

## Section 204 Data Collection – EMAIL TEMPLATE

### Subject line:

New data collection requirements for Consolidated Appropriations Act

### Copy:

I wanted to make you aware of important steps you must take to comply with certain requirements of the Consolidated Appropriations Act (CAA). Section 204 of the CAA requires issuers and health plans to report certain prescription drug information and certain medical benefit spending, premiums, and other plan expense information to the Departments of Labor, Health and Human Services, and Treasury (the “Tri-Agencies”).

Wellmark Blue Cross and Blue Shield will file much of this information on your behalf. However, Wellmark must collect additional data for one of the required reports. This report includes information about the respective premium or premium equivalent contributions that are collected from the employer and employees, and this applies to all groups of all sizes, both fully insured and self-funded.

### What you need to do

A CAA Reporting tool is available on Employer Connection to collect required data from each group. You must be a registered user for Employer Connection to submit. To access the tool after logging in to Employer Connection, click on the CAA Reporting link under your tasks. **You have until April 15 to submit your data.**

### What you need to submit

The following information should be submitted to Wellmark using the form on Employer Connection:

- **Group Health Plan Employer Identification Number (EIN):** Enter a 9-digit EIN. This is located on the Form 5500 or other federal government filings for your group health plan.
- **Form 5500 Plan Number (if applicable):** For ERISA plans, enter the 3-digit plan number reported on the Form 5500 filed with the Department of Labor.
- **How much did your employer group collect in total dollars during the 2022 calendar year from employees for health care coverage?** — The dollar-figure response should include premiums collected for COBRA participants but should not include premiums collected for retiree-only plans. If Wellmark administers group COBRA coverage, Wellmark will provide the dollar amount collected for COBRA coverage. If Wellmark does not administer COBRA, you may need to work with your COBRA administrator.

**NOTE:** For health plans with multiple employer groups like an association or trust, the health plan should collect the information from each employer and provide the aggregate dollar amount for all employers for this field.

[For groups without carveout pharmacy or stop-loss coverage]

If your group health plan does not carveout pharmacy and/or stop-loss coverage, you can select “Not Applicable” for the “Self-funded carveout pharmacy and carveout stop-loss” sections and move to the end of the form.

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[For groups with carveout pharmacy or stop-loss]

### **Additional information for groups with carveout pharmacy and/or stop-loss coverage**

Section 204 also requires self-funded groups with carveout pharmacy or stop loss benefits to report certain information relating to group health plan expenses, including pharmacy administrative services fees and stop-loss premiums.

The tool on Employer Connection will collect the following information based on their carveout arrangement:

- Carveout pharmacy
  - Outside pharmacy benefit manager (PBM) vendor name
  - PBM EIN
  - Total fees (administrative or other) paid by group to the PBM for the calendar year
  - Total pharmacy benefit claims amount paid by the PBM on behalf of the group in the calendar year
- Carveout stop-loss
  - Outside stop-loss vendor name
  - Total stop-loss premiums paid to carrier for the calendar year
  - Total amount paid by stop-loss carrier to the group (e.g., stop-loss credits) in the calendar year

**NOTE:** If your PBM is submitting this information on behalf of the group, Wellmark still needs the total fees and total pharmacy claims amount to calculate the average monthly employer calculation for the self-funded groups.

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Click “Save” at the end of the form to record your information. You can edit the information until the data collection period ends on April 15.

### **Not registered for Employer Connection?**

Employer Connection makes it quick and easy to manage your health plan and serve your employees — and now it can help you meet important compliance requirements for CAA too.

Registration is simple. Once you have determined a designated security coordinator (DSC), your group can register on Wellmark.com with your organization’s name, group number and tax identification number (TIN).

[Download, customize and attach the “Employer Connection step-by-step registration guide” (M-2019244) from the Marketing Toolkit for detailed registration instructions.]