

# Transparency in Coverage and Consolidated Appropriations Act

## Implications for Benefits Administration



### No Surprises Act Notice

January 1, 2022

- Must be posted on a public website and included on each EOB for an item or service to which surprise medical billing requirements apply
- Posting to password-protected benefits website or portal does not constitute public posting (e.g., BenefitConnect or password-protected Embark Portal)
- If a group health plan does not have a public website, the plan may enter into a written agreement with the plan's carriers to post the information on the carriers' public websites where information is normally made available to participants, beneficiaries, and enrollees, on the plan's behalf. WTW also has an Embark Transparency in Coverage microsite available for this purpose



### Provider Directories

January 1, 2022

- Provider directories are maintained by carriers and are a tool for participants who are enrolled in a specific medical plan. They are distinct from an enrollment decision support tool
- The Network Provider Search tool on BenefitConnect is not a provider directory



### Machine-Readable Files

July 1, 2022

- Files must be posted to a publicly available website free of charge
- Machine-readable files are not intended for participant use. They are intended for researchers and consultants
- WTW Benefits Outsourcing does not support posting links to the machine-readable files to ESS, including the landing page
- If a group health plan does not have a public website, the plan may enter into a written agreement with a service provider (such as a TPA) to post the machine-readable files on its public website on behalf of the plan
- WTW can also provide links to carrier-hosted files through the Embark Transparency in Coverage microsite



### Rx Data Collection and Spending Reporting (RxDC)

January 31, 2023

- Electronic filing with HHS of data on prescription drug and health claims
- Plan must also provide population counts and premium information, including the share of premiums paid by the employer vs. the employee
- Carriers are the best source of data on enrollment counts
- BenefitConnect may be able to provide some of this data for plan years 2020 and 2021, if available
- WTW Health & Benefits consultants can support clients on gathering plan information and coordinating with carriers and filers
- WTW will not support the electronic filing of the reports directly to HHS



### Price Comparison Tool

January 1, 2023

- Must include estimated cost-sharing liability, including the individual's progress toward accumulators such as deductibles
- Must include any prerequisites or prior authorizations to coverage
- Prices are specific to the plan/coverage in which the individual is enrolled. It is not an enrollment decision support tool
- WTW's technology (BenefitConnect or Embark Portal) will provide links to the carriers' websites for this tool

#### About WTW

At WTW (NASDAQ: WTW), we provide data-driven, insight-led solutions in the areas of people, risk and capital. Leveraging the global view and local expertise of our colleagues serving 140 countries and markets, we help you sharpen your strategy, enhance organizational resilience, motivate your workforce and maximize performance. Working shoulder to shoulder with you, we uncover opportunities for sustainable success — and provide perspective that moves you. Learn more at [wtwco.com](https://wtwco.com).



[wtwco.com/social-media](https://wtwco.com/social-media)

Copyright © 2023 WTW. All rights reserved.  
WTW-NA-BDA

[wtwco.com](https://wtwco.com)

