

# The Status of ACA Compliance

Presenter:

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***Pioneering Specialists in***

***Group Health Care***

***Post-Payment Administration***

***For Over 25 Years***

**Customer Philosophy**

**Respect** for Existing Procedures

**Emphasis** on Customization

**Focus** on Solutions

# ACA Self-Assessment

- Health Decisions has performed dozens of ACA Self-Assessments.
- Not a formal survey but a series of case studies.
- 55 questions in 7 areas.
- All must be answered “Yes” to comply.

# ACA Self-Assessment

Initial responses interesting enough to share.

- All pleasantly surprised with what they have covered.  
**Initial notices and “Pay-or-Play” Tests and Taxes**
- Compliance burden does not fall equally or evenly.  
**Complex Workforces = Complex Compliance**
- How do you compare? **Call Monika Blazeski 734-451-2230 to schedule a 30 minute assessment.**

# ACA Self-Assessment

<b>A</b>	<b>ACA uses a number of existing IRS rules and employer control group definitions.</b>
<b>B</b>	<b>ACA requires you inform employees of their benefits and rights.</b>
<b>C</b>	<b>ACA requires group health plans meet certain minimum requirements.</b>
<b>D</b>	<b>ACA requires group health plans offer certain minimum benefits.</b>
<b>E</b>	<b>ACA requires employers account for all employees enrolled/not enrolled, eligible/ineligible.</b>
<b>F</b>	<b>ACA requires employers account for all dependents.</b>
<b>G</b>	<b>ACA places limits on the amount of cost sharing and out-of-pocket costs your plan can assess.</b>

# ACA Self-Assessment

A	ACA uses a number of existing IRS rules and employer control group definitions.	Yes	No	“Huh”?
		1	Do you know how your organization currently files with the IRS?	
2	Are your group health plans set-up consistently with your organization's current IRS definitions?			
3	If you offer different plans to different groups of employees, do the plans comply with the “Cadillac” plan rules?			
4	Can you document all employee and employer contributions to any IRS account (HSA/FSA/HRA/HDHP)?			
5	Have you completed and distributed to employees W-2 statements that indicate the value of their health plan?			

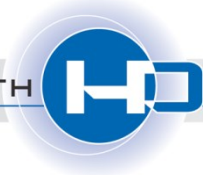
# ACA Self-Assessment

<b>B ACA requires you inform employees of their benefits and rights.</b>		Yes	No	“Huh”?
1	Can you confirm that you have provided employees with an approved Summary of Benefits and Coverage in the manner prescribed by the Dept. of Labor?			
2	Can you confirm that you have provided employees with notices of Health Exchanges in the manner prescribed by the Department of Labor?			
3	Are you prepared to send employee specific communications regarding changes in employment. status that alter plan eligibility (e.g. terminations, new hires, leaves, reinstatements, changes in hours worked or rates of pay)?			

# ACA Self-Assessment

<b>C ACA requires group health plans meet certain minimum requirements.</b>		Yes	No	“Huh“?
1	Have you confirmed and documented that your plan has no pre-existing condition limitations on eligibility?			
2	Have you confirmed and documented that your plan has no annual limits on plan benefits?			
3	Have you confirmed and documented that your plan has no lifetime limits on plan benefits?			
4	Does your plan have a 90 day or less waiting period prior to eligibility and can you document this?			
5	Does your plan offer enrollment to all persons working 30 or more hours per week?			
6	Does your plan comply with non-discrimination requirements?			
7	Can you document you cover dependents until the age of 26?			
8	Can you document your plan covers at least 60% of total costs?			





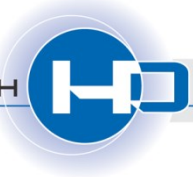
# ACA Self-Assessment

D	ACA requires group health plans offer certain minimum benefits.			
		Yes	No	“Huh”?
1	Do you know and can you document the ACA value of your plan and its “metal” tier (bronze, silver, gold, or platinum)?			
2	Does your plan cover Ambulatory patient services?			
3	Does your plan cover Emergency services?			
4	Does your plan cover Hospitalization?			
5	Does your plan cover Maternity and newborn care?			
6	Does your plan cover Mental health and substance abuse disorder services?			
7	Do these treatments include behavioral health treatments?			
8	Does your plan cover Prescription drugs?			
9	Does your plan cover Rehabilitative and/or habilitative services and devices?			
10	Does your plan cover laboratory services?			
11	Does your plan cover preventive and wellness services?			
12	Does this also include chronic diseases management?			
13	Does your plan cover Pediatric services?			



