

HEALTH CARE REFORM REGULATORY UPDATE



Kevin Knopf
Office of Benefits Tax Counsel
Office of Tax Policy
U.S. Department of the Treasury
Washington, DC



Topics to be Covered

- Dependent Care Coverage Regulations
- Grandfathered Health Plan Regulations
- Pre-existing Conditions, Annual and Lifetime Limits, Rescission Prohibition Regulations
- Preventive Health Services Without Cost Sharing Regulations
- Internal Claims, Appeals, and External Review Regulations



Dependent Coverage Regulations

- ❑ Interim Final Regulations issued May 10, 2010
- ❑ What is a “dependent child”?
- ❑ Can coverage or premium costs vary within the category of dependent children?
- ❑ How must plan enroll newly eligible dependent children?
- ❑ What is the effect of voluntary compliance with the regulations prior to effective date?



Grandfathered Health Plan Regulations

- ❑ Interim Final Regulations issued June 14, 2010
- ❑ Provide applicable exemptions for “grandfathered health plans” under PPACA
- ❑ What are “grandfathered health plans”?
- ❑ How to maintain status as grandfathered health plan?
- ❑ What changes result in the loss of grandfathered health plan status?



Pre-existing Conditions, Annual and Lifetime Limits, Rescission Prohibition Regulations

- ❑ Interim Final Regulations issued June 22, 2010
- ❑ Pre-existing Condition Exclusions
- ❑ Annual and Lifetime Limits
- ❑ Prohibition on Rescissions
- ❑ Patient Bill of Rights



Preventive Health Services Without Cost Sharing Regulations

- ❑ Interim Final Regulations issued July 14, 2010
- ❑ Basic Rule – coverage of preventive services that have strong scientific evidence without cost sharing
- ❑ Preventive Services Covered
- ❑ Elimination of Cost Sharing
- ❑ Effective Date – when new preventive services are named under PHSA



Internal Claims, Appeals, and External Review Regulations

- ❑ Interim Final Regulations issued July 22, 2010
- ❑ Internal Process for Appeal of Claims
- ❑ Continuation of Coverage
- ❑ Costs Borne by Plan or Insurer
- ❑ Requirements for Group Health Plans
- ❑ Requirements for Individual Health Plans

QUESTIONS



This presentation should not be construed as, nor is it intended to provide, legal advice. The opinions expressed herein are the opinions of the individual presenter and not the opinions of the U.S. Department of the Treasury.