



Federal Health Care Reform Implementation of Regulations

This Checklist is designed to help you evaluate whether plan changes under consideration may affect your plan's grandfather status. It includes the specific proposed changes which could affect grandfathering status with a link to the Plan Grandfathering Calculator to help assess the impact of changes to deductibles, copayments and out-of-pocket maximums. You may contact your **Health Plans** Account Manager for help in using the checklist and the calculation tool.

As you conduct your review, keep the following in mind:

- Once a plan has lost grandfathering status, it cannot regain it, unless a revocation is permitted (see *Compliance Bulletin, Transitional Rules on Timing*).
- Provisions mandated for non-grandfathered plans must be implemented starting with the first plan year that begins after September 23, 2010.

Company:		Plan name/Option:		Plan change effective date:
Item	Plan Feature	Amended or considering amendment after 3/23/10?	Outcome See the <i>Compliance Bulletin, What Causes A Plan to Lose Grandfathered Status</i> , for an explanation of these regulatory provisions	
1	Coinsurance – increase member's share	Yes → No	Lose grandfathered status for any increase to member's share	
2	Copayment increase (any copayment, including Rx)	Yes → No	Calculate to determine status Plan Grandfathering Calculator	
3	Deductible increase: --Single	Yes → No	Calculate to determine status Plan Grandfathering Calculator	
	--Single + 1	Yes → No		
	--Family	Yes → No		
4	Out-of-pocket maximum increase: --Single	Yes → No	Calculate to determine status Plan Grandfathering Calculator	
	--Single + 1	Yes → No		
	--Family	Yes → No		

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Company:		Plan name/Option:			Plan change effective date:
Item	Plan Feature	Amended or considering amendment after 3/23/10?	Plan provision on 3/23/10	New provision	Outcome <i>See the Compliance Bulletin, What Causes A Plan to Lose Grandfathered Status, for an explanation of these regulatory provisions</i>
5	Overall Annual Limits (OAL)	Yes → No	Overall annual limit \$ _____ Overall lifetime limit \$ _____	New overall annual limit \$ _____	Lose grandfather status for any change below: OAL added to a plan that had no overall annual limit or lifetime limits OAL added that is lower than lifetime limit on 03-23-10 OAL decreased by any amount
6	Coverage of necessary element to diagnose a particular condition	Yes → No	Diagnostic service covered:	Change:	Lose grandfather status if element necessary for diagnosis of particular condition is eliminated
7	Benefits necessary to treat a particular condition	Yes → No	Benefit covered:	Change:	Lose grandfather status if necessary element for treatment of particular condition is eliminated
8	Eliminate benefit option(s) (e.g., Option A, B, C or Standard, HDHP, etc.) and transfer members to other options	Yes → No	Current options available:	New options available:	Lose grandfather status of remaining option(s) with less coverage than option(s) eliminated
9	Reduce employer contribution toward total cost --Single --Single + 1 --Family	Yes → No Yes → No Yes → No	Current employer contribution: ____% of total cost ____% of total cost ____% of total cost	New employer contribution: ____% of total cost ____% of total cost ____% of total cost	Lose grandfather status if Employer contribution reduced more than 5% for any coverage level: single, single + one or child, family, etc.

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