



AMERICAN BENEFITS
COUNCIL

P4P ... “Preparing for PPACA” Webinar:
Employer Responsibility Guidance
(Definition of "full-time employee"
& 90-day waiting periods)

Tuesday, September 25, 2:00 p.m. to 3:30 p.m. ET

P4P ... “Preparing for PPACA” Conference Call/Webinar Series

Session #16: Employer Responsibility Guidance (Definition of "full-time employee" & 90-day waiting periods)

Tuesday, September 25, 2:00 p.m. to 3:30 p.m. ET

This is a **reminder** that the American Benefits Council will continue its **P4P ... Preparing for PPACA** series on **Tuesday, September 25 at 2:00 p.m. Eastern Time**, to discuss recent IRS guidance (Notice 2012-58 and Notice 2012-59) addressing the definition of a "full-time employee" and 90-day waiting periods for issuance of coverage, respectively.

- [Notice 2012-58](#) describes safe harbor methods employers may use (though they are not required to use) to determine which employees are treated as full-time employees for purposes of the shared employer responsibility provisions of Internal Revenue Code Section 4980H (as added by PPACA).
- [Notice 2012-59](#) provides temporary guidance on what the agencies will consider as compliance with the 90-day waiting period limitation under Public Health Service (PHS) Act Section 2708 (as instituted by PPACA), effective through the end of 2014.

Kathryn Wilber, senior counsel, health policy, will moderate the webinar. She will be joined by:

- **J. Mark Iwry**, Senior Advisor to U.S. Treasury Secretary Timothy Geithner and Deputy Assistant Secretary for Retirement and Health Policy; and
- **Seth Perretta**, Crowell & Moring LLP.

The panelists will discuss the guidance in depth and address its implications for employer health plan sponsors. Because the guidance solicits comments from employers and other

stakeholders by September 30, we will be noting employer concerns for inclusion in future comment letters to IRS.

This session will include a question-and-answer period. Members are encouraged to [submit questions in advance](#) to Wilber at kwilber@abcstaff.org.

About the Series

The “P4P ... Preparing for PPACA” series, like our prior PPACA Compliance series, will examine the plan design and operational challenges and (where applicable) the opportunities presented by PPACA and its implementing regulations as employers proceed toward full implementation of the health law in 2014.