

Zimbra

revansiddha.gaur@harbingergroup.com

RE: Question on ACA reporting for Metso URGENT

Thu, Apr 13, 2017 10:05 PM

From : Alex Nguyen <alex.nguyen@ebsbenefits.com>
Subject : RE: Question on ACA reporting for Metso URGENT 9 attachments**To :** Nandkumar Karlekar <nandkumar@harbingergroup.com>, Abhay Patil <abhay.patil@ebsbenefits.com>**Cc :** Debbie Kulling <debbie.kulling@ebsbenefits.com>, Cindy Wibbing <cindy.wibbing@ebsbenefits.com>, Smita Pawar <smita.pawar@harbingergroup.com>, Revansiddha Gaur <revansiddha.gaur@harbingergroup.com>

Hello Nandkumar,

Lets go with option 2 because the more data we can provide on the file the better, especially being able to see what they are eligible for even though it's only for 1 day. It gives the client/member an idea of what is available to them, and they can decide from there.

Thank you,

Alex Nguyen | EDI Analyst
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From: Nandkumar Karlekar [mailto:nandkumar@harbingergroup.com]
Sent: Wednesday, April 12, 2017 11:59 PM
To: Abhay Patil <abhay.patil@ebsbenefits.com>
Cc: Debbie Kulling <debbie.kulling@ebsbenefits.com>; Alex Nguyen <alex.nguyen@ebsbenefits.com>; Cindy Wibbing <cindy.wibbing@ebsbenefits.com>; Smita Pawar <smita.pawar@harbingergroup.com>; Revansiddha Gaur <revansiddha.gaur@harbingergroup.com>
Subject: RE: Question on ACA reporting for Metso URGENT

Hi Abhay,

Both parties understanding is same for IRS guideline. But this is a client specific requirement so we have two options for sending these [Mid month terminated and losing eligibility] employee on file .

Please let me know which option you will prefer so that we can send you in the next file.

Option 1 : We can send this employee without populating the ELIG Row on file.

1. Brian Raup [Only eligible till 01/16/2017 i.e not complete month]

EEID|11111111|11111111|Brian|F|Raup|M|10/11/1977
 OFFR|11111111|Qualifying Event - Admin Change|Qualifying Event - Admin
 Change|01/01/2017|01/01/2017|01/01/2017|12/31/2017|01/04/2017 05:11:11.957000 AM
 COVG|11111111|Qualifying Event - Admin Change|01/01/2017|504|2017 MEDICAL OPT
 OUT|EE|Employee|0.00|83.33|01/01/2017|Y|06|01/05/2017 08:53:08.000000 PM|185683722

Option 2 : We can send this employee with complete ELIG Rows even if Employee is eligible for Single day of the month.

1. Brian Raup [Only eligible till 01/16/2017 i.e not complete month]

EEID|11111111|11111111|Brian|F|Raup|M|10/11/1977
 OFFR|11111111|Qualifying Event - Admin Change|Qualifying Event - Admin
 Change|01/01/2017|01/01/2017|01/01/2017|12/31/2017|01/04/2017 05:11:11.957000 AM
 ELIG|11111111|Import Enrollment|566|HIGHMARK PPO 90|EE|Employee|Y|172.61|491.28|Y|Y|Y|Y|Y|74.00|Y|N
 ELIG|11111111|Import Enrollment|566|HIGHMARK PPO 90|EE+SP|Employee + Spouse|N|345.23|982.57|Y|Y|Y|Y|Y|74.00|Y|N
 ELIG|11111111|Import Enrollment|566|HIGHMARK PPO 90|EE+CH|Employee + 1 Child|N|345.23|982.57|Y|Y|Y|Y|Y|74.00|Y|N

