Transitioning toward Consumer Driven Health Care Plans

April 14, 2016

Today's Discussion

- Consumer Driven Health Plans
- Types of Health Savings Accounts
- Considerations
- Plan Design Strategy
- Communication Strategy
- System Considerations
- Payroll Considerations

Consumer Driven Health Plans

A Consumer Driven Health Plan (CDHP) is a health insurance plan with higher deductibles and lower premiums than traditional health plans. A CDHP is partnered with some type of health savings account. A CDHP option is required to offer a Health Savings Account.

- There are limits on the annual deductible and out-of-pocket medical expenses. Out-of-pocket expenses include copayments and other amounts, but not premiums.
- CDHP's have specific limits on plan features that are governed by the IRS.

  2016 annual limits for:

  - Minimum deductibles - $1,300/$2,600
  - Maximum out-of-pocket - $6,550/$13,100
  - Maximum annual HSA contributions - $3,350/$6,750 (+$1,000)

- A CDHP is typically a Co-insurance Plan model once the annual deductible has been met.
- Routine Preventive care is paid at 100% and not subject to the deductible if provided by an In-Network provider.

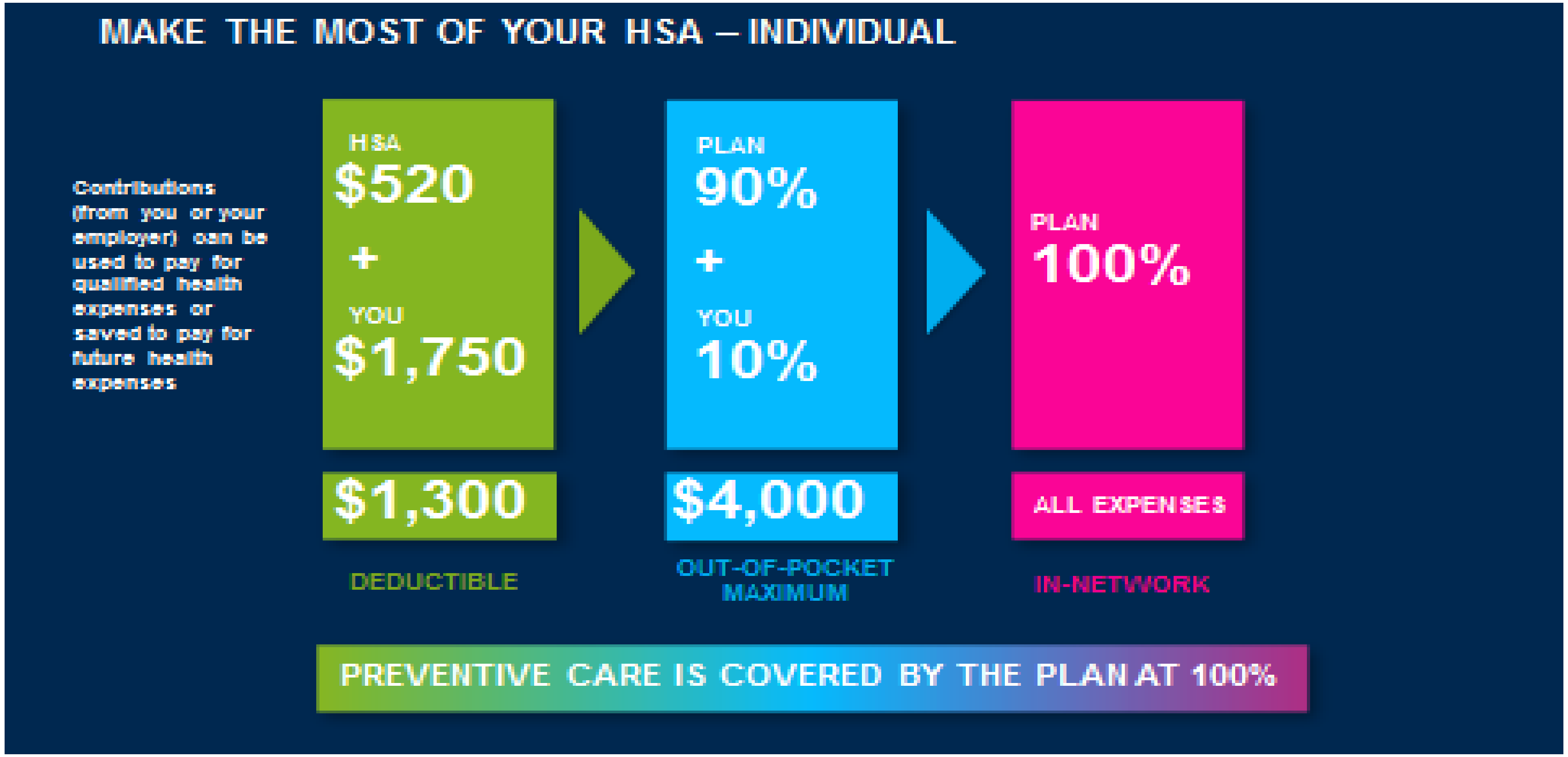
Why a Consumer Driven Health Plan?

