

Affordable Care Act (ACA) Large Employer Checklist

Plan Year Effective Date of Provision	Provision Requirement – Ongoing	Details	Completed
9/23/12	Summary of Benefit and Coverage SBC	Provide employees with Summary of Benefits and Coverage document at open enrollment, upon hire or upon request	
10/1/13	Exchange Notice	Provide Exchange Notice to all new hires	
1/1/14	COBRA Language Update	COBRA notices must include language regarding public Exchange as an alternate marketplace to purchase coverage	
1/1/14	Waiting Period	Limit waiting period for new FT employees to 90 days	
1/1/14	Enforcement of Individual Mandate	All individuals must have coverage – Carrier will provide Form 1095-B to document those covered by employer plan	
1/1/15	Enforcement of Employer Mandate	Determine full time status of employees based on working 30 hours per week (130 hours per month) and offer minimum essential coverage	
1/1/15	Affordability Test	Confirm that employee contributions meet the guidelines	
1/1/15	Minimum Value Test	Confirm that employer plan offered is affordable and of minimum value (See guidelines for affordability safe harbor)	
1/1/16	Reporting offer of minimum essential coverage	Provide Form 1095-C to each employee regarding “Offer of Coverage” and report to IRS on 1094-C	
1/1/18	Cadillac Tax	40% Excise tax imposed on plans on high-cost employer sponsored coverage (Guidance in development stages by IRS)	