Preventive Services Mandated for Non-grandfathered Plans Under the PPACA

The Patient Protection and Affordable Care Act (PPACA) mandates that non-grandfathered health care plans provide Preventative Coverage with no cost sharing (deductible, co-pay or coinsurance) as of the first day of the plan year beginning after September 23rd 2010. A current list of coverage which must be added by non-grandfathered plans is outlined in Attachments A, B, C, D & E of this letter. HSS has indicated that this list of services will be updated from time to time as recommendations change.

The list of services is extensive and even if you had opted out of the Mental Health Parity and Addiction Equity Act, the Preventative coverage mandates which involve counseling will prevail.

We believe these mandated coverage’s will add significant costs to a non-grandfathered plan based upon the fact that there is no cost to the plan participant. You may want to consider the potential cost of this mandate when determining whether or not you will maintain grandfather status, through your next plan year renewal. We anticipate that the insurance industry will have credible experience available to better project the additional cost of adding preventive coverage in future plan years. This data will help us to determine the cost of these procedures for your plan in the future, as you continue to assess if it is feasible from a cost perspective to try to maintain your plan’s grandfather status.

The list of mandated preventive items is separated into the following major categories:

- Grade A and B Recommendations of the United States Preventive Services Task Force
- Recommended Immunizations
- Recommended Preventive Pediatric Care
- SACHDNC Recommended Uniform Screening Panel – Core Conditions
- SACHDNC Recommended Uniform Screening Panel – Secondary Conditions

[SACHDNC stands for Secretary’s Advisory Committee on Heritable Diseases in Newborns and Children]

When reviewing these listings please bear in mind they are simply a listing of preventive services. For more detailed information please access the publication “The Affordable Care Act’s New Rules on Preventive Care and You”. This publication can be found at the following web address [http://www.healthcare.gov/law/about/provisions/services/index.html]. Also HHS has advised that items may be added to the mandated services after the publication of this initial listing and non-grandfathered plans will need to add the new services as of the first day of the new plan year following one year after the date the new service was added.

Disclaimer:

IMPORTANT: This document is designed to provide an overview of grandfathered plan status in the new health reform law. It does NOT attempt to cover all of the law’s provisions and should NOT be used as legal advice for implementation activities.
ATTACHMENT A

Grade A and B Recommendations of the United States Preventive Services Task Force

- Screening for abdominal aortic aneurysm
- Counseling to reduce alcohol misuse
- Screening for anemia
- Aspirin to prevent CVD in Men
- Aspirin to prevent CVD in Women
- Screening for bacteriuria
- Screening for blood pressure
- Counseling for BRCA screening
- Screening for breast cancer
- Chemoprevention of breast cancer
- Counseling for breast feeding
- Screening for cervical cancer
- Screening for chlamydial infection – non-pregnant women
- Screening for chlamydial infection – pregnant women
- Screening for cholesterol – men 35 & over
- Screening for cholesterol – men under 35
- Screening for cholesterol – women 45 & over
- Screening for cholesterol – Women under 45
- Screening for colorectal cancer
- Chemoprevention of dental caries
- Screening for depression - adults
- Screening for depression – adolescents
- Screening for diabetes
- Counseling for diet
- Supplementation with folic acid
- Screening for gonorrhea – women
- Prophylactic medication for gonorrhea – newborns
- Screening for hearing loss
- Screening for hemoglobinopathies
- Screening for hepatits B
- Screening for HIV
- Screening for congenital hypothyroidism
- Iron supplementation for children
- Screening and counseling for obesity – adults
- Screening and counseling for obesity – children
- Screening for osteoporosis
- Screening for PKU
- Screening for RH incompatibility – 1st pregnancy visit
- Screening for RH incompatibility – 24 to 28 weeks gestation
- Counseling for STIs
- Counseling for tobacco use – adults
- Counseling for tobacco use – pregnant women
- Screening for syphilis – non-pregnant persons
- Screening for syphilis – pregnant women
- Screening for visual acuity in children

