Kilpatrick

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Annual Limit Waiver Applications - Update

I recently talked to HHS regarding an annual limit waiver (i.e., mini-med waiver) that i filed on behalf of a client. HHS requested additional information, which is not new. But, what is new, is that one of the additional pieces of requested information is a hypothetical calculation of premiums for the next year, assuming that the plan sponsor had to raise the annual limit to $750,000. Theoretically, this sounds like good information for HHS to request. But, this information takes time to produce and is not included in any of the HHS guidance regarding the waiver application process. Anyone filing a new waiver application should include this additional information from the start, because HHS said they will request this of every applicant in the future.