

Having trouble viewing this email? [Click here](#)



### In This Issue

[Health Reimbursement Arrangements](#)

[Exchange Notice Delayed](#)

[Coming Soon Minimum Essential Definition for Large Groups](#)

### Quick Links

[Our Website](#)

[Architects and Engineers](#)

[Accountants](#)

[Attorneys](#)

### **Health Reimbursement Arrangements and their Coordination with the Prohibition of Imposing Lifetime and/or Annual Limits**

In the FAQ released by the Department of Treasury on January 24, there was additional guidance regarding the

### **Medicare Part D Creditable Coverage Notice Due**

A quick reminder it's time for all calendar year group health plans to report the Medicare Part D Creditable Coverage status of their plans to Centers for Medicare and Medicaid Services (CMS). This must be done annually within 60 days after the beginning of the plan year.

In addition, the reporting is required:

- \* Within 30 days after termination of a plan providing prescription drug benefits; and
- \* Within 30 days after any change in the creditable status of the prescription drug coverage under a health plan.

### **March 2013 Notice of Coverage Options Available Through the Exchange - Delayed**

On January 24, 2013 in a FAQ released by the Departments of Labor, Health & Human Services and Treasury regarding the implementation of The Patient Protection and Affordable Care Act, the requirement that employers distribute to each new employee at the time of hire or all current employees no later than March 1, 2013 a Notice of Coverage Options Available Through the Exchanges was delayed. The delay is projected to be until either late summer or fall of 2013.

In this statement, the Department of Labor cited the following reasons for the delay. First, it is the opinion that the Notice be coordinated with Health & Human Services Exchange educational efforts and the IRS guidance on minimum value. Next, the commitment by the Department that implementation of the Act is a smooth process and that providing employees this notice closer to the actual Exchange open enrollment time would be more meaningful.

impact of PHSA Section 2711 (regarding prohibition of imposing lifetime or annual limits) on HRA's.

Earlier regulations distinguished between a HRA that is "integrated" with a group health plan one that is stand-alone. A HRA is not considered integrated unless under the terms of the HRA it is only available to employees who are covered by primary group health plan coverage provided by the employer that meets the requirements of PHSA Section 2711.

The FAQ identifies the following:

1. If an employer-sponsored HRA is used to purchase coverage in the individual market (i.e. the employer contributes a defined contribution amount to a HRA to help employees purchase individual coverage) it is NOT considered integrated; and, thus, does not comply with PHSA Section 2711.

2. If an employee is offered group coverage that complies with PHSA Section 2711 but waives off of that coverage any HRA that may be provided to that employee is not integrated (not in compliance).

The Department of Labor is also considering providing generic language that may be used to satisfy this requirement. In addition, compliance alternative are currently under consideration.

As additional information is available, we will be sure to let you know.

## Minimum Essential Coverage Definition Expected Very Soon

**The definition of the plan that will be required for an individual to comply with the Individual Mandate under the PPACA is expected very soon. Be sure to watch for this update.**

## Aetna No Longer Guaranteeing for Individual Health Plans

**Aetna has removed their 12-month rate guarantee language from all under 65-marketing material for individual, family, and self-employed health plans beginning January 15, 2013.**

As always, we hope you enjoyed this edition of our monthly newsletter. We thank you for the confidence you have placed in our firm and look forward to servicing all of your insurance needs.

Your friends at Stuckey Insurance



[Forward this email](#)



This email was sent to [scott.nugent@stuckeyinsurance.com](mailto:scott.nugent@stuckeyinsurance.com) by [stuckey@stuckeyinsurance.com](mailto:stuckey@stuckeyinsurance.com) | [Update Profile/Email Address](#) | Instant removal with [SafeUnsubscribe™](#) | [Privacy Policy](#).

Stuckey Insurance | 5343 N. 16th St. | Phoenix | AZ | 85016

