HEALTHREFORMGUY

2027 ACA EMPLOYER CHECKLIST

Self-Funded & Large Group Plans

Based on the 2027 ACA Notice of Benefit and Payment Parameters, here are the key action items employers with self-funded or large group plans should review before the 2027 plan year.

1 WHAT EMPLOYERS NEED TO REMEMBER

- [ ] Self-funded and large group plans are not required to cover all state-defined essential health benefits (EHBs).
- [ ] If the plan covers EHBs, ACA rules on annual/lifetime dollar limits and cost-sharing protections still apply.
- [ ] Using a third-party administrator (TPA) does not remove employer responsibility for plan design and compliance oversight.

2 2027 CHANGES TO REVIEW

- [ ] Review whether routine adult dental services are referenced anywhere as an essential health benefit.
- [ ] Confirm plan documents, SPDs, summaries, and employee communications are updated if needed.
- [ ] Review how your plan identifies and applies EHB-related protections.

3 PLAN DESIGN & COMPLIANCE REVIEW

- [ ] Confirm which EHB benchmark framework is being used for compliance purposes.
- [ ] Identify any annual or lifetime dollar limits that could apply to covered EHBs.
- [ ] Review how out-of-pocket maximums are being applied.
- [ ] Ask your TPA, broker, or legal/compliance partners to confirm plan administration matches the written plan design.
- [ ] Document who is responsible for monitoring regulatory changes and approving plan design updates.

4 MARKETPLACE / HRA CONSIDERATIONS

- [ ] Monitor Marketplace eligibility and premium tax credit verification changes for employees purchasing individual coverage.
- [ ] If you offer an ICHRA or QSEHRA, update employee education materials accordingly.
- [ ] Prepare HR to explain the employer arrangement, while directing employees elsewhere for personal tax advice.

KEY TAKEAWAY

Outsourcing administration does not outsource plan-sponsor responsibility. Employers should actively review plan design, compliance touchpoints, and employee communications before 2027.