TO: Our Valued Clients and Brokers
FROM: Health Plans, Inc.
DATE: July 9, 2026
RE: Compliance eBlast: Summer Regulatory Updates and Med D Process Reminder

Health Plans, Inc. (HPI) is issuing this Compliance eBlast to notify you of recent regulatory updates and HPI process updates including a reminder of HPI's revised Medicare Part D creditable coverage determination process.

Federal IDR Operations Final Rule

- The Departments of Labor, Treasury, and Health and Human Services (HHS) released a final rule intended to improve the Federal Independent Dispute Resolution (IDR) process under the No Surprises Act (NSA). While most of the changes affect providers, carriers, and TPAs, employers sponsoring self-insured group health plans seemly will be required to register through a new Federal IDR Registry.
- This new Federal IDR Registry is not yet open, and the Centers for Medicare & Medicaid Services (CMS) instructions are pending, but registration will become mandatory 90 business days after it becomes available.
- It remains unclear to what degree, if at all, TPAs can assist with registration on behalf of their self-funded clients.
- HPI will continue to monitor and provide updates on future guidance regarding the registration process. This future guidance is expected prior to 2027.

HPI IDR Fee Billing Changes

- HPI is making a change to your administrative invoice.
- Beginning in September, you may see a line item for "IDR fees." This is not a new fee, but rather a change in how it is billed.
- When a provider disputes a claim and enters the Independent Dispute Resolution (IDR) process, HPI receives an invoice from the mediator and pays it upfront. A claim is then submitted to request reimbursement from the plan.
- HPI is streamlining this administration process by eliminating separate reimbursement requests, providing greater transparency into IDR-related costs, and helping to ensure timely and accurate reconciliation.
- IDR fees will be aggregated and included on the monthly invoice to be funded as a part of the regular billing cycle and will no longer be entered individually as claims.

- No action is required of you. The IDR fee line item will appear, if applicable, beginning with the September administrative bill.

Federal Compensation Disclosure Document and HPI's Approach

- Compensation Disclosure is a federal transparency requirement under ERISA that requires brokers, consultants, and certain service providers to disclose direct and indirect compensation they receive for services provided to group health plans, as well as other information.
- For TPAs, brokers, and plan sponsors, this helps ensure visibility into fees and compensation arrangements so plan fiduciaries can make informed decisions and meet their compliance responsibilities.
- This disclosure requirement was extended to TPAs as part of the 2026 Consolidated Appropriations Act.
- HPI's current disclosure document, in accordance with the 2026 Consolidated Appropriations Act revisions, is available from your Account Manager upon request and HPI is also finalizing a process to provide it with the annual Renewal Proposals.

Medicare Part D HPI Analysis Reminder

- As seen in the HPI December 10, 2025, eBlast (here), because of the continued changes to the federal Medicare Part D creditable coverage process, HPI reevaluated the Medicare Part D creditable coverage determination process.
- To more effectively streamline the procedure, clients will need to work directly with a vendor of their choice for federal Medicare Part D creditable coverage analysis. HPI will not be involved in the process.
- Clients can work with MZQ/Lumelight directly, as HPI did in 2025, or another vendor of their choice.

For additional assistance, please contact your HPI Account Service Team.