

Before your 2027 plan year starts

The next four months will shape your CAA exposure through 2029.

New federal PBM rules put more money and more responsibility on **your** plan. The choices you make between now and January decide whether you capture the value or carry the risk.

100%

of PBM rebates and related payments must come to your plan, starting with plan years from August 2028.

\$10,000

a day in potential penalties for missing reports, and plan administrators can be liable, not just PBMs.

Now

Your PBM and other vendors must already disclose everything they earn from your plan.

Your next 120 days

Oct	Nov	Dec	Jan
Renewals close A PBM contract renewed now may not have to pass rebates through until it renews again after August 2028.	Open enrollment Employees see 2027 costs. Make sure you know what your vendors earn behind them.	Year-end duties Yearly data-access attestation due December 31. Budgets and committee reviews wrap up.	2027 begins Set up oversight before the first quarter closes, and start the record you'll need.

Three questions worth answering by year end

- 1 When rebates pass through, fees often rise. Will our total cost go down, not just the line items?
- 2 Does our next PBM renewal build in full rebate pass-through and audit rights?
- 3 Who is responsible for checking, and could we show it?

How ALTTRAX helps, without adding headcount

START HERE

Readiness Check

An independent read on your contracts, disclosures and renewal dates, with a ranked list of what to fix first.

Readiness and Gap Closure

We close the priority gaps with you: renewal terms, disclosures and an oversight process.

Readiness and Oversight

An ongoing independent check on what your vendors report and pay.

Why employers work with ALTTRAX

- ✓ **Independent advice**
No stake in which PBM or carrier you choose. Our only interest is your plan.
- ✓ **Proven experience**
Decades in pharmacy and PBM implementations.
- ✓ **Results you can rely on**
Dependable execution that lowers your plan's risk.

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

Knowing isn't the same as doing