The Jefferson Health Plan

Jefferson HEALTH PLAN

The latest JHP news and announcements

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State Employee Relations Board (SERB) Survey Time

JHP Account Managers (Jen, Kristin, Michelle and Susan) are again offering to complete your group's insurance survey, on your behalf, and submit it to SERB by the March deadline.

The SERB 2024 Health Insurance Survey email from Justin Brown should have been emailed directly to you. If you wish for the AMs to complete your survey, please forward the entire email to: ihpemployer@thejeffersonhealthplan.org. We will send confirmation and follow-up soon with a request for any information JHP does not have and is needed to complete the survey.

We ask that you let us know by Friday, February 2, 2024 if you want us to complete your survey. This gives the AMs time to gather the required information to complete the survey by the March deadline.





JHP Semi-Annual Meeting Wednesday, April 24, 2024 Quest Center – Columbus More information coming soon!

Financial Update

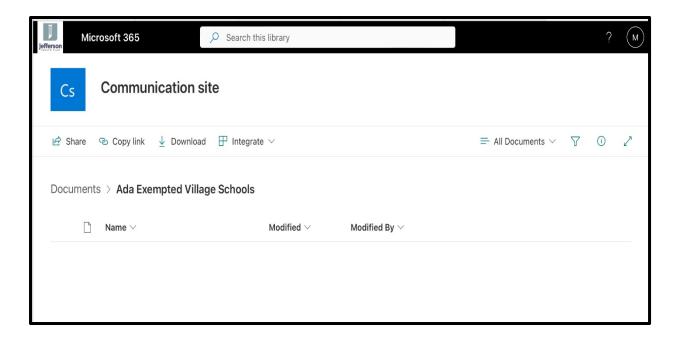


Over the next month, JHP will be converting the way that member groups access their monthly financial statements. Under the current arrangement, monthly financial statements are saved on a ShareFile site hosted by CLA (formerly GJM). Users received an email when new files were uploaded to the ShareFile site.

With the conversion, the files will now be on a JHP hosted SharePoint site. This will allow JHP to better manage the files stored for each member. To start, historical financial statements will be moved from the previous site to the new SharePoint site. Future monthly financial statements will be uploaded when they have been released. In the future, the monthly invoices will also be available via JHP SharePoint.

Watch your email for contact from JHP to set up your access to the new JHP SharePoint site.

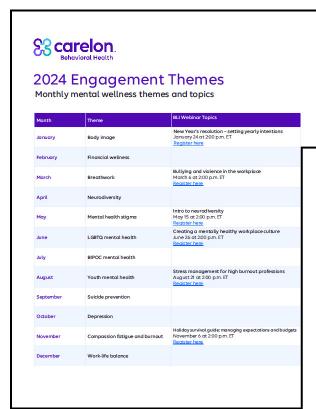
Here is what the new site will look like:





Account Management Update







Carelon has announced the 2024 Engagement Themes and 2024 Work/Life Seminars. Remember, JHP provides the Carelon Employee Assistance Program (EAP) at no cost to eligible members and their employees. Contact your JHP Account Manager for more information.



Legal Update



Form W-2 Reporting of Employer-Sponsored Health Coverage

The Affordable Care Act requires employers to report the cost of coverage under an employer-sponsored group health plan on an employee's Form W-2, Wage and Tax Statement, in Box 12, using Code DD. The reporting requirement currently applies only to employers who filed 250 or more eligible employee W-2 Forms in the preceding calendar year. Employers are

required to provide the information by January 31, 2024. The reporting requirement remains optional for employers issuing fewer than 250 W2 forms. Additional information is at the IRS website at: https://www.irs.gov/affordable-care-act/form-w-2-reporting-of-employer-sponsored-health-coverage (IRS page last reviewed or updated March 1, 2023).



CMS Medicare Part D Disclosure for Calendar Year Plans

The Medicare Modernization Act (MMA) requires employers whose health plans provide prescription drug coverage to notify Medicare-eligible individuals whether their prescription drug coverage is creditable coverage, which means that the coverage is expected to pay on average as much as the

standard Medicare prescription drug coverage. The Centers for Medicare and Medicaid Services (CMS) has imposed two disclosure requirements on employers with health plans that provide prescription drug coverage to Medicare-eligible individuals, and one of which is for such employers to complete the Online Disclosure to CMS Form to report the creditable coverage status of their prescription drug plan. More specifically, the Medicare Part D disclosure notice must be provided within the following time frames:

- · Within 60 days after the first day of the plan year (this is February 29, 2024 for calendar-year plans);
- Within thirty (30) days after any change in the prescription drug plan's coverage status (from creditable to non-creditable or vice versa); and
- · Within thirty (30) days after the termination of a plan's prescription drug coverage.

