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Annual Limit Waiver Update

Today, the Centers for Medicare & Medicaid Services (CMS) introduced a process for plans that have already received annual limit waivers and want to renew those waivers for plan or policy years beginning before January 1, 2014. The new guidance extends the duration of waivers that have been granted through the end of 2013, if applicants submit annual information about their plan and comply with requirements to ensure that their enrollees understand the limits of their coverage. Existing waiver recipients must apply to extend their current waiver and all extension applications must be submitted by September 22, 2011. After that date applications for an extension will no longer be considered. Any plans that have not yet applied for a waiver also must apply by September 22, 2011. Thereafter, plans will need to submit annual information at the end of the 2012 calendar year and the 2013 calendar year, but such submission appears to only be a notice filing and not a process of re-application for the waiver.
http://cciio.cms.gov/resources/files/06162011_annual_limit_guidance_2011-2012_final.pdf