

LEGAL & COMPLIANCE

DOL PUBLISHES MODEL COBRA SUBSIDY NOTICES

New COBRA subsidies for employees and new notification mandates for employers are set forth in the American Recovery and Reinvestment Act of 2009 (ARRA). To help employers explain the subsidy to their employees and comply with the notification requirements, Congress has directed the Department of Labor to publish model COBRA notices that are easily downloaded from government websites.

BACKGROUND

The stimulus package signed by President Obama on February 17, 2009 includes a temporary COBRA subsidy provision that employers must address immediately, as its requirements went into effect for most plans on March 1, 2009.

Employers are also required to provide certain notices (the DOL model notice was developed to satisfy this requirement) no later than April 18, 2009. Key COBRA subsidy provisions include:

- For certain involuntarily terminated employees and their dependents, group health plans must accept 35% of the required COBRA premium as full payment for the coverage.
- After receiving the 35% payment, the employer maintaining the group health plan may recover the remainder of the COBRA premium through offsets to payroll tax deposits or direct payment from the government, but the employer must provide certain information in order to receive reimbursement.
- In the case of certain employees involuntarily terminated since August 31, 2008 and their dependents, group health plans must allow a "second chance" COBRA election.
- Employers must provide notice of the availability of the subsidy and the second chance election.
- Employers must report to the individuals receiving the subsidy and to the IRS the amount of subsidy provided under their plans.



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WHAT KIND OF NOTICES DID THE DOL ISSUE?

The notices consist of:

- **General Notice** (full version)
- **General Notice** (abbreviated version)
- **Alternative Notice**
- **Notice in Connection with Extended Election Periods**

The DOL supplies directions for using their sample materials. The full version of the General Notice must be sent to all qualified beneficiaries who experienced any type of qualifying event from September 1, 2008 through December 31, 2009. The abbreviated version may only be used for individuals who: (1) experienced a qualifying event during, on, or after September 1, 2008; (2) have already elected COBRA coverage; and (3) still have COBRA coverage.

The Alternative Notice must be provided by April 18, 2009 by group health insurers to persons eligible for continuation coverage under state law. (This particular model notice should be further modified by issuers as necessary to conform to the relevant state law.) Finally, the Notice in Connection with Extended Election Periods must be sent by plans subject to federal COBRA provisions to any assistance-eligible individual who both had a qualifying event (regardless of whether it was due to an involuntary termination of employment and even though the person may not be eligible for the subsidy or the second change COBRA election) at any time from September 1, 2008 through February 16, 2009 and elected COBRA continuation coverage or elected it but subsequently discontinued it.

As this article was being prepared, the IRS issued Notice 2009-27, which offers 27 pages of new guidance about COBRA subsidy provisions that were included in the economic stimulus package, and perhaps most importantly, offers the government's first meaningful insight about "involuntary termination" and subsidy eligibility. It also examines rules that more sharply define the start and conclusion of the premium reduction period and a range of other topics.

This guidance is in question-and-answer form on the IRS website at

<http://www.irs.gov/pub/irs-drop/n-09-27.pdf>

A Willis HRH *Employee Benefits Alert* detailing COBRA subsidy guidance to date (specifically including this new IRS material) will be issued soon. Willis HRH's National Legal & Research Group will also continue monitoring subsidy-related developments and providing updates as warranted.

CHIPRA EXPANDS HIPAA SE RIGHTS

As described in last month's edition of *HRFOCUS*, President Obama signed the Children's Health Insurance Program Reauthorization Act of 2009 (CHIPRA) extending the state Children's Health Insurance Program (CHIP) established under the Social Security Act.

A key provision of this law gives states the authority to directly subsidize premiums for employer-provided group health coverage for eligible children and families. Specifically, the law allows states to provide premium assistance to low-income employees who want to change their single coverage to family coverage in order to cover a CHIP- or Medicaid-eligible dependent. Group health plans also have the choice of directly accepting the government subsidy and crediting the targeted participant, or continuing to require participant group health plan contributions and have the government directly reimburse the individual.

