



# BENECARD®

Carve-out prescription drug benefit programs.

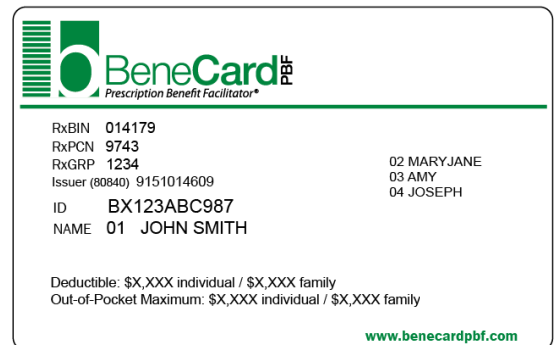
## Bulletin: New ID Card Requirements Effective 1/1/2022

The Consolidated Appropriations Act, 2021 (CAA) was enacted on December 27<sup>th</sup>, 2020. The CAA contains various components that will become effective through the 2021 to 2023 plan years which are by regulation the responsibility of the employer plan sponsor. A portion of the CAA, called the No Surprises Act (NSA), contains various rules and provisions to mitigate surprise balance billing. In addition, the November 2020 Group Health Plan Transparency Regulations are a separate set of rules which run parallel to the CAA and with similar purposes.

As a follow up to the Benecard CAA Overview bulletin distributed on October 7<sup>th</sup>, under CAA Title I NSA, Sec 204 "ID Card Requirements", it states that as of January 1<sup>st</sup>, 2022, member ID cards for healthcare benefits, including prescription benefits, must show the deductible (if applicable) and maximum out-of-pocket (MOOP) amounts set by the plan sponsor. This requirement of the CAA is intended to help members understand how much they may have to pay out of pocket for any medical and prescription services they receive in a given year.

Benecard has adapted our standard member ID card template to meet the CAA requirements. For plan sponsors that have a deductible and/or MOOP, the amounts will be identified on the member ID card and updated as needed (MOOP amounts are updated annually by the IRS). These amounts will also be displayed on the digital ID card accessible through the member portal and mobile app.

Because of this new ID card requirement, changes will need to be made in how ID cards are managed going forward. A new ID card must be made available to both new and existing members, either physically or digitally, whenever the plan's deductible and/or MOOP change. Benecard will provide the following options for you to choose from as it relates to your existing members; new members are addressed on the following page.



### Existing Member ID Card Options (choose one):

1. Members will receive a formal written notification prior to January 1<sup>st</sup> that ID cards will automatically be available digitally through the member portal at [www.benecardpbf.com](http://www.benecardpbf.com) or through our mobile app whenever the deductible and/or MOOP changes for the plan each year. Plan sponsors will be required to notify members when MOOP changes are updated annually. Members will also have the ability to print their ID card from either the member portal or mobile app as well. Plan sponsors may allow individual members to request a physical copy of the updated ID card and packet, if they require one, through the normally established channels (e.g. member must request through the plan sponsor's benefits office who will then contact Benecard through [eligibility@benecard.com](mailto:eligibility@benecard.com) or via our Online Access real time enrollment application). The plan sponsor will be billed at cost for the printing and postage of card packets for members who request a physical ID card.
2. Issue a complete re-carding of new physical ID cards to all members whenever the deductible and/or MOOP changes for their plan each year. Digital ID cards will also automatically be updated each plan year and made available through the member portal and mobile app. Members will also have the ability to print their ID card from either the member portal or mobile app as well. The plan sponsor will be billed at cost for the printing and postage each year for re-carding to all members as well as any individual requests made throughout the year.



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## **New Member and New Plan Sponsor ID Cards (standard—do not need to request):**

New members for existing plan sponsors as well as new plan sponsors starting with Benecard will still receive an initial physical copy of their ID card with a full member packet without any cost to the plan sponsor. We will also ensure members have instructions to access the digital versions of their ID card and appropriate communication if the ID card has been updated with revised deductible and/or MOOP amounts.

Your Client Relations Manager will be reaching out to you shortly to discuss these options with you in further detail and to help you determine which may be the best choice for you and your membership. **Plan Sponsors must be in compliance with the CAA as of the plan's anniversary/renewal effective date beginning in 2022.** As such, Benecard will need to know before October 31<sup>st</sup>, 2021 which option you have chosen.

**Please contact your Benecard Services Client Relations Manager at (609) 219-0400 or via email should you have any questions on the above bulletin.**

*Disclaimer: This bulletin is not legal, tax, or accounting advice. Consult with your attorney or accountant about the impact these federal healthcare reform laws have on your health benefit plans.*

[www.benecard.com](http://www.benecard.com)

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