

Action Items

- **Action Items for Employers:**
 - **All Plans:** Calendar compliance dates—initial (**December 27, 2022**) and annual (**June 1**)
 - **Fully Insured:** Enter into a written agreement with issuer; timely provide any plan-level or other data required by issuer
 - **Self-Funded:** Self-funded plans must either comply or outsource to a TPA, ASO, or PBM; if outsource, enter into a written agreement and specify who will submit each required file; timely provide any plan-level or other data required by third party; employer-sponsored plan may have to register with HIOS and file some data on your own
 - Even with a written agreement, the “plan” remains responsible, so ensure that the written agreement provides appropriate protections for plan and employer
- **Note:** Written agreement requirement also applies to TiC Final Rule (both MRF and on-line self-service tool mandates) and the CAA air ambulance reporting requirement (awaiting final rule)