



BENECARD®

Carve-out prescription drug benefit programs.

CAA Bulletin: RxDC Reporting Requirements for CY 2025

As required under the Consolidated Appropriations Act, 2021 (“CAA”), Benecard has since inception and will continue to do so each year thereafter, submit for all of our plan sponsors the Prescription Drug Data Collection (otherwise known as “RxDC”) reporting data to the Centers for Medicare & Medicaid Services (CMS). For the 2025 calendar year, the RxDC reporting data must be submitted to CMS by June 1, 2026. In order for us to meet this deadline, we need plan sponsors to provide Benecard with the following information by April 8, 2026. At this time, CMS has not updated the reporting instructions or requirements from the 2024 reporting year. Last year, the reporting instructions and requirements were updated in April 2025. We will continue to monitor CMS and if they provide updated or changed information which will impact the data you need to provide to Benecard, we will notify you as soon as possible. Please click on the hyperlink, [BCS CAA Bulletins](#), to see all of our previous bulletins pertaining to this legislation.

Plan Sponsors must provide the following to Benecard by April 8, 2026:

For the data elements that Benecard does not have, this information needs to be provided by the plan sponsor and sent back to us using the required attached PDF file layout labeled as “[FORM D1](#).”

- The file must be provided in a PDF format and transmitted back to Benecard via an encrypted email to BCSCAA@benecard.com, no later than April 8, 2026.
- For any plan sponsors who started with Benecard after January 1, 2025, Benecard will submit the 2025 data applicable to the time period of active coverage with us. The plan sponsor will need to work with the prior PBM to coordinate the accurate submission of data applicable to the time period before the effective date with Benecard.
- For any plan sponsors who terminated from Benecard in the 2025 calendar year, Benecard will submit the 2025 data applicable to the time period of active coverage with us. The plan sponsor will need to work with the new PBM to coordinate the accurate submission of data applicable to the time period after the termination date with Benecard.
- Plan sponsors should be able to report back to Benecard the Average Monthly Premium (contribution) paid by members and Average Monthly Premium paid by employers for just the prescription portion. You should discuss with your medical carrier what data they want you to submit to them.

Please click on the following link, [RxDC Reporting Data – Illustrative Calculations](#), that provides illustrative examples of how average monthly premium paid by members and by employers for the prescription portion may be calculated. You should not include any medical premiums paid by the members or employers in these calculations you provide to Benecard. You should discuss with your medical carrier what data they want you to submit to them. It is important to note that the regulatory guidance and instruction on calculating these new and additional items has been very limited at this point. Benecard is only providing these sample calculations based on our own interpretation of this limited and ambiguous information. The calculations should not be construed as legal guidance or advice on how to actually report such information. Should further guidance or instruction become available or more clear, Benecard will update our plan sponsors accordingly.



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- The RxDC reporting is ultimately a plan sponsor's responsibility. In order for Benecard to help plan sponsors meet this responsibility, the plan sponsor must provide this data to Benecard to report on their behalf. Benecard will not be responsible for any penalties or fines imposed by federal agencies if the required data from the plan sponsor is not provided to us timely, contains inaccurate information, or is in the incorrect format.

This is an annual requirement and Benecard will need to collect the appropriate data from plan sponsors by April 8th of each year in order to be submitted by June 1st of each applicable year going forward.

Please contact your Benecard Services Client Relations Manager at (609) 219-0400 or via email should you have any questions regarding the above bulletin.

Disclaimer: This document is not intended to provide legal, tax, or accounting advice nor a full description of all components that make up the CAA RxDC Reporting Requirements. Consult with your attorney or accountant about the impact these federal healthcare reform laws and requirements have on your health benefit plans.

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