

Fringe Benefit Time Frames

Are the employers responsible for the admin fees for the months in the extended runout period for both active and terminated employees?

Infinisource will invoice you only for the letters that must be mailed to eligible participants. You will not incur additional monthly per participant fees.

Will Infinisource be notifying groups and/or participants of these tolled timeframes?

Yes, we will be sending letters to the participants that have available balances and/or are still within the appeals timeframe.

How will we determine who was affected and lost money due to not filing timely?

Infinisource is reprocessing any claims that were denied due to being submitted outside of the runout period. No additional action is needed by the customer or the participant.

Do the runout periods and Claims appeal timeframe also work for HRA the same as FSA/HSA?

The appeal timeframe applies to FSA and HRA plans.

Will updates to SPD's and Plan Documents need to be updated or an SMM?

Updated plan documents and SMMs are not required. Infinisource will send eligible participants appropriate communications.

Do these new changes apply to municipalities, churches, and other non-ERISA plans?

No, they do not.

Does this timeframe apply to new hires/open enrollment participants too?

Yes, if they were eligible to participate into the plan and were actively participating in the plan.

Will the outbreak period end date depend on when each state defines the end date?

Someone in Michigan vs someone in Indiana could have two different dates, correct. Notice 2020-01 does contemplate that the emergency could be declared over by area, region or state. Infinisource will be prepared for that possibility.

Due to the current situation, if you have an FSA plan from July to June and because of the shelter in place employees are not using their transportation deduction, can that be rolled over into the next year even if the employer has opted to no roll over. If not, how can employees recover their costs?

With the Transportation plans the employees can make monthly election changes so it would allow them to change the Transportation election to \$0.00 and the funds will roll month to month within the existing plan year if you do not allow them to roll into the next plan year. If you would like to allow funds to roll into the next plan year and currently do not have this setup you will need to amend your plan by contacting your CSR.

What about calendar year FSA plans that provide a rollover feature, do plans now have to wait the full outbreak period + the length of your runout period to determine the rollover balances?

The carryover will still happen on the first day of the plan year. The system will automatically move funds if they submit claims for the previous plan year.

The employee still has to use up their election within the plan year or they will lose the funds?

Notice 2020-01 does not change the terms of your plan. Your plan year, options for grace period, runout and carryover all remain the same.

Is there any relief for DCA enrollees since daycares have been closed? Can they stop their DCA contributions mid-year?

Yes, they can make changes to the Dependent Care elections any time they have a change in need/cost. The ability to make such changes is not dependent upon Notice 2020-01.

How does the FSA change effect groups that are not on a calendar year plan? Example, Aug – July

This will depend on when the runout period for the plan ends. If it ends after 3/1/2020 and between when the national emergency ends, then it will be extended.

Do employees have more time to incur 2020 FSA expenses in 2021 since they may not have been able to use it during the breakout period this year?

Notice 2020-29 extends the grace period through December 31, 2020.

Can we increase the carry over funds for Health FSA since our employees have not been able to use the funds?

Notice 2020-33 allows the amount of the funds that can carry over in Health FSA plans from \$500 to \$550 for plan years starting in 2020.