

**Overview of Act 48 Implementation Milestones: 2011-2017**  
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*January 7, 2014*

**May 26, 2011 - Act 48 enacted**

Governor Shumlin signs into law Act 48 (H.202), An act relating to a universal and unified health system, which includes:

- Creating framework for the Vermont Health Benefit Exchange
- Creating framework for Green Mountain Care (GMC)
- Creating the Green Mountain Care Board
- Establishing preconditions for Green Mountain Care implementation

**January 17, 2012 - Exchange integration report submitted**

Director of Health Care Reform submits Act 48 Integration Report: The Exchange, as required by Sec. 8(a)(1) of Act 48. Report includes:

- Addressing the Basic Health Program (an option under the ACA)
- Recommending against allowing individual and small group plans to be sold outside the Exchange
- Recommending defining a “small employer” as an employer with 100 or fewer employees
- Considerations for design of Exchange common benefit package (but not benefit package itself)

**January 17, 2012 - Green Mountain Care integration report**

Director of Health Care Reform submits Act 48 Integration Report: Green Mountain Care, as required by Sec. 8(a)(2). Report includes:

- Recommending providing for a supplemental insurance market when GMC is implemented; the design “should follow the design of the [GMC] benefit package”
- Recommending that GMC coverage for out-of-state adult children up to age 26 “should be provided using similar parameters as under current law,” with the benefit structure determined as part of the benefit determination
- Discussion of financial reserve requirement or reinsurance mechanism in GMC

**February 27, 2012 - Exchange plan update**

Director of Health Care Reform provides updated information on health benefit plans for the Exchange as required by Sec. 2(a)(2)(B) of Act 48

**May 16, 2012 - Act 171 enacted**

Governor Shumlin signs into law Act 171 (H.559), An act relating to health care reform implementation

- Requires all individual and small group plans to be sold through the Exchange beginning January 1, 2014

- Defines “small employer” for Exchange as employer with 50 or fewer employees for 2014 and 2015 and an employer with 100 or fewer employees beginning in 2016

**January 15, 2013 - Workers’ compensation report submitted**

Administration submits report on integration or alignment of GMC with Vermont’s workers’ compensation system (required by Sec. 8(b) of Act 48, was due January 15, 2012)

**January 24, 2013 - Financing plan report**

Administration submits financing plans for Exchange and GMC (required by Sec. 9 of Act 48, due January 15, 2013)

- Exchange plan addresses funding for the Exchange, State subsidies for low- and middle-income Vermonters, and addressing the “cost shift”
- GMC plan (State contracted with UMASS and Wakely) estimates coverage costs, payment rates, and administrative savings, and lists potential revenue sources
  - Does not recommend specific financing mechanism(s) or address, e.g., cross-border issues, provider shortages, retiree health benefits

**May 28, 2013 - Act 50 (Budget bill) enacted**

Governor Shumlin signs into law Act 50 (H.530), An act relating to making appropriations for the support of government

- Sec. E.307.1(a) creates State premium assistance subsidy for Exchange plans to reduce premium by additional 1.5% for individuals and families up to 300% FPL
- Sec. E.307(b) creates State cost-sharing subsidies for Exchange plans for individuals and families up to 300% FPL
- Provisions to take effect October 1, 2013 for coverage beginning January 1, 2014

**June 7, 2013 - Act 79 enacted**

Governor Shumlin signs into law Act 79 (H.107), An act relating to health insurance, Medicaid, the Vermont Health Benefit Exchange, and the Green Mountain Care Board

**October 1, 2013 - Exchange (Vermont Health Connect) website goes live, open enrollment begins**

Individuals and employers with 50 employees or fewer begin shopping for plans online and enrolling in plans (Act 171); online premium payment function not operational

**November 1, 2013** - Act 48 deadline for Exchange to begin enrolling individuals and small groups (Sec. 2(a)(2)(A))

**January 1, 2014 - Exchange coverage starts**

Coverage begins under Exchange plans, as well as federal and State premium tax credits and cost-sharing subsidies

**JANUARY 7, 2014 - 2014 LEGISLATIVE SESSION BEGINS**

**March 31, 2014 - Initial open enrollment period for Exchange ends**

**January 15, 2015 - Director of Health Care Reform to deliver a report including:**

- Plans available inside and outside the Exchange, projected premiums, and enrollment data
- Recommendations for statutory changes to improve the Exchange
- Vermont's efforts to obtain a federal waiver under Sec. 1332 of the ACA

**March 15, 2015 - First Exchange impact report due**

Then every three years thereafter (Act 79, Sec. 42a)

**January 1, 2016 - Employers with 100 or fewer employees buy through Exchange**

**January 1, 2017 - Large employers may purchase plans through Exchange**

**January 1, 2017 - Waiver for State Innovation available**

January 1, 2017 is the first day that a waiver of the Exchange and other Affordable Care Act requirements can take effect under Sec. 1332 of the ACA

**Future:**

- Multistate plans to become available in Vermont by 2017 - federal Office of Personnel Management to oversee
- Secretary of Administration to seek ACA waiver "as soon as allowed under federal law"
- GMC to be implemented 90 days following the last occur of
  - Receiving ACA waiver
  - Enactment of financing mechanism(s)
  - Approval by GMC Board of initial GMC benefit package
  - Enactment of appropriations for initial GMC benefit package
  - GMC Board determination that certain conditions will be met