- These plans have proven to provide lower costs and better outcomes over the long term than more traditional plans (Cigna Eighth Annual Experience Study - 2012)
  - $7,900 savings per employee over 5 years.
- 66% of all large employers (>500 employee's) expect to offer a CDHP by 2017
- In 2015 more employees enrolled in CDHP's than in HMO's
- Corporate cost containment strategy
  - CDHP's with an HSA cost 21% less than PPOs and 25% less than HMO's
- Accompanying health savings accounts could provide additional retirement savings vehicle.

Employer Objectives for Offering CDHPs

- Promote Self-Service environment and accountability (Increased Consumerism)
- Contain rising Health Care Costs
- Provide a Low-Cost Plan Without Increasing Employee Contributions
- Offer Cutting-Edge Benefits
- Avoid/Reduce Impact of Cadillac Tax
- Expand Choice of Offerings
- Tax Advantages

CDHP Illustration



*Includes deductible

All plans have exclusions and limitations and some plans have pre-existing condition limitations. Please review your Benefit Summary for more information about what is and is not covered under your plan.

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Types of Health Savings Accounts

- Health Savings Account (HSA)
- Health Reimbursement Account (HRA)
- Flexible Spending Accounts (FSA)
- Limited Flexible Spending Account (Limited FSA)
- Post-Deductible FSA (PD FSA)

Health Savings Accounts

- A health savings account (HSA) is a tax-exempt trust account used to pay or reimburse qualified medical expenses
- No permission or authorization from the IRS is required to establish an HSA.
- An HSA is set up with a qualified HSA trustee and can be:
  - A bank, an insurance company, or anyone already approved by the IRS to be a trustee of individual retirement arrangements (IRAs) or Archer MSAs.
  - Different from your health plan provider.
- Funded by employee and employer.

What are the benefits of an HSA?

- You may enjoy several benefits from having an HSA.
  - Your contributions through your employer are pre-tax and reduce your taxable income.
  - You can claim a tax deduction for contributions you or someone other than your employer make directly to your HSA, even if you do not itemize your deductions on Form 1040.
- The contributions remain in your account until you use them. No mandatory minimum distribution.
- Distributions may be tax free when used to pay for qualified medical expenses.
- An HSA is “portable” - it stays with you if you leave your employer
- Some HSA’s offer investments once you meet a minimum account balance
- Investments in the account grow tax free.

Pre-Retirement Savings Vehicle

- HSAs offer triple tax benefits
  - Contributions reduce taxable income
  - Earnings on accounts build tax free
  - Distributions from accounts for qualified expenses are not subject to taxation

- When account holder reaches age 65
  - Premiums for Medicare and other healthcare coverage become eligible expenses
  - 20% distribution penalty for non-medical distributions no longer applies
  - No required minimum distribution
  - HSA balances are not taken into account for Social Security means testing

Qualifying for an HSA

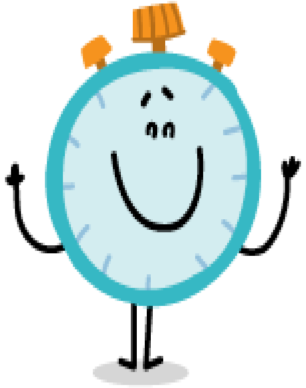
To be an eligible individual and qualify for an HSA, you must meet the following requirements.

