

Past	Provision	Already Accomplished	Market	Affected by Grandfathering?	Notes
	Small employer tax credit	Tax Year After 12/31/2009	Small		Less than 25 employees and average salary of less than \$50k
	Nursing mothers provision	3/23/2010	All		Exception for less than 50 EEs based on hardship
	Retiree reinsurance program	7/1/2010	All		<b>Closed as of 5/5/2011</b>
	Designate any MD as PCP	9/23/2010; Plan Year	All	Y	Applies to HMO plans only
	Emergency services at in-network rate regardless of provider	9/23/2010; Plan Year	All	Y	
	No lifetime dollar limits	9/23/2010; Plan Year	All		
	No rescission with limited exceptions	9/23/2010; Plan Year	All		
	Coverage of dependent to age 26	9/23/2010; Plan Year	All		Until 2014, no access to other employer coverage
	New coverage appeal process	9/23/2010; Plan Year	All	Y	
	OB/GYN non-referral	9/23/2010; Plan Year	All	Y	Applies to HMO plans only
	Pre-existing coverage for children under age 19	9/23/2010; Plan Year	All	Y	Applies to all persons in 2014
	Preventive care coverage	9/23/2010; Plan Year	All	Y	
Restricted annual dollar limits	9/23/2010; Plan Year	All		Completely prohibited in 2014	

**Discussions at Renewal**

Current	Wellness grants	Vendor applications due 8/8/2011	Small		<b>Vendor is being chosen to provide services nationwide; only \$10 million earmarked. No definition of grant process.</b>
	HSA distribution tax increase	1/1/2011	All		
	OTC exclusion for FSAs, HSAs, HRAS	1/1/2011	All		
	Simple cafeteria plans	1/1/2011	Small	Y	Less than 100 employees
	Minimum loss ratio requirement/rebate	2011; Plan Year	All		<b>Only applies to insured plans</b>

**Future Considerations**

Future	Summary of benefits	3/23/2012	All		
	Plan reporting on quality information	3/23/2012	All		
	Tax on GHPs - \$2/enrollee	Plan Year Ending After 9/30/2012 to Ending 9/30/2019	All		
	Discrimination rules for highly paid individuals	Plan Year	All	Y	<b>Postponed until regulation from IRS is issued</b>
	W2 reporting by employer	1/1/2012	All		<b>Delayed from 2011 enactment</b>
	Material modification notice to summary	2012	All		<b>Postponed until DOL guidance is issued</b>

	Provision	Future Considerations	Market	Affected by Grandfathering?	Notes
Future	Elimination of Medicare Part D subsidies deductibility for Employer	Tax Year After 12/31/2012	All		Expenses from change recognized in Q1 2010
	CLASS Act enrollment	1/1/2013	All		
	Employers provide notice regarding exchanges	3/1/2013	All		
	FSA limit of \$2500/year	1/1/2013	All		

Future	Employer mandate	1/1/2014	All		50+ full-time employees
	Employer notice on individuals covered	1/1/2014	All		
	<del>Free choice voucher</del>	<del>1/1/2014</del>	<del>All</del>		<b>Repealed as of 4/15/2011</b>
	Limit on waiting periods	1/1/2014	All	Y	50+ employees
	State exchanges available	1/1/2014	Small		Under 100 employees
	Employer notice on qualifying and affordable coverage	2014	All		Only if subject to employer mandate; 50+ full time employees
	Guarantee issue	1/1/2014; Plan Year	All		
	Guarantee renewability	2014	All		
	Community rating	1/1/2014; Plan Year	Small		For fully insured plans
	Essential benefits mandate	1/1/2014; Plan Year	All	Unclear	
	No lifetime limits or annual limits	1/1/2014; Plan Year	All		
	Pre-existing condition coverage for all persons	1/1/2014; Plan Year	All		
	Increased wellness incentives	1/1/2014; Plan Year	All		Increases health status based incentive limits from 20% to 30%
	Auto-enrollment	2014	Large		200+ full-time employees; <b>postoned until regulation from DOL is issued</b>

"Cadillac" plan excise tax	1/1/2018	All		Tax computed by using W-2 reporting
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Small - 100 Employees or Less
Large - More than 101 Employees
All - Employers of All Sizes