Keystone Benefits Group, Inc.

ACA Compliance Services

(March 2015)

Initial ACA Analysis

- Controlled group analysis to determinate "Applicable large employer" status
- Determine "Applicable large employer members" to be tested and reported on
- Obtain basic data to do a "Snapshot" test to determine the extent of compliance and penalty exposure based on the benefit program as currently structured:
 - o Coverage of substantially all employees
 - o Minimum essential coverage
 - o Minimum value analysis
 - o Affordability testing
- Analysis of possible transition relief for non-calendar year plans

Ongoing ACA Compliance Monitoring Services

- Assistance in establishing the company wide look-back measurement period(s), administrative period(s) and stability period(s).
- Assistance in establishing the initial measurement period, administrative period and the stability period for new variable hour employees.
- Implementation of an employee administrative/eligibility system thru a monthly payroll feed which will track employee hours of service projecting full-time eligibility based upon the plan design parameters specific to your company's ACA compliance plan.
- Track individual employee hours of service during the initial and standard measurement periods.
- Employer management reporting:
 - Are you projected to cover "Substantially all" employees?
 - o Trending reports for managing hours relative to the 30 hour threshold
 - o Affordability monitoring
 - o Tracking of "Offer of coverage" to employees and dependents
- IRS Reporting
 - Form 1095-C Reporting of offer of coverage to each employee employed during the year.
 - Form 1095-C Transmittal Form One required for each "Applicable large employer member".
- Employee Reporting
 - o Preparation of annual exchange notice.
 - o Preparation and delivery of form 1095-C by January 31st following the close of the year.
- Supporting documentation for IRS/DOL audits and potential challenge of IRS initiated ACA penalties.
- Annual overall compliance review covering the items outlined in the Initial ACA Analysis.
- Review of any problem areas relating to testing problems, data transmission issues, etc.

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ACA Compliance Services (Implementation and Administration Fees) (March 2015)

Plan Implementation – Including items detailed in Initial ACA Analysis above.

In addition:

- System set-up
- Payroll system interface analysis, set-up and testing

Fee range from \$500 - \$1,500 based on employee count, number of applicable large employer members to be tracked and number of payroll feeds to be set-up and tested.

Ongoing ACA Compliance Monitoring – Including items detailed in Ongoing ACA Compliance Monitoring Services above.

Monthly Fees - \$2 per employee per month. There may be a minor additional charge for electronically filing the 1095-C forms. Final guidance from the IRS and programing are not yet completed. This is required to know what the scope of the filing work will be.