



Health Care Reform Update



IMPORTANT NOTICE REGARDING HEALTHCARE REFORM Update #39 November, 2014

HHS Releases Reinsurance Submission Form on Pay.gov for November Deadline

HHS has announced the availability of an online form for submitting required enrollment counts and scheduling contribution payments under health care reform's transitional reinsurance program. As background, the program requires contributing entities (health insurers and self-insured group health plans) to make reinsurance contribution payments for 2014, 2015, and 2016. The announcement explains that all submissions must be made online through the government portal, pay.gov (See our Additional Information Update #20). A contributing entity may register and make submissions itself, or engage a third party (such as its TPA or administrative-services-only (ASO) contractor) to do so on its behalf.

The form asks for the contributing entity's identifying information, enrollment count and payment information, contact persons for billing and submission questions, and an acknowledgment by an authorized official. In addition, supporting documentation for the enrollment count must be uploaded in the proper format, and banking information must be provided to effect electronic payment. The form itself does not include instructions, but a CMS webpage provides background information with links to additional resources and a 60-page CMS manual is available with detailed instructions for the reinsurance program's registration and submission processes.

The announcement includes a reminder of the **November 15 deadline** for submitting the plan's annual enrollment count, but a related agency FAQ states that because November 15, 2014 is a Saturday, enrollment counts may be submitted through Monday, November 17, 2014. Although payments are not due until later, one of two payment schedules must be selected when the enrollment count is submitted. Contributing entities may choose to submit the entire 2014 contribution (\$63.00 per covered life) in one payment no later than January 15, 2015, or submit two separate payments for 2014, with the first (\$52.50 per covered life) due no later than January 15, 2015 and the second (\$10.50 per covered life), no later than November 15, 2015.

Although contributing entities have until November 17 to submit 2014 enrollment counts, CMS strongly encourages earlier submission to avoid any difficulties.

For Additional Information use the links below:

[CMS webpage Form](#)

[CMS manual Announcement](#)

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