



October 31, 2016

## **Final Year of Transitional Reinsurance Fee Program - Action Required for Self-Insured Health Plans**

November 15, 2016 marks the deadline for “contributing entities” to submit the 2016 [ACA Transitional Reinsurance Program Annual Enrollment and Contributions Submission Form](#), required by the Centers for Medicare & Medicaid Services (CMS) to facilitate payment of the [Transitional Reinsurance Program \(TRP\)](#) contribution (fee). Plans will make final contributions in 2017 for the 2016 year.

Contributing entities responsible for TRP payments include insurers for fully insured major medical plans and the plan (sponsor) for self-insured major medical plans, although a third party administrator (TPA) or administrative service only (ASO) contractor may transfer the contribution payments on behalf of the contributing entity. Plan sponsors should discuss the TRP fee with their TPA to determine if the TPA will assist with any of the steps required to complete the TRP payment. Ultimately, the TRP process and payment is likely best handled by the sponsor’s internal accounting and financial departments. Note that certain self-insured health plans that do not use a TPA for administrative functions such as plan enrollment, claim adjudication or claim processing may be excluded from the TRP fee for the 2015 and 2016 years.

CMS has published the following schedule of key dates for the 2016 TRP payment:

Date	Activity	Contribution Amount
<b>To Make a Full Contribution in One Payment (Combined Collection) for the 2016 BY:</b>		
File no later than November 15, 2016	Submit the Form and schedule payment	
Remit no later than January 17, 2017	Pay full contribution amount due (one payment)	<b>\$27.00</b> per covered life
	<b>TOTAL</b>	<b>\$27.00</b>
<b>OR</b>		
<b>To Make a Full Contribution in Two Payments (First and Second Collection) for the 2016 BY:</b>		
File no later than November 15, 2016	Submit the Form and schedule payment of first collection contribution and duplicate the Form and schedule payment of second collection	
Remit no later than January 17, 2017	Pay first contribution amount due	<b>\$21.60</b> per covered life
Remit no later than November 15, 2017	Pay second contribution amount due	<b>\$5.40</b> per covered life
	<b>TOTAL</b>	<b>\$27.00</b>

CMS has also created the [Quick Start Guide to the 2016 Transitional Reinsurance Form](#) to assist contributing entities with the TRP contribution submission process. Several resources are also available on [www.regtap.info](http://www.regtap.info), including job aides for the file layout and submission of "supporting documentation," as well as a web based training for completing and submitting the annual enrollment count and contribution form.

Should you have questions about this or any aspect of healthcare reform, contact your Conner Strong & Buckelew account representative toll free at 1-877-861-3220. For a complete list of Legislative Updates issued by Conner Strong & Buckelew, visit our online [Resource Center](#).



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