

Publications

Departments Issue Proposed Rule on Expatriate Coverage, Excepted Benefits, Lifetime and Annual Limits, and Short-Term, Limited Duration Insurance

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On June 10, 2016, the Departments of Health and Human Services, Treasury, and Labor (collectively, “Departments”) published a proposed rule (“Proposed Rule”) that primarily provides guidance on the Expatriate Health Coverage Clarification Act (“EHCCA”), which was signed into law on December 16, 2014. In addition, through the Proposed Rule, the Departments provide additional guidance or seek comment on a host of other issues, such as excepted benefits, lifetime and annual limits, and short-term, limited duration insurance.

The Proposed Rule is generally effective for plan or policy years beginning on or after January 1, 2017 and can be relied upon pending the applicability date of the final rule. If the final rule is more restrictive than the Proposed Rule, the final rule will not have retroactive effect. In the attached memo, we highlight the major provisions of the Proposed Rule.

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