

Reporting Requirements for HRA Plans • October, 2010

More reporting...just when you least expected it.

Do you have a Health Reimbursement Arrangement (HRA)? You may have to provide quarterly reports to the government. The great news is that if you have an outside vendor managing your HRA program, they should be filing these reports for you.

Going it alone? If you don't have an HRA vendor, then you'll have to bone up on this new requirement. The good news: the reporting is done online. The bad news: the Feds have a 231 page user guide.



Plans Not Required to Report

I won't keep you in suspense. If you fall into one of the following four categories, read no further. You get to skirt this requirement.

- Retiree-only HRAs
- HRAs of employers with less than 20 employees where no one is a Medicare beneficiary or an End Stage Renal Disease (ESRD) beneficiary
- HRA participants with less than \$1000 of coverage per plan year (this includes rollovers from prior years)

When to Report

You need to begin reporting the next time your HRA program renews, on or after 10/1/2010. Thereafter you will need to report quarterly.

The Penalty

If you fail to report your data to the Centers for Medicare and Medicaid Services (CMS), **you can be fined \$1000 per day per person that should have been reported.**

Who Has to Be Reported

Any employee or spouse who is age 45 or older must be reported, plus any known Medicare and End Stage Renal Disease beneficiaries. Since you may not know who falls into this last category, the recommendation is to report all your employees and their spouses who are age 45 or older.

Data Needed

You will need to report the following:

- Name
- Social Security Number
- Date of Birth

Where to Find More Information

The government has published a guide that includes information about submitting HRA plan data. This can be found on the internet at:

<http://www.cms.gov/Medicare/Coordination-of-Benefits-and-Recovery/Mandatory-Insurer-Reporting-For-Non-Group-Health-Plans/Downloads/New-Downloads/NGHPUserGuideVer41Ch5Appendices.pdf>

Or see their training powerpoint at:

<https://www.cms.gov/Medicare/Coordination-of-Benefits-and-Recovery/Mandatory-Insurer-Reporting-For-Group-Health-Plans/GHP-Training-Material/Downloads/Health-Reimbursement-Arrangement-HRA.pdf>



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