HUMAN CAPITAL PRACTICE

Willis

HRFocus

October 2011 – Issue 52 www.willis.com

LEGAL & COMPLIANCE

SAN FRANCISCO HCSO UPDATES

San Francisco's Office of Labor Standards Enforcement (OLSE) recently released its analysis of the information it gathered from the 2010 Annual Reporting Forms (ARF) submitted by employers (the 2010 ARF was due by April 30, 2011). The ARF fulfills the annual reporting requirement under San Francisco's Health Care Security Ordinance (HCSO). It is used by employers to report on their compliance efforts.

Highlights of San Francisco's findings are as follows:

- The primary way for employers of all sizes to meet the expenditure requirement was through health insurance. In 2010, 90% of all health care dollars was spent on health insurance, 3% on the city option (Healthy San Francisco) and 7% was allocated to reimbursement plans.
- The percentage of employers electing to primarily satisfy the health care expenditure requirement by providing employees with reimbursement plans has increased from 8% in 2008 to 13% in 2010.
- The average reimbursement rate of money allocated to reimbursement plans in 2010 is low (this low utilization is consistent with prior years). Only 20% of the $62 million allocated to such plans in 2010 was actually reimbursed to employees.

A copy of the report can be found **here**.

2012 EXPENDITURE RATES

The 2012 health care expenditure rate is now available. In 2011, the health expenditure rate for a large employer (100 or more employees) was $2.06 per hour. For 2012, the rate for large employers will be $2.20, an increase of $.14 per hour. For medium-sized employers (20-99 employees) the 2011 rate was $1.37. For 2012, the rate for a medium-sized employer will increase to $1.46 per hour.

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PROPOSED AMENDMENT

San Francisco City Supervisor David Campos recently proposed an amendment to the HCSO. The amendment would redefine qualifying health care expenditures so that only amounts actually paid or irrevocably committed to pay for providing health care services to employees would satisfy the HCSO's employer expenditure requirements. Amounts that are retained by the employer or that may be recovered by or returned to the employer would not constitute valid health care expenditures. Under this definition an employer would not be able to use a Health Reimbursement Arrangement (HRA) that provides for unused amounts to revert back to the employer to meet its obligation under the law.

The amendment would require employers to provide covered employees with a written notice of the employer's obligations under the law and how the employer is meeting the obligation. The amendment would also change the penalties imposed on employers who fail to make required health care expenditures on behalf of employees.

The San Francisco Small Business Commission unanimously opposed efforts to redefine qualifying health care expenditures. The commission found that the amendment would have a $50 million annual impact on local businesses.

A hearing on the proposed amendments took place on July 14, 2011. The purpose of the meeting was to get the amendment approved by the Government Audit and Oversight Committee and sent on to the full Board of Supervisors. However, the measure did not have sufficient votes to advance to the full board. The three-member committee voted 2-1 to hold the amendment for further review. Campos was unable to get the six votes necessary to approve the legislation during the full board meeting on July 26 and the Board voted 9-2 to shelve the measure. The legislation was tabled due to concerns that the amendments would affect jobs or threaten the city's health care program.

While this particular legislation is no longer on the table, it is likely that similar legislation will be proposed in the near future. Board President David Chiu has already asked the San Francisco city attorney to draft a new proposal to address this issue.

BACKGROUND

San Francisco's HCSO requires that medium and large businesses make certain minimum contributions toward their San Francisco employees' health care. Under this mandate, an employer may either contribute at least the minimum amount to a medical plan or other health benefits or pay that amount into the publicly available program established by the HCSO. (See Willis Human Capital Practice *Alert*, Issue 112, "**San Francisco Delays Health Care Security Ordinance Effective Date**" for additional details on the HCSO's requirements.)

ARRA SUBSIDY ENDED FOR MANY BUT NOT ALL

The COBRA premium subsidy provided under the American Recovery and Reinvestment Act of 2009 (ARRA) ended on August 31, 2011 for the majority of individuals receiving it. However, the subsidy may be still available for those employees who had their COBRA start date delayed (e.g., due to the terms of a severance agreement). Individuals who were eligible for premium assistance based on an employment termination date of May 31, 2010 and did not experience a deferred loss of coverage, reached the end of their 15-month period of federal government subsidy on August 31. Those who had a May 31 termination date but had their COBRA start date delayed would be eligible for up to 15 months of reduced COBRA premiums starting from the date their COBRA coverage began. Individuals with termination of employment dates after May 31, 2010 were not eligible for the subsidy.