# ACA Self-Assessment

E	ACA requires employers account for all employees enrolled/not enrolled, eligible/ineligible.	Yes	No	“Huh“?
1	Have you combined payroll and enrollment rosters to confirm employee eligibility and enrollment?			
2	Can you identify all full-time employees?			
3	Can you identify all part-time employees?			
4	Can you identify all seasonal employees?			
5	Can you identify all retirees?			
6	Can you identify temp employees, contracted employees, or other employees who may fall into a non-traditional employment category?			
7	Can you identify any person associated with your company who's employment status is questionable under the common law definition of an employee?			
8	Can you document <u>employee-by-employee</u> changes in employment status <u>month-by-month</u> due to terminations, new hires, leaves, reinstatements, changes in hours worked or rates of pay, etc.?			
9	Can you produce monthly rosters of all employees that classify each employee as eligible-and-enrolled, eligible-but-not-enrolled, ineligible-but-enrolled or ineligible-and-not-enrolled?			
10	Can you produce these rosters of all employees to the IRS as computer files formatted to IRS specifications?			
11	Can you identify by name any employee paying more than 9.5% of their family income in health insurance premiums to be eligible for coverage under your plan? Copyright Health Decisions, Inc.			10



# ACA Self-Assessment

F	ACA requires employers account for all dependents.			
		Yes	No	“Huh“?
1	Have you confirmed eligibility for spouses and dependents enrolled in your health plan?			
2	Do you know the social security number (SSN) for each employee, retiree, spouse and dependent covered by your health plan?			
3	If no, to the question above, can you prove you have made “good faith” efforts to collect their SSN on at least two occasions?			
4	Are you prepared to pay the Patient Centered Outcomes Research Initiative (PCORI) tax due in July and confirm that it is based on and consistent with the roster of employees, retirees spouses and dependents reported to the IRS?			
5	Are you prepared to pay the Transitional Reinsurance tax of \$5.25 per member per month and confirm that it is based on and consistent with the roster of employees, retirees spouses and dependents reported to the IRS?			
6	Are you able to create and submit electronic rosters to the IRS according to their guidelines?			



# ACA Self-Assessment

<b>G ACA places limits on the amount of cost sharing and out-of-pocket costs your plan can assess.</b>		Yes	No	“Huh“?
1	Are your plan cost sharing limits for in-network medical benefits under \$6,350 for a single employee and include all forms of cost sharing (deductibles, copays and coinsurance)?			
2	Are your plan cost sharing limits for in-network medical benefits under \$12,700 for NON-single employees and include all forms of cost sharing (deductibles, copays and coinsurance)?			
3	Can you confirm these medical out-of-pocket limits were enforced and identify any cases of over or under payment?			
4	Are your plan cost sharing limits for in-network prescription benefits under \$6,350 for a single employee and include all forms of cost sharing (deductibles, copays and coinsurance)?			
5	Are your plan cost sharing limits for in-network prescription benefits under \$12,700 for NON-single employee and include all forms of cost sharing (deductibles, copays and coinsurance)?			
6	Can you confirm these prescription out-of-pocket limits were enforced and identify any cases of over or under payment?			
7	Can you confirm that all cost sharing has been waived for preventive care as defined by ACA?			
8	Can you coordinate Out-of-Pocket costs between your medical and prescription plans?			
9	Does your plan exclude HSA/FSA/HRA amounts from cost-sharing limits?			

- **Common Gaps**
  - **Tracking ALL employees (not just covered)**
  - **IRS Reporting**
  - **Managing employee “trigger events” communications**
  - **Identifying covered spouses and dependents**
  - **Enforcement of new cost sharing limits**

How do you compare?

**Call Monika Blazeski 734-451-2230 to schedule a 30 minute assessment.**

# ACA Compliance Support

Once your attorney, accountant, and adviser tell you what you have to do...

**Someone has to do it.**

**You have 5 options but only 1 real choice.**

Option	Choice
<b>1. DIY (Do It Yourself)</b>	<b>Too disruptive.</b> Distracts from other responsibilities with on-going commitment to stay current.
<b>2. Assign Current Staff</b>	<b>Not practical.</b> Lost productivity, need to stay current and lack of continuity over time.
<b>3. Hire New Staff</b>	<b>Too expensive.</b> Another FTE (salary, benefits and overhead) to count other FTE.
<b>4. Do Nothing</b>	<b>Not advisable.</b> Not only penalties but, more importantly, lost opportunities for savings, market leverage and improved employee relations.
<b>5. Hire Us</b>	<b>Just right:</b> <ul style="list-style-type: none"><li>• 1/5 the cost of qualified staff</li><li>• 1/10 the cost of DIY (Do It Yourself)</li><li>• Takes away concern about changes</li><li>• Keeps you current through 2017 and beyond</li><li>• Your time reduced to a monthly conference call</li><li>• You still direct activity and decide questions</li></ul>

For More Information  
Contact

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734-451-2230

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