CLIENT WEBINAR | NOVEMBER 2026

Transparency in Coverage 3.0

What is changing, what to do now, and what it means for you

RevSpring

TODAY

Agenda

1. What is changing
2. Phone cost-sharing
3. Your to-do list
4. Project milestones
5. What you can start on now
6. Next steps and how to reach us

WHAT IS CHANGING

Your files

CHANGE	WHAT IT MEANS	APPLIES FROM
One file per provider network	Instead of one per plan, with network name, identifier, and product type	**Mar 6, 2027**
Unlikely rates removed	Rates a provider is unlikely to be paid for, given their specialty, are excluded	**Mar 6, 2027**
Rates as dollar amounts Supported today	Percent of billed charges only when no dollar amount exists before a bill	**Mar 6, 2027**
Out-of-network files by market	One file per insurance market, with an 11-claim threshold	**Mar 6, 2027**
Quarterly posting	In-network and out-of-network files move from monthly to quarterly	**Apr 1, 2027**

WHAT IS CHANGING

New requirements

CHANGE	WHAT IT MEANS	APPLIES FROM
Phone cost-sharing Supported today	Personalized cost-sharing must also be available by phone	**Jan 1, 2027**
Attestation	Each file includes an accuracy attestation by a named official	**Mar 6, 2027**
Open format, public access Supported today	One open-standards format, no login or blocking	**Mar 6, 2027**
Text file and footer link	Root-folder text file, plus a Price Transparency footer link	**Sep–Oct 2027**
Taxonomy file	Pairs billing codes with provider specialty codes	**Oct 1, 2027**
Rx file	Fee-for-service drug rates move to a separate file	**Dec 2027**
Utilization file	Annual file showing which providers bill for which services	**Jul 1, 2028**

TIMELINE

Key dates

Dec 7, 2026	Rule takes effect. Nothing due
Jan 1, 2027	**Phone cost-sharing, for plan years starting on or after**
~Feb 1, 2027	CMS Schema 3.0 Phase 1 expected: networks, plans, rates, attestation
Mar 6, 2027	Rule applies: network-level files, rate exclusion, attestation, and more
Apr 1, 2027	First quarterly in-network and allowed-amount files
~Jun 2027	CMS Schema 3.0 Phase 2 expected: taxonomy and utilization files
Sep–Oct 2027	Text file and website footer link
Oct 1, 2027	Taxonomy file
Dec 2027	Rx file expected to begin
Jul 1, 2028	First utilization file, then annually

Source: 45 CFR 147.212; FAQs About ACA Implementation Part 75 (Oct 7, 2026)

PHONE COST-SHARING · JAN 1, 2027

How member emulation works

When a member calls, the CSR signs in as that member and reviews personalized costs together on the call.

IN YOUR CSR TOOL

1. **CSR selects the active member**
2. **SSO signs the CSR in as that member**

IN THE REVSPRING COST ESTIMATOR

3. **Signed in as the member**
4. **Picks a procedure in Procedure Cost**
5. **Reviews results with the member**

TIMING **Phone cost-sharing applies for plan years starting on or after January 1, 2027. The member stays on the line while the CSR looks up costs.**

PHONE COST-SHARING · JAN 1, 2027

How to set up member emulation

Your CSR tool team and your SSO team work together on two changes.

1 Build the CSR step

Add a way for CSRs to select the active member in your CSR tool, plus a button that logs in as that member.

2 Extend your SSO

Add a new SSO connection, or extend your current one, to pass CSR details in the SAML payload. See the CSR payload section of our SSO guide.

BEFORE YOU START

You need a live member cost estimator with SSO and negotiated rates working. No data or preference changes are needed.

WHAT REVSPRING DOES

If you are reusing your existing SSO, typically nothing. If you need a new SSO connection, then we'll set it up with you.

PLAN AHEAD **Allow time for your teams to build and test before Jan 1, 2027. We will walk you through it.**

YOUR GROUP

Which group are you in?

GROUP 1

We build your files

You send us your data. We build, host, and publish your files, and power your cost tool.

Includes clients whose payer also publishes files we read for cost.

GROUP 2

We host your files

You make your own files, through your vendor or payer. We publish them and power your cost tool.

You produce; we post.

GROUP 3

Cost tool only

Your payer publishes the files. We read them for your cost tool and publish nothing for you.

No files published by us.

Not sure which group you are in? Your client team will confirm.

YOUR GROUP

Who does what, at a glance

★ Key for that group

CHANGE	WE BUILD YOUR FILES	WE HOST YOUR FILES	COST TOOL ONLY
Phone cost-sharing	Mostly you	Mostly you	Mostly you
Network-level files	★ Both	Mostly you	Mostly you
Unlikely-rate filtering	★ Both	Mostly you	Mostly you
Out-of-network files	Mostly us	Mostly you	Mostly you
Attestation	Both	Both	Mostly you
Quarterly posting	Both	Both	Mostly you
Drug (Rx) file	Mostly you	Mostly you	Mostly you
Website items	Both	Both	Mostly you
Plan details and mapping	★ Both	★ Both	★ Both

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YOUR TO-DO LIST · GROUP 1

We build your files

You send us your data. We turn it into compliant 3.0 files.

