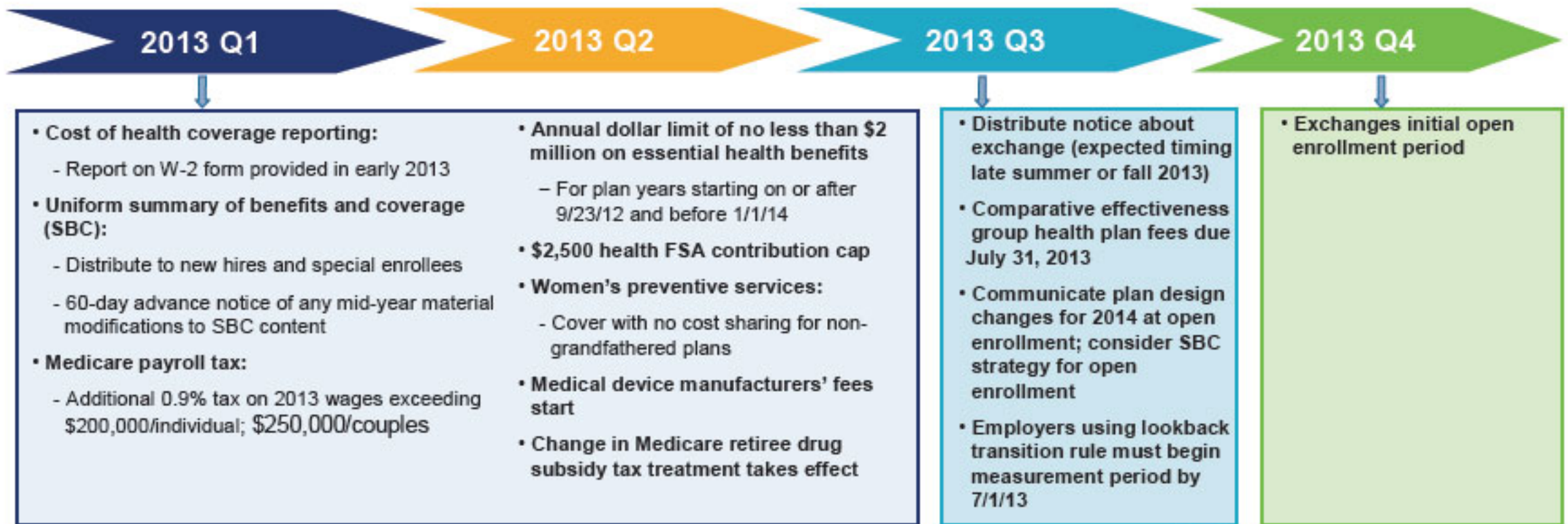


HEALTH CARE REFORM

Key Dates, Key Events, Key Concerns

Start

Timeline for top priority 2013 - 2014 activities



Conduct ongoing strategy discussions, refine future plans

Looking Ahead to 2014

- Health insurance exchange coverage
- Individual coverage mandate
- Financial assistance for exchange coverage of lower-income individuals
- Employer shared responsibility
- State Medicaid expansion (possible only some states)
- Wellness limit increase allowed
- Dependent coverage to age 26 for any covered employee's child
- No annual dollar limits on essential health benefits
- No pre-existing condition limits
- No waiting period over 90 days
- Additional standards for non-grandfathered health plans, including limits on out-of-pocket maximums, provider nondiscrimination, and coverage of routine medical costs of clinical trial participants
- Insurers must apply guaranteed issue and renewability to non-grandfathered plans of all sizes
- Health insurance industry fees
- Auto enrollment some time after 2014
- Temporary reinsurance fees (first due late 2014/early 2015)
- Additional employee-specific reporting and disclosure of 2014 coverage (first due in 2015)

NOTE: Timeline assumes a January 1 plan year. Timing for non-calendar year plans must be adjusted accordingly.

Key Concerns - General

- Potential for new enrollment
 - Individual mandate (*beginning 2014*)
 - Auto enrollment requirement
- Employer shared responsibility (*beginning 2014*)
 - 30 hour work week requirement
- Government Fees
 - Transitional Reinsurance Fee (*2014 - 2016*)
 - Patient-Centered Outcomes Research Institute (PCORI) Fee (*2012 – 2019*)
- Excise tax (*beginning 2018*)
 - Lead to manage health and delivery efficiency
 - Demise of the FSA?
- Exchanges
 - Should they have an active role in strategic planning?

Key Concerns – Special Situations

- Non-bargained and Bargained plans
 - Responsibilities for communication, compliance status and payment of government fees vary by who establishes or maintains the plan
- Insured and Self-funded plans
 - Responsibility for fees and their payment can vary by the type of funding arrangement
- Off-calendar plan years
 - May still have exposure in 2014 *before the plan anniversary*
- Retiree Medical
 - Stand-alone retiree medical plans are exempt from some requirements
 - Understand where retirees must be considered alongside actives