The Department of Labor (DOL) has recently updated its FAQs to address those who may be eligible to receive the subsidy beyond August 31, 2011. The FAQ (Q1) can be found **here**.

BACKGROUND

ARRA included a temporary COBRA subsidy provision. For certain involuntarily terminated employees and their dependents, group health plans (other than health flexible spending accounts offered under a cafeteria plan) were required to accept 35% of the required COBRA premium as full payment for up to 15 months of COBRA coverage. When the COBRA subsidy was first enacted in February 2009, eligibility was limited to those who qualified for the subsidy by the end of 2009. In December 2009, an extension moved the eligibility deadline to February 28, 2010. In March 2010, the deadline was extended to March 31, 2010, and a final extension in April 2010 made May 31, 2010 the deadline.

NEW YORK NEW HIRE REPORTING REQUIREMENTS MODIFIED

New York modified its new hire reporting requirements on July 15, 2011. Employers with employees working in New York must now report certain dependent health coverage information to the New York Department of Taxation and Finance when they file their quarterly wage withholding reports as well as when they submit new hire and rehire reports. The new requirements are intended to improve the enrollment of children in health insurance programs.

Regarding new hires (and rehires), employers must report the employee's name, address, Social Security number, the availability of dependent health insurance to the new employee and the date the employee is eligible for the dependent health insurance. This information must be reported within 20 calendar days after the employee's hire date, which is the first date any services are performed for wages, other compensation, or eligibility to earn commissions. More information about this requirement is available at **www.nynewhire.com**.

In addition, as part of the employer's quarterly filing of Form NYS-45 (Quarterly Combined Withholding, Wage Reporting, and Unemployment Insurance Return), an employer must now disclose whether it made dependent health insurance coverage available to its employees (the employer must check a box indicating "yes" or "no"). A copy of the updated form can be found **here**.

Employers with employees working in the state of New York will need to review their recordkeeping systems to make certain that they are reporting those employees eligible for dependent health insurance benefits in the new hire (and rehire) and quarterly wage withholding reports. If the employer uses an outside vendor to file these reports on its behalf, it will want to verify with the vendor that it is in compliance with the reporting requirements.

NEW YORK TAX DEPARTMENT ISSUES GUIDANCE ON SAME-SEX MARRIAGE

The New York State Department of Taxation and Finance has issued guidance on how the recently enacted Marriage Equality Act, which allows for same-sex marriage and requires same-sex spouses and opposite-sex spouses to be treated equally under the laws of New York, impacts personal income taxes and employer reporting and withholding obligations. The guidance can be found **here**.

For purposes of personal income taxes, the guidance clarifies that same-sex married couples must file their state income tax returns as married, even though their marital status is not recognized for federal tax purposes. Even if they do not use a married filing status on their federal income tax return (e.g., single), they must use a married filing status (e.g., married filing jointly, married filing separately). Couples that are married as of December 31, 2011 are treated as married for the entire year. Same-sex couples married in another state before the Marriage Equality Act's effective date (July 24, 2011) are considered married in New York for tax purposes on July 24, 2011 (they cannot use a married filing status prior to the 2011 tax year).

Separate withholding tax instructions make clear that employer-provided health coverage for a same-sex married spouse would not be included in New York taxable income. They advise employers not to withhold New York tax on benefits that are provided to same-sex married employees (e.g., domestic partner health coverage) even though the benefit is subject to federal withholding.

When reporting annual wage totals on Form NYS-45 (Quarterly Combined Withholding, Wage Reporting, and Unemployment Insurance Return), employers are instructed to report federal wages minus the benefits discussed above that the employer does not withhold for New York income tax purposes. The guidance advises employees to consider filing a new Form IT-2104, Employee's Withholding Allowances Certificate, with their employer. This is to adjust their withholding for New York income tax purposes to take into account their married filing status. It also tells employees to provide proof to employers of their marital status in order to stop the withholding of New York tax on the value of certain benefits (e.g. domestic partner health care coverage).

For additional information about New York's Marriage Equality Act, please see Willis' *HR Focus*, Issue 50, **"New York Enacts Same-Sex Marriage Law."**

SINCE YOU ASKED:

CAN EMPLOYERS OFFER OPT-OUT BONUSES TO EMPLOYEES COVERED BY TRICARE?

The National & Legal Research Group (NLRG) recently received a question about a client offering employees an opt-out option for the medical and dental coverage. The employer pays $200 per quarter to any eligible employee who opts out of the medical and dental coverage. The benefits are offered through a § 125 cafeteria plan (which allows employees to pay for their medical and dental coverage on a pre-tax basis).

