

## The Consolidated Appropriations Act (CAA) Identifies the Health Plan Sponsor as a Fiduciary

The CAA legislation, passed in December of 2020, lays out extensive rules and responsibilities that plan sponsors, as Fiduciaries, must both familiarize themselves and comply with.

**The goal of the CAA legislation is to improve transparency in four key areas:**

- 1 Removal of Gag Clauses From Service Provider Contracts
- 2 Establish Reporting Requirements for Pharmacy and Prescription Drug Disclosures
- 3 Disclosure of Direct and Indirect Compensation From All Service Providers
- 4 Required Parity in Substance Abuse and Mental Health Benefits

### CAA will provide you with more transparency and access into your health care data so you can:

- ✓ Create significant savings for the plan and their participants
- ✓ Improve health outcomes for your participants
- ✓ Understand who you're paying and what you're getting
- ✓ Demonstrate parity in substance abuse & mental health

### Potential Risks:

- ✓ Government action for non-compliance
- ✓ Class Action Lawsuits

It's critical that plan sponsors act with urgency and establish a Fiduciary procurement process, just like you do with your retirement plan!

### How TrueNorth can help:

- ✓ Educate you and your team about CAA and its implications for your organization
- ✓ Produce the benchmarking & regulatory reporting necessary to comply with CAA
- ✓ Provide our Vault solution to store your data and CAA compliance documentation

*"CAA is good for plan sponsors and their participants. When those two things are aligned, something magical happens."*

Hugh O'Toole, CEO at Innovu