
Congress Expands Compensation Disclosure Requirements for Service Providers of Group Health Plans

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Key Takeaways

- The Consolidated Appropriations Act (CAA), 2026 expands the compensation disclosure requirements under ERISA to require ERISA-covered group health plans to receive compensation disclosures from nearly all of their plan vendors (and beyond only brokers and consultants, as previously required under CAA, 2021).
- The provision appears to be effective immediately and is likely applicable to contracts entered into or renewed between a plan and a service provider after the date of enactment (i.e., after February 3, 2026).
- Employers who are in the process of selecting a new service provider for their group health plan, including renewing, or extending the contract of an existing provider, should review the requirements and request the appropriate compensation disclosures from service providers.

Previously, under the CAA, 2021, group health plans were required to receive compensation disclosures from brokers and consultants. Earlier this month Congress passed, and the President signed into law, the Consolidated Appropriations Act, 2026 (CAA, 2026). In addition to new and noteworthy provisions related to pharmacy benefit manager (PBM) disclosures and rebate pass-throughs (see [here](#) for additional details) the law also amended ERISA to expand the applicability of the compensation disclosures beyond brokers and consultants to virtually all plan service providers, including:

- Third-party administrators
- PBMs
- Stop-loss carriers
- Ancillary vendors providing medical management, disease management, transparency tools, wellness services, and employee assistance program services

There is no effective date included in the legislation for this provision, so it appears to be effective immediately. A plan fiduciary that does not receive the required disclosures may need to take additional action.

CPC Comment: *Absent any relief from the Department of Labor, employers should begin discussions with their service providers to obtain this information. For employers who are currently in the process of selecting a new service provider or who will extend or renew their contracts with*



existing service providers, employers should request this detailed information regarding the services to be performed and the direct and indirect compensation that the service provider expects to receive in connection with the services provided.

The Aon Health Solutions CPC Group will continue to monitor developments in this area.



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