

**Health Care Reform: 2014 – 2016 Timelines for UMC Employers**

2014		
January	<p><b>PTCs:</b> Consider health plan “affordability” for clergy/participant PTC eligibility.</p> <p><i>Note: Coverage is “affordable” under the ACA for PTC purposes if it does not cost a participant more than 9.5% of his or her household income (MAGI) for self-only coverage.</i></p>	Plan sponsor
January – December	<p><b>Employer Mandate for 2015:</b> Choose 6-12 months to count FTEEs in 2014 to determine whether Employer Mandate applies for 2015.</p> <ul style="list-style-type: none"> <li>• Employer Mandate applies for 2015 to employers that employ 100 or more FTEEs on average in 2014.</li> <li>• Employer Mandate is delayed to 2016 for employers that employ at least 50 but not more than 99 FTEEs on average in 2014. Reporting requirements still apply for 2015.</li> </ul>	Employer
July 31	<b>PCORI Fee:</b> 2013 fee due (calendar year plans): <b>\$2 per covered life.</b>	Plan sponsor
November 5	<b>HIPAA:</b> Obtain HIPAA-required HPI <i>for large health plans</i> — i.e., plans with annual receipts (claims paid) over \$5 million. (Small health plans have an additional year to comply.)	Plan sponsor
November 15	<b>ACA Marketplace:</b> Open enrollment begins for 2015 (through February 15, 2015).	Participant
November 15	<b>Reinsurance Fee for 2014:</b> Submit 2014 headcount to HHS.	Plan sponsor
December 15	<b>Reinsurance Fee for 2014:</b> Receive invoice from HHS (within 30 days of submitting headcount).	Plan sponsor

2015		
January	<p><b>PTCs:</b> Consider health plan “affordability” for clergy/participant PTC eligibility.</p> <p><i>Note: Coverage is “affordable” under the ACA for PTC purposes if it does not cost a participant more than 9.5% of his or her household income (MAGI) for self-only coverage.</i></p> <p><b>Employer Mandate:</b> Employers subject to the Employer Mandate in 2015 should ensure that health coverage offered employees is “affordable,” which for Employer Mandate purposes can satisfy one of three safe harbors based on the cost to an employee of self-only coverage not exceeding 9.5% of W-2 wages, overall rate of pay, or 1/12<sup>th</sup> of FPL.</p>	Plan sponsor; Employer
January – December	<p><b>Employer Mandate for 2016:</b> Track employees’ hours for 12 months to count FTEEs; use FTEE count to determine whether Employer Mandate applies for 2016.</p> <ul style="list-style-type: none"> <li>Employer Mandate applies in 2016 to all employers that employ 50 or more FTEEs on average in 2015.</li> </ul>	Employer
January 14	<p><b>Reinsurance Fee for 2014:</b> Pay first installment (\$52.50 per covered life).</p>	Plan sponsor
July 31	<p><b>PCORI Fee:</b> 2014 fee due (calendar year plans). Pay \$2 (+inflation adjustment) per covered life.</p>	Plan sponsor
November 5	<p><b>HIPAA:</b> Obtain HIPAA-required HPI <i>for small health plans</i>—i.e., plans with annual receipts (claims paid) of \$5 million or less.</p>	Plan sponsor
November 15	<p><b>Reinsurance Fee for 2015:</b> Submit 2015 headcount to HHS.</p>	Plan sponsor
December	<p><b>Reinsurance Fee for 2014:</b> Pay second installment (\$10.50 per covered life).</p>	Plan sponsor
December 13	<p><b>HIPAA:</b> Certify HIPAA Standard Transaction Compliance to HHS for large health plans—i.e., plans with annual receipts (claims paid) over \$5 million. (Small health plans have an additional year to comply.)</p>	Plan sponsor
December 15	<p><b>Reinsurance Fee for 2015:</b> Receive invoice from HHS (within 30 days of submitting headcount).</p>	Plan sponsor

2016		
January 1	<p><b>PTCs:</b> Consider health plan “affordability” for clergy/participant PTC eligibility.</p> <p><i>Note: Coverage is “affordable” under the ACA for PTC purposes if it does not cost a participant more than 9.5% of his or her household income (MAGI) for self-only coverage.</i></p> <p><b>Employer Mandate:</b> Employers subject to the Employer Mandate in 2016 should ensure that health coverage offered employees is “affordable,” which for Employer Mandate purposes can satisfy one of three safe harbors based on the cost to an employee of self-only coverage not exceeding 9.5% of W-2 wages, overall rate of pay, or 1/12<sup>th</sup> of FPL.</p>	Plan sponsor; Employer
January – December	<b>Employer Mandate for 2017:</b> Track employees’ hours for 12 months to count FTEEs; use FTEE count to determine whether Employer Mandate applies for 2017.	Employer
January 14	<b>Reinsurance Fee for 2015:</b> Pay first installment (\$33 per covered life).	Plan sponsor
January 31	<p><b>Section 6055 Reporting Requirements:</b> Issue statements to applicable individuals on:</p> <ul style="list-style-type: none"> <li>• Minimum essential coverage of participants</li> </ul>	Plan Sponsor
January 31	<p><b>Section 6056 and W-2 Reporting Requirements:</b> Issue statements to applicable individuals on:</p> <ul style="list-style-type: none"> <li>• Covered full-time employees</li> <li>• Cost/value of health coverage on employees’ W-2s (<i>possibly</i>)</li> </ul>	Employer
February 28 (or March 31, if electronically)	<b>ACA Reporting Requirements:</b> Form 1094-C (or B) and Form 1095-C (or B) due to IRS.	Plan sponsor for 6055 Reporting Employer for 6056 Reporting
July 31	<b>PCORI Fee:</b> 2015 fee due (calendar year plans).	Plan sponsor
November 15	<b>Reinsurance Fee for 2016:</b> Submit 2016 headcount to HHS.	Plan sponsor
December	<b>Reinsurance Fee for 2015:</b> Pay second installment (\$11 per covered life).	Plan sponsor
December 15	<b>Reinsurance Fee for 2016:</b> Receive invoice from HHS (within 30 days of submitting headcount).	Plan sponsor

**Employer:** Local church (for appointed clergy, deacons and local church lay employees), conference office (for conference lay staff, conference-employed clergy and employees in an annual conference's controlled group), general agency or other church-affiliated employer.

**Plan Sponsor:** Annual conference board of pensions. However, the General Board will perform these duties for HealthFlex plan sponsors related to PCORI Fees (except for OneExchange HRAs), Reinsurance Fees, HIPAA and 6055 Reporting.

**ACA:** Affordable Care Act (Patient Protection and Affordable Care Act; i.e., health care reform)

**FPL:** Federal poverty level

**FTEE:** Full-time equivalent employee

**HIPAA:** Health Insurance Portability and Accountability Act (i.e., patient privacy protections)

**HHS:** U.S. Department of Health and Human Services

**HPI:** Health plan identifier

**IRS:** Internal Revenue Service

**MAGI:** Modified adjusted gross income (i.e., household income)

**PCORI:** Patient-Centered Outcomes Research Institute

**PTC:** Premium tax credit