CHIPRA generates some important plan sponsor compliance obligations which are detailed below.

HIPAA SPECIAL ENROLLMENTS

CHIPRA amends the Internal Revenue Code, ERISA, and the Public Health Service Act to create new HIPAA special enrollment rights, new notice and disclosure obligations, and penalties for non-compliance. The enrollment opportunities will open the door for transitioning individuals from Medicaid or CHIP coverage to group health plans. Employers will face penalties of up to \$100 a day for failure to comply with the notice and disclosure requirements. The \$100 penalty applies for each violation per participant or beneficiary.

Starting on April 1, 2009, group health plans must permit employees and dependents that are "eligible but not enrolled for coverage" under an employer plan to enroll in two new cases:

- When the employee or dependent covered under Medicaid or CHIP has coverage terminated as a result of loss of eligibility, and the employee requests coverage under the group health plan within 60 days after such termination
- When the employee or dependent becomes eligible for Medicaid or CHIP assistance (i.e., becomes subsidy-eligible), if the employee requests health coverage within 60 days after the eligibility determination date

In a departure from other HIPAA special enrollment events, the law says that the employee or dependent must request coverage within *60 days* after the employee or dependent is terminated from, or determined to be eligible for, such assistance. (HIPAA special enrollment rules regarding loss of private plan coverage and changing family events [such as birth or marriage] provide for only a 30-day period in which to request coverage due to a change in status.) Plan documents should be reviewed and revised to reflect these new rules. (A sample SMM to address the ERISA disclosure obligations necessitated by these revisions is available from your Willis HRH representative.)

Group health plans must also notify all employees of their potential eligibility for the new subsidies. Group health plans will be required to distribute notices when an employee becomes eligible for enrollment under the plan. Such disclosure may be included in the employer's open enrollment materials, in the Summary Plan Description, or in other general materials used to communicate health plan eligibility to employees. Model notices are to be developed by the DOL and the Department of Health and Human Services by February 4, 2010. (*Note:* The agencies will also be developing another model notice to be used when the state, relative to the subsidy, requests information about benefits available under the group health plan. Specifically, CHIPRA will require plan sponsors to provide disclosure information to the states explaining when a participant or beneficiary is covered under an organization's group health plan and Medicaid or CHIP – but that particular requirement will not go into effect until the first plan year that starts after the date on which the model form is first issued.)

Although plans will be required to distribute notices during the first plan year beginning after the date on which model notices are first issued (January 1, 2011 for calendar year plans), we believe additional notification requirements are also due. (Please see below.)

WHAT SHOULD PLAN SPONSORS DO?

Although CHIPRA did not contain an immediate, direct notification requirement, arguably ERISA-borne duties will compel plan sponsors to communicate the availability of the HIPAA special enrollment so that participants receive a meaningful opportunity to weigh their coverage options. Consequently, the lawyers at Willis HRH's National Legal & Research Group (NLRG) believe that the wisest move is for employers to proactively deliver revised HIPAA special enrollment notices. A summary material modification (SMM) should also be distributed reflecting the change. Although the SMM would not have to be distributed until 210 days following the end of the plan year*, now is an opportune time to send it. NLRG has therefore prepared sample revised HIPAA special enrollment notices, and corresponding sample SMM. Both documents are available from your Willis HRH adviser.

It's also prudent to send the notice now because virtually all employers are already scrambling to distribute a COBRA subsidy notice in the next few days. (The DOL released its sample notice on March 19, 2009.) Although the CHIPRA related notice is directed primarily at active employees, COBRA recipients are required to be treated the same as similarly situated active employees and they should therefore also receive CHIPRA notification. Since employers must satisfy the COBRA subsidy notification requirement anyway, there is a natural opportunity to undertake a comprehensive notification effort addressing both obligations.

