

HEALTH CARE REFORM TIMELINE

| 2010 | 2011 | 2013 | 2014 | 2015 |
|---|--|--|---|--|
| Health plans that provide dependent coverage must make coverage available for dependents up to age 26 | Medical loss ratio (MLR) rules apply to health insurer premium spending. Insurers with excessive ratios must pay consumer rebates each year starting in 2012 | Improvements on HIPAA's electronic transaction rules start to be phased in | Individuals must obtain health insurance coverage or pay a penalty (some exemptions apply) | Large employers with 100 or more full-time employees must offer coverage to FT employees (that is affordable and provides minimum value) or pay a penalty |
| Uninsured individuals with pre-existing conditions can obtain health insurance through a high-risk health insurance pool program HHS established a website for individuals to identify affordable health insurance options in their state (www.healthcare.gov) | Employers must report health coverage costs on Form W-2 (optional for 2011; mandatory for later years; delayed for further guidance for small employers) OTC medicine and drugs are "qualified medical expenses" for HSAs, FSAs and HRAs only if prescribed (except insulin) | Employers must provide a notice to employees regarding the insurance exchanges by Oct. 1, 2013 Medicare Part D subsidy deduction eliminated | Health insurance Exchanges are available for individuals and small employers to purchase coverage Health insurance companies may not discriminate against individuals based on health status | Under final IRS regulations, the employer mandate rules will generally apply to employers with 50-99 FT employees starting in 2016. |
| Early retiree reinsurance program provides reimbursement for a portion of the cost of providing health coverage for early retirees. Program was available for claims incurred before Jan. 1, 2012 | Simple cafeteria plan provides small businesses with an easier way to sponsor a cafeteria plan | Income threshold for claiming itemized deduction for medical expenses increased | Health care tax credits available for eligible individuals with income below a certain threshold who purchase Exchange coverage | 2016 Large employers with fewer than 100 FT employees must offer coverage to FT employees (that is affordable and provides minimum value) or pay a penalty |
| Lifetime dollar limits on essential health benefits are prohibited. Annual dollar limits are restricted until 2014 when all annual dollar limits on essential health benefits are prohibited | Medicare Part D drug discounts start to be phased in for beneficiaries in the "donut hole" until the coverage gap is filled in 2020 | Medicare hospital insurance tax rate for high wage workers increased | Health insurance provider fee and reinsurance fee take effect and increase annually (reinsurance fee effective 2014-2016) | 2018 |
| Pre-existing condition exclusions are eliminated for children under age 19 | Penalty tax increases on withdrawals from HSAs (prior to age 65) and Archer MSAs not used for qualified medical expenses | Medical device excise tax established | Health plans cannot impose waiting periods longer than 90 days | High-cost plan excise tax established in 2018 |
| Non-grandfathered health plans must cover certain preventive care services without cost-sharing | Free annual wellness visit for Medicare beneficiaries and elimination of cost sharing for preventive care services | Salary reduction contributions to health FSAs are limited to \$2,500 | No limits on annual dollar value of essential health benefits | Future |
| Rescissions are prohibited in most cases; plan coverage may not be retroactively cancelled without prior notice to the enrollee | 2012 | By Dec. 31, 2013, employers must certify compliance with certain HIPAA transactions (deadline generally extended to Dec. 31, 2015) | Pre-existing condition exclusions prohibited for all enrollees | Automatic enrollment rules for employers with more than 200 FT employees |
| Fully insured group health plans must satisfy nondiscrimination rules regarding participation and benefit eligibility (delayed for future regulations) | Plans must provide SBC with the open enrollment period or plan year beginning on or after Sept. 23, 2012 (depending on type of enrollment) | | Insured plans in the small group and individual market must provide comprehensive benefits coverage (does not apply to grandfathered plans) | |
| Plans and issuers must adopt an improved internal claims and appeals process and comply with external review requirements (some rules were delayed until plan years beginning on or after Jan. 1, 2012) | For plan years beginning on or after Aug. 1, 2012, plans and issuers must cover additional preventive care services for women without cost-sharing. Exceptions to contraceptive coverage apply to religious employers | | Reforms related to the allocation of insurance risk through reinsurance, risk corridors and risk adjustment become effective | |
| First phase of the small business health care tax credit | For plan years ending on or after Oct. 1, 2012, issuers and self-insured health plans must pay PCORI fees | | Some non-grandfathered health plans subject to cost-sharing limits | |
| Rebates for the Medicare Part D "donut hole" sent to eligible enrollees | | | Second phase of small business tax credit | |