

## REQUIREMENTS IN AND OUTSIDE THE EXCHANGE

		Individual		Small Group <sup>1</sup>		Large Group <sup>2</sup>	
Provision	Effective Date	Inside Exchange	Outside Exchange	Inside Exchange	Outside Exchange	Outside Exchange	Self-Insured
2010 "NEAR-TERM" MARKET CHANGES							
No Pre-Existing Exclusion for Children	Plan years 6 Months after Enactment	x	x	x	x (including GF plans) <sup>3</sup>	x (including GF plans)	x (including GF plans)
Dependent Coverage to Age 26	Plan years 6 Months after Enactment	x	x (including GF plans)	x	x (including GF plans)	x (including GF plans)	x (including GF plans)
No Rescissions	Plan years 6 Months after Enactment	x	x (including GF plans)	x	x (including GF plans)	x (including GF plans)	x (including GF plans)
No Discrimination in Favor of Highly Compensated (Eligibility/Benefits)	Plan years 6 Months after Enactment	n/a	n/a	x	x	x	n/a (already subject to similar rules)
Rate Review	2010 Plan Year	x	x	x	x	x	n/a
Medical Loss Ratios	- Reporting: Plan Years 6 Months after Enactment - Rebates: Begin 1/1/11 with respect to Plan Year	x	x (including GF plans)	x	x (including GF plans)	x (including GF plans)	n/a
2014" MARKET CHANGES							
Guaranteed Issue	2014 Plan Year	x	x	x	x (including GF plans)	x	n/a
No Pre-Existing Exclusion Period	2014 Plan year	x	x	x	x (including GF plans)	x (including GF plans)	x (including GF plans)
No Waiting Periods >90 Days	2014 Plan Year	n/a	n/a	x	x (including GF plans)	x (including GF plans)	x (including GF plans)

<sup>1</sup> "Small Employer" means an employer who employed on average not more than 100 employees. In years beginning before January 1, 2016, a state may choose to define a "small employer" as one with fewer than 51 employees.

<sup>2</sup> Beginning January 1, 2014, issuers of health insurance in the large group market are not eligible to offer health plans through the Exchange. Beginning in 2017, states may allow issuers in the large group market to offer plans through the Exchange.

<sup>3</sup> A grandfathered ("GF") plan is a health benefits plan in place on the date of enactment of the PPACA, March 23, 2010. New employees and their families may enroll in such grandfathered plans. The Department of the Treasury, Department of Labor, and the Department of Health and Human Services issued interim final regulations relating to status as a grandfathered health plan under PPACA on June 14, 2010.

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Nondiscrimination Based on Health Status (Eligibility)	2014 Plan Year	x	x	x	x (including GF plans)	x (including GF plans)	x (including GF plans)
Risk Corridors	Calendar Years 2014-2016	x	Qualified Health Plans	x	Qualified Health Plans	n/a	n/a
Risk Adjustment	1/1/14	x	x (but not GF plans)	x	x (but not GF plans)	n/a	n/a
Interstate Sales Compacts	1/1/16	n/a	x	n/a	n/a	n/a	n/a
Transitional Reinsurance Program	1/1/14-12/31/16	x	x	Ineligible for reinsurance but subject to assessment	Ineligible for reinsurance but subject to assessment	Ineligible for reinsurance but subject to assessment	Ineligible for reinsurance but subject to assessment (directly through insurers and indirectly through any third party administrators)
Uniform Application of State Laws Across Market	1/1/2014	x	x	x	x	x	Retains ERISA exclusive federal regulation. State laws do not apply.
<b>PREMIUM CREDITS AND COST SHARING SUBSIDIES</b>							
Premium Credits for Individuals	1/1/2014	x	n/a	n/a	n/a	n/a	n/a
Cost Sharing Subsidies for Individuals	1/1/2014	x	n/a	n/a	n/a	n/a	n/a
Small Business Tax Credit	Taxable years beginning after 12/31/2010	n/a	n/a	x	n/a	n/a	n/a
<b>BENEFIT REQUIREMENTS</b>							
Lifetime Dollar Limits	Plan Years 6 Months after Enactment	x	x (including GF plans)	x	x (including GF plans)	x (including GF plans)	x (including GF plans)
Annual Dollar Limits	- Restricted: Plan Years 6 Months after Enactment - Prohibited: 2014 Plan Years	x	x	x	x (including GF plans)	x (including GF plans)	x (including GF plans)

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Preventive Services with No Cost-Sharing	Plan Years 6 Months after Enactment	x	x	x	x	x	x
Clinical Trials Coverage	2014 Plan Year	x	x	x	x	x	x
Essential Benefits: - Hospitalization - Ambulatory Services - Emergency Services - Maternity - Mental Health - Rx Drugs - Specified Other Services	- Exchange: 1/1/14 - Outside: 2014 Plan Year	x	x	x	x	n/a	n/a
Annual Out-of-Pocket Maximum (Limited to HDHP Levels)	- Exchange: 1/1/14 - Outside: 2014 Plan Year	x	x	x	x	x	x
Continues Application of State Benefit Mandates	- 1/1/14	n/a unless state pays the difference	x	n/a unless state pays the difference	x	x	n/a
<b>CONSUMER INFORMATION AND DISCLOSURE</b>							
Coverage and Cost Sharing Transparency and Disclosure Requirements	Plans Years 6 Months after Enactment	x	x	x	x	x	x
Uniform Summaries of Benefits/Coverage	24 Months after Enactment	x	x (including GF plans)	x	x (including GF plans)	x (including GF plans)	x (including GF plans)
Quality Reporting Requirements	HHS to Issue Requirements within 2 Years after Enactment	x	x	x	x	x	x