

Updated Timeline of Highlights for Employer Group Health Plan Compliance with the Affordable Care Act

by Joan A. Disler, Michelle Capezza, and Gretchen Harders

October 2014

Since enactment of the Affordable Care Act (“ACA”), the regulators have promulgated a myriad of regulations implementing the ACA’s requirements for group health plans. Over the past several years, the Obama administration has delayed many different elements of the ACA’s requirements, in large part, to give the regulators sufficient time to promulgate guidance. As the employer shared responsibility penalties become a reality for employers with plan years beginning on and after January 1, 2015, we have updated our timeline for employer group health plans to assist employers in staying current with the ACA’s requirements and deadlines. The updated timeline can be found on the next page of this Client Alert.

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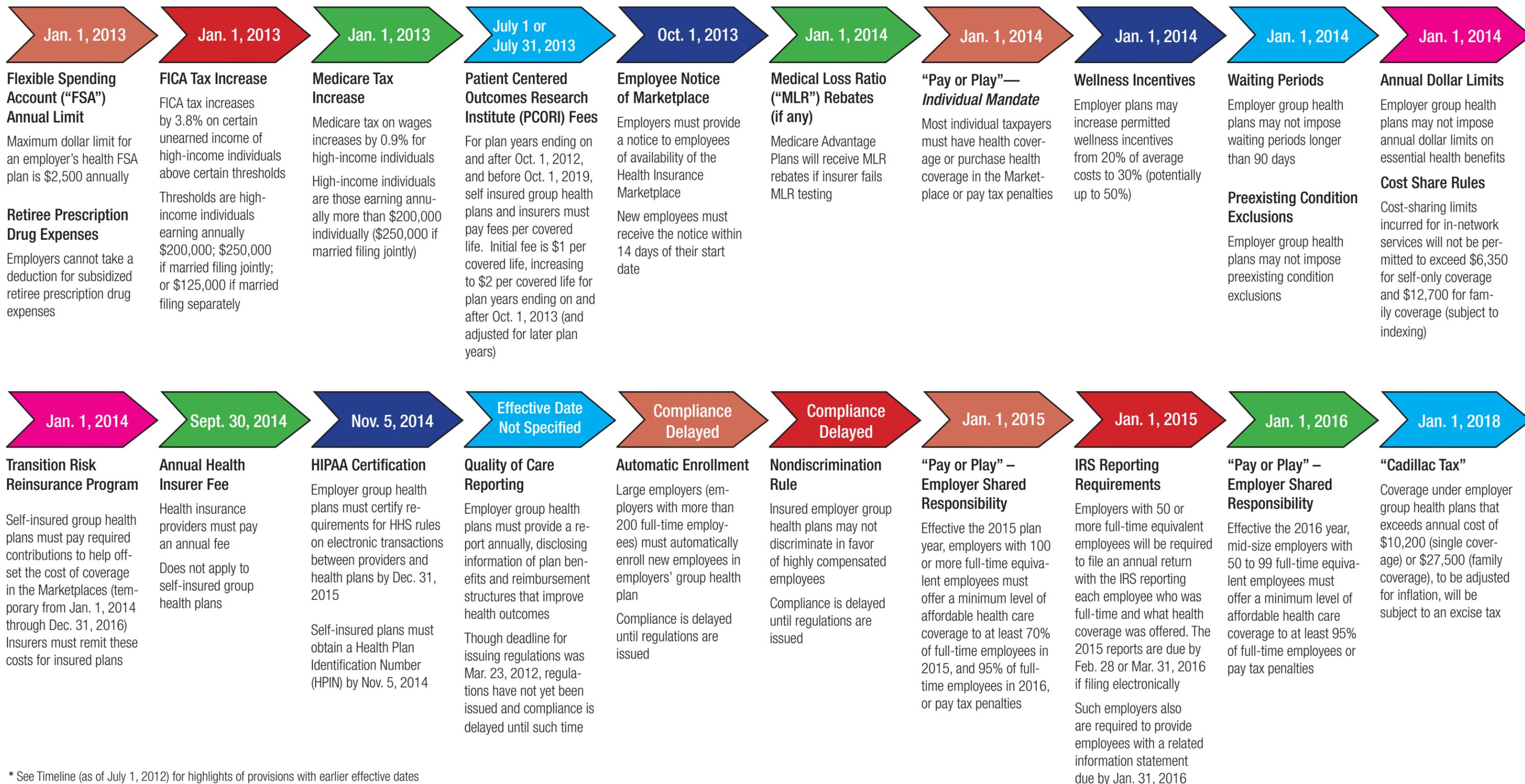
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Highlights of The Affordable Care Act—Timeline for Employers of Non-Grandfathered Plans (as of September 1, 2014)*



* See Timeline (as of July 1, 2012) for highlights of provisions with earlier effective dates

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