WHAT WE DO

Generate your in-network and out-of-network files, build the table of contents, host everything, and power your cost tool

	WHAT YOU NEED TO DO	APPLIES FROM
1	**Define networks and map every plan** Stable IDs and names; plans ranked by precedence. Link provider and rate groups to each network ID in your crosswalk file	Mar 6, 2027
2	**Apply the specialty-based rate exclusion** Filter your rates before you send them WE CAN HELP Need us to filter rates? Contact your account manager	Mar 6, 2027
3	**Clean up rates and codes** Identify any gaps or invalid codes you send today. Make sure you follow the new rules WE CAN HELP A report of codes to be dropped or remapped	Mar 6, 2027
4	**Confirm out-of-network markets** Markets, sponsors to combine, six-month claims window	Mar 6, 2027
5	**Name your attesting official**	Mar 6, 2027

SPEC UPDATE · WE BUILD YOUR FILES

One new spec for your data

REVSPRING SPEC V6

Draft in review

Our draft v6 spec replaces the current spec

- Providers and rates defined by network ID
- Aligned to the CMS 3.0 model
- New and repurposed fields. Details in the coming weeks

1 **You send your data in the spec**

Everyone plans to get their data to it

2 **We run it through our pipeline**

Transform, validate, and build your files

3 **Compliant 3.0 files**

Network level and market level

SUBJECT TO CHANGE

This is our draft spec and it may change. CMS has not released Schema 3.0, expected around Feb 1, 2027. We will confirm the final spec when CMS publishes.

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YOUR TO-DO LIST · GROUP 2

We host your files

Your vendor or payer makes the files. We publish them and power your cost tool.

WHAT WE DO

Build the table of contents, host your files, and power your cost tool from them

	WHAT YOU NEED TO DO	APPLIES FROM
1	**Get your vendor's 3.0 timeline** When will they publish, and are files split per network/market?	**Now**
2	**Recheck your mapping and keys** When your payer's files change to 3.0, confirm your mapping and product-to-network keys still hold and point to the correct files	**When your payer moves to 3.0**
3	**Name your attesting official**	**Mar 6, 2027**

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YOUR TO-DO LIST · GROUP 3

Cost tool only

Your payer publishes the files. We read them for your cost tool.

WHAT WE DO

Read your payer’s published files for your cost tool. We host and generate nothing

	WHAT YOU NEED TO DO	APPLIES FROM
1	**Get your vendor’s 3.0 timeline** When will they publish, and are files split per network/market?	**Now**
2	**Recheck your external file mapping** Confirm it still points to the right files and products	**When your payer moves to 3.0**
3	**Keep your plan details current** Plan metadata still drives your cost tool	**Ongoing**

PROJECT PLAN

Project milestones

IN REVIEW

Draft our 3.0 spec

NEXT

Share draft spec with clients

Nov 20

THEN

Client data analysis and reports

Dec 1

THEN

Client gets data ready

Dec 1–Jan 1

THEN

Testing and client feedback

Jan 1–Mar 6

MAR 6, 2027

Final sign-off and PRD file delivery

March files publish as 2.0. We update production files in March so April files publish as 3.0

CALL TO ACTION

What you can start on now

1. **Review the readiness questions**
   We will share the readiness questions shortly after the webinar

2. **Identify your legal networks**
   Stable IDs and public names for each

3. **Review your plan and mapping files**
   Check plan details, your crosswalk file, and external MRF mapping files for changes

4. **Decide who filters rates**
   You filter, or share your reimbursement rules

5. **Engage your PBM and vendors**
   Ask when they will produce 3.0 and Rx files

EARLIEST DEADLINE **Phone cost-sharing applies Jan 1, 2027. Confirm CSR emulation is set up for every TiC-regulated line of business, and tell your client team when it is live.**

NEXT STEPS

What happens next

1. **We share the draft spec**
   With clear notice that it may change until CMS is final

2. **We analyze your data**
   A report on where you stand and where you need to get to

3. **You make the changes**
   Using your client spec, with our team alongside you

4. **Pilot the spec with us (optional)**
   We want one or two clients who can move quickly. Tell your account team if that's you

JOIN OUR MONTHLY EVENT

Compliance Insights: A Monthly Info Session

Second Friday of every month through Jun 11, 2027 · 10:00 AM PT

RESOURCES

Federal Register final rule

CMS fact sheet

go.revspring.com/health-plan-upcoming-events-and-past-recordings

WORKING TOGETHER

How to reach us

YOUR CLIENT TEAM

Your first contact

General questions, scheduling, and anything specific to your plan

ZENDESK TICKETS

Data and spec questions

Submit data and questions about your client spec; we track every one

HELP ARTICLE + LANDING PAGE

The full checklist and latest updates

Every field and decision in detail, plus news, milestones, and schedule changes

Links coming soon

MONTHLY WEBINAR

Compliance Insights

Second Friday of every month through Jun 2027

RAISE YOUR HAND **If our approach will be hard for your team, tell us early. We will meet with you to find the right path.**