

HEALTH CARE REFORM TIMELINE

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The following is a list of the Health Care Reform provisions applicable to employers, and the effective dates as of November 15, 2010. This information has been prepared for informational purposes and should not be relied upon as legal advice. For more information, please contact John Walch at jdw@aterwynne.com or 503-226-8451.

Effective Date	Provision
2010 Tax Year	Small Business Health Care Income Tax Credit
March 23, 2010	Protection Against Retaliation
March 23, 2010 (Although likely delayed until Regulations issued)	Automatic Enrollment in Health Plans of Large Employers
March 30, 2010	Tax-free Coverage of Children under age 27
June 1, 2010	Early Retiree Cost Subsidy
June 21, 2010	High Risk Pool
Plan Years beginning after September 22, 2010	Lifetime Limits on Essential Benefits Prohibited
Plan Years beginning after September 22, 2010	Annual Limits on Essential Benefits Phased-Out through 2014
Plan Years beginning after September 22, 2010 (Regulations due by 3/23/11 and distribution deadline one year after)	Four-Page Summary of Plan Benefits, Coverage, etc.
Plan Years beginning after September 22, 2010	Pre-Existing Condition Exclusions Prohibited for Children under 19
Plan Years beginning after September 22, 2010	Rescissions Prohibited
*Plan Years beginning after September 22, 2010	Coverage for Dependent Children under age 26
*Plan Years beginning after September 22, 2010	Preventive Medical Treatment
*Plan Years beginning after September 22, 2010 (regulations due by 3/23/2012)	Reporting on Quality of Care
*Plan Years beginning after September 22, 2010	Insured Plans Subject to Discrimination Testing
*Plan Years beginning after September 22, 2010	Appeals Process Revisions
*Plan Years beginning after September 22, 2010	Primary Care, Pediatric and OB/GYN Provider Designations
*Plan Years beginning after September 22, 2010	Emergency Room Treatment

Effective Date	Provision
Distributions after 2010	HSA/MSA Distribution Penalty Tax Increase
Taxable Years beginning after December 31, 2010	Over the Counter Drugs no Longer Eligible for Reimbursement
Plan Years beginning after December 31, 2010	Simple Cafeteria Plans
2012 Taxable Year	Report Health Care Costs on W-2 (Revises 2011 date in Handout)
2013 Taxable Year	Deduction for Retiree Prescription Drug Subsidy Repealed
2013 Taxable Year	Health FSA Cap Reduced to \$2,500
March 1, 2013	Notice to Employees
Plan Years beginning after December 31, 2013	Annual Limits on Essential Health Benefits Prohibited
Plan Years beginning after December 31, 2013	Pre-Existing Condition Exclusions Prohibited Regardless of Age
*Plan Years beginning after December 31, 2013	Health Insurance Premium Rating for Small Businesses
*Plan Years beginning after December 31, 2013	Guaranteed Availability of Coverage
*Plan Years beginning after December 31, 2013	Guaranteed Renewability of Coverage
*Plan Years beginning after December 31, 2013	Comprehensive Health Insurance Coverage for Small Employers
Plan Years beginning after December 31, 2013	Cost Sharing Limitations
Plan Years beginning after December 31, 2013	Provider Discrimination Prohibited
*Plan Years beginning after December 31, 2013	Coverage for Clinical Trials
Plan Years beginning after December 31, 2013	Excessive Waiting Periods Prohibited
Plan Years beginning after December 31, 2013	Limitations on Offering Health Plans through Cafeteria Plan
January 1, 2014	Health Insurance Exchanges
January 1, 2014	“Pay or Play” Large Employer Tax
January 1, 2014	Reporting Health Insurance Coverage to IRS
January 1, 2014	Employer-Paid Health Insurance Vouchers
January 1, 2018	“Cadillac” Plan Tax

Subject to Exceptions or Delayed Effective Dates for Grandfathered Plans