List as of July 16, 2010
ATTACHMENT B

Recommended Immunizations

Compilation of vaccines on all required schedules:

- Hepatitis B
- Rotavirus
- Diphtheria
- Tetanus
- Pertussis
- Haemophilus influenzae Type b
- Pneumococcal
- Inactivated Poliovirus
- Influenza
- Measles
- Mumps
- Rubella
- Varicella
- Hepatitis A
- Meningococcal
- Human Papillomavirus
- Zoster

List as of July 16, 2010
ATTACHMENT C

Recommendations for Preventive Pediatric Care

- History
  - Initial
  - Interval
- Measurements
  - Length
  - Height
  - Weight
  - Head
- Circumference
  - Weight for Length
  - Body Mass Index
  - Blood Pressure
- Sensory Screening
  - Vision
  - Hearing
- Developmental/Behavioral Assessment
  - Developmental Screening
  - Autism Screening
  - Developmental Surveillance
  - Psychosocial/Behavioral Assessment
  - Alcohol and Drug Use Assessment
- Physician Examination
- Procedures
  - Newborn Metabolic/Hemoglobin Screening
  - Immunization
  - Hematocrit for Hemoglobin
  - Lead Screening
  - Tuberculin Test
  - Dyslipidemia Screening
  - STI Screening
  - Cervical Dysplasia Screening
- Oral Health
- Anticipatory Guidance

List as of July 16, 2010
ATTACHMENT D

SACHDNC Recommended Uniform Screening Panel

Core Conditions

- Propionic academia
- Methymalonic academia (methylmalonyl-CoA mutase)
- Methymalonic academia (cobalamin disorders)
- Isovaleric academia
- 3-Methylcrotonyl – CoA carboxylase deficiency
- 3-Hydroxy -3-methylglutaric aciduria
- Holocarboxylase synthase deficiency
- β –Ketothiolase deficiency
- Glutaric academia type I
- Carnitine uptake defect/carnitine transport defect
- Medium – chain acyl-CoA dehydrogenase deficiency
- Very long – chain acyl-CoA dehydrogenase deficiency
- Long – chain L-3 hydroxyacyl-CoA dehydrogenase deficiency
- Trifunctional protein deficiency
- Argininosuccinic aciduria
- Citrullinemia, type I
- Maple syrup urine disease
- Homocystinuria
- Classic phenylketonuria
- Tryosinemia, type I
- Primary congenital hypothyroidism
- Congenital adrenal hyperplasia
- S,S disease (Sickle cell anemia)
- S, βeta-thalassemia
- S,C disease
- Biotinidase deficiency
- Classic galactodemia
- Severe Combined Immunodeficiences
- Cystic fibrosis
- Hearing loss

List as of July 16, 2010
ATTACHMENT E

SACHDNC Recommended Uniform Screening Panel

Secondary Conditions

- Methylmalonic academia with homocystinuria
- Malonic academia
- Isobutyrylglycinuria
- 2-Methylbutyrylglycinuria
- 3-Methylglutaconic aciduria
- 2-Methyl-3-hydroxybutric aciduria
- Short-chain acyl-CoA dehydrogenase deficiency
- Medium/short-chain L-3-hydroxyacyl-CoA dehydrogenase deficiency
- Glutaric academia type II
- Medium-chain ketoacyl-CoA
- 2,4 Dienoyl-CoA reductase deficiency
- Carnitine palmitoyltransferase type I deficiency
- Carnitine palmitoyltransferase type II deficiency
- Carintine acylcarnitine translocase deficiency
- Argentinemia
- Citrullinemia, type II
- Hypermethioninemia
- Benign hyperphenylalaninemia
- Biopterin defect in cofactor biosynthesis
- Biopterin defect in cofactor regeneration
- Tyrosinemia, type II
- Tyrosinemia, type III
- Various other hemoglobinopathies
- Galactepimerase deficiency
- Galactokinase deficiency
- T-cell related lymphocyte deficiencies

List as of July 16, 2010