One employee who chose to opt out of the client's plan is covered by TRICARE. NLRG was asked whether the client's opt-out policy complies with Department of Defense's (DOD) Secondary Payer rules for TRICARE.

ANALYSIS

TRICARE is the health care program serving active duty service members, National Guard and Reserve members, retirees and their families. Starting in 2008, federal law generally prohibited employers from offering TRICARE-eligible employees any financial

or other incentives to drop (or not enroll in) an employer-sponsored group health plan that would provide primary coverage. Like Medicare, TRICARE coverage for veterans generally is the secondary payer for individuals with employment-based health coverage.

The preamble to the final TRICARE regulations notes that certain common employer-provided benefits will not constitute improper incentives under the TRICARE incentive prohibition rules. For example, an employer-provided incentive not to enroll in a group health plan generally does not violate the incentive prohibition if the incentive is "available to and can be used by all employees," and is not limited to employees who are also TRICARE beneficiaries.

The final regulations also indicate that the incentive prohibition does not apply if the benefit is a cafeteria plan offered under Internal Revenue Code (IRC) § 125 and is offered to all similarly situated employees, including non-TRICARE eligible employees. The preamble to the final regulations clarifies that an employer-sponsored cafeteria plan is not a prohibited incentive if the cafeteria plan meets the requirements of IRC § 125 and offers all employees (without regard to TRICARE eligibility) a choice between health coverage and cash payments. Thus, if a TRICARE beneficiary elects the cash payment option as a benefit offered under such a cafeteria plan, the employer would not violate the incentive prohibition. This means that the employer's opt-out option described above does not violate the DOD's TRICARE Secondary Payer rules.

For more information on the TRICARE Secondary Payer rules, please see Willis' August 2007 edition of **FOCUS on Benefits** and *HR Focus*, Issue #36, June 2010, **"DOD Publishes Final TRICARE Secondary Payer Rule."**

HR CORNER

ALIGNING PAY-FOR-PERFORMANCE THROUGH MERIT INCREASE MODELING

DO MERIT INCREASES MATTER?

Tis' the budgeting season when HR professionals are being asked by the Finance Department for benchmarking data on salary increase budgets for 2012. After seeing zero merit increase budgets, or small budgets of 2%-3%, over the past three years, HR and even front-line managers may be asking if merit increases truly matter any more.

Even though incentives and other forms of variable pay are becoming the desired form of compensation for rewarding high performance, merit pay increases have not gone away. In fact, for many organizations, it is still often the primary (and sometimes only) method to pay for performance. Although there is a wealth of published benchmarking data with projected budgets for 2012, merit increase planning is more than simply providing "the number" to the Finance Department. The process calls for a rigorous performance management process, special skills by HR professionals to model merit increase scenarios, and commitment and buy-in by senior and line managers to accurately differentiate between performance levels and allocate rewards fairly.

MERIT PAY: WHAT IT IS... AND WHAT IT ISN'T

When communicating information about pay increases in organizations, managers sometimes erroneously use the terms "cost-of-labor" increases and "merit" increases interchangeably. Confusion also exists around the concepts of "cost of labor" vs. "cost of living."

- **Merit Increases** are periodic upward pay adjustments based on an individual employee's performance appraisal results. Increases are based on performance, regardless of changes in cost of living or labor.
- **Cost-of-Living Adjustments** are base pay increases typically granted in a government/union environment to recognize increases in cost of goods (housing, food, transportation) for a typical consumer. Most organizations, however, do not increase pay based on cost of living.
- **Cost-of-Labor Adjustments** are differentials in base pay levels to recognize that certain geographic areas may pay more (or less) for a specific type of work. Cost of labor is not the same as cost of living, although they may or may not be correlated. Pay may increase or decrease based on geographic differentials associated with the cost of labor.

WHY ARE MERIT INCREASES SUCH A CHALLENGE?

No doubt about it, administering merit increases in these challenging economic times (and even in good times) is difficult for many reasons.

- **FAILURE TO DIFFERENTIATE PERFORMERS**
  The primary reason is managers' leniency in their performance ratings. Conflicted about being candid with employees about how work can be done better (especially when money is tied to performance), most managers find it difficult to provide constructive performance feedback. The result is a tendency to rate too many employees at the "exceeds expectations" level and not enough in the "meets" or "needs improvement" categories.

