



BENEFIT NEWS BRIEFS

Upcoming "Reinsurance Fee" Deadlines

With the November 16, 2015 deadline approaching for contributing entities to submit an enrollment count to HHS in preparation of payment of the *Affordable Care Act's (ACA's)* "reinsurance fee," we thought a review of the upcoming deadlines would be helpful. As noted in prior newsletters, the ACA calls for reinsurance fees to be collected from insured and self-insured group health care plans in the following amounts, on a national basis: \$10 billion in 2014, \$6 billion in 2015, and \$4 billion in 2016. These monies will be used to help stabilize premiums in the ACA Health Plan Marketplace.

Generally, self-insured multiemployer group health plans are considered "contributing entities" and required to make reinsurance contributions, except for certain self-insured, self-administered plans, though such plans are usually very large plans. See [Benefit News Briefs 2014-12](#) for more on this limited exemption from the reinsurance fee.

What Are The Key 2015 Reinsurance Program Dates?

The key dates for the 2015 benefit year reinsurance fee program are shown below:

- Oct. 1, 2015 -** [2015 ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form](#) Available on Pay.gov
- By Nov. 16, 2015 -** Submit the Form and schedule payment by due date(s)
- By Jan. 15, 2016 -** Full contribution amount due (single payment)
(\$44.00 per covered life)
- By Jan. 15, 2016 -** First contribution amount due (two-part payment)
(\$33.00 per covered life)
- By Nov. 15, 2016 -** Second contribution amount due (two-part payment)
(\$11.00 per covered life)

As reported in a previous publication, the [calculation of reinsurance contributions](#) regulation found at 45 CFR 153.405, lists four options for a self-insured plan to calculate the covered lives for payment of the reinsurance fee. The four counting methods for self-insured plans are the (1) *Actual Count Method* (2) *Snapshot Count Method*; (3) *Snapshot Factor Method*; and (4) *Form 5500 Method*. Insured plans mostly use similar methods.

A slideshow with many helpful tips from a CMS 2015 Reinsurance Fee webinar is available by "[clicking here](#)." According to the [CMS Reinsurance Fee website](#), a contributing entity (or third party administrators or administrative services-only contractors on their behalf) will access the 2014 "[ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form](#)" to enter the annual enrollment count for the **2014 benefit year** and will access the "[2015 ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form](#)" to enter the annual enrollment count for the **2015 benefit year**.

Please note that there is a specific Form for each benefit year. The Form will auto-calculate the annual contribution amount to be remitted based on the annual enrollment count and the contributing entity will then schedule payment for the calculated reinsurance contributions on the payment page.

For more on the Reinsurance Fee:

- CB 2012-65** - HHS Publishes Proposed Regulations on Reinsurance Fee *Self-Insured, Self-Administered Health Plans Included*
- CB 2013-71** - HHS Proposes Some Relief from Reinsurance Fee for Self-Insured, Self-Administered Health Plans
- BNB 2014-12** - HHS Finalizes Exemption From Reinsurance Fee for Certain Self-Insured, Self-Administered Health Plans
- BNB 2014-23** - HHS Sets 2015 Reinsurance Fee at \$44 Annually; About \$3.67/Month
- BNB 2014-27** - HHS Releases Guidance on Payment of Reinsurance Fee
- BNB 2014-44** - CMS Guidance on "Reinsurance Fee" Counting Method Examples for Contributing Entities
- BNB 2014-47** - Must The Plan Pay The Reinsurance Fee For Individuals For Whom The Plan Is Secondary?
- BNB 2014-50** - CMS Releases Reinsurance Fee Payment Manuals
- BNB 2014-53** - Reinsurance Contributions Submission Process 101 *Highlights From CMS Webinar*
- BNB 2014-54** - CMS Extends November 15 Deadline to Report 2014 Enrollment Counts for Reinsurance Fee to December 5

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