- You must be covered under a Consumer Driven Health Plan (CDHP) on the first day of the month you are eligible to contribute
- You have no other health coverage that is not a CDHP
- You are not enrolled in Medicare
- You cannot be claimed as a dependent on someone else's annual tax return

Contributing to an HSA

When To Contribute

- You can make contributions to your HSA for the tax year that you are eligible up to April 15th of the following year. (For 2015, you can make contributions up to April 18, 2016).
- Your employer can make contributions to your HSA between January 1st and and April 15th of the following year, for any year you are eligible.
  - Your employer must notify you and the trustee of your HSA that contributions made after December 31st are for the previous year.
  - The contribution will be reported on the new year's Form W-2. (Funds contributed in 2016 for the 2015 plan year would be reported on the 2016 W-2)



Contributions to an HSA

Reporting Contributions on Your Return

- Contributions made by your employer are not included in your income.
- Contributions to an employee's account by an employer using the amount of an employee's salary reduction through a cafeteria plan are treated as employer contributions.
- Generally, you can claim contributions you made and contributions made by any other person, other than your employer, on your behalf, as an adjustment to income.

Contributions to an HSA

- Contributions by a partnership to a bona fide partner's HSA are not contributions by an employer. The contributions are treated as a distribution of money and are not included in the partner's gross income. Contributions by a partnership to a partner's HSA for services rendered are treated as guaranteed payments that are deductible by the partnership and includible in the partner's gross income. In both situations, the partner can deduct the contribution made to the partner's HSA.
- Contributions by an S corporation to a 2% shareholder-employee's HSA for services rendered are treated as guaranteed payments and are deductible by the S corporation and includible in the shareholder-employee's gross income.
  - The shareholder-employee can deduct the contribution made to the shareholder-employee's HSA.

Contributions to an HSA

Form 8889. Report all contributions to your HSA on Form 8889 and file it with your Form 1040 or Form 1040NR. You should include all contributions made for the plan year, including those made by April 15th of the following year, that are designated for the plan year. Contributions made by your employer and qualified HSA funding distributions are also shown on the form.

- You should receive Form 5498-SA, HSA, Archer MSA, or Medicare Advantage MSA Information, from the trustee showing the amount contributed to your HSA during the year. Your employer's contributions also will be shown in box 12 of Form W-2, Wage and Tax Statement, with code W. Follow the instructions for Form 8889. Report your HSA deduction on Form 1040 or Form 1040NR.

Contributions to an HSA

Excess contributions. You will have excess contributions if the contributions to your HSA for the year are greater than the limits discussed earlier.

- Excess contributions are not deductible.
- Excess contributions made by your employer are included in your gross income. If the excess contribution is not included in box 1 of Form W-2, you must report the excess as “Other income” on your tax return.
- Generally, you must pay a 6% excise tax on excess contributions. The excise tax applies to each tax year the excess contribution remains in the account.

Contributions to an HSA

- You may withdraw some or all of the excess contributions and not pay the excise tax on the amount withdrawn if you meet the following conditions.
  - You withdraw the excess contributions by the due date, including extensions, of your tax return for the year the contributions were made.
  - You withdraw any income earned on the withdrawn contributions and include the earnings in “Other income” on your tax return for the year you withdraw the contributions and earnings.
- If you fail to remain an eligible individual during any of the testing periods, the amount you have to include in income is not an excess contribution. If you withdraw any of those amounts, the amount is treated the same as any other distribution from an HSA.

Contributions to an HSA

Deducting an excess contribution in a later year.

- You may be able to deduct excess contributions from previous years that are still in your HSA. The excess contributions you can deduct for the current year is the lesser of the following two amounts.
  - Your maximum HSA contribution limit for the year minus any amounts contributed to your HSA for the year.
  - The total excess contributions in your HSA at the beginning of the year.
- Amounts contributed for the year include contributions by you, your employer, and any other person. They also include any qualified HSA funding distribution made to your HSA. Any excess contribution remaining at the end of a tax year is subject to the excise tax.

Distributions from an HSA

You will generally pay qualified medical expenses during the year without being reimbursed by your CDHP until you reach the annual deductible for the plan. When you pay qualified medical expenses during the year that are not reimbursed by your CDHP, you can request a distribution from your HSA.

