



SPECIAL BULLETIN

CMS Informally Advising Certain Self-Insured, Self-Administered Health Plans To File Notice Of Such Status

It was brought to our attention that CMS was informally advising certain self-insured, self-administered (SISA) health plans that are eligible for and claiming the SISA exemption from paying the transitional reinsurance fee for 2015 to advise CMS of such choice. We were able to independently verify that information via an email exchange with ReinsuranceContributions@cms.hhs.gov. We were informed that:

"CMS requests that any plan claiming the self-insured, self-administered exemption send an email to ReinsuranceContributions@cms.hhs.gov with their company legal business name (LBN), tax identification number (TIN), 2014 filing Pay.gov Tracking ID and whether they identified themselves as SISA in their 2014 filing. Providing this information will assist CMS in not sending these entities emails related to non-compliance because they filed for 2014 but did not file in 2015.

In order to ensure proper routing of the information, please include "SISA Exemption" in the subject line."

Health plans would insert the Plan name as they do not have what is commonly understood as a "company legal business name."

Self-insured, self-administered plans should have identified themselves as such by now and should not have made arrangements to pay the reinsurance fee for 2015. However, until this recent informal CMS guidance, there were not any instructions from CMS to file notice of claiming the SISA exemption. As of now, such guidance has not released as an FAQ on the [REGTAP](#) site.

See [Benefit News Briefs 2014-12](#) for more on the SISA exemption.

Additional information about the Transitional Reinsurance Program is located at: <http://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/The-Transitional-Reinsurance-Program/Reinsurance-Contributions.html>.

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