

U.S. CHAMBER OF COMMERCE'S OVERVIEW OF HEALTH CARE REGULATORY WORK

The US Chamber of Commerce has submitted 20 comment letters in response to 7 Interim Final Rule (IFRs), 1 Amended Interim Final Rule, 8 Requests for Comments (RFCs), 1 Proposed Rule, and 2 Request for Information (RFI).

1. Medical Loss Ratio (RFI)
2. Adult Child Coverage*
3. Grandfathered Plan Status*
4. Preexisting Condition Exclusion, Lifetime & Annual Limits, Rescissions, Patient Protections*
5. Preventive Services Coverage
6. Internal Claims & Appeals and External Review Processes*
7. Preexisting Condition Insurance Plan (PCIP)
8. 1099 Reporting Requirements
9. Planning and Establishment of State-level Exchanges
10. National Quality Plan
11. Non-Discrimination in Favor of Highly Compensated Individuals*
12. Essential Health Benefits (IOM Study)
13. Amended IFR on Grandfathered Plan Status
14. Guidance on OTC Medicine & Definition of Medical Expenses*
15. Development of Health Risk Assessment Guidance
16. Medical Loss Ratio Requirements
17. Rate Increase Disclosure and Review
18. Value Based Insurance Design in connection with Preventive Care Benefits
19. Planning and Establishment of Consumer Operated & Oriented Plan Programs
20. Timing of the Application of Non-Discrimination Provisions Applicable to Insured Group Plans

The three Departments involved – Health and Human Services, Labor and Treasury - have also issued numerous pieces of sub-regulatory guidance in the form of Technical Releases, Notices, Frequently Asked Questions, and Model Notice Language Samples. Other materials have been posted on the Healthcare.gov website “explaining the new rules under the Affordable Care Act.”

* The Departments have issued numerous pieces of sub-regulatory guidance¹ that have substantially changed portions of the previously issued regulations (indicated by an asterisk) addressing some of the concerns that the Chamber highlighted in our comment letters and making important and positive changes and clarifications.

For more information, please contact:

Katie Mahoney, Director, Health Care Regulations kmahoney@uschamber.com

¹ Many of these sub-regulatory guidance materials have been issued by the Departments in the form of “Frequently Asked Questions” with one recently issued as an Amendment to the Interim Final Regulation.