- You can receive tax-free distributions from your HSA to pay or be reimbursed for qualified medical expenses you incur after you establish the HSA.
- If you receive distributions for other reasons, the amount you withdraw will be subject to income tax and may be subject to an additional 20% tax.
  - ***Exceptions.*** There is no additional tax on distributions made after the date you are disabled, reach age 65, or die.
- You do not have to make distributions from your HSA each year.
- Your total distributions include amounts paid with a debit card that restricts payments to health care and amounts withdrawn from the HSA by other individuals that you have designated.

Distributions from an HSA

- The trustee will report any distribution to you and the IRS on Form 1099-SA, Distributions From an HSA, Archer MSA, or Medicare Advantage MSA.
- If, under the last-month rule, you are considered to be an eligible individual for the entire year for determining the contribution amount, only those expenses incurred after you actually establish your HSA are qualified medical expenses.

Balance in an HSA

- An HSA is generally exempt from tax. You are permitted to take a distribution from your HSA at any time; however, only those amounts used exclusively to pay for qualified medical expenses are tax free.
  - Amounts that remain at the end of the year are generally carried over to the next year.
  - Earnings on amounts in an HSA are not included in your income while held in the HSA.

Distribution from an HSA

Death of HSA Holder

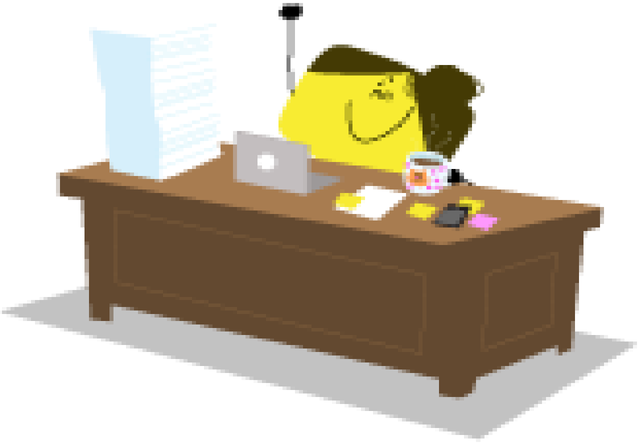
- You should choose a beneficiary when you set up your HSA. What happens to that HSA when you die depends on whom you designate as the beneficiary.
  - **Spouse is the designated beneficiary.** If your spouse is the designated beneficiary of your HSA, it will be treated as your spouse's HSA after your death.
  - **Spouse is not the designated beneficiary.** If your spouse is not the designated beneficiary of your HSA: The account stops being an HSA, and
    - The fair market value of the HSA becomes taxable to the beneficiary in the year in which you die.
    - If your estate is the beneficiary, the value is included on your final income tax return.

Take a Breather
Let's move for a minute

Employer HSA Participation

Contributions

- Employers can make contributions to employees' HSAs. Employer’s can deduct the contributions on their business income tax return for the year in which contributions are made. If the contribution is allocated to the prior year, the employer may still deduct it in the year in which the contribution was made.



Employer HSA Participation

Comparable contributions.

- If the employer makes contributions, comparable contributions must be made to all comparable participating employees' HSAs. Contributions are comparable if they are either:
  - The same amount, or
  - The same percentage of the annual deductible limit under the CDHP covering the employees.
- The comparability rules do not apply to contributions made through a cafeteria plan.

Employer HSA Participation

Comparable participating employees - Are covered by your CDHP and are eligible to establish an HSA,

- Have the same category of coverage (either self-only or family coverage), and
- Have the same category of employment (part-time, full-time, or former employees).

To meet the comparability requirements for eligible employees who have not established an HSA by December 31 or have not notified you that they have an HSA, you must meet a notice requirement and a contribution requirement. You will meet the notice requirement if by January 15 of the following calendar year you provide a written notice to all such employees. The notice must state that each eligible employee who, by the last day of February, establishes an HSA and notifies you that he or she has established an HSA will receive a comparable contribution to the HSA for the prior year.

- For purposes of making contributions to HSAs of non-highly compensated employees, highly compensated employees shall not be treated as comparable participating employees.