- **LIMITED BUDGETS**
  When merit dollars are limited, the lack of performance differentiation is an even greater issue. Managers find themselves in a situation where there are not enough dollars to allocate to the "true" top performers, and all employees receive about the same merit increase, eroding the entire concept of pay-for-performance. When budgets are small, the need is greater for managers to be more judicious in their performance ratings and reserve the highest ratings for those employees who really deserve it.

- **PERMANENCY OF MERIT PAY**
  Another challenge with merit increases is that they are a permanent increase in labor expenses to the organization. Unlike variable pay, which can be paid when times are good and eliminated when times are tough, merit increases are sometimes called "the gift that keeps on giving," since the fixed increases to base pay are compounded for years to come.

- **ENTITLEMENT MENTALITY**
  Since merit increases have become somewhat of an employee expectation, it is especially critical for managers to be candid about limited salary budgets and communicating that not every employee can be a high performer. The more realistic and honest that managers can be in their performance ratings and in communication to employees, the greater the likelihood that merit increases can truly matter in the organization.

CREATING A MERIT POLICY

Three factors to consider when creating a merit pay policy are:

1. The size of budget
2. Timing
3. Delivery methods of merit increases

FACTOR 1: ESTABLISHING A MERIT BUDGET SIZE

A fundamental feature of any merit increase policy is the size of the budget. Although a wealth of benchmarking surveys shows salary increase budget

trends by type of job and/or industry, benchmarking data is not the only consideration. Affordability, based on actual or anticipated business results, plays a huge role in determining merit increase budgets. The cost of labor and the competitive position of the company's pay vs. the marketplace is another important consideration. Some organizations prefer a one-size-fits-all approach to establishing the budget, whereas others may tailor the budget based on a particular department or business unit's performance and needs.

WorldatWork, the professional association for total reward professionals, publishes an annual salary budget survey. According to their *2011-2012 Salary Increase Budget Survey*, the mean 2012 projected merit increase budget is 2.8%. This is an improvement over 2009 levels when budgets were at an unprecedented low of 1.9%, but they are still not as high as they were prior to the recession.

	ACTUAL 2009	ACTUAL 2010	ACTUAL 2011	ACTUAL 2012
Merit Increase Budget Trends	1.9%	2.3%	2.8%	2.8%

FACTOR 2: TIMING OF MERIT INCREASES

In general, organizations select one of two alternatives in determining when the annual performance appraisal and merit review event occurs: (1) anniversary date of each employee's hire, last promotion or salary action or (2) focal or common review date, usually at the end of the business year.

Advantages and disadvantages exist for both approaches, and organizations need to decide which approach is right for them based on these considerations.

- **Anniversary Date Approach:** Proponents of the anniversary date approach say that by having reviews spread throughout the year, managers are always thinking about performance and do not have to be bombarded with completing so many reviews at the same time. Performance reviews are also based on a full review period, not a partial, and new hires and those promoted would have their reviews scheduled a full year later. However, as much as it sounds easier to administer, in reality, it seldom is. HR often becomes a watch dog to ensure performance appraisals are not overlooked by managers. It is also more difficult to gather workforce analytics on performance since the data are constantly changing as new reviews could be done virtually every day. Probably the biggest drawback is that it is more difficult to ensure alignment of employee goals with company objectives if employee reviews are occurring all year long rather than synchronized with the business goal-setting and results calendar. Since more and more organizations want to increase the alignment and engagement of employee behaviors with company goals, using an anniversary date approach creates a disconnection in the process.

- **Focal Point or Common Review Date Approach:** The biggest advantage to a focal or common review date is that company goals can be established before the performance review planning process, so everyone in the organization can align their goals to those of the organization. Everyone's performance is evaluated at the same time, so managers can easily compare employees' performance and provide ratings and feedback that are fair and consistent (at least theoretically). Managers can also evaluate employee performance in light of business results, further linking individual and organizational goals. Differentiating rewards based on performance is easier if everyone is being evaluated, relative to one another. With these advantages, the focal date approach still

AN ALTERNATIVE: LUMP SUM INCREASES

Lump sum increases historically have been used as an alternative to merit pay when an employee approaches the maximum of the salary range, but lately, more and more organizations are delivering merit increases in the form of a lump sum cash award, regardless of where an employee falls in the salary range; the size of award may (and should) vary based upon performance.