ELIG|11111111|Import Enrollment|566|HIGHMARK PPO 90|EE+1+CH|Employee + 2+
 Children|N|486.77|1385.41|Y|Y|Y|Y|Y|74.00|Y|N
 ELIG|11111111|Import Enrollment|566|HIGHMARK PPO 90|EE+SP+CH|Employee + Spouse + 1
 Child|N|486.77|1385.41|Y|Y|Y|Y|Y|74.00|Y|N
 ELIG|11111111|Import Enrollment|566|HIGHMARK PPO 90|EE+SP+2+CH|Employee+Spouse + 2+
 Children|N|486.77|1385.41|Y|Y|Y|Y|Y|74.00|Y|N
 ELIG|11111111|Import Enrollment|669|Highmark HDHP plan|EE+SP+2+CH|Employee+Spouse + 2+
 Children|N|151.21|1360.86|N|Y|Y|Y|Y|90.00|Y|N
 ELIG|11111111|Import Enrollment|669|Highmark HDHP plan|EE|Employee|Y|54.00|486.03|N|Y|Y|Y|Y|90.00|Y|N
 ELIG|11111111|Import Enrollment|669|Highmark HDHP plan|EE+SP|Employee + Spouse|N|108.00|972.04|N|Y|Y|Y|Y|90.00|Y|N
 ELIG|11111111|Import Enrollment|669|Highmark HDHP plan|EE+CH|Employee + 1 Child|N|108.00|972.04|N|Y|Y|Y|Y|90.00|Y|N
 ELIG|11111111|Import Enrollment|669|Highmark HDHP plan|EE+1+CH|Employee + 2+
 Children|N|151.21|1360.86|N|Y|Y|Y|Y|90.00|Y|N
 ELIG|11111111|Import Enrollment|669|Highmark HDHP plan|EE+SP+CH|Employee + Spouse + 1
 Child|N|151.21|1360.86|N|Y|Y|Y|Y|90.00|Y|N
 ELIG|11111111|Import Enrollment|565|HIGHMARK PPO 80|EE|Employee|Y|89.39|506.56|Y|Y|Y|Y|Y|85.00|Y|N
 ELIG|11111111|Import Enrollment|565|HIGHMARK PPO 80|EE+SP|Employee + Spouse|N|178.79|1013.12|Y|Y|Y|Y|Y|85.00|Y|N
 ELIG|11111111|Import Enrollment|565|HIGHMARK PPO 80|EE+CH|Employee + 1 Child|N|178.79|1013.12|Y|Y|Y|Y|Y|85.00|Y|N
 ELIG|11111111|Import Enrollment|565|HIGHMARK PPO 80|EE+1+CH|Employee + 2+
 Children|N|250.30|1418.37|Y|Y|Y|Y|Y|85.00|Y|N
 ELIG|11111111|Import Enrollment|565|HIGHMARK PPO 80|EE+SP+CH|Employee + Spouse + 1
 Child|N|250.30|1418.37|Y|Y|Y|Y|Y|85.00|Y|N
 ELIG|11111111|Import Enrollment|565|HIGHMARK PPO 80|EE+SP+2+CH|Employee+Spouse + 2+
 Children|N|250.30|1418.37|Y|Y|Y|Y|Y|85.00|Y|N
 COVG|11111111|Qualifying Event - Admin Change|01/01/2017|504|2017 MEDICAL OPT
 OUT|EE|Employee|0.00|83.33|01/01/2017|Y|Y|06|01/05/2017 08:53:08.000000 PM|185683722

Thanks & Regards,
 Nandkumar Karlekar
 Senior Technical Lead|Harbinger Systems
 Ext:-467,Mob: + 91 9822834092
"Learn To Live & Live To Learn"

From: Abhay Patil [<mailto:abhay.patil@ebsbenefits.com>]

Sent: Thursday, April 13, 2017 1:23 AM

To: 'Nandkumar Karlekar'

Cc: Debbie Kulling; Alex Nguyen; Cindy Wibbing

Subject: FW: Question on ACA reporting for Metso URGENT

Nandu,

Please see the email below. Sharon of BSG has a different interpretation of IRS guidelines. We should follow that. (See the detailed discussion with ADP person.)

--

Abhay

From: Sharon Schulteis [<mailto:Sharon.Schulteis@bsg.com>]

Sent: Wednesday, April 12, 2017 11:35 AM

To: Debbie Kulling <debbie.kulling@ebsbenefits.com>; Abhay Patil <abhay.patil@ebsbenefits.com>

Cc: Tamkeen Siddiqui <Tamkeen.Siddiqui@bsg.com>; Christy Oswald <Christy.Oswald@bsg.com>

Subject: FW: Question on ACA reporting for Metso URGENT

Hi Debbie and Abhay, Debbie I checked the IRS guidelines concerning the reporting and I didn't come to the same conclusion you did about not needing to report mid-month employment terminations so as requested I checked with ADP. Please see their response below. They **DO** want the information-

BSG Office's will be closed on Friday, April 14th



Sharon Schulteis

Account Executive

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E-mail: Sharon.Schulteis@bsg.com

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From: Camak, James (ES) [<mailto:James.Camak@ADP.com>]

