

FYI[®] Alert

For Your Information[®]

Volume 37 | Issue 165 | November 17, 2014

Transitional Reinsurance Deadline Delayed

CMS has delayed the transitional reinsurance submission deadline to December 5, 2014. This delay provides plan sponsors with additional time to complete the submission.

Background

The Affordable Care Act's (ACA)'s transitional reinsurance program was designed to provide temporary funding to insurers that incur high claims costs for enrollees in the individual market both inside and outside the public marketplaces. The program is funded in part by fees assessed on insured and self-insured group health plans. Under prior guidance from the Centers for Medicare & Medicaid Services (CMS), plan sponsors had to submit covered lives data for 2014 by November 17, 2014. (See our [October 21, 2014](#) and [November 6, 2014](#) *For Your Information* publications.)

Delay in Submission Deadline

Late last Friday, CMS [announced](#) the delay in the November 17 reinsurance submission deadline to Friday, December 5. Importantly, the January 15, 2015 and November 15, 2015 payment deadlines have not changed.

Key Deadlines for 2014 Transitional Reinsurance Submissions

Date	Activity	Contribution Amount
No later than December 5, 2014	Submit enrollment count and schedule payment dates	
No later than January 15, 2015	Remit first contribution amount. The full contribution can be made in a single payment by this date	\$52.50 per covered life
No later than November 15, 2015	Remit second contribution amount	\$10.50 per covered life
	Total	\$63.00 per covered life

In Closing

With the extended deadline, some plan sponsors may want to update or correct a prior submission. Changes can be made to the submission, both before and after the new December 5th deadline. The process required depends on the type of change and the timing of the change.

Authors

Richard Stover, FSA, MAAA
Amy Reynolds, JD

Produced by the Knowledge Resource Center of Buck Consultants at Xerox

The Knowledge Resource Center is responsible for national multi-practice compliance consulting, analysis and publications, government relations, research, surveys, training, and knowledge management. For more information, please contact your account executive or email fyi@xerox.com.

You are welcome to distribute *FYI*® publications in their entirety. To manage your subscriptions, or to sign up to receive our mailings, visit our [Subscription Center](#).

This publication is for information only and does not constitute legal advice; consult with legal, tax and other advisors before applying this information to your specific situation.