



How will Florida Blue handle the annual gag clause attestation for its group clients?

- Florida Blue will file the annual gag clause attestation on behalf of all of our groups administered on our Florida Blue and new ASO operational platforms, regardless of group size or funding type, for the provider contracts that we directly control. Each attestation will include all active and former groups who were under contract during the reporting period.
- For our Partner Plan groups: BCBS South Carolina will attest for active groups only, while BCBS Alabama will attest for both active and former groups. Group health plans administered by these companies will receive additional instructions on the attestation process. Group health plans administered by Highmark (as well as those formerly with BCBS South Carolina) will be included in the Florida Blue attestation.

How will Florida Blue handle attestations for groups with carve out benefits?

- As with the Section 204 prescription drug reporting, Florida Blue will only attest for the provider contracts that we directly control. Therefore, if a group carves out a benefit (such as pharmacy coverage), it will need to work directly with that vendor to coordinate a separate submission of an attestation for that contracted benefit.