Therefore, Calendar year plans must submit this year's disclosure to CMS by February 29, 2024. Employers are required to complete the online Disclosure to CMS Form (https://www.cms.gov/Medicare/PrescriptionDrug-Coverage/CreditableCoverage/CCDisclosureForm) on the CMS Creditable Coverage web page. No other filing methods are allowed. The CMS Guidance and Screen Prints for the electronic filing can be found to the left of the fields of entry. When reviewing the screen print examples, please note that some sections of the Disclosure Form may not apply to your plan. Only fields relevant to your plan may appear on your screen. Also note that Total Number of Medicare Part D Eligible Individuals covered as of Plan Year Beginning Date can be acquired from your TPA.

Legal Update continued . . .

No Surprises Act Update – Posting of Machine-Readable Files

Effective July 1, 2022, employers offering group health plans to their employees must begin complying with the federal No Surprises Act Transparency in Coverage (TiC) Rule requiring employers to create machine-readable files (MRFs). The MRFs must contain negotiated rate information for healthcare services that are provided innetwork as well as allowed amounts for services derived from historical claims from out-of-network providers. Employers were required to make these MRFs available through a publicly available website beginning July 1, 2022.

In August 2021, the Department of Labor (DOL), the Internal Revenue Service (IRS), and the Department of Health and Human Services (HHS) issued FAQ Part 49 which indefinitely delayed the enforcement of the "Prescription Drug" MRFs requirement, pending further rulemaking. Enforcement of the "Prescription Drug" MRF requirement has remained suspended until the recent issuance of Frequently Asked Questions About Affordable Care Act Implementation Part 61 (FAQ 61), which was issued on September 27, 2023 by the Departments. FAQ 61 addressed the implementation of the TiC regulations and overlapping transparency provisions in the Consolidated Appropriations Act, 2021 (CAA, 2021). Under this new guidance, the Departments lifted the pause on the Prescription Drug MRFs requirement. The Departments stated that no "meaningful conflict" existed between the TiC regulations and the RxDC reporting requirements under CAA 2021, and that a "case-by-case enforcement approach" will be utilized in place of general deferred enforcement. Additionally, the Departments intend to issue further guidance, including "technical requirements" and an "implementation timeline."

Since the adoption of the No Surprises Act, the Jefferson Health Plan has remained in contact with the various third-party administrators (TPAs) and Pharmacy Benefit Managers (PBMs) utilized by JHP members to ensure that the necessary information is being created for member compliance with the TiC Rules. Most of the TPAs utilized by JHP members have created a website link where the MRFs can be accessed with the MRFs updated on a monthly basis as required by the TiC Rule. This link supplied by the TPA can then be posted on the employer's website for the employer to comply with the TiC Rule. PBMs also will provide a link for the prescription drug MRFs that JHP members can post along with the medical MRF links.

If you have not received yet instructions from your TPA and/or PBM about posting MRFs or a website link where the MRFs will be available, please contact your TPA and/or PBM for further information. Likewise, if your TPA/PBM already has provided information and instructions about accessing MRFs, but you have not yet added the link(s) (or medical and prescription drug MRFs) to the employer's website, please add this information to the website now to ensure compliance.

As another way to reach out to current JHP groups and communicate issues that directly impact our members, we will be providing updates on what is happening in the consortium.

If you have items that you would like to see in these updates, feel free to let us know! Email: jhpemployer@thejeffersonhealthplan.org



Kevin Kerr, Sales & Marketing Specialist

Kevin started with the JHP in September 2023. Prior to his start with JHP, he spent 16 years in public education and 15 years in the insurance industry. In his spare time, he enjoys reading, doing home improvement projects and spending time with his kids. He and his fiancée Jennifer are looking forward to their wedding on February 16th. They have 7 kids and 5 grandkids between them.



JHP Service Contacts

Billing	billing@thejeffersonhealthplan.org
Broker with Questions	<u>broker@thejeffersonhealthplan.org</u>
Employee with Questions (Wellness & EAP)	jhpmember@thejeffersonhealthplan.org
Employer with Questions	ihpemployer@thejeffersonhealthplan.org
Investment (US Bank/ Audit)	invest@thejeffersonhealthplan.org
Legal and Compliance	<u>legal@thejeffersonhealthplan.org</u>
Life Insurance	lifeinsurance@thejeffersonhealthplan.org
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Don't know who to contact? Reach out to any JHP ACCOUNT MANAGER!



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