

March 26, 2025

President Donald J. Trump
The White House
1600 Pennsylvania Avenue, NW
Washington, D.C. 20005

Dear President Trump,

On behalf of several employer groups dedicated to providing affordable and high-quality health coverage to employees, we are writing to express our strong support for the administration's efforts to increase price transparency in the U.S. health care system. We applaud your recent executive order¹ on price transparency, and we urge you to continue moving forward with policies that improve transparency, increase competition, and empower consumers.

We are particularly supportive of the Transparency in Coverage (TiC) rule and the Hospital Price Transparency rule, both of which are vital steps toward giving employers and employees the tools they need to make informed health care decisions. These rules help drive down costs and provide greater access to critical pricing information. We believe that the following recommendations would strengthen the administration's ongoing efforts and complement the progress made thus far:

1. **Standardize Format Requirements and Definitions:** We urge the administration to align the format requirements and definitions between the TiC rule and the Hospital Price Transparency rule. This will help create a unified and consistent approach to transparency that benefits both employers and health care consumers, ensuring easier access to relevant information. Additionally, we urge the administration to explore ways to reduce the size of files, so the MRFs are accessible to a greater audience.
2. **Publicly Report the Prescription Drug Machine-Readable Files (MRFs):** We strongly support the administration enforcing the requirement in TiC that payers disclose prescription drug pricing data in its unique MRF.² Prescription drugs are a significant cost driver in the health care system, and providing access to this novel data will allow employers and consumers to make better-informed decisions regarding medication costs and prescription management.
3. **Increase Enforcement Efforts and Penalties:** While we support the current provisions, stronger enforcement mechanisms are needed to ensure compliance with the rules. For the hospital price transparency rule, CMS should monitor compliance more closely, issue penalties for noncompliance with greater frequency, and increase the penalties for noncompliance to be material and meaningful.

¹ Making America Healthy Again by Empowering Patients with Clear, Accurate, and Actionable Healthcare Pricing Information. February 25, 2025 available at <https://www.whitehouse.gov/presidential-actions/2025/02/making-america-healthy-again-by-empowering-patients-with-clear-accurate-and-actionable-healthcare-pricing-information/>

² According to the TiC Final Rule, plans and insurers must disclose negotiated rates and historical net prices for prescription drugs in a third, separate MRF apart from the in-network provider rates and out-of-network allowed amounts and billed charges. Although the Departments [deferred](#) enforcing the prescription drug MRF requirement on August 20, 2021, the Departments [rescinded](#) the delay on September 27, 2023. Despite this rescission, CMS has yet to specify a schema and the prescription drug data files in many instances **have not been publicly disclosed**. A [recent blog](#) by Turquoise Health confirms this, noting that only "preliminary files" have been disclosed by Optum, Avera, and BCBS of TX.

For the TiC rule, we strongly encourage the administration to enforce payer compliance with the rule, since it is the payer that is functionally responsible for disclosing the vast amounts of pricing data under TiC. Increased penalties for non-compliant providers and payers will help guarantee that the Trump administration’s transparency initiatives are fully realized and that the public receives the information they need to make informed choices.

4. **Make Clear Employers’ Access to Claims Data:** Employers should have unrestricted access to their own claims data, consistent with Section 201 of the Consolidation Appropriations Act (“CAA”) of 2021. This data is critical for evaluating and managing health plan performance, negotiating with insurers, and designing more cost-effective benefits packages. Furthermore, employer claims data is critical for employers to glean insights from the prices made public under the hospital and TiC rules (public data must be analyzed in conjunction with employer-specific data). Access to this information will allow employers to take proactive steps toward better-managing health care costs for their employees.
5. **Exempt Employers from Penalties for Payer Posting of MRFs:** As mentioned above, employers should not be penalized if their health insurance carriers post inaccurate or incomplete MRFs in accordance with the TiC rule. Employers do not have the resources or technical expertise to validate the content and accuracy of TiC MRFs. Penalizing employers – rather than penalizing insurance carrier service providers – would be inappropriate and ineffective at accomplishing the goal of TiC, which is to make pricing and coverage information available to the public.

In addition, your executive order states that the federal government will “identify opportunities to further empower patients with meaningful price information, potentially including through the expansion of existing price transparency requirements.” One commonsense expansion would be to require data to be reported by individual hospital facilities, not solely at the health system level. This would allow the government and the public to receive more accurate hospital data, which would ultimately provide a clearer pricing picture for employers and beneficiaries. In the future, we also hope to see expansion of price transparency beyond the four walls of a hospital as well as pairing of price transparency with meaningful quality metrics, so employers and patients can better assess value.

These recommendations align with the administration’s goals of increasing transparency and driving greater competition in the health care system. We, the undersigned organizations, are committed to working with you to advance these important efforts and believe that increasing transparency within the health care system will lead to better outcomes for employers, employees, and consumers across the nation.

Thank you for your leadership and continued commitment and efforts to make health care more affordable and transparent. We look forward to collaborating with you to improve health care access, affordability, and transparency.

Sincerely,

The ERISA Industry Committee

National Alliance of Healthcare Purchaser
Organizations

Purchaser Business Group on Health

Silicon Valley Employers Forum

Small Business Majority