

The Affordable Care Act (ACA) of 2010 was signed into law on March 23, 2010. The chart below provides an overview of the law's provisions applicable to group plans, along with the expected implementation.

Effective Date	Provision	Applies to Non-Grandfathered Plans	Applies to Grandfathered Plans
6/1/2010*	Dependent coverage to age 26	X	X
10/1/2010 (effective for plan years beginning on/after 9/23/10)	100% preventive care services	X	
	Choice of PCP/pediatrician	X	
	Direct access to ob-gyn	X	
	Limited rescissions	X	X
	No lifetime maximum on essential benefits	X	X
	No pre-existing conditions for children under 19	X	X
	Patient protection for emergency services	X	
	Restricted annual dollar limits on essential benefits	X	X
1/1/2011	Revised appeal process	X	
	Transparency disclosures	X	X
	Form W-2 reporting of value of benefits	X	X
	Increased penalty for non-qualified HSA withdrawals	X	X
2012	Medical loss rebate begins	X	X
	No reimbursement for OTC drugs on HSAs	X	X
	Summary of coverage requirement	X	X
2013	60-day notice in advance of modifications	X	X
	Cap on health FSA contributions	X	X
	Employer notification regarding exchanges	X	X
	Medicare tax increase for high-earners	X	X
	No deduction for retiree drug subsidy	X	X
2014	Maximum 90-day limit on waiting periods	X	X
	Early retirement reinsurance program ends	X	X
	Free choice vouchers	X	X
	Free rider penalty	X	X
	Increased wellness program incentives	X	X
	Limit on employee out-of-pocket expenses	X	
	MLRs based on three years of data begins	X	X
	No annual maximum on essential benefits	X	X
	No pre-existing conditions exclusions	X	X
	New rate restrictions begin	X	
	Required coverage for clinical trials for life-threatening diseases	X	
	Small employer tax credit up to 50% for two years	X	X
State-based insurance exchanges	X	N/A	

*The ACA mandates dependent coverage up to age 26 on/after Sep. 23, 2010. VBHP elected to make the change effective June 1, 2010, to prevent eligible dependents from experiencing a lapse in coverage.