CAA EMPLOYER QUESTIONS

As more Consolidated Appropriations Act of 2021 (CAA) requirements go into effect in 2022, here's what employers need to know to comply with this legislation.



Do you offer a group health plan?

NO

VES

The CAA applies to your organization for plan years beginning on or after 1/1/22.

The CAA does not apply to your organization.

Is your health plan fully insured or self-funded?

FULLY INSURED

Insurance carriers should be making the required updates to EOBs, ID cards, cost reporting, etc.

Next Steps

- Confirm insurers have met CAA requirements
- Review with your partners and consultants
- Communicate changes to participants

SELF-FUNDED

Your third-party administrator (TPA) should be making the required updates to EOBs, ID cards, cost reporting, etc. This is, however, not guaranteed. Plan sponsors of self-funded plans have additional liability.

Next Steps

- Confirm that your TPA has met CAA requirements
- Have records accessible in case of an audit
- Review with your partners and consultants
- Communicate changes to participants

New transparency and surprise billing requirements effective January 1, 2022 and through 2024:

- ID Card Requirements
- Emergency Services Coverage
- Continuity of Care
- Provider Directory Requirements
- Enhanced Explanation of Benefits (EOB) (late 2022)
- Prohibition on gag clauses
- Accuracy of provider directories
- Reporting on pharmacy and drug benefits (late 2022)
- Transparency in coverage (machine-readable format)
- Transparency in coverage (price comparison tools 2023/2024)



corpsyn.com