Employer HSA Participation

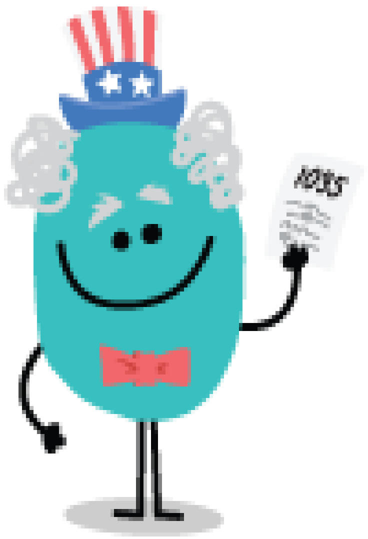
Excise tax

If you made contributions to your employees' HSA’s that were not comparable, you must pay an excise tax of 35% of the amount you contributed.

Employer HSA Participation

Employment taxes

Amounts you contribute to your employees' HSAs are generally not subject to employment taxes. You must report the contributions in box 12 of the Form W-2 filed for each employee. This includes the amounts the employee elected to contribute through a cafeteria plan. Enter code “W” in box 12.



Health Reimbursement Account (HRA)

- Funded solely by an employer
- Contribution cannot be paid through voluntary salary reduction
- An HRA may be offered with other health plans, including FSA's.

What are the benefits of an HRA?

- Employees are reimbursed tax free for qualified medical expenses up to a maximum dollar amount for a coverage period.
- There are no reporting requirements for HRA’s on your income tax return.
- Contributions made by your employer are not included in your gross income.
- Reimbursements may be tax free if you pay qualified medical expenses.
- Any unused amounts in the HRA can be carried forward for reimbursements in later years.

Qualifying for an HRA

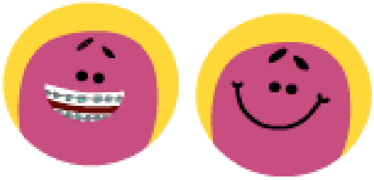
- HRA's are employer-established benefit plans. These may be offered in conjunction with other employer-provided health benefits.
- Employers have complete flexibility to offer various combinations of benefits in designing their plan.
- Self-employed persons are not eligible for an HRA.

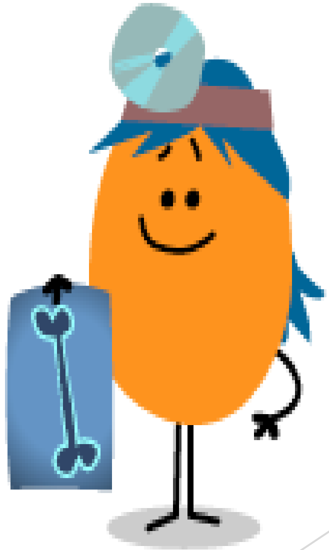
Contributions to an HRA

- HRA’s are funded solely through employer contributions.
- Contributions are not included in the employee's income.
- You do not pay federal income taxes or employment taxes on amounts your employer contributes to the HRA.
- No limit on employer contributions to an HRA
- The maximum reimbursement amount credited under the HRA in the future may be increased or decreased by amounts not previously used.

Distributions from an HRA

- Generally, distributions from an HRA must be paid to reimburse you for qualified medical expenses.
- Expenses must be incurred on or after the date you enrolled in the HRA.
- Debit cards, credit cards, and stored value cards given to you by your employer can be used for HRA reimbursements.
- If the use of these cards meets certain substantiation methods, you may not have to provide additional information to the HRA.





Distributions from an HRA

- If any distribution is, or can be, made other than the reimbursement of qualified medical expenses, any distribution (including reimbursement of qualified medical expenses) made in the current tax year is included in gross income.
  - For example, if an unused reimbursement balance is payable to you in cash at the end of the year, or upon termination of your employment, any distribution from the HRA is included in your income.
  - This also applies if any unused amount upon your death is payable in cash to your beneficiary or estate, or if the HRA provides an option for you to transfer any unused reimbursement at the end of the year to a retirement plan.
- If the plan permits amounts to be paid as medical benefits to a designated beneficiary (other than the employee's spouse or dependents), any distribution from the HRA is included in income.