Alternatively, for organizations that are reluctant to eliminate increases to base pay entirely, mixing the delivery, using a combination of a merit increase to base pay and a lump sum award may be a good choice. For example, an organization may allocate a small increase to employees who receive at least a "meets expectations" performance rating. However, for high performers and high potentials, management may reserve an additional increase to be delivered as a lump sum cash award.

has drawbacks. It can be a labor-intensive process for a 1-2-month period, and some organizations report that managers may rush through the appraisals rather than provide a thoughtful, personal touch. On the other hand, having a focal point review cycle can make it easier to arrange and offer management training on the tools, process and skills needed to conduct effective employee performance appraisals – and the learning can be applied immediately.

FACTOR 3: DELIVERY OF MERIT PAY

Traditionally, merit increases are delivered as an increase to base pay. Unlike variable pay, which can be set to fluctuate based upon business and/or individual performance, merit pay increases are permanent increases to fixed costs that stay with the employee as long as the employee remains with the employer.

Of course, merit pay does not always have to be delivered in the form of an increase to base pay or as a cash award. Saddled with small merit budgets, some organizations employ non-cash methods to recognize and reward good performance, and often, these strategies have a greater impact to employee engagement and satisfaction than traditional methods. Non-traditional approaches, such as career development, flexible work arrangements and supplemental time off can be reserved for the best performers as a way of retaining and engaging them beyond traditional merit increases (or even variable pay).

MERIT MATRIX GUIDELINES

Organizations often use a merit increase matrix as a tool to stay within the merit budget and provide consistent guidelines for determining merit increases. Although several types are available, the best practice is to use a Performance and Position-in-Range approach, where an employee receives a merit increase based on both individual performance and on the location of their salary within the pay range for their position.

This approach assumes that any given position has a pre-determined salary range. That range can be divided into quartiles. In this example, the salary range for this position is $40,000 to $60,000. When divided, the first quartile is $40,000 to $44,999, while the fourth quartile is $55,000 to $60,000. The midpoint of the salary range for this position essentially falls between the second and third quartiles. Those whose salaries fall below the midpoint are rewarded at a higher rate than those whose salaries are above the midpoint.

The level of performance also determines the rate of increase, so that those who are top performers are rewarded most generously while the poorest performers are given minimal-to-no increase.

For example, if you have an employee who earns a rating of 4 and that employee's salary is in the first quartile, according to this matrix that employee would receive a 5% increase. An employee in the second quartile still receives a salary increase, but it is slightly smaller than

the first quartile. Across the midpoint into the third quartile, the increase drops lower to 3%, and for employees in the fourth quartile the increase would be zero to 2%.

SALARY RANGE FOR ACCOUNTANT: $40,000-$60,000

Rating and Distribution		POSITION IN RANGE			
		1st Quartile	2nd Quartile	3rd Quartile	4th Quartile
		$40,000 to $44,999	$45,000 to $49,999	$50,000 to $54,999	$55,000 to $60,000
5	10%	7%	5%	4%	3%
4	20%	5%	4%	3%	0% - 2%
3	60%	4%	3%	2%	0%
2	5%	0%	0%	0%	0%
1	5%	0%	0%	0%	0%

FIVE STEPS TO CREATING A BUDGET-ALIGNED MERIT MATRIX

HR departments often ask how to develop a merit matrix that will ensure they meet their merit increase budget while ensuring pay-for-performance. Below are the five steps for creating a budget-aligned matrix based on the anticipated performance rating distribution, the percentage of employees in each salary range quartile (position-in-range) and the allocated merit budget.

- Step 1: **Anticipate the distribution of the performance ratings**. Through thoughtful discussion with leadership, estimate the percentage of employees who will be receiving each rating.
- Step 2: **Determine the most highly populated cell in the merit matrix**. Determine where to anchor your specific merit budget percentage based upon the cell that reflects the highest employee population for both performance rating and salary range quartile.
- Step 3: **Develop a merit matrix of increases**. In designing the matrix, use performance rating distribution, position-in-range and merit budget to populate your merit matrix with desired percentages.
- Step 4: **Determine payout** based upon anticipated distribution and percentage of employees in each quartile.
- Step 5: **Revise, if necessary**. If you determine your overall budget figure is too high or too low, adjust the merit percentages until the desired percentage is reached.

Each of these steps was discussed during Willis' September 20 external webcast. **Making Merit Pay Matter in Your Organization**. For replay information, please **click here**.

