

Updated Country Regulations and Policy Information

Important International Healthcare Guidelines

- It's our priority to keep you informed on economic or trade sanctions that affect our ability to provide coverage in certain countries. These guidelines come from regulators like the United States Department of Treasury's Office of Foreign Assets Control (OFAC), European Union (EU) Financial Sanction Regime, United Nations Common Foreign and Security Policy (UN CFSP), and other regulatory authorities from countries where Aetna does business.
- Please see this communication for the most updated information detailing updated country laws and Aetna policy rider.

Regulations that May Affect Your Coverage

Crimea (Annexed Region of Ukraine), Cuba, Iran, North Korea, and Syria

Aetna is restricted from issuing or entering into contracts in the countries/region listed above. This includes contracts covering groups or individuals and contracts for business arrangements with network providers, intermediaries/agents or others located or incorporated in those countries/region. This restriction also prevents Aetna from sending correspondence or funds (including claim reimbursements and direct claim settlements) into these countries/region.



- In some limited instances, Aetna may be able to provide cover to third country nationals or expatriates working in a sanctioned country for an employer located, and the plan issued, outside of the sanctioned country, but only for services rendered outside of the sanctioned country.
- If the employer has a valid written OFAC license authorizing its activity in the sanctioned country, Aetna may be able to provide cover to its employees working in that sanctioned country, including services rendered in the sanctioned country.
- Aetna is not permitted to provide cover to local nationals residing in a sanctioned country, but may be able to cover sanctioned country nationals (except Cuban nationals) residing outside of the sanctioned country, but only for services rendered outside of any sanctioned country. A Cuban national must prove that he/she has established a permanent residency in a non-sanctioned country in order for Aetna to cover.
- If Aetna is providing cover under an authorized license or sanction exemption as noted above, payments and correspondence must go to an alternate address, such as an employer or a member's bank outside of the sanctioned country.
- The situations listed on the left must be reviewed and preapproved by Aetna's Financial Sanctions Compliance Team.

Cuba

Although the U.S. government signaled a significant policy shift for Cuba in December 2014, OFAC has not yet substantially changed the Cuba sanction rules as they relate to Aetna and other healthcare insurers. Aetna will continue to monitor changes in the regulations and will advise when our guidelines are revised.

Financial Sanctions Exclusions

If coverage provided by this policy violates or will violate any U.S., UN, or EU or other applicable economic or trade sanctions, the coverage is immediately considered invalid. For example, Aetna companies cannot make payments or reimburse for health care or other claims or services if it violates a financial sanction regulation. This includes sanctions related to a blocked person or entity, or a country under sanction by the United States, unless permitted under a valid written Office of Foreign Asset Control (OFAC) license. For more information on OFAC, visit <u>http://www.treasury.gov/resource-center/sanctions/</u> <u>Pages/default.aspx</u>

We Can Help You Plan Your Care

If you are planning travel to any of these countries, we can help you better understand how restrictions on claims reimbursements and correspondence may impact you. In some instances, we can also assess whether we can provide coverage under an exception. In these cases, we could reimburse claims and send correspondence in and out of the sanctioned country and/or help you find treatment outside of the sanctioned country.

For more information, please call the number on the back of your Member ID Card.

*This country list is subject to change based on changes in financial sanctions regulations. In addition, there are other countries subject to less broad sanctions than the countries/region listed here. For more information, visit http://www.treasury.gov/resource-center/sanctions/Pages/default.aspx.

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