Highlights of The Affordable Care Act—Timeline for Employers for Non-Grandfathered Plans (as of July 1, 2012)

**Medical Loss Ratio ("MLR") Rebates**
- Employer group health plans receiving MLR rebates must establish procedures for compliance with ERISA plan asset rules for distribution of rebates to employees and/or plan sponsors.

**Preventive Health Services for Women**
- Employer group health plans’ requirement to provide recommended preventive health services without cost-sharing is expanded to include preventive coverage for women, including coverage for contraceptives.

**Form W-2 Reporting**
- Form W-2s must include the value of group health plan benefits provided to employees.
- This applies to employers issuing 250 or more Form W-2s.

**Flexible Spending Account ("FSA") Annual Limit**
- Maximum dollar limit for an employer’s FSA plan is $2,500 annually.

**Retiree Prescription Drug Expenses**
- Employers cannot take a deduction for subsidized retiree prescription drug expenses.

**FICA Tax Increase**
- FICA tax will increase by 3.8% on certain unearned income of high-income individuals above certain thresholds.
- Retiree Prescription Drug Expenses

**Medicare Tax Increase**
- Medicare tax on wages will increase by 0.9% for high-income individuals.

**Employee Notice of Exchange**
- Employers must provide a notice to employees of availability of State Health Insurance Exchanges.

**Comparative Clinical Effectiveness Research Fees**
- For plan years ending on and after Oct. 1, 2012, and before Oct. 1, 2019, self insured group health plans and insurers must pay fees per covered life.
- Initial fee is $1 per covered life, increasing to $2 per covered life for plan years ending on and after Oct. 1, 2013 (and adjusted for later plan years).
- First possible payments are due July 1 or July 31, 2013 (depending on method of calculation).

**Preexisting Condition Exclusions**
- Employers will be required to pay an excise tax if coverage under their group health plan exceeds annual cost of $10,200 (single coverage) or $27,500 (family coverage), to be adjusted for inflation.