**Summary Material Modification (SMM):* As described more fully above, most group health plans will have to be amended to recognize the newly expanded HIPAA special enrollment opportunities. Since this plan change will not represent a benefit cutback, ERISA's standard disclosure rule of 210 days following the end of the plan year would be sufficient. However, since the client will likely already be taking steps to notify participants of these changes, we think it's smart to distribute the SMM now and get that obligation out of the way.



SINCE YOU ASKED: HOW LONG MUST COBRA RECORDS BE KEPT?

With the DOL applying a broad focus of review during its compliance audits, Willis HRH clients often voice questions and concerns about their internal benefits practices. The following article summarizes key compliance requirements from a benefits perspective as well as suggesting ways to maintain a distinct recordkeeping trail.

HOW LONG TO KEEP RECORDS

ERISA requires that plan administrators maintain records justifying the information in any report that must be filed for an employee benefits plan (such as an Annual Form 5500). This information must be maintained for at least six years after the filing date of the plan. *(As a practical matter, this really represents an ERISA obligation to hold records for seven years – six years plus one additional year to reflect the current plan year period of operation.)* Other ERISA provisions, such as those dealing with the breach-of-fiduciary duty rules, also suggest a minimum six-year recordkeeping period.

The Internal Revenue Code also includes various recordkeeping requirements, generally indicating that records related to payroll and group health plans should be maintained for at least a three- to four-year period. Absent any longer limits that might potentially apply under state law (though from a benefits perspective, state law is unlikely to apply because of ERISA preemption), employers should consider retaining documents for at least the ERISA recordkeeping period.

WHAT ABOUT COBRA COMPLIANCE?

COBRA's statutory language does not specifically address how long COBRA records must be kept. However, employers who are subject to ERISA can look to the general ERISA recordkeeping rules for some guidance. (See above.)

A reason for keeping COBRA records longer than the ERISA-mandated period is that there is no fixed rule on how long a person has to bring a COBRA claim. Most experts and court cases suggest that a claim must be brought within the time period outlined under state contract laws. Absent any longer state limits, employers should consider retaining documents for at least the ERISA recordkeeping period.

WHAT COBRA RECORDS SHOULD BE KEPT?

The short answer is that the employer, or plan administrator (if not the employer), must keep everything relevant to establishing or supporting compliance. As a practical matter, that may not always be feasible. A typical list for each participant includes the following records:

- Date of birth, date of hire, and date of initial plan eligibility
- Date of plan enrollment and type of coverage
- Loss of coverage date, and dates of other events affecting the period of coverage continuation
- Copies of all COBRA notifications (and proof of mailing and other documentation of receipt for the initial notice)
 - *Note:* Certified mail is not required for sending COBRA notices. In fact, NLRG generally advises against using certified mail because of the inevitable risk of inadvertently proving that a qualified beneficiary never received his notice. Instead, first class mail, coupled with proof of mailing, offers more than adequate delivery documentation.
- Original COBRA election forms
- Claim-related forms
- Dates and amounts of premium payments received
- Letters rejecting COBRA coverage
- Postmarked envelopes relating to correspondence from qualified beneficiaries

A crucial aspect of COBRA compliance is that employers and administrators must be able to demonstrate that COBRA notifications were adequate and sent on time. Unfortunately, employers will find the volume of records that must be kept can quickly create storage and retrieval problems.

Employers or administrators might consider contracting for some acceptable alternative means of storage or using a third-party record keeper to maintain hard copies of all COBRA-related documents for a required period. This may be preferable to administering COBRA in-house with related recordkeeping costs, as long as the employer can be assured that the records can actually be retrieved when needed.

FORMAT FOR MAINTAINING RECORDS

No standard format exists for retaining benefits-related documents. The obvious response is to keep originals of everything. Given space constraints, however, this is often not feasible. An alternative is to maintain hard copies of current documents (three years or so) with “adequate copies” (e.g., microfilm) maintained for longer periods. Some employers and administrators will keep records on microfiche, microfilm or by computerized methods. All of these methods are generally permissible under ERISA and the tax code. However, as a practical matter, the employer should maintain the information in a manner that can be easily retrieved. If information is kept on computer (database programs or computer listings), the employer should also have documented procedures for ensuring the accuracy of the information.

