² which require non-grandfathered group health plans and health insurance issuers offering non-grandfathered group or individual health insurance coverage to disclose on a public website information regarding in-network provider rates for covered items and services, out-of-network allowed amounts and billed charges for covered items and services, and negotiated rates and historical net prices for covered prescription drugs in three separate machine-readable files (MRFs).³ The 2026 TiC Final Rules amend the MRF requirements by modifying the required data elements of the In-network Rate and Allowed Amount MRFs, requiring additional Utilization, Taxonomy, and Text MRFs, and standardizing MRF formats, among other things.

As set forth in the preamble to the 2025 TiC Proposed Rules,⁴ the Departments issue technical implementation guidance for the MRFs on GitHub in the form of schemas. Schemas provide the technical data formats for the MRFs. GitHub is an online hosting platform for development and source code management that permits version control. The CMS GitHub project for Price Transparency Guide⁵ hosts the repository set of schemas and provides a space for the Departments to collaborate with industry, including regulated entities and third-party developers, to ensure the file formats can meet the public disclosure data requirements for various plan and contracting models.

¹ 91 FR 63748 (Oct. 6, 2026). OMB Control Number 0938-1429.

² 85 FR 72158 (Nov. 12, 2020). OMB Control Number 0938-1429.

³ The Departments deferred enforcement of the 2020 TiC Final Rules' requirement that plans and issuers publish machine-readable files relating to prescription drug pricing pending further rulemaking. See FAQs About Affordable Care Act and Consolidated Appropriations Act, 2021 Implementation Part 49 (FAQs Part 49) (Aug. 20, 2021), Q1, available at <https://www.dol.gov/sites/dolgov/files/EBSA/about-ebsa/our-activities/resource-center/faqs/aca-part-49.pdf> and <https://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/Downloads/FAQs-Part-49.pdf>. The Departments subsequently rescinded that policy and stated that the Departments would address enforcement decisions under the relevant requirements of the 2020 TiC Final Rules on a case-by-case basis, as the facts and circumstances warrant. See FAQs About Affordable Care Act Implementation Part 61 (FAQs Part 61) (Sept. 27, 2023), Q1, available at <https://www.dol.gov/agencies/ebsa/about-ebsa/our-activities/resource-center/faqs/aca-part-61> and <https://www.cms.gov/files/document/faqs-about-affordable-care-act-implementation-part-61.pdf>.

⁴ 90 FR 60432 (Dec. 23, 2025).

⁵ See <https://github.com/CMSgov/price-transparency-guide/>.

The Departments are releasing schema version 3.0 of the In-network Rate and Allowed Amount MRFs and schema version 1.0 of the new Utilization, Taxonomy, and Text MRFs to implement the 2026 TiC Final Rules. The 2026 TiC Final Rules and corresponding schemas will result in improvements that include:

- Significant reduction of duplicative rates repeated across plans and reduction of file size and total number of MRFs as a result of requiring the In-network Rate MRF to be organized at the provider network level, rather than at the plan/policy level;
- Addition of further context to in-network rates by requiring new data elements like product type, provider network name, and provider network ID along with new contextual Taxonomy and Utilization MRFs;
- Reduction of file size by requiring plans and issuers to exclude in-network rates for unlikely provider-to-service mappings;
- Augmentation of out-of-network historical data by increasing the reporting period and lookback period, requiring that data be aggregated by health insurance market type rather than at the plan/policy level, and lowering the claims threshold for the Allowed Amount MRF;
- Enhanced findability of all publicly disclosed MRFs by requiring a Text file with the source page URL that hosts the MRF and contact information for the MRF;
- Decrease in burden on both plans and issuers and file users by reducing the reporting frequency from monthly to quarterly for the In-Network Rate and Allowed Amount MRFs; and
- Standardization of file format across plans and issuers by requiring a single, non-proprietary, open standards format for all MRFs. As announced in Q5 of these FAQs, the format for all MRFs except the Text MRF is JavaScript Object Notation (JSON). The Text MRF is required by the 2026 TiC Final Rules to be published as a plain text (.txt) file.

