

# Brief Notes

News for  
Brokers and Consultants

October 20, 2015

**Applies to:** All non-grandfathered/non-retiree only plans in the Individual, Small and Large Group markets

## Changes to Maximum Out-of-Pocket (MOOP) Limits in 2016

The Affordable Care Act (ACA) payment notice requires that Individual (self-only) Maximum-Out-of-Pocket (MOOP) on cost sharing apply to every member in a non-grandfathered/non-retiree only plan, regardless of contract type. This means that beginning **January 1, 2016** for the Small Group market and **upon renewal** for any Large Group that is subject to the mandate, the Individual MOOP applies to each and every member who is enrolled under a Family, Two Adults or Parent and Child contract under a group health plan.

The new MOOP limits for fully insured and self-insured, non-grandfathered/non-retiree only plans are:

Contract Type	2016 Non-Health Saving Account (non-HSA) Plans	2016 High-Deductible Health Plan (HSA)
Individual	\$6,850	\$6,550
Family	\$13,700	\$13,100

For example, a family contract for a non-HSA plan with a \$13,700 MOOP cannot have cost sharing that exceeds \$6,850 for any individual enrollee on the contract.

This requirement will impact plans that impose an overall family MOOP that does not consist of an embedded maximum limitation for any individual on that family coverage (generally known as a *True Family Aggregate*). By embedding the MOOP:

- All eligible medical expenses will be reimbursed at 100 percent for an individual under a family contract who reaches the individual MOOP, regardless of whether the family MOOP has been met. This is generally known as the *Aggregate Model*.
- Once the family MOOP is met, the plan must pay 100 percent of all eligible medical expenses for every covered person regardless of how much each person has accumulated in MOOP expenses.

Horizon Blue Cross Blue Shield of New Jersey is on track to meet full compliance with this new requirement. Group administrators of impacted groups will receive an email outlining this information.

If you have questions, please contact your Horizon BCBSNJ sales executive or account manager.

