



## ACA Update Memo

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To: All Participating Banks

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### Federal Exchange Notices and Minimum Value Plans

Advantage Health Plans Trust has received numerous phone calls and emails from the member banks about parts of the ACA that are slated for implementation in 2014. The purpose of this memo is to outline information about the Exchange Notices and the Minimum Value Plan.

**Exchange Notices.** We are currently waiting for further direction from HHS on the Exchanges, which are scheduled to begin enrollment on October 1, 2013. The **Exchange Notice**, mandated by HHS to be provided to all of your employees, is required to be provided by October 1, 2013. Both Oklahoma and Texas opted to not set up state exchanges, so the Federal government is setting up an exchange in each state. The Notice includes information about the non-existent exchanges, so the Notice will elicit questions that no one is currently able to answer. It will be provided to you as soon as we receive information as to how the exchanges will work in the states where there is only a Federally-run exchange.

**Minimum Value Plan.** Advantage Health Plans is creating a plan that will meet the standards for "**Minimum Value**" as defined by HHS regarding coverage and cost. This new plan will not need to be in place until July 2015, as AHPT is a fiscal year Plan. However, the new plan may be available sooner, based on direction provided by HHS, information about the Federal Exchange, and feedback from our members. The *Minimum Value* plan will be available to all participating member banks, and it will not affect the plans you are currently offering. It will be designed to ensure that your bank meets its obligation to offer *affordable* coverage.

If your bank has over 50 full time employees or full time equivalents, you are subject to penalties if you fail to offer a *Minimum Value*, affordable plan. However, because of the delay, you **will NOT** be subject to the "pay or play" taxes, even if an employee enrolls in a Federal Exchange plan or receives subsidies. The pay or plan tax has been delayed until **2015**.

I would encourage you to attend the **2013 Annual Member Group Meeting** to learn more information about the Minimum Value plan and the Federal Exchanges. The Annual Member Group Meeting is on September 11, 2013, for Oklahoma banks and on October 3, 2013, for Texas banks.

If you have further questions and concerns specific to your bank, please call your account manager.

Sincerely,

Maria Robles Meyers  
Legal Counsel  
Advantage Health Plans Trust