

Large Group, Small Group | VA

CAA Surprise Billing protection takes effect January 2022

November 2, 2021

We're taking the necessary steps to comply with the Consolidated Appropriations Act of 2020 (CAA) and the Transparency in Coverage rule (TIC), which was intended to create greater transparency to help consumers make informed healthcare decisions.

As you may know, in August the Department of Labor, in conjunction with the Departments of Health and Human Services and the Treasury, (known collectively as the Tri-Agencies) issued [updated guidance](#) related to the implementation of the CAA and TIC final rule. The latest guidance has delayed enforcement and provided good faith compliance safe harbors related to the implementation of several CAA and TIC provisions. Even though many aspects of the federal regulations have been delayed, we are working diligently to ensure compliance.

It is important to note that requirements related to the “No Surprise Billing” provision remain unchanged and will take effect on January 1, 2022.

Once in effect, under the “No Surprise Billing” components of the CAA, our members will be responsible for only in-network cost-sharing amounts, including deductibles, in emergency situations and non-emergency situations where they receive services at an in-network facility (including air ambulance providers).

Our agreements with ASO groups and some other self-funded clients may include additional details related to member cost shares and surprise bills. [We're reaching out to those groups separately](#) with specifics and any needed amendments to their agreement.