

CAA - No Surprises Act	Overview 1/31/23	Date	UHC Approach	Employer Impact	Member Impact
Surprise Medical Billing	Addresses member cost-sharing, balance billing and Independent Dispute Resolution (IDR). The law applies to medical bills for covered services related to 1) OON emergency at a hospital or facility; 2) items and services provided by certain OON health care providers at an INN facility; 3) OON air ambulance.	Plan years on/after 1/1/22	Supports end to end process: provides calculations for member recognized amount and provider initial payment.EOBs updated with balance bill and cost share language.	Impacted claim expense when reimbursement increases as a result of IDR.	Member cost share is fixed.
Independent Dispute Resolution (IDR)	Process to settle disputes related to reimbursement for No Surprises Act services. IDR involves a neutral third party that settles reimbursement disputes between parties. Party that loses IDR pays the other party's IDR expenses. Requires extensive knowledge of law, data, reporting, analysis, reporting, and brief preparation.	Plan years on/after 1/1/22	Manages the entire process from negotiating reimbursement through IDR/arbitration. Pays \$50 from ASO bank account. Upfronts IDR entity fee for ASO client until decision.	UnitedHealthcare will manage the process on behalf of the client through IDR .	No balance bill or change in member cost share regardless of final provider reimbursement.
Plan ID Cards	Requires in-network and out of network deductible and out of pocket maximum on ID cards. Requires phone numbers and the website address where members may obtain support and network facility and provider information.	Plan years on/after 1/1/22	Compliant ID cards are available electronically on portal as plan renews in 2022.	ID card real estate capacity limits additional customization.	More detailed information on ID cards to assist member.
Patient Protections: Advance Cost Estimate(ACE) External Appeals	Providers must ask patients if they have coverage when scheduling appointments and send estimated service/cost notice to insurer/plan. Then insurer/plan send an Advance Cost Estimate (ACE) to member with estimated member responsibility. On hold pending future rulemaking. Insurer/plan required to offer external review for surprise bill member disputes.	ACE pending rulemaking Plan years on/after 1/1/22	Additional rulemaking required. Updating EOBs, Health Statements and external appeals process.	When effective, UHC will handle ACE for client. If employer uses their own appeals vendor, employer needs to update.	Upon launch date, member receives cost estimate and member expense information prior to service.
Provider Directories	Insurer/plan must have process to verify provider information, respond to member inquiries on provider status. Requires verification process and written/electronic member response.	Plan years on/after 1/1/22	Update directories on timetable, send confirmation when members inquire provider network status.	Customer works with UHC for custom networks managed.	Timely, accurate information. Member protected if provider status is communicated in error.
CAA - Transparency	Overview	Date	UHC Approach	Employer Impact	Member Impact
Removal of Gag Clauses	Health care contracts shall not prohibit electronic access of provider information, access to de-identified claims and encounter information or sharing information with others. Plans are asked to use good faith and reasonable interpretation to meet 1/1/22 dates.	Attestation required beginning 12/31/23	Review contracts and ensure contracts are in compliance with prohibition on gag clauses.	ASO groups required to attest to compliance.	Members HIPAA and PHI will continue to be protected.
Broker Compensation Disclosure	Direct and indirect compensation information must be disclosed to employer prior to purchase. Broker discloses to group plans; carrier discloses in individual market..	Effective 12/27/21	Data/report will be available prior to contract execution.	Employer fiduciary reviews compensation; supports broker disclosure.	No impact.
Pharmacy Benefits and Costs Reporting	Requires insurers/health plans to annually report information on prescription drug benefits and costs to the Tri-Agencies. Beginning in 2023 reporting is due each year by June 1 for prior year.	Yr. 1 - 12/27/22 Then 6/1 each year	Preparing data for reports.	Customer works with UnitedHealthcare to obtain data.	No impact.
Mental Health Parity NQTL Reporting	Insurer/plans must develop and disclose to state and federal regulatory agencies information on NQTLs upon request. Insurer creates report for fully insured plans.	Effective 2/10/21	Assist and provide information for ASO plans. Provide assistance for NQTL audits initiated by tri-agencies	ASO legally responsible for NQTL compliance/analysis/documentation. UHC provides standard & support.	Member notified if plan doesn't meet NQTL requirements.
Transparency in Coverage	Overview	Date	UHC Approach	Employer Impact	Member Impact
Machine-Readable Files (MRFs)	Requires insurers/plans to create and post 3 separate MRFs including detailed pricing data regarding 1) network negotiated rates for all items and services 2) allowed amounts for OON items, services, and prescription drug 3) negotiated rates and historical prices for in-network prescription drugs (delayed).	INN/OON MRF Plan years on/after 7/1/22	Create and publish file on publicly accessible web site 7/1/22, then monthly.	UHC creates/publishes monthly MRF on UHC public site for standard files. No fee.	Access to detailed pricing data.
Member Tools	Price Transparency tool — personalized, real-time, cost share estimates for covered services and items, including pharmacy for 500 <i>designated</i> items/services in 2023 and <i>all</i> items/services in 2024. CAA cost transparency tool requirement now aligns with Transparency in Coverage timeline,.	Plan years 1/23 & 1/24	UnitedHealthcare launched 500 items and services 1/1/23. All items and service in works for 1/1/24..	ASO would establish own tools if not using UHC tools. Attestation required.	Member access on myuhc.com. Members w/o access to myuhc.com have standalone tool