Q1: What will the process be for releasing new schema specifications?

The Departments will follow the same process for developing the new schema versions as was used for schema versions 1.0 and 2.0—engaging industry in collaboration on GitHub beginning with the release of this guidance. In two phases, the Departments will introduce new schema elements and reporting requirements, request feedback on the discussion board, and diagram examples of MRFs in the new format. When decisions are finalized on GitHub, the Departments will provide the policy context and explanation of the changes in plain language on the Transparency in Coverage Technical Clarifications webpage⁶ on the Transparency in Coverage website.⁷ The Departments will also host a series of webinars⁸ throughout the iteration process to explain the changes, take questions, and provide technical assistance to file developers.

Q2: When will the Departments release the technical guidance for the new schemas?

The Departments are releasing the schemas in two phases. Schema version 3.0 of the In-network Rate and Allowed Amount MRFs will be released on or around February 1, 2027 (Phase 1). Schema version 1.0 of the new Utilization, Taxonomy, and Text MRFs will be released on or around June 1, 2027 (Phase 2). Links to the technical implementation guidance on GitHub are

⁶ See <https://www.cms.gov/healthplan-price-transparency/resources/technical-clarification>.

⁷ See <https://www.cms.gov/priorities/key-initiatives/healthplan-price-transparency>.

⁸ See <https://www.cms.gov/healthplan-price-transparency/resources/webinars>.

available on the Transparency in Coverage Resources webpage.⁹

Q3: What does each phase of technical implementation consist of and why are the Departments releasing the new schema versions in two phases?

Phase 1 includes updated information related to the In-network Rate and Allowed Amount MRFs, including about the exclusion of unlikely provider-rate combinations in the In-network Rate MRF (Schema 3.0).¹⁰ Phase 2 includes new information for the Utilization, Taxonomy, and Text MRFs (Schema 1.0).¹¹ In response to public comments received with respect to the 2025 TiC Proposed Rules,¹² the Departments determined that the applicability date for the new In-network Rate and Allowed Amount MRFs requirements could be accelerated given that the technical changes largely consist of restructuring existing data.¹³ Therefore, the Departments are publishing the technical implementation guidance for these requirements first in Phase 1. The Departments finalized a later applicability date for the requirements related to the Utilization, Taxonomy, and Text MRFs and the requirement to include a link to the posted MRFs in the footer of the plan's or issuer's website to allow plans and issuers more time for development of new requirements. The Departments therefore are publishing the technical implementation guidance for these requirements later in Phase 2.

Q4: When must plans and issuers begin publishing MRFs?

The 2026 TiC Final Rules reduced the publishing frequency of the In-network Rate and Allowed Amount MRFs from monthly to quarterly.¹⁴ The updated In-network Rate and Allowed Amount MRFs must be published on April 1, 2027 and on the first day of each calendar-year quarter thereafter (*i.e.*, on July 1, 2027; October 1, 2027; January 1, 2028; and April 1, 2028), and the Taxonomy MRF must be published on October 1, 2027 and on the first day of each calendar-year quarter thereafter. The Utilization MRF must be published annually on July 1st of each year beginning on July 1, 2028.

The 2026 TiC Final Rules also require plans and issuers to publish a Text MRF in .txt format that includes the source page URL that hosts the MRFs, a direct link to the MRFs, and contact information for inquiries and issues on the MRFs. This file must first be published on October 1, 2027 and within 7 calendar days of any updates. See Table 1 below for expected disclosure dates.

Until April 1, 2027, plans and issuers are expected to continue complying with the requirements of the 2020 TiC Final Rules using schema version 2.0 for the In-network Rate and Allowed Amount MRFs.¹⁵

⁹ See <https://www.cms.gov/priorities/healthplan-price-transparency/overview/resources>.

