

Group Health Plans: Federal Mandates Other Than COBRA & HIPAA



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What's New in the 1st Qtr. 2018 Edition

This What's New section highlights the changes made in the last quarter to *Group Health Plan Mandates*—the authoritative group health plans resource for employers, administrators, and advisors.

Also see the 1st Qtr. 2018 *Current Developments* newsletter, which can be accessed under the Bookmarks tab. The *Current Developments* newsletter summarizes important legal developments that occurred during the quarter.

Below are some highlights of the substantive changes that we made to the Outline and Appendix.

- **Medicare Part D Creditable Coverage Disclosures**

- We've supplemented our coverage of Medicare Part D disclosures with new Sample Notices—one for Creditable Coverage and another for Non-Creditable Coverage. We've also prepared a Guide to using these new sample disclosures.

- **National Medical Support Notices (NMSNs)**

- In Section V, we've updated our discussion of an employer's obligations when it receives a NMSN from a state child support enforcement agency, including how to handle problems that arise from state and federal wage withholding limitations and other issues raised by new HHS guidance. We've also refreshed our discussion of QMCSOs throughout Section V.

- **Medicare Secondary Payer (MSP) Reporting**

- We have updated Section XXIV throughout for CMS's latest version of the MSP User Guide, including discussion of guidance on the use of new Medicare Beneficiary Identifiers (MBIs) in place of the current Social Security-based number (known as the HICN) for purposes of MSP mandatory reporting.

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Substantive Changes to the Appendix:

- **Tab 2—Regulations**

- Updated TOC
- Updated Code Section
- Updated regulations

- **Tab 10—Sample Documents**

- Updated TOC
- Added new sample documents

Lots More to Come! From the feedback we've received, we know that our manuals are the premier group health plans resources in the country. But here at EBIA we're not satisfied. We are constantly striving to make the manual even better. In upcoming editions, look forward to complete coverage of all legal developments affecting federal group health plan mandates other than COBRA and HIPAA, and to our further analysis of existing law, with more examples and Q/As, etc.

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