Although computers may be useful in storing data, such as coverage period records, employers should be leery of exclusively relying on computer systems to store records. Even so-called secure computer systems can be compromised; consequently, some courts may view such records as less credible than hard copy documents.

NONCOMPLIANCE PENALTIES

Various penalties could apply due to a failure to maintain documents demonstrating compliance. COBRA failures can be particularly expensive. Moreover, the DOL has indicated that the penalty for a failure to maintain records for the six-year period may vary depending on the facts of the particular case. Employers should also note that ERISA penalties can be applied at the court’s discretion, when a COBRA notice is not provided or a plan administrator does not respond to a participant’s request within 30 days. Courts will often impose a per-day penalty under the statute, but they will usually reduce it from the maximum \$110 for each day of the failure to a more modest, though still painful, amount. Additionally, an excise tax of \$100 per day may be awarded.

An employer’s records and preparedness in the event of a lawsuit by an employee could drastically affect the court’s perception of employer practices. If an employer cannot produce records, a court would likely view this as a presumption *against* the employer and in favor of the employee. The absence of adequate records could also be used in determining an employer’s bad faith when a court assesses damages and attorneys’ fees. Conversely, easy retrieval and organized documentation can help shift the presumption to one that demonstrates the employer’s proper compliance with the full range of COBRA requirements.



NEWS

AARP: THE RECESSION HITS OLDER AMERICANS

The American Association of Retired Persons (AARP) recently conducted a national telephone survey of middle-aged and older Americans to gauge their expectations of the government during these difficult times. Gleaned from the responses of 1,097 people, 45 and older, the findings conclude that:

- An overwhelming majority of respondents believe that the economy is in bad shape. The majority also say that, because of the economic downturn, they cut back on entertainment spending (68%) and eating out (64%) during 2008. Additionally, 52% had more difficulty paying for such essential items as food, gas and medicine, and 44% found it more difficult to pay for utilities.
- Many respondents expressed concerns about paying for health care, mortgage and rent over the next 12 months, 29% think that their health insurance coverage will likely be reduced or eliminated in the next 12 months, and 31% of those who are still employed express fears that their jobs could be eliminated.
- The majority of respondents are looking to the government to help Americans who have lost jobs and health insurance and those at risk for losing their homes. Specifically, they say that they expect the government to take action by extending unemployment benefits, facilitating access to health care coverage, making home mortgages more affordable, and helping people who face foreclosure remain in their homes.

The AARP survey underscores challenges facing our nation due to an aging population and our dependence on employer-provided health coverage. As modern medicine helps us live longer, economists warn that costs for senior health care and retirement income could put a hefty strain on future generations.

Those planning early retirement often believe that Social Security and Medicare will pay for their health care. However, healthy seniors can cost just as much as sick ones, since average lifetime medical costs after turning 65 are generally the same no matter how long a person lives.

To access the full report, click on:

http://www.aarp.org/research/economy/trends/economic_slowdown_09.html



WELLNESS WORKS

WELLNESS IN HARD TIMES

The news is disconcerting: companies downsizing, cutting benefits or closing their doors. Employees are on edge, stressed and worried.

You may have planned to start a worksite wellness program this year, or perhaps you began last year and wonder how to keep the program afloat with little-to-no budget to support it. We all must do more with less, and encouraging the health and well-being of our workforce is part and parcel of the big picture, because now more than ever your business needs a healthy and productive workforce. But how do we do it?

Here are eight ideas costing little to nothing in money or time that may help you kick-start your wellness initiative or maintain an existing program in the face of budget cuts.