HRA Reimbursements

- Reimbursements under an HRA can be made to the following persons:
  - Current and former employees.
  - Spouses and dependents of those employees.
  - Any person you could have claimed as a dependent on your return except:
    - The person filed a joint return,
    - The person had gross income of $4,000 or more, or
    - You, or your spouse if filing jointly, could be claimed as a dependent on someone else's 2015 return.
  - Your child under age 27 at the end of your tax year.
  - Spouses and dependents of deceased employees.

HRA - Additional Information

Balance in an HRA

- Amounts that remain at the end of the year can generally be carried over to the next year (based on employers plan design).
- Your employer is not permitted to refund any part of the balance to you without tax consequences.
- These amounts may never be used for anything but reimbursements for qualified medical expenses.

Employer Participation

- For an HRA to maintain tax-qualified status, employers must comply with certain requirements that apply to other health plans.

Flexible Spending Accounts (FSA)

- A health flexible spending account (FSA) allows employees to be reimbursed for qualified medical expenses.
- FSAs are usually funded through voluntary salary reduction agreements with your employer.
- No employment or federal income taxes are deducted from your contribution.
- The employer may also contribute.
- There are no reporting requirements for FSAs on your income tax return.

What are the benefits of an FSA?

- Contributions made by your employer can be excluded from your gross income.
- No employment or federal income taxes are deducted from the contributions.
- Withdrawals may be tax free if used to pay qualified medical expenses.
- You can withdraw funds from the account to pay qualified medical expenses even if you have not yet placed the funds in the account.

Qualifying for an FSA

- Health care FSAs are employer-established benefit plans.
- They may be offered in conjunction with other employer-provided benefits as part of a cafeteria plan.
- Employers have complete flexibility to offer various combinations of benefits in designing their plan.
- Self-employed persons are not eligible for an FSA.

Contributions to an FSA

- Certain limitations may apply if you are a highly compensated participant or a key employee.
- You contribute to your FSA by electing an amount to be voluntarily withheld from your pay by your employer.
- The employer may also contribute to your FSA if specified in the plan.
- You do not pay federal income tax or employment taxes on the salary you contribute or the amounts your employer contributes to the FSA. However, contributions made by your employer to provide coverage for long-term care insurance must be included in income.

When to contribute to an FSA

- At the beginning of the plan year, you must designate how much you want to contribute.
  - Your employer will deduct amounts periodically (generally, every payday) in accordance with your annual election.
  - You can change or revoke your election only if there is a Qualified Family Status change that is specified by the plan.

Contribution Limits

- Current salary reduction contributions to a health FSA cannot be more than $2,550 a year (or any lower amount set by the plan). This amount is indexed for inflation and may change from year to year.
- Generally, contributed amounts that are not spent by the end of the plan year are forfeited. “Use it or Lose it” rule.
- Plan carry-over exceptions:
  - Grace Period - the plan can offer a “Grace Period” to participants which allows them 2 months and 15 days into the new plan year to incur expenses for past year funds; reimbursement claims must be filed by March 31st of the new plan year.
  - $500 Rule – the plan may offer participants the option of a $500 a year carryover into the new plan year

Note: Employers must designate if they are offering either of these options for their plan participants and the options can not be used concurrently.

Distributions from an FSA

- Distributions from a health FSA must be paid only to reimburse you for qualified medical expenses you incurred during the period of coverage.
  - You must be able to receive the maximum amount of reimbursement (the amount you have elected to contribute for the year) at any time during the coverage period, regardless of the amount you have actually contributed.
  - maximum amount you can receive tax free is the total amount you elected to contribute to the health FSA for the year.
- You must provide the health FSA with a written statement from an independent third party stating that the medical expense has been incurred and the amount of the expense.
- You must also provide a written statement that the expense has not been paid or reimbursed under any other health plan coverage.
- The FSA cannot make advance reimbursements of future or projected expenses.
- Debit cards, credit cards, and stored value cards given to you by your employer can be used to reimburse participants in a health FSA. If the use of these cards meets certain substantiation methods, you may not have to provide additional information to the health FSA.

