Kilpatrick

OCTOBER 5, 2012

ACA Reinsurance Fee

Early this year in March, HHS finalized its regulations regarding the reinsurance fee. This fee applies to all employer group health plans starting in 2014. The fee has not been established yet by HHS, but is expected to be in the range of $60-$110 per year, per covered life. The final regulations exempt stand-alone dental and vision benefits, but unfortunately do not exempt other benefits that have been traditionally exempted from the Affordable Care Act mandates. Yesterday, I filed comments with HHS on behalf of certain clients arguing for an exemption from the reinsurance fee for EAPs, wellness programs, health FSAs, prescription drug benefits and retiree-only plans. A copy of these comments can be found here: KTS Reinsurance Comments.