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Benefit Plan Bulletin No. 26-10-447

TO: **Teamsters Local Union Officers and Agents**

FROM: Kyle R. Stallman

DATE: October 19, 2026

SUBJECT: **Affordable Care Act (ACA) Waiting Period Limitation**

This Bulletin is an update to Benefit Plan Bulletin No. 24-11-444 that was mailed November 11, 2024, with the subject Final Rules Regarding the 90-Day Waiting Period Limitation. An excerpt from that bulletin read:

Effective April 25, 2014, the Department of Labor finalized its rules regarding the 90-day waiting period limitation. Effective for plan years beginning on or after January 1, 2015, this rule applies to group health plans like MCTWF. From the Federal Register, Volume 79, No. 36, dated February 24, 2014, the following pertinent language is noted:

Under these final regulations, after an individual is determined to be otherwise eligible for coverage under the terms of the plan, any waiting period may not extend beyond 90 days, and all calendar days are counted beginning on the enrollment date, including weekends and holidays.

Effective September 27, 2026, for any remaining groups with waiting periods exceeding 90 calendar days, MCTWF is processing all new hires with eligibility as of the 90th calendar day from their date of hire in accordance with these final regulations. Consequently, these new hires will be included on the monthly Employer invoices. If new Employer groups join, or new contracts for existing groups are received with waiting periods exceeding 90 calendar days, MCTWF will continue to apply the ACA maximum allowed waiting period of 90 calendar days. If the Employer and Teamster Local Union wish to change the waiting period for a non-compliant group to something less than 90 calendar days, they must execute a Letter of Understanding outlining the new ACA compliant waiting period. Once the LOU is received by MCTWF, the revised waiting period will be applied prospectively.

If you have any questions regarding this Bulletin, please contact Field Services Manager, Ken Miller, via phone at 313-748-4397 or email, kmiller@mctwf.org.