Federal Departments Shed Light on Upcoming Health Plan Disclosure Requirements

“A collection of federal agencies have announced that they will not start enforcing the reporting requirements until December 27, 2022. The interim final rules (IFR) states that the Departments plan to issue a form with instructions that will give more details for these new requirements. Further, the Departments have announced that they will be developing an internet portal for electronic reporting.” Full Article

Fisher Phillips

Illinois Imposes Group Health Coverage Disclosure Requirements

“The Illinois Consumer Coverage Disclosure Act, which went into effect on August 27, 2021, requires an employer to notify employees in Illinois who are eligible for its group health plan whether such plan does or does not cover each of the essential health benefits identified by the Illinois DOL. Because this is a disclosure requirement and not a benefits mandate, the Illinois DOL maintains that this requirement also applies to self-funded group health plans regulated by ERISA.” Full Article

Haynes and Boone, LLP

In the Years before the COVID-19 Pandemic, Nearly 13 Million Adults Delayed or Did Not Get Needed Prescription Drugs Because of Costs

By, Urban Institute

Centers for Medicare & Medicaid Barred From Enforcing Mandatory COVID-19 Vaccine Rule in 10 States

By, Jackson Lewis P.C

District Court Finds No Mental Health Parity Violation, Despite Offending Plan Provisions

By, Thomson Reuters / EBIA

Employer Checklist for New Health Plan Price Transparency Rules and CAA

By, Foley & Lardner LLP
District Court Finds No Mental Health Parity Violation, Despite Offending Plan Provisions

“Although this case illustrates the uphill road faced by plan participants alleging MHPAEA violations, it also serves as a warning of the costly litigation expenses that a plan may face due to allegations of a parity violation -- especially when the plan’s coverage standards differ between medical/surgical and mental health benefits.” Full Article

Thomson Reuters / EBIA

Employer Checklist for New Health Plan Price Transparency Rules and CAA

“Several provisions of the Consolidated Appropriations Act (CAA) of 2021 and related regulations, and the Transparency in Coverage Rule that will have a large impact on self-funded health plans are effective in January 2022, including requirements related to surprise billing. This checklist is designed to help employers with self-funded health plans be aware of the obligations imposed by these laws and the steps they may need to take to comply.” Full Article

Foley & Lardner LLP

This Weekly Digest is not intended to be exhaustive nor should any discussion or opinions be construed as legal advice. Readers should contact legal counsel for legal advice.