

2020 Program Agreement Changes

GIB – Item 5A

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Office of Strategic Health Policy





Action Needed

ETF recommends the Group Insurance Board (Board) approve the proposed minor changes to the *State of Wisconsin Group Health Insurance Program Agreement* (Agreement) for plan year 2020, including revisions to language for clarity, consistency, or improved administration.

Previously Approved Changes



Additional Proposed Revisions

- **1095-B Issuance Notification**

- Clarified federally required 1095-B forms are not required for Medicare plans
- Medicare plans exempt from annual deliverable requirement to notify ETF of 1095-B mailing dates

- **Vision Services**

- Added clarifying language to Uniform Benefits for the appropriate application of deductible and copayments for vision services

Additional Proposed Revisions

- **Audit and Other Services**

- Clarifies health plan exemption from annual SOC 1, Type 2 audit report provision outlined in the Department Terms and Conditions (DTCs)

- **Information Systems Security Audit**

- Audit requirement outlined in the DTCs
- Provides annual assurance that contracted health plans have adequate information security policies and protocol in place
- Newly added Program Agreement language clarifies health plan-specific documentation requirements, is complementary to DTCs

IRS Notice 2019-45

- Published in mid-July
- Expands the service set health plan members can receive as covered before a deductible is met for a Health Savings Account (HSA)-qualified high deductible health plan (HDHP)
- No immediate impact to ETF members
 - Does not require benefits be made without a deductible
 - Does not require plan design changes
 - Does not impact how members receive benefits currently

IRS Notice 2019-45

- Late publication date prohibitive to implementation for plan year 2020
 - Published after health plan negotiations and submission of best and final premium bids
 - Does not provide adequate time for health plan and vendor partners to implement code changes before start of new plan year
- ETF does not recommend implementing for plan year 2020
- Will be reconsidered as part of annual change cycle for plan year 2021



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Questions?