Consolidated Appropriations Act (CAA) – updates through 2025

This communication outlines information that is being sent to Cigna Healthcare® medical clients this week. This includes the annual reminder on the Gag Clause Prohibition Compliance Attestation as well as other key dates for the Consolidated Appropriations Act 2021 (CAA) through 2025.

What's happening when

Gag Clause Prohibition Compliance Attestation

- Consistent with last year's process, Cigna Healthcare will be attesting for itself and for its fully insured business on or before December 31, 2025.
- Fully insured clients may choose to rely on the Cigna Healthcare attestation.
- Cigna Healthcare does not intend to attest on behalf of Administrative Services Only (ASO) clients. However, given the unique status of level-funded, graded-funded, preferred-funded and standard-funded Facets ASO clients, Cigna Healthcare will support them by attesting on their behalf directly to the regulators before December 31, 2025 (and before the annual CMS deadline in future years). An email will be sent to these clients this week.
- If you have traditional ASO clients, please remind them that they must provide their own submission by December 31, 2025, through the portal set up by the Departments of Health and Human Services, Labor, and the Treasury (collectively, the Departments), attesting to the compliance of their ASO agreements with all providers (e.g., Cigna Healthcare and any other providers used for carve-out services).

- To support your clients, we have attached a **letter** from Cigna Healthcare that states Cigna Healthcare agreements are in compliance with the Gag Clause prohibition and that Cigna Healthcare intends to attest as such to the Departments.

Prescription Drug and Health Care Spend reporting (CAA section 204)

- As part of the aggregated information in the Cigna Healthcare submission for June 1, 2026, inform your clients that they will be asked to verify or update their employer contribution percentage (across all medical plans) during their renewal process.

- To comply with the CAA section 204 final rule, Cigna Healthcare is submitting files on our clients' behalf. We submit these files at no additional cost to the clients. This is the standard option for ASO and fully insured clients. While ASO clients may choose to opt out of our standard offering, we believe that there are compelling reasons for clients to leverage the Cigna Healthcare standard offering. If you have clients who wish to opt out of the Cigna Healthcare standard process, they must contact their Cigna Healthcare representative, complete a review process, and sign a non-disclosure agreement prior to November 21, 2025.

Recommended next step for your ASO clients

Make sure your clients access the **attestation form** on the Centers for Medicare & Medicaid Services (CMS) website and remind them to submit prior to the deadline of December 31, 2025. The **Gag Clause Prohibition Compliance Attestation page** from CMS outlines the steps to ensure compliance with this section of the regulation.

To help guide your clients and get more information on the CAA Gag Clause and other government regulations register or log in at **Cigna for Brokers** and click on Plan & Product Training Hub.

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