- 1 Willis Rewards.** Launch the base portal of our Willis Rewards program and pass along valuable discounts to your employees when they need them the most. Willis Rewards is a password-protected discount purchase site that provides members with access to discounts from a national network of more than 10,000 retailers. For a modest fee, you can sponsor the Willis Rewards Healthy Points program. You design your own rewards system and use the portal to administer the rewards.
- 2 Virtual Health Fair.** Don't have the time or money to support an onsite health fair? No problem. The Willis Rewards program also includes a Virtual Health Fair, an online link to reputable health websites and merchants.
- 3 Jillian Michaels.** Want to help your employees get in shape? Jillian's program provides the information, advice and reinforcement they need. You may provide your employees access to memberships on this website at discounted rates.
- 4 The Biggest Loser League.** Your employees have seen the show; now they can join the league and team up with Willis HRH and *The Biggest Loser League* for a fitter, healthier, happier year. Participants can lose weight and get in shape with family, friends

and colleagues. Our wellness consulting team has designed team challenges you can implement throughout the year to keep the program fresh.

- 5 Maximize your existing vendor partnerships.** Ensure that you are utilizing training hours included in your EAP or health carrier contracts. Financial planning, coping with stress, effective budgeting may all be welcome topics for brown bag lunch seminars.
- 6 Tap into low-cost/no-cost community resources.** Many non-profit organizations and local community agencies have programs and resources available to employers at no cost. Willis HRH Wellness Consultants have compiled resource guides to acquaint you with many options in your locale.
- 7 Personal Health Goal.** Encourage associates to choose one personal health improvement goal to display in their office or workstation. Kick off the campaign with the president or CEO announcing their own health goal and challenging associates to join the campaign. For example: *"My health goal is to increase my regular physical activity to five days per week. Ask me to join you for a walk at lunch."* An initiative like this generates a lot of positive interaction and peer support and it doesn't cost a dime.
- 7 Healthy Moment.** Provide managers and department heads with a listing of brief "Health Tips" that can be conveyed in a minute or two and make it a practice to kick off company meetings with a Healthy Moment. Quick, easy – and effective.

Meet the challenge and continue to support the health and productivity of your workforce. Building a culture of health is even more important in hard times. Many simple, low-cost initiatives can enhance and bolster the wellness culture of your organization. Contact your Willis HRH service representative and start Winning With Willis!



HR CORNER

THE IMMIGRATION REFORM AND CONTROL ACT OF 1986 (IRCA)

The Immigration Reform and Control Act of 1986 (IRCA) bars employers from hiring individuals, including illegal aliens, who are not legally entitled to work in the United States. Employers must verify that individuals are eligible to work by obtaining an Employment Eligibility Verification Form, known as Form I-9, and inspecting the required supporting documents at the time of hiring. I-9 forms must be retained for 3 years after the worker is hired or for 1 year after termination, whichever is longer. IRCA prohibits employers from discriminating in hiring, firing, recruiting, or referring on the basis of national origin or citizenship status. It is also illegal to retaliate against an employee who has filed a discrimination charge. This provision applies to employers with four or more employees.

Immigration Reform and Control Act of 1986 (IRCA)

The **Immigration and Naturalization Act**, as amended by IRCA and all subsequent amendments, prohibits employers from hiring illegal aliens. IRCA applies to all employers, including those that hire domestic help or farm laborers. Employers are required to verify that all employees hired after November 6, 1986, are legally entitled to work in the United States. The law also makes it illegal to discriminate in hiring and firing based on citizenship status or national origin.

Employees must provide employers with documents that show (1) identity and (2) employment eligibility. Employees must also complete an Employment Eligibility Verification Form, known as Form I-9, attesting under penalty of perjury that they are either U.S. nationals or aliens authorized to work in the United States. The law is administered by the United States Citizenship and Immigration Services (USCIS), which is part of the Department of Homeland Security (DHS). This agency was formerly known as the Bureau of Citizenship and Immigration Services (BCIS) and the Immigration and Naturalization Service (INS) and was part of the U.S. Department of Justice.

