



Health Care Reform Update



IMPORTANT NOTICE REGARDING HEALTHCARE REFORM Update #40 November, 2014

HHS Extends 2014 Filing Deadline for Reinsurance Submission Form

Health and Human Services (HHS) has announced that the deadline for submitting 2014 enrollment counts for the transitional reinsurance program has been extended through December 5, 2014.

As background, the program generally requires contributing entities, health insurers and self-insured group health plans, to make reinsurance contribution payments for 2014, 2015, and 2016. Annual enrollment count and contribution submissions must be made online through the government portal, pay.gov. While the deadline for submitting 2014 annual enrollment counts had been Monday, November 17, 2014, since the otherwise applicable deadline of November 15, 2014 was a Saturday, HHS delayed this deadline in response to requests for an extension. The January 15, 2015 and November 15, 2015 contribution payment deadlines remain the same.

This extension, provides a limited reprieve for those responsible for the submission. Payments are not due until late, according to HHS guidance, 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.

Bernie Lowe & Associates, Inc. is not providing any legal advice with regard to compliance with the requirements of the Affordable Care Act ("ACA"). Bernie Lowe & Associates, Inc. makes no representation as to the impact of plan changes on a plan's grandfathered status or interpretation or implementation of any other provisions of ACA. Bernie Lowe & Associates, Inc. will not determine whether coverage is discriminatory or otherwise in violation of Internal Revenue Code Section 105(h).