HRtoGO
ONE STOP HR

Timeline: Healthcare Reform Key Changes for Employers

Enactment 3/23/10 | 6/23/10 | 9/23/10 | 1/1/11 | 1/1/12 | 1/1/13 | 1/1/14

6/23/10

- Reinsurance for early retiree coverage (6/23/10 – 1/1/14
- High-risk pools for individuals with preexisting conditions established

1/1/11

- Rebates for exceeding targeted medical loss ratios
- HRA, FSA, HSA OTC drug reimbursement excluded
- Tax on non-qualified HSA distributions increased to 20%
- Tax credit of 35% of employer contributions to health premium for small employers' (tax years 2010-2013)
- Value of health benefits included on W-2 (begins with 2011 tax year)

1/1/13

- Annual contributions to FSA limited to $2,500
- 3.8% Medicare Tax on net investment income for individuals with modified adjusted gross income over $200,000/$250,000
- Additional Part A tax on 0.9% on individuals earning over $200,000/$250,000
- Employer deduction on Part D drug subsidy eliminated

9/23/10

- Lifetime dollar limits prohibited; annual dollar limits restricted *(applies to grandfathered plans)*
- Rescissions prohibited *(applies to grandfathered plans)*
- Coverage of preventative health care required
- Coverage of unmarried adult children to age 26 *(applies to grandfathered plans, but limited to those not eligible for employer coverage)*
- Coverage for pre-existing for enrollees up to age 19 required
- IRS 105(h) nondiscrimination rules extended to fully insured plans
- Claims appeals procedure requirements
- Applies to plan years beginning on or after 9/23/10

1/1/14

- Employer coverage mandate
- Individual coverage mandate (phased in 2014-2016)
- Waiting periods limited to 90 days
- Annual dollar limits prohibited
- Coverage for pre-existing health conditions required for all ages
- Children covered to age 26 (even if eligible for employer coverage)
- Small group plan deductibles limited to $2000/$4000
- Discrimination based on health status prohibited
- Changes to wellness programs requirements