

Key Features of the Affordable Care Act, By Year

Provision	Definition	UAB's Status	Timeframe
2010			
Prohibiting Denying Coverage Based on Pre-Existing Conditions	Prevents denying coverage due to a pre-existing condition.	UAB does not have a pre-existing condition clause	Already in place prior to 2010
Eliminating Lifetime Limits on Insurance Coverage.	Prohibits imposing lifetime dollar limits on essential benefits, like hospital stays.	UAB does not have lifetime dollars limits	Already in place prior to 2010
Regulating Annual Limits on Insurance Coverage	Eliminates the use of annual dollar limits on the amount of insurance coverage a patient may receive	UAB does not have annual dollar limits	Already in place prior to 2010
Appealing Insurance Company Decisions	Provides a way to appeal coverage determinations or claims and establishes an external review process.	UAB medical plans provide an appeals process	Already in place prior to 2010
Providing Free Preventive Care	All new plans must cover certain preventive services such as mammograms and colonoscopies without charging a deductible, co-pay or coinsurance	UAB's plans are grandfathered	At some point due to ACA UAB will lose grandfathered status Implemented effective 1/1/2015
Extending Coverage for Young Adults	Allows young adults to stay on their parents' plan until they turn 26 years old.	UAB Allows	Implemented in 2010

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2011			
Medical Loss Ratio	Requires that at least 85% of all premium dollars collected by insurance companies for large fully insured employer plans are spent on health care services and health care quality. If insurance companies do not meet these goals, because their administrative costs or profits are too high, they must provide rebates to consumers by August 2012.	Viva UAB's loss ratio is within required limits	Ongoing action item
2012			
	Report value of health insurance on W-2's (both employee and employer value)	Completed	Reported on 2012 W-2 Ongoing action item
2013			
Uniform Medical Summaries	Requires employers to provide a summary of benefits and coverage to all plan participants using federal template	Completed	Available during Open Enrollment 2012 for 2013 plans Ongoing action item
Flexible Spending Account Limit	Annual Contributions to Health FSA may not exceed \$2,500	Completed	In place in 2013
Comparative Effectiveness Research Fee	Employers required to pay \$1 per member on self-insured plans for 2012 plan year and \$2 per member for 2013 plan year.	Ongoing	First payment made in July 2013 (for 2012 plan year) \$19,745
Women's Preventative Services	Requires non-grandfathered plans to cover certain women's preventative services at 100% with no copay.	UAB Allows	Implemented in 2013

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2014			
Waiting Periods	Plans cannot have waiting periods in excess of 90 days	UAB plans do not have waiting periods	Already in compliance
Automatic Enrollment	Become subject to automatic health insurance enrollment for all eligible employees	Process to accomplish this requirement under review	Delayed until 2016
Health Insurance Exchanges	State health insurance exchanges available to individuals	Dependent on State	Alabama has not setup a State Exchange and will default to Federal
Comparative Effectiveness Research Fee	Employers required to pay \$1 per member on self-insured plans for 2012 plan year and \$2 per member for 2013 plan year.	Ongoing	Second payment made in July 2014 (for 2013 plan year) \$40,305.42
Transition Reinsurance Fee	Requires employers with self-insured plans to pay \$63.00 per member annually (direct cost to UAB for self-insured plans)	Ongoing	First payment of \$586,435.50 was made on January 15, 2015 representing 2014 plan year.
Part-time employees who work at least 30-hours per week (Pay or Play)	Requires employer to provide health insurance coverage to all part-time employees who regularly works 30 hours per week.	UAB already provides health insurance to part-time regular employees. However, this new ruling would apply to our 04 irregular employee population working 30 hours or more.	Delayed until 2015 by US Treasury Effectively delayed again until 2016. Changed coverage threshold from 95% to 70% for 2015.
HPID requirement for self-insured plans	Self-insured groups were originally required to obtain a health plan identifier (HPID) by November 5, 2014.	On Hold	Health and Human Services (HHS) has delayed indefinitely the deadline for enforcement due to a question on HPIDs not being used in HIPAA transactions

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2015			
Automatic Enrollment	Become subject to automatic health insurance enrollment for all eligible employees	Would utilize UAB for Me system for auto enrollment	Still awaiting final guidance on this issue and timing of potential implementation.
Part-time employees who work at least 30-hours per week (Pay or Play)	Requires employer to provide health insurance coverage to all part-time employees who regularly works 30 hours per week.	UAB already provides health insurance to part-time regular employees. However, this new ruling would apply to our 04 irregular employee population working 30 hours or more.	Must offer during 2015 Open Enrollment. Coverage threshold scheduled to revert back to 95% for 2016. Cost for tracking and IRS form production software alone is \$38,000 annually
1094-C and 1095-C Reporting Requirement	Employer required to provide new IRS 1094-C and 1095-C forms to all Benefit eligible employees beginning that includes information on health coverage offered and enrollment of employees. The IRS will use the forms to determine whether the individual and employee mandates were met and enforce penalties accordingly.	Pay or Play software will assist with this requirement	Forms must be delivered to employees by January 31, 2016 based on 2015 plan year data.
Comparative Effectiveness Research Fee	Employers required to pay \$1 per member on self-insured plans for 2012 plan year, \$2 per member for 2013 plan year, and \$2.08 for 2014 plan year.	Ongoing	Third payment made in July 2015 (for 2014 plan year) \$43,268.68
Transition Reinsurance Fee	Requires employers with self-insured plans to pay \$44.00 per member annually (direct cost to UAB for self-insured plans)	Ongoing	Second payment of \$393,931.56 was made on January 15, 2016 representing 2015 plan year.

Provision	Definition	UAB's Status	Timeframe
2016			
Automatic Enrollment	Become subject to automatic health insurance enrollment for all eligible employees	Would utilize UAB for Me system for auto enrollment	This has been closed and no longer a requirement.
Part-time employees who work at least 30-hours per week (Pay or Play)	Requires employer to provide health insurance coverage to all part-time employees who regularly works 30 hours per week.	UAB already provides health insurance to part-time regular employees. However, this new ruling would apply to our 04 irregular employee population working 30 hours or more.	UAB had 177 employees in initial lookback that qualified for the ACA plan for January 1, 2016. To date, UAB has had 19 enroll in coverage.
1095-B and 1095-C Reporting Requirement	Employer required to provide new IRS 1095-B and 1095-C forms to all Benefit eligible employees beginning that includes information on health coverage offered and enrollment of employees. The IRS will use the forms to determine whether the individual and employee mandates were met and enforce penalties accordingly.	Pay or Play software will assist with this requirement	Originally forms must be delivered to employees by January 31, 2016 based on 2015 plan year data. Federal government delayed delivery date to March 31 st . UAB still in process for January.

Future:

Cadillac Tax - Excise tax originally scheduled to take effect in 2018 to reduce health care usage and costs by encouraging employers to offer plan that are cost-effective and engage employees in sharing in the cost of care. It is a 40% tax on employers that provide high-cost health benefits to their employees.

In December 2015, it was announced that the implementation has been delayed by two years to January 1, 2020