



CARRIER NOTICE

●●●● Updates affecting your benefit coverage ●●●●

November 6, 2025

Cigna self-funded/ASO plan sponsors must complete annual attestation

Cigna will complete requirement on behalf of fully insured, level-funded-type plan sponsors

The Consolidated Appropriations Act (CAA) gag clause prohibition requires issuers and plan sponsors to attest each year that certain health care arrangements do not contain language restricting access to cost and quality of care information.

Cigna has stated that self-funded/ASO plan sponsors must provide their own attestation. Cigna released a [confirmation of compliance letter](#) confirming the insurer's health care agreements comply with the gag clause requirements. The attestation submission deadline is December 31, 2025.

Fully insured plan sponsors, as well as level-funded, graded-funded, preferred-funded, and standard-funded clients, do not need to take any action, given Cigna's submission will satisfy the attestation requirement for both entities.

Bukaty Companies has prepared a [How-To Guide](#) with screen shots and links to help self-funded/ASO clients navigate the attestation process.

For additional information and support, contact your Bukaty benefits consultant or support team.