

# Health Care Reform Management Alert Series



## Affordable Care Act Self-Compliance Tool for Pre-2014 Changes

Issue 57

*This is the fifty-seventh issue in our series of alerts for employers on selected topics on health care reform. (Click [here](#) to access our general summary of health care reform and other issues in this series.) This series of Health Care Reform Management Alerts is designed to provide an in depth analysis of certain aspects of health care reform and how it will impact your employer-sponsored plans.*

On March 1, 2013, the Department of Labor’s Employee Benefits Security Administration (DOL) published a new self-compliance *tool* for the Affordable Care Act (“ACA”) on its website. This self-compliance tool is intended to provide an informal explanation of the ACA regulations and interpretations that apply to group health plans such as employer-sponsored plans. The self-compliance tool, however, only focuses on the provisions noted below, which are already in effect.

[ ✓ ] Applies to  
grandfathered plans

[ ✓ ] Applies to  
new health plans  
and plans that lose  
grandfathered status

- Grandfathered Status
- Dependent Coverage of Children to Age 26
- Rescission
- Prohibitions on Lifetime Limits and Restrictions on Annual Limits
- Preexisting Condition Exclusion for Individuals Under 19
- Summary of Benefits and Coverage (SBC) and Uniform Glossary
- Patient Protection Provisions
- Coverage of Preventive Services
- Internal Claims and Appeals and External Review

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While this tool does not currently include any guidance on the employer shared responsibility provisions, it does provide employers with a checklist format to help determine whether their group health plans are “grandfathered” for purposes of ACA and whether their group health plans comply with these other provisions of ACA that are already in effect.

Also, follow the Health Care Reform Team on  [@SeyfarthEBLaw](https://twitter.com/SeyfarthEBLaw)

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