



Compliance Corner

April 21, 2015

Health Care Reform

Essential Health Benefits: List of the Largest Three Small-group Products by State

On April 8, 2015, CMS issued a list of the largest three small-group products by state, as well as a listing of the three largest nationally available Federal Employee Health Benefit Program (FEHBP) plans, based on enrollment in the first quarter of 2014.

[Continue reading »](#)

IRS Releases Publication 5215: Responsibilities for Health Coverage Providers

On April 15, 2015, the IRS released Publication 5215, which is primarily directed at small self-insured employers and health insurance carriers. As background, under PPACA entities that provide health insurance coverage to individuals are required (under IRC Section 6055) to report that coverage to the IRS and to the individual. Publication 5215 is a two-page document that provides general information aimed at

Announcements

Register for Our May Benefits Compliance Webinar Series

NFP Benefits Compliance is hosting a series of webinars in May.

[Continue reading »](#)

FAQ

Employer mandate reporting does not actually happen until 2016. What should employers be doing in 2015 in preparation for their reporting obligations?

[Read the Answer »](#)

State Updates

 [Arkansas Read Update »](#)

 [Louisiana Read Update »](#)

helping small employers and other affected entities understand the Section 6055 reporting requirements.

[Continue reading »](#)

Federal Updates

EEOC Publishes Proposed Rule on Employer Wellness Programs

On April 16, 2015, the EEOC released a proposed rule and interpretive guidance on the manner in which an employer's wellness program may comply with Title I of the Americans with Disabilities Act (ADA). Importantly, the rule and guidance do not address the manner in which Title II of GINA governs incentives contained within a participatory wellness program. The EEOC will address this issue in future rulemaking.

[Continue reading »](#)

DOL Proposes Regulations Regarding Definition of Fiduciary; Conflict of Interest Rule

On April 14, 2015, the DOL released a proposed regulation that would amend the definition of "fiduciary" by creating a new Conflict of Interest Rule. This regulation broadens the definition of fiduciary under ERISA by recognizing more forms of investment advice than are recognized under existing ERISA regulations. The regulation also identifies the circumstances which would render the person providing investment advice a fiduciary.

[Continue reading »](#)

CMS Issues Medicare Part D Benefit Parameters for 2016

On April 6, 2015, CMS issued an announcement and press release relating to Medicare Part D benefit parameters for 2016. As background, employer plan

 [Maine
Read Update »](#)

 [Montana
Read Update »](#)

 [Nebraska
Read Update »](#)

 [South Dakota
Read Update »](#)

 [Texas
Read Update »](#)

 [Utah
Read Update »](#)

 [Washington
Read Update »](#)

 [West Virginia
Read Update »](#)

Reference

[Commonly Used Acronyms
Glossary »](#)

sponsors that offer prescription drug coverage to Part D-eligible individuals must disclose to those individuals and to CMS whether the prescription plan coverage is creditable (as compared to Part D coverage).

[Continue reading »](#)

EEOC Releases Informal Discussion Letter Addressing ADEA Implications of Paying Employees' Medicare Premiums

The EEOC recently released an informal discussion letter written Dec. 22, 2014 in response to an inquiry from a member of the public. The letter of inquiry was written regarding health insurance options for Medicare-eligible employees.

[Continue reading »](#)