I-9 revisions. Amendments to IRCA adopted in 1996 reduced the number of acceptable documents on List A of the I-9 form. On November 7, 2007, USCIS issued a revised Form I-9 to achieve full compliance with those document reduction requirements. Employers were required to start using the revised form by December 26, 2007. USCIS has issued an interim final regulation, "Documents Acceptable for Employment Eligibility Verification," that was published in the Federal Register on December 17, 2008. The rule is intended to streamline the I-9 process. When the new I-9 must be used has been postponed to April 3, 2009, from February 2, 2009, to allow an opportunity for further consideration of the rule and also to allow the public additional time to submit comments. The latest version of Form I-9 for use before April 3, 2009, may be obtained by going to <http://www.uscis.gov>. The revised regulations provide that employers will no longer be able to accept expired documents to verify employment authorization, add documents to List A, and make technical changes to the form.

To read and or print the full article, go to the link below:

<https://welcome2.willis.com/ebvideo/Document%20Library/National%20Practice/HR%20Focus%20Articles/I-9%20HR%20Focus%20article,%2004.09.doc>

This article provided by BLR.



WEBCASTS & EVENTS

WELLNESS ON A SHOESTRING

TUESDAY, JUNE 9, 2009
2:00 PM EASTERN TIME

Presenters

**Jennifer Martinsen, CWWPC - Willis HRH Regional Wellness Consultant and
Connie Gee - Willis HRH Regional Wellness Consultant**

Are you just getting started with wellness and have a limited budget to implement your program? This web seminar will provide you with the information, tools and resources to implement a successful program with a minimal financial investment. Willis HRH will answer the following:

- What is *Wellness on a Shoestring*?
- Free and low-cost resources to promote healthy living, including:
 - Worksite education
 - Health promotion campaign toolkits
 - Free promotional materials to use at the worksite
 - Speaker resources for onsite lunch-and-learns
 - Free resources available through Willis HRH and your vendor partners

Web RSVP:

https://e-meetings.verizonbusiness.com/emeet/rsvp/index.jsp?customHeader=mymeetings&Conference_ID=3112208&passcode=7497755

HIPAA PRIVACY AND SECURITY

MAY 26, 2009
2:00 PM EASTERN TIME

Presenters

**Elizabeth Vollmar, Vice President & Principal Employee Benefits Attorney and
Jay Kirschbaum, JD, LLM - National Legal and Research Group Practice Co-Leader**

HIPAA's Privacy and Security Rules include training requirements for employees who have access to protected health information (PHI). Not only is initial training required when employees' job responsibilities first bring them into contact with PHI, on-going training is required. Participation in this webcast, led by Elizabeth Vollmar, J.D. and Vice President, Willis HRH National Legal and Research Group, will help satisfy HIPAA training obligations for employees who have access to protected health information in connection with an employer-sponsored group health plan. Our training session will address:

- Types of information that are PHI
- Which plans are subject to HIPAA privacy and security requirements
- The role of designated employees in HIPAA compliance
- HIPAA's restrictions on use and disclosure of PHI
- The requirement for reasonable safeguards to protect PHI
- Why written policies and procedures are an integral part of HIPAA compliance

- The rights that individuals have with respect to their PHI

Web RSVP:

https://e-meetings.verizonbusiness.com/emeet/rsvp/index.jsp?customHeader=mymeetings&Conference_ID=3124896&passcode=2618821

MAXIMIZING HUMAN CAPITAL INVESTMENT IN A RECESSION ENVIRONMENT - DOING MORE WITH LESS

MAY 12, 2009

2:00 PM EASTERN TIME

Presenters

Employee Benefit Practice Leaders

In recent issues of HR Focus we polled our clients and all readers as to the topic you wanted to hear about for our May 12 “Client Pick Webcast”. Poll results are in and the majority have indicated a preference for the topic “Maximizing Human Capital Investment in a Recession Environment – Doing More with Less”.

