



# National Compliance Update

## USI EMPLOYEE BENEFITS

May 8, 2025

## 2024 RxDC Reporting Reminder

The Centers for Medicare and Medicaid Services (“CMS”) recently released updated Prescription Drugs Data Collection (“RxDC”) reporting instructions related to reporting 2024 data; there are no changes between the 2023 and 2024 instructions. The deadline to report 2024 RxDC data to CMS is **June 1, 2025**.

### BACKGROUND

As previously reported,<sup>1</sup> plan sponsors of group health plans (typically, employers) must submit information annually about prescription drugs and health care spending (“RxDC reporting”) to CMS. The next deadline is **June 1, 2025**,<sup>2</sup> for reporting on calendar year 2024.

**USI Note.** Carriers, pharmacy benefit managers (“PBMs”), and third-party administrators (“TPAs”) assisting with the reporting may have earlier deadlines for employers to respond to them with certain data points (e.g., plan name, average monthly premiums).

RxDC reporting consists of uploading to CMS a total of nine spreadsheets, consisting of a plan list (P2 is used for group health plans) and eight data files (D1 through D8), plus a “narrative response.” In some situations, a TPA or PBM will not handle the full filing. This often requires the employer to file at least the D1 file, and occasionally the D2 file. A P2 list file must accompany all “D” filings.

### HIOS GUIDANCE

The HIOS RxDC User Manual and RxDC HIOS Access Guide were updated in April 2024. If an employer needs to submit one (or more) of the “D” files (e.g., D1) on behalf of the group health plan because a TPA or PBM is not handling the full filing, the employer must sign up for a HIOS account.

---

<sup>1</sup> See USI’s Compliance Updates, [2023 RxDC Reporting Instructions Released](#) (February 8, 2024), [RxDC Reporting Due December 27, 2022](#) (December 1, 2022), [Prescription Drug Reporting Reminder](#) (October 27, 2022), [New Prescription Drug Reporting Requirement](#) (July 28, 2022), and [Guidance on Prescription Drug Reporting](#) (Nov. 30, 2021).

<sup>2</sup> Note this is a firm deadline date, which falls on a Sunday in 2025.

## EMPLOYER NEXT STEPS

Employers should:

- Work with carrier partners, TPAs, PBMs and other vendors, as appropriate, to submit the requisite 2024 data and submit RxDC reporting.
- Understand whether the employer will be responsible for submitting any of the information to HIOS. For example, when an employer offers a self-funded health plan where stop loss insurance is carved out, the employer may be responsible for furnishing stop loss information by filing a P2 and D1 with HIOS.

The instructions are very helpful and answer questions about the filing requirement and provide relevant examples when appropriate.

USI will continue to monitor and inform you of any applicable changes.

## RESOURCES

For the 2024 RxDC Reporting Form Instructions, HIOS RxDC User Manual and RxDC HIOS Access Guide visit: <https://www.cms.gov/marketplace/about/oversight/other-insurance-protections/prescription-drug-data-collection-rxdc>.

**USI** [usi.com/about-usi/locations](https://www.usi.com/about-usi/locations)

This summary is intended to convey general information and is not an exhaustive analysis. This information is subject to change as guidance develops. USI does not provide legal or tax advice. For advice specific to your situation, please consult an attorney or other professional.

These materials are produced by USI Insurance Services for educational purposes only. Certain information contained in these materials is considered proprietary information created by USI. Such information shall not be used in any way, directly or indirectly, detrimental to USI and/or their affiliates.

Neither USI nor any of its respective representatives or advisors has made or makes any representation or warranty, expressed or implied, as to the accuracy or completeness of these materials. Neither USI nor their respective representatives or advisors shall have any liability resulting from the use of these materials or any errors or omission therein. These materials provide general information for the use of our clients, potential clients, or that of our clients' legal and tax advisors.

IRS Circular 230 Disclosure: USI Insurance Services and its affiliates do not provide tax advice. Accordingly, any discussion of U.S. tax matters contained herein (including any attachments) is not intended or written to be used, and cannot be used, in connection with the promotion, marketing or recommendation by anyone unaffiliated with USI of any of the matters addressed herein or for the purpose of avoiding U.S. tax-related penalties.

© 2025 USI Insurance Services. All Rights Reserved.