



WINTER
2023

GROUP UPDATE

for Employers

Inside this issue...

- ▶ Healthy Moms, Healthy Babies
- ▶ Gag Clause Prohibition Compliance Attestation (GCPA)
- ▶ Reminders for Member Eligibility Requirements
- ▶ Understanding Employer Shared Responsibility
- ▶ New Healthcare Reform Preventive Mandates



**BlueCross BlueShield
of Alabama**

An Independent Licensee of the Blue Cross and Blue Shield Association

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Healthy Moms, Healthy Babies

Expectant mothers need special care, and that care should begin as early as possible to ensure babies have the best chance for a healthy start. The Baby Yourself® Maternity Program helps your members get early, thorough care throughout pregnancy, and they can sign up as soon as they find out they are expecting.

This benefit gives enrolled members the opportunity to have a registered nurse follow them throughout their pregnancy. All Baby Yourself nurses are skilled professionals. Their combined experience includes extensive work in OB/GYN settings, prenatal care, labor and delivery, well-baby nurseries, postpartum units and newborn care.

HOW TO ENROLL

Members can enroll in Baby Yourself three ways:

- ▶ Call 1-800-222-4379
- ▶ Register online at AlabamaBlue.com/BabyYourself
- ▶ Download the Baby Yourself App*

*Eligible program participants** receive:*



Personalized support and educational materials



A personal nurse you can contact throughout your pregnancy



Care coordination for high-risk pregnancies



Useful gifts that support healthy habits

Encourage your employees to sign up for Baby Yourself and take advantage of their benefit.

*There is no charge from Blue Cross and Blue Shield of Alabama to download the Baby Yourself app, but rates from your wireless provider may apply.

**For this service you must be a Blue Cross and Blue Shield of Alabama member and enrolled in the Baby Yourself Maternity Program.

This information is for educational purposes only and is not a substitute for personal care from a licensed physician. Please consult your physician for diagnosis and treatment options.



Gag Clause Prohibition Compliance Attestation (GCPCA)

Group health plans must annually submit a **Gag Clause Prohibition Compliance Attestation**

(GCPCA) to the Centers for Medicare & Medicaid Services (CMS), as required by the Consolidated Appropriations Act, 2021 (CAA).

The CAA requires group health plans to submit an annual attestation that its provider network contracts do not prevent the disclosure to members, plan sponsors or referring providers of cost, quality of care data or certain other information. A healthcare provider, network or association of providers, or other service provider may place reasonable restrictions on the public disclosure of this information.

The initial GCPCA reporting period is from December 27, 2020, to the day the report is filed with CMS. The initial report must be filed no later than December 31, 2023, and then by December 31 every year thereafter.

Blue Cross will attest to CMS on behalf of group health plan(s) for any time period the group health plan(s) was active with us from December 27, 2020, to the day the report is filed. Such attestation is limited to provider agreements entered into by Blue Cross. Groups were notified of GCPCA reporting requirements via a letter or email and instructed to provide needed data to Blue Cross by October 31, 2023, in order for us to attest on the group's behalf.

Reminders for Member Eligibility Requirements

- ▶ All applications and new enrollments must be submitted within 30 days of a qualifying event or during the group's Open Enrollment period.
- ▶ All cancellation requests are due within 60 days of the event date. Retroactive cancellation requests will be termed 60 days from the date of notification.
- ▶ Groups can move members to a different plan or division only if the same benefit package exists for both.
- ▶ If a Blue Cross internal error results in a delay, requests will be approved.



Understanding Employer Shared Responsibility

Annually, employer groups provide Form 1095-C and/or Blue Cross provides 1095-B to confirm to employees that they had Minimum Essential Coverage (MEC). This information is also provided to the IRS.

Blue Cross CANNOT determine the following for employer groups:

- Was the plan deemed affordable by IRS rules for each employee?
- Was the plan offered to each employee?

Below is the timeline for reports released on GroupAccess:

- Test reports available
August-December 2023
- Production reports available
January 7, 2024
January 14, 2024
January 21, 2024



Enrollment data that was sent to Blue Cross by December 4, 2023, will be reflected in the final file. For enrollment data received after December 4, every effort will be made to process it prior to creating the final file.

Each **group** must determine if it is an Applicable Large Employer (ALE) by seeking advice from its legal and tax professionals.

This will determine two things:

1. Who is responsible for the reporting.
2. Which forms to file.

Use the chart below to aid in understanding reporting responsibilities.

What is an ALE?

Employer has at least 50 full-time employees, including full-time equivalent employees, on average during the previous calendar year.

IS THE PLAN UNDERWRITTEN OR SELF-FUNDED?

UNDERWRITTEN

SELF-FUNDED

IS THE GROUP AN ALE?

Non-ALE

ALE

Group has nothing to file.
Blue Cross files Forms 1094-B and 1095-B to IRS. 1095-B forms are available on *MyBlueCross* or by calling Customer Service.

Group files Forms 1094-C and 1095-C to IRS and provides copy of Form 1095-C to member.
Blue Cross files Forms 1094-B and 1095-B to IRS. 1095-B forms are available on *MyBlueCross* or by calling Customer Service.

IS THE GROUP AN ALE?

Non-ALE

ALE

Group files Forms 1094-B and 1095-B to IRS and provides copy of Form 1095-B to member.
Blue Cross has nothing to file.

Group files Forms 1094-C and 1095-C to IRS and provides copy of Form 1095-C to member.
Blue Cross has nothing to file.

New Healthcare Reform Preventive Mandates

| PREVENTIVE REQUIREMENT | PUBLISHED DATE | BLUE CROSS EFFECTIVE DATE | CHANGE TO CURRENT BENEFIT? |
|---|--|---------------------------|--|
| Routine Immunizations - RSV vaccines (Adult) | New recommendation published July 21, 2023 | July 21, 2023 | YES: Addition of two new immunizations into existing routine immunization schedule. |
| Routine Immunizations - RSV vaccines (Infants/Young Children) | New recommendation published August 25, 2023 | August 25, 2023 | YES: Addition of new immunization into existing routine immunization schedule. |
| Routine Immunizations - COVID-19 vaccines | New recommendation published September 12, 2023 | September 12, 2023 | YES: Addition of new immunizations into existing routine immunization schedule. |
| Routine Immunizations - RSV vaccine (Maternal) | New recommendation published September 22, 2023 | September 22, 2023 | YES: Expansion of indication for recently approved adult RSV vaccine that is included routine immunization. |
| Multiple Services | Existing recommendation with updated ICD-10 (procedure and diagnosis) & HCPCS coding | October 1, 2023 | NO: Applicable procedural and diagnosis coding updates (new/revised/deleted codes) to existing benefit services comprehensively reviewed and operationalized. |

HAVE QUESTIONS OR COMMENTS ABOUT GROUP UPDATE?

Please send your feedback to your account management team.

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