Sent: Wednesday, April 12, 2017 1:30 PM

To: Sharon Schulteis <Sharon.Schulteis@bsg.com>; Fuller, Tim (ES) <Tim.Fuller@adp.com>; 'Amy Turnbough' <Amy.Turnbough@metso.com>

Cc: Tamkeen Siddiqui <Tamkeen.Siddiqui@bsg.com>; Christy Oswald <Christy.Oswald@bsg.com>

Subject: RE: Question on ACA reporting for Metso URGENT

Please see below:

James Camak | Product Support III | AVS - Health Care Reform
706-731-2000 ext. 447-2319



From: Sharon Schulteis [<mailto:Sharon.Schulteis@bsg.com>]

Sent: Wednesday, April 12, 2017 1:47 PM

To: Camak, James (ES); Fuller, Tim (ES); 'Amy Turnbough'

Cc: Tamkeen Siddiqui; Christy Oswald

Subject: Question on ACA reporting for Metso URGENT

James, Tim and Amy, we have been working with the enrollment vendor (EBS) for Metso the past few months auditing the January 2017 full file and the change files for Feb. & March 2017. ADP has not received these files yet from EBS to load because we have found some inconsistencies during our audit and have been trying to get corrections made.

We (BSG) had a joint call with the Development staff and Acct. mgmt. staff at EBS today regarding the data, the question is whether those employees that elected to "Waive" coverage or selected the "medical opt out credit" should be coming over on the files to ADP? I believe we have that question resolved with EBS and the files will be updated to include those employees and dependents. **[Camak, James (ES)] We do want those Waives or Opt outs, but we do not need the dependents for those who waive/opt-out. (Unless they already have coverage and are now simply waiving without ending those coverages.) However, we do not want nor need any medical opt out "credit". We are looking at offers and selections (and waivers) of coverage. The credit an employee may get for waiving is not used.**

But the question they are asking pertains to those employees that were covered under a Medical Plan or elected to "waive coverage" or selected the medical opt out credit-if the employee terminated employment mid-month EBS's interpretation of the IRS regulations are that they are **not to be** included in the files.

For example-employee John Smith.

John enrolled in the medical opt out credit on 1.1.2017, terminated employment on 1.15.17-should his record come over on the file to ADP?

[Camak, James (ES)] First, remember that we want to see the Offer for the time that the EE was eligible for coverage. If the EE is eligible and there is no offer, I believe that would reflect poorly on the client. I believe that I would send another offer for Termination with that new date. That Termination (end coverage) would do a couple things: First the new Offer (reflecting a new "life event") would terminate the coverage. It would also end the EE's Eligibility. You can technically end the coverage by passing an "end date" of coverage, but the new offer actually ends the previous offer and thereby ends the EE's eligibility. (That Termination Offer would have no plans in it, but the Offer itself would close the offer with the eligible plans. And any dependents in it would be ended as well.)

I've researched some regulations and based on what I've read- "If an employee terminates employment on any day other than the last day of the month and the coverage or offer of coverage expires upon termination of employment, the employee must be reported as "no offer of coverage for the entire month". But that they still must be reported.

[Camak, James (ES)] I believe that is for counting the month in the 1095-C form for reporting purposes. But it is not necessarily the actual nature of the coverage. The EE did have coverage from 1/1 to 1/15, but the client gets no credit for having offered coverage for that month. If the coverage actually terms that last (termination) day, then the Employer should not be seen as having provided coverage for the whole month. By the way, some clients extend coverage until the end of the month for those leaving, and in that case it would be expected to reflect the full month.

The goal is to show that the client has made a good faith effort in their mandate to provide coverage for eligible employees. When an EE becomes ineligible (Terms), then it would be best to show the termination of that coverage and also show the loss of coverage. The new offer of "termination" does a good job of that.

Sending the data allows our system to populate the 1095-C form correctly—as you say—but based on the benefits data we have received.

Please see the companion guide on "termination" and "loss of eligibility".

They are asking because if you disagree with their interpretation, it requires some changes to their coding.

[Camak, James (ES)]

Let me go back to another question raised in your term "medical opt-out credit". Again, the client is not expected to report any credits it gives to those who waive coverage. Are you doing something here? And does this affect the cost of the coverage for those who do select coverage?

Can you confirm asap?

Thank you for your help-

BSG Office's will be closed on Friday, April 14th



Sharon Schulteis

Account Executive

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