

The Affordable Care Act – Key Provision Timeline

Several provisions of the Affordable Care Act (ACA) are scheduled to go into effect over the next three years. Review this timeline and speak with your benefits administrator to ensure that your organization is prepared for each of these key mandates.

2015

Q1

JAN
1

- Employer shared responsibility penalty enforcement begins
- Individual Mandate penalty increases to the greater of \$325 per adult or 2% of taxable income.

JAN
15

- First installment or lump sum payment of 2014 Transitional Reinsurance Program fee due.

FEB
2

- W-2 reporting on the value of employer-sponsored coverage for 2014 due to employees. Filing due to the IRS by March 2, 2015 (or by March 31st for electronic filers).

Q3

JUL
31

- Patient Centered Outcomes Research Institute (PCORI) filing due for plan years that began on or after February 1, 2013.
 - **Fee per average number of covered lives increases by rate of National Health Expenditures (exact amount to be determined).**

- Summary of Benefits and Coverage (SBC) format may be changing. Changes would be effective for coverage beginning on or after 9/1/15. Comment period on proposed changes closes March 2, 2015.

Q4

NOV
15

- Second installment of 2014 Transitional Reinsurance Program fee due.
- Plan sponsors must provide enrollment counts and their selected payment dates to HHS for the 2015 Transitional Reinsurance Program fee.
 - **Fee decreases to \$44 per covered life (enrollees and dependents).**

DEC
31

- Health plans must certify compliance with HIPAA electronic transaction standards and operating rules. Note that final guidance on HIPAA compliance is still outstanding.

2016

Q1

JAN
31

- Individual Mandate penalty increases to the greater of \$695 per adult or 2.5% of taxable income.

JAN
15

- First installment or lump sum payment of 2015 Transitional Reinsurance Program fee due.

FEB
1

- Large employer reporting due to plan participants on 2015 coverage offered to full-time employees. Filing due to IRS by February 29, 2016 (March 31st for electronic filers).
- W-2 reporting on the value of employer-sponsored coverage for 2015 due to employees. Filing due to the IRS by February 29, 2016 (March 31st for electronic filers).

Q3

JUL
31

- Patient Centered Outcomes Research Institute (PCORI) filing due for plan years that began on or after February 1, 2014.
 - **Per member fee increases by rate of National Health Expenditures (exact amount to be determined).**

NOV
15

- Second installment of 2015 Transitional Reinsurance Program fee due.
- Plan sponsors must provide enrollment counts and selected payment dates to HHS for the Transitional Reinsurance Program fee.
 - **Per member fee to be determined based on the 2016 statutory amount.**

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2017

Q1

JAN
1

- Transitional Reinsurance Program sunsets after 2016.
- Individual Mandate penalty continues.
- Health Insurance Exchanges may open to large employers.

JAN
15

- First installment or lump sum payment of 2016 Transitional Reinsurance Program fee due.

JAN
31

- Large employer reporting due to plan participants on 2016 coverage offered to full-time employees. Filing due to IRS by February 28, 2017 (March 31st for electronic filers).
- W-2 reporting on the value of employer-sponsored coverage for 2016 due to employees. Filing due to IRS by February 28, 2017 (March 31st for electronic filers).

Q3

JUL
31

- Patient Centered Outcomes Research Institute (PCORI) filing due for plan years that began on or after February 1, 2015.
 - Per member fee increases by rate of National Health Expenditures (exact amount to be determined).

Q4

NOV
15

- Second installment of 2016 Transitional Reinsurance Program Fee due.

2018

Q1

JAN
1

- Cadillac Tax: 40% nondeductible excise tax on high-cost health coverage (above \$10,200 for individual, and \$27,500 for family coverage. Subject to certain adjustments and indexed to the CPI-U).
- Individual Mandate penalty continues.

JAN
31

- Large employer reporting due to plan participants on 2017 coverage offered to full-time employees. Filing to IRS due February 28 (April 2nd for electronic filers).
- W-2 Reporting on the value of employer-sponsored coverage for 2017 due to employees. Filing to the IRS due February 28 (April 2nd for electronic filers).

Q3

JUL
31

- Patient Centered Outcomes Research Institute (PCORI) filing due for plan years that began on or after February 1, 2016.
 - Per member fee increases by rate of National Health Expenditures (exact amount to be determined).

The deadlines for the following provisions are yet to be determined, as final guidance has not been issued:

- Auto-enrollment of new hires
- Reporting relative to transparency of coverage
- Quality reporting for non-grandfathered plans
- Non-discrimination rules for fully-insured non-grandfathered plans

Note: This information is accurate as of February 2015 and is subject to change as federal regulations and guidance are finalized.