

Publications

Update: Embedded MOOP Requirement Applies to Large Group and Self-Funded Plans

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Groom Law Group published a client alert on May 20, 2015 describing informal guidance from the Department of Labor (DOL) and the Department of Health and Human Services (HHS) applying an embedded maximum out-of-pocket limit (embedded MOOP) on individuals enrolled in family coverage. At that time, there remained open questions regarding whether the embedded MOOP requirement would be limited to insurance in the individual and small group markets or whether such requirement would also be applied to insured coverage in the large group market, as well as self-funded plans.

On May 26, 2015, the DOL, HHS, and the Department of Treasury (Departments), issued guidance clarifying the embedded MOOP requirement applies to insured coverage in the large group market as well as to self-funded plans (May 26thGuidance). Please see the attached memo for further information.

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