¹⁰ The corresponding provisions in the 2026 TiC Final Rules are effective March 6, 2027. See 26 CFR 54.9815-2715A3(c)(1)(ii), 29 CFR 2590.715-2715A3(c)(1)(ii), and 45 CFR 147.212(c)(1)(ii). ("The provisions of this section apply beginning March 6, 2027, except that paragraphs (b)(2), (b)(3)(iii), and (b)(4)(iii) through (v) of this section apply beginning September 6, 2027.")

¹¹ The corresponding provisions in the 2026 TiC Final Rules are effective September 6, 2027. *Id.*

¹² 90 FR 60432 (Dec. 23, 2025).

¹³ 91 FR 63802 (Oct. 6, 2026).

¹⁴ For the prescription drug file, the reporting frequency remains monthly.

¹⁵ See 26 CFR 54.9815-2715A3(c)(1)(i), 29 CFR 2590.715-2715A3(c)(1)(i), and 45 CFR 147.212(c)(1)(i). ("Until the applicability dates specified in paragraphs (c)(1)(ii) of this section, plans and issuers are required to continue to comply with [26 CFR 54.9815-2715A3] [29 CFR 2590.715-2715A3] [45 CFR 147.212] revised as of [April 1, 2025] [July 15, 2025] [October 1, 2025].")

TABLE 1: TiC Initial and Subsequent MRF Disclosure Timing Requirements

	<u>Applicability Date</u>	<u>Initial Disclosure Date</u>	<u>Subsequent Disclosures Dates</u>
<u>In-network Rate File (quarterly)</u>	March 6, 2027	April 1, 2027	July 1, 2027; October 1, 2027; January 1, 2028; April 1, 2028; etc.
<u>Allowed Amount File (quarterly)</u>	March 6, 2027	April 1, 2027	July 1, 2027; October 1, 2027; January 1, 2028; April 1, 2028; July 1, 2028; etc.
<u>Taxonomy File (quarterly)</u>	September 6, 2027	October 1, 2027	January 1, 2028; April 1, 2028; July 1, 2028; etc.
<u>Text File (ongoing)</u>	September 6, 2027	October 1, 2027	Within 7 days of any updates
<u>Utilization File (annually)</u>	September 6, 2027	July 1, 2028	July 1, 2029; July 1, 2030; etc.

Q5: What is the specified format for MRFs?

The 2026 TiC Final Rules require plans and issuers to make MRFs available in a single, non-proprietary, open standards format, in a form and manner specified in guidance issued by the Departments, unless otherwise required.¹⁶ The Departments also announced an intention to specify JSON as the specified format in guidance to preserve flexibility to adapt to future technological developments.¹⁷ The Departments confirm here that JSON is the specified format in which plans and issuers should publish their MRFs because JSON best supports the current structure and exchange of TiC data and aligns with existing market implementation. As such, MRFs required by the 2026 TiC Final Rules should be published in JSON on the required publication dates, which are discussed in the response to Q4 above. The Text file, which is required to be published in .txt format, is not subject to the JSON format specification.

Q6: When will the Departments release technical guidance for the prescription drug MRF (Rx File)?

The Departments will begin development of schema version 1.0 for the Rx File on GitHub in November 2026 based on the 2020 and 2026 TiC Final Rules. Schema version 1.0 for the Rx file will be released on or around May 2027. Plans and issuers will be expected to publish Rx Files in accordance with schema version 1.0 starting in December 2027 and monthly thereafter.

¹⁶ 26 CFR 54.9815-2715A3(b)(3)(i), 29 CFR 2590.715-2715A3(b)(3)(i), and 45 CFR 147.212(b)(3)(i).

¹⁷ 91 FR 63791 (Oct. 6, 2026).

TABLE 2: TiC Rx File Disclosure Timing Requirements

<u>Rx File Schema Development Begins</u>	<u>Rx Schema Finalized</u>	<u>Initial Rx Disclosure Date</u>	<u>Subsequent Rx Disclosure Dates (Monthly)</u>
November 2026	May 2027	December 2027	January 2028; February 2028; March 2028; etc.