



CARRIER NOTICE

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

November 6, 2025

UnitedHealthcare self-funded/ASO, Surest plan sponsors must complete annual attestation

No action required by fully insured, level-funded 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.

UnitedHealthcare (UHC) has stated that self-funded/ASO plan sponsors must provide their own attestation if they didn't submit a request by November 1 instructing UHC to complete the attestation on their behalf. UHC released letters confirming health care agreements for [UHC](#) and [Surest](#) comply with the gag clause requirements. Plan sponsors submitting on their own behalf must do so by December 31, 2025.

Fully insured plan sponsors, as well as level-funded clients, do not need to take any action, given UHC'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.