



HIGHLIGHTS

- The Departments issued new FAQs explaining when health plans must start posting their updated MRFs.
- The In-network Rate and Allowed Amount Files must be updated quarterly rather than monthly, starting April 1, 2027.
- The new Taxonomy and Text Files must be published beginning Oct. 1, 2027.
- The new Utilization File must be published annually beginning July 1, 2028.
- Plans and issuers will be expected to publish the Prescription Drug File starting in December 2027 and monthly thereafter.

New Transparency FAQs Set Timeline and Format for Updated MRFs

The U.S. Departments of Labor, Health and Human Services and the Treasury (Departments) recently issued [Frequently Asked Questions \(FAQs\)](#) explaining when health plans and issuers must begin publishing updated machine-readable files (MRFs) under the Transparency in Coverage (TiC) rules finalized on Oct. 6, 2026. The FAQs also address the required MRF format and the timeline for the Prescription Drug File.

Current MRF Requirements

The original 2020 TiC final rules require group health plans and issuers to disclose detailed pricing information on a public website in three separate MRFs: an In-network Rate File (containing negotiated rates for covered items and services), an Allowed Amount File (containing historical payments to and billed charges from out-of-network providers), and a Prescription Drug File (containing negotiated rates and historical net prices for covered drugs). **Plans and issuers are expected to continue complying with these requirements until April 1, 2027.** Most employers rely on their insurance carriers and third-party administrators to provide and post the MRFs.

Updated MRF Requirements

The Oct. 6, 2026, final rule adds a Utilization File and a Taxonomy File, and requires plans and issuers to attest that their MRFs are accurate and complete. To improve the findability of MRFs, including the Prescription Drug File, the final rule also requires a Text File containing contact information for the files and a footer with website URLs. In addition, the In-network Rate and Allowed Amount Files must be updated quarterly rather than monthly.

New MRF Posting Schedule

Plans and issuers must publish the updated MRFs on the following schedule:

- **In-network Rate and Allowed Amount Files:** These move from monthly to quarterly posting. The first updated MRFs must be published on **April 1, 2027**, and quarterly thereafter (i.e., July 1, 2027, Oct. 1, 2027, Jan. 1, 2028, and April 1, 2028);
- **Taxonomy File:** This new file must be published on **Oct. 1, 2027**, and quarterly thereafter;
- **Text File:** This new file must be published on **Oct. 1, 2027**, and within seven calendar days of any updates; and
- **Utilization File:** This new file must be published annually on July 1, beginning **July 1, 2028**.

In addition, plans and issuers will be expected to publish the **Prescription Drug File** starting in **December 2027** and monthly thereafter.

Required MRF Format

The FAQs confirm that **JSON is the specified format** in which plans and issuers should publish their MRFs, with the exception of the Text File which is required to be published in .txt format.