At a time when the economy weighs heavily on everyone’s mind, Willis HRH looks forward to presenting this topic to you. We will provide insight, sound advice and practical ideas you can apply to your organization’s particular situation. You will hear from our practice leaders on a variety of topics including: wellness, auditing, compensation, 401(K) and communication.

Join us for this informative webcast and thank you for voting for the topic of interest to you!

Web RSVP:

https://e-meetings.verizonbusiness.com/emeet/rsvp/index.jsp?customHeader=mymeetings&Conference_ID=3124845&passcode=4053098



KEY CONTACTS

US BENEFITS OFFICE LOCATIONS

NEW ENGLAND

Bangor, ME
207 942 4671

Boston, MA
617 557 7517

Hartford, CT
860 756 7365

Shelton, CT
203 924 2994

NORTHEAST

Buffalo, NY
716 856 1100

Cranford, NJ
908 931 3005

Florham Park, NJ
973 410 4622

Morristown, NJ
973 829 6374
973 829 6465

New York, NY
212 915 8802

Norwalk, CT
203 523 0501

Philadelphia, PA
610 260 4351

Radnor, PA
610 254 7289

Wilmington, DE
302 397 0171

ATLANTIC

Baltimore, MD
410 584 7528

Bethesda, MD
301 581 4261

Knoxville, TN
865 588 8101

Memphis, TN
901 248 3103

Nashville, TN
615 872 3716

Norfolk, VA
757 628 2303

Reston, VA
703 435 7078

Richmond, VA
804 527 2343

Rockville, MD
301 692 3025

SOUTHEAST

Atlanta, GA
404 224 5000

Birmingham, AL
205 871 3300

Charlotte, NC
704 344 4856

Gainesville, FL
352 378 2511

Greenville, SC
704 344 4856

Jacksonville, FL
904 355 4600

Marietta, GA
770 425 6700

Miami, FL
305 421 6208

Mobile, AL
251 544 0212

Orlando, FL
352 378 2511

Raleigh, NC
704 344 4856

Savannah, GA
912 239 9047

Tallahassee, FL
850 385 3636

Tampa, FL
813 490 6808
813 289 7996

Vero Beach, FL
772 469 2842

MIDWEST

Appleton, WI
414 259 8837

Chicago, IL
312 527 6482
312 621 4843
312 621 4704

Cleveland, OH
216 357 5921

Columbus, OH
614 326 4788

East Lansing, MI
517 349 3226

Grand Rapids, MI
248 735 7249

Green Bay, WI
414 259 8837

Milwaukee, WI
414 203 5248
414 259 8837

Minneapolis, MN

763 302 7131

763 302 7209

Moline, IL

309 764 9666

Pittsburgh, PA

412 645 8537

412 586 3524

Schaumburg, IL

847 517 3469

SOUTH CENTRAL**Amarillo, TX**

806 376 4761

Austin, TX

512 651 1660

Dallas, TX

972 715 2194

972 715 6272

Denver, CO

303 765 1564

303 773 1373

Houston, TX

281 584 1672

281 584 1676

713 625 1017

McAllen, TX

956 682 9423

Mills, WY

307 266 6568

New Orleans, LA

504 581 6151

Oklahoma City, OK

405 232 0651

Overland Park, KS

913 498 4423

913 339 0800, ext. 108

San Antonio, TX

210 979 7470

Wichita, KS

316 263 3211

WESTERN**Aliso Viejo, CA**

949 461 3996

Fresno, CA

559 256 6212

Las Vegas, NV

602 787 6235

602 787 6078

Los Angeles, CA

213 607 6300

Novato, CA

415 493 5210

Phoenix, AZ

602 787 6235

602 787 6078

Portland, OR

503 274 6224

Rancho/Irvine, CA

562 435 2259

San Diego, CA

858 535 1800

858 678 2130

San Francisco, CA

415 291 1567

San Jose, CA

415 291 1567

Seattle, WA

800 456 1415

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