

Before your clients start asking

The sooner you are ready, the stronger you look to clients through 2029.

The 2026 CAA puts most of its new pharmacy duties on **PBMs**. The ones that are ready early, and can prove it, will be the ones employers and regional plans choose.

Each renewal

Each client contract you sign or renew decides when pass-through and new disclosure duties apply.

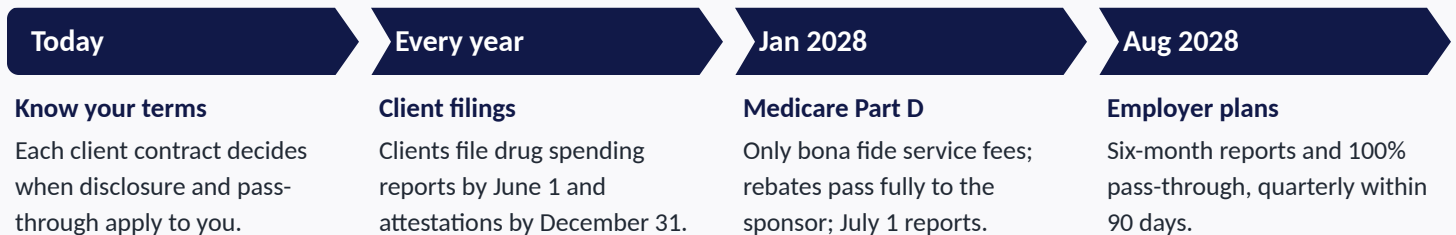
100%

of rebates and related payments must be remitted to self-funded plans, for plan years and contracts from Aug 2028.

\$10,000

a day at most for late or missing reports, from 2028, with PBM entities named as liable.

Dates that set the pace



Three questions worth answering before your next renewal

- 1 Can we show every client all the direct and indirect pay we earn on their plan?
- 2 What does our margin look like on service fees once every rebate passes through?
- 3 Can our systems produce drug-level reports and 90-day remittances for every client?

How ALTTRAX helps

START HERE

Readiness Check

An independent review of your contracts, disclosures, reporting and rebate flows against the law, with a ranked list of fixes.

Readiness and Gap Closure

We rebuild what the law changes with you: fee model, templates, reporting and remittance.

Readiness and Oversight

A standing independent check on what you send clients, before they or their auditors find it.

Why PBMs work with ALTTRAX

- ✓ **An objective read**
We see your offering the way clients, brokers and auditors will.
- ✓ **Implementation depth**
Decades in pharmacy operations and complex PBM implementations.
- ✓ **Results you can rely on**
Dependable execution that lowers risk and gives clients proof.

Sources: CAA 2026, Pub. L. 119-75, div. J, §§6224, 6701, 6702; ERISA §§408(b)(2), 502(c)(13), 724. December 31 date from agency guidance.

Knowing isn't the same as doing

Every PBM has to make these changes. We help you make them early and prove it. Request a consultation at alttrax.com.