



ACA Cost Sharing: The Ticking Time Bomb of Liability

Presenter:

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April 24, 2014

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

FOCUS

Non-grandfathered, calendar year plans.

Comply not just because you have to.
Comply in a way that helps your plan.

Quick Review

What you should have done.

- Reporting to employees
 - W-2 plan values
 - Summary of Benefits and Coverage (SBC)
 - Exchange Notices
- Benefits
 - Selected Essential Health Benefits
 - No cost sharing for federal preventive care benefits
 - No pre-existing conditions
 - No lifetime maximums
 - Dependents covered until 26
 - Clinical trial coverage
- Safe Harbors
 - Minimum Value Safe Harbor
 - Affordability Safe Harbor
- New Out-of-Pocket rules implemented

ACA Compliance
Checklist

Sessions available now.

Call 734-451-2230
Ask for Leslie.

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ACA Cost Sharing

- **New Preventive Care Cost Sharing Waiver**
EFFECTIVE NOW
 - [November 2013 webinar](#)
- **New Out-of-Pocket (OOP) Maximum Limits**
EFFECTIVE NOW medical and RX separate
EFFECTIVE 2015 medical and RX together
- **New OOP Maximum Calculations**
Pre-ACA OOP Maximum ONLY coinsurance
Post ACA OOP Maximum includes all cost sharing
copays + deductibles + coinsurance

ACA Cost Sharing

Pre-ACA

- Copays assessed independently
- Deductibles assessed independently
- OOP Maximum calculations set plan-by-plan

Difficult to detect error.

Impossible to enforce.

- [March 2013 webinar](#)

Post ACA

- Preventive has 0 cost sharing
- Copays+deductible+coinsurance all count toward OOP Maximum
- OOP Maximum calculations defined by law

Error easier to detect.

Enforcement possible practically and legally.

ACA Cost Sharing

	Employee Overpaid Plan Underpaid	Employee Underpaid Plan Overpaid
Preventive services error	\$	
Copay assessment error	\$	
Copay waiver error		\$
Deductible assessment error	\$	
Deductible waiver error		\$
OOP Max too late	\$	
OOP Max too soon		\$

ACA Cost Sharing

What to do.

- Check with payer on what they are doing.
- BUT do not rely solely on payer efforts.
- Get claims and enrollment data.
- Do not re-pay claims but confirm the results of claim payments.
- Re-construct cost sharing levels person by person.
- Confirm correct cases.
- Flag cases for validation.
- Monitor payer progress to 0 cases needing validation.

ACA Cost Sharing

Resolution Strategies

- Use of pre-tax accounts
- Claim credit/debit
- Monitor to remove current cases
- Monitor to prevent future cases

ACA Cost Sharing

- Minus:
 - New regulatory requirements
 - New liabilities
- Plus
 - Brings order to chaos of cost-sharing
 - Levels the competitive playing field

For More Information
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