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FYI® Alert

For Your Information®

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HHS Releases Transitional Reinsurance Contributions Submission Form

Yesterday HHS announced that the long-awaited Transitional Reinsurance Annual Enrollment and Contributions Submission Form will be available on pay.gov on Friday, October 24, 2014. With the release of this form, plan sponsors and insurers can now schedule the payment of 2014 reinsurance amounts.

Background

The Affordable Care Act's (ACA)'s transitional reinsurance program was designed to provide temporary funding to insurers that incur high claims costs for enrollees in the individual market both inside and outside the public marketplaces. The program is significant for group health plans and their sponsors because it is funded by fees assessed on insured and self-insured plans for 2014, 2015, and 2016. The fees for 2014 and 2015 are $63 and $44 per covered life respectively; the fee for 2016 has not yet been announced. Plan sponsors must submit covered lives data for 2014 by November 15, 2014 and make the payments through pay.gov during 2015. In March, the Department of Health & Human Services (HHS) finalized regulations on the transitional reinsurance program. (See our March 25, 2014 For Your Information.)

Key Deadlines for 2014 Calendar Year		
Date	Activity	Contribution Amount
No later than November 15, 2014	Submit enrollment count and schedule payment dates	
No later than January 15, 2015	Remit first contribution amount The full contribution can be made in a single payment by this date	$52.50 per covered life
No later than November 15, 2015	Remit second contribution amount	$10.50 per covered life
	Total	$63.00 per covered life

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Transitional Reinsurance Annual Enrollment and Contributions Submission Form Released

Yesterday HHS announced that the Transitional Reinsurance Annual Enrollment and Contributions Submission Form will be available on pay.gov on Friday, October 24, 2014. HHS also released an Annual Enrollment and Contributions Submission Form Manual and a Supporting Documentation Job Aid Manual that provide guidance on the payment process. We will release a detailed summary of the guidance and process.

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