Additional FSA’s

- Limited Use FSA
- Post-Deductible FSA

Qualified Medical Expenses

- Qualified medical expenses are those specified in the plan that would generally qualify for the medical and dental expenses deduction. These are explained in Pub. 502.
- Also, non-prescription medicines (other than insulin) are not considered qualified medical expenses for HRA purposes. A medicine or drug will be a qualified medical expense for HRA purposes only if the medicine or drug requires a prescription.
- Qualified medical expenses from your HRA include the following.
  - Amounts paid for health insurance premiums.
  - Amounts paid for long-term care coverage.
  - Amounts that are not covered under another health plan.
- There are special rules if you are covered by both an HRA and an FSA.

Take a Breather
Let's move for a minute

Considerations

- Corporate Culture
  - Boomers or Millennials
  - Paternal or not
  - Behavioral shift for workforce
- Turnover Risk
  - Low or High
  - Portability or Non-Portable
- Control of Plan Design
- Cost Containment Strategy (Excise tax, cost shifting)
- Wellness Incentives as part of the mix

FSA vs. HRA vs. HSA

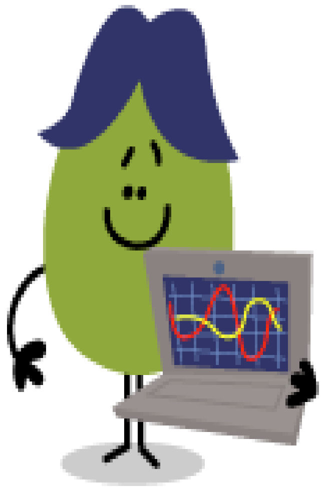
	FSA	HRA	HSA
Employer Contribution	✓	✓	✓
Employee Payroll Contribution	✓		✓
Employee Direct Contribution			✓
Contribution Limit	✓		✓
Account Owner	Employer	Employer	Employee
Account Portability			✓
Employee Tax Savings	✓		✓
Earnings Investment			✓
Claim Substantiation	✓	✓	?
Rollover	?	?	✓
Employer Involvement	✓	✓	
Qualified Expense Distribution	✓	✓	✓
Multiple Year Expenses	?	✓	✓

Communication Strategy

- Early and Often!
- Pre-Implementation Communication
  - Focus Groups to support “Grass Roots” promotion
  - Communicate segments of the program – Break it down.
- Roll-out Communications
  - Create a targeted communications plan and stick to it
  - Simple and Clear information
  - Don’t Gloss over the down side
  - Lots of examples and scenarios that employees can relate to
- On-going Communications
  - Continue to communicate throughout the year
    - Honest communications to set expectation of “Point of Service” sticker shock
    - Target the good news
    - Utilize Health plan vendor’s pre-prepared education materials

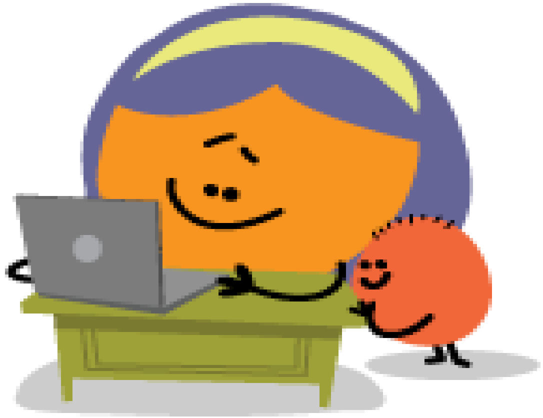
System Considerations

- System Capabilities
  - Additional plans, vendors and electronic file transfer
  - Additional elections with maximum contribution cut-offs
  - Employer Contributions
    - One lump sum vs. quarterly or per pay period
  - Pass information to a third party payroll administrator



Payroll System Considerations

- Make sure you have a seat at the Implementation Table
- Payroll System Capabilities
  - Monitor contribution caps
  - Ability to send funds to trustee (or multiple trustees)
  - Reporting capabilities
  - Timeliness of mid-year contribution change processing



Payroll Considerations for an HSA

Employee Funded, After-Tax on Employee's Own

- Employee contributes to an HSA and receives a deduction when filing personal income tax return

Employee Funded, Pre-Tax Through Payroll Deferral

- Employers can help employees fund their HSAs by allowing for HSA contributions via payroll deferral. This is inexpensive and can be accomplished by adding Section 125 plan with an HSA module. The administration is limited because the HSA custodian generally does much of the work.

  Employer Benefit: Employers benefit by not having to pay payroll taxes on the employee's HSA contributions, typically 7.65% of the amounts paid plus state unemployment taxes (where applicable).

  Employee Benefit: Employees save 7.65% on payroll taxes on HSA contributions made through this method (FICA and FUTA are not withheld). Plus, the HSA contribution is also never counted as income, saving approximately 15- 32% on income taxes (depending upon state and federal tax brackets and personal income).

  - Note: HSA contributions made outside of payroll are deductible on personal tax returns.

Payroll Considerations for an HSA

Employer Contributions to an HSA

- Employers may make direct contributions to their employees' HSA's without a Section 125 plan however, the contributions must be "comparable" in order to be tax deductible

  Employer Benefit: Employer HSA contributions are tax deductible by the employer as an employee benefit.

  Employee Benefit: Employees receive HSA funds tax-free.

Questions

Resources

- IRS Publication 969, Health Savings Accounts and other Tax-Favored Medical Plans
- IRS Publication 502, Medical and Dental Expenses
- https://www.benefitadministrationcompany.com/blog/hra-vs-hsa/
- https://www.hsaresources.com/pdf/HSA_FSA_HRA_Chart.pdf
- Society for Human Resource Management (SHRM) website

Today’s Presenters

John Clough is currently the Division Director, Benefits at Fairfax County Government. John has had a career in Human Resources, more particularly compensation and benefits for the past 30 years. Prior to the County John held the position of Director, Compensation and Benefits for Rolls-Royce North America, where during his stay there he converted health care plans to full replacement consumer driven health plans. Prior to that he spent 6 years at MSX International, a tier one automotive company where he held the position of Director, Global Compensation and Benefits. Originally from Canada, he spent 18 years of his career with BASF Corporation, in positions of increasing responsibility, beginning in Ottawa Canada, with stops along the way in Toronto, Canada, corporate headquarters in New Jersey to the Automotive Coatings and Colorants Division in Southfield Michigan. John, a father of four and graduate of the University of Windsor (Ontario), became a U.S. citizen February 2006.

Susan Kirkman is the Benefits Manager for Fairfax County Government. Susan has over 30 years of experience in benefit design and administration in private industry and the public sector working for local, national and international companies including Washington Gas, Avalon Bay Communities and Gate Gourmet. Susan also worked for Cigna Healthcare assisting clients in the Mid-Atlantic region create strategies for Benefit and Wellness programs for their organizations.

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Employer Objectives for Offering CDHP Programs[1]

CDHP Program Objectives	Percentage of Employers With Each Objective					
	2010[2]	2011[3]	2012[4]	2013[5]	2014[6]	2015[7]
Promote Self-Service Environment and Accountability (Increased Consumerism)	70%	69%	77%	72%	84%	79%
Contain Rising Health Care Costs	67%	69%	73%	71%	79%	75%
Provide a Low-Cost Plan Without Increasing Employee Contributions	25%	35%	33%	44%	53%	47%
Offer Cutting-Edge Benefits	27%	27%	25%	19%	21%	24%
Avoid/reduce Impact of Cadillac Tax	N/A	N/A	N/A	3%	6%	10%
Expand Choice of Offerings	36%	38%	31%	39%	42%	29%
Tax Advantages	N/A	N/A	N/A	N/A	N/A	18%

Note: *Questions with responses listed as N/A were not asked in prior years*

- Objectives most commonly cited by employers for offering CDHP programs continue to include promoting accountability/consumerism and containing rising health care costs

[1] Multiple responses per employer were collected **AON Large Market Survey, 2015**
[2] Reflects responses from 88 of the 96 employers represented in the 2010 survey
[3] Reflects responses from 88 of the 101 employers represented in the 2011 survey
[4] Reflects responses from 48 of the 50 employers represented in the 2012 survey
[5] Reflects responses from 72 of the 75 employers represented in the 2013 survey
[6] Reflects responses from 62 of the 71 employers represented in the 2014 survey
[7] Reflects responses from 100 of the 118 employers represented in the 2015 survey