MAKING MERIT PAY MATTER IN YOUR ORGANIZATION

Although merit pay systems can have drawbacks, organizations can take innovative steps to improve merit pay programs and achieve a close pay-for-performance alignment. Improving the performance management process and tools, focusing on measurable results (including more than just the employee's immediate manager in evaluating performance and pay decisions) and differentiating among performers will all help to make merit pay matter in your organization.

WELLNESS

AVOID THE FIZZLE: ADD SOME *SIZZLE* TO YOUR WORKSITE WELLNESS PROGRAM

This time of year can be exhausting for many organizations struggling to communicate Open Enrollment, focusing on the fourth quarter or moving into the holiday season. You may think that your wellness program efforts are about to fizzle or that it is not a good time to dwell on employee health. Below are some simple, low-cost ways to avoid the fizzle and add some sizzle! Doing something is always better than nothing. Choose what options work best for your organization.

DELEGATE, DELEGATE, DELEGATE – Use your internal Wellness Committee to assist with simple tasks, such as getting the word out, putting up posters or sharing information at staff meetings. Don't have a committee? Start one today!

SMOKE 'EM OUT – Celebrate the Great American Smokeout, which typically falls on the third Thursday in November. So this year, that's November 17. You still have plenty of time to get some information out to your employees and even consider a stronger emphasis on tobacco cessation efforts for your organization.

MAINTAIN, DON'T GAIN – Help your employees avoid holiday weight gain. Each participant weighs in at the beginning of the program and weighs out at the end, with the goal being maintenance of weight throughout the holiday season. Use this time to host healthy potluck lunches, sponsor healthy recipe contests and share brief health tips to encourage healthy habits.

STRESS, ENJOY, REPEAT – This time of year can be stressful, and some of that stress in both work and life is hard to avoid. Promote healthy and effective ways of dealing with stress via your Employee Assistance Program, offering financial wellness programs or having some fun while at work to encourage social support among employees.

MOVE MORE – Busy times may plague your organization at this time of year, but remind people to fit in physical activity any time and any where they can. Encourage "walk breaks" around your building, promote the use of the stairs and share some simple stretches that can be done during the work day.

BE A TEASE – If you plan on rolling out any new wellness program options in 2012, start with a teaser campaign now. Put out some brief, but fun messaging to pique interest for the full message of what is to come in 2012.

Inspired? Block off some time on your calendar, make some phone calls, print off some new materials and get started. You have the ideas and the resources – now add some sizzle! Don't waste time creating new materials – for more tools, templates and resources to support your worksite wellness program, contact your Willis service team.

WEBCASTS

DEBUNKING MYTHS IN WORKSITE WELLNESS

OCTOBER 18, 2011
2 PM EASTERN

Presented by:
CHERYL MEALEY
NATIONAL PRACTICE LEADER - WELLNESS CONSULTING

Have you fallen prey to some common misperceptions about your wellness program? Have you set goals that are unachievable based on faulty assumptions? Join us for this discussion of common missteps and misperceptions in worksite wellness that can lead to suboptimal program results. Topics addressed will include return-on-investment, making appropriate use of comparative case studies, engagement, culture, communication and more. Learn what not to do and how to position your program for success using established best practice standards.

PARTICIPANT ACCESS

Advance reservations are required to participate. **Click here** to RSVP for this call.

HEALTH CARE REFORM A YEAR LATER

NOVEMBER 15, 2011
2 PM EASTERN

Presented by:
KATHY VACCARO
VICE PRESIDENT
CIGNA HEALTHCARE PROGRAM MANAGEMENT OFFICE

Please join us for a discussion about the impacts and upcoming changes related to the passage of the Patient Protection and Affordable Care Act. In this informative webcast, we will highlight the judicial controversy surrounding the passage of the legislation, ongoing effects of the implemented provisions and we will summarize the upcoming provisions. We will also spend some time on the evolution and establishment of the State Health Benefit Exchanges, how their implementation is progressing and, importantly, their impacts on the marketplace.

PARTICIPANT ACCESS

Advance reservations are required to participate. **Click here** to RSVP for this call.

KEY CONTACTS

U.S. HUMAN CAPITAL PRACTICE OFFICE LOCATIONS

NEW ENGLAND

Auburn, ME
207 783 2211

Bangor, ME
207 942 4671

Boston, MA
617 437 6900

Burlington, VT
802 264 9536

Hartford, CT
860 756 7365

Manchester, NH
603 627 9583

Portland, ME
207 553 2131

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

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
407 562 2493

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
800 236 3311

Chicago, IL
312 288 7700
312 621 4843
312 348 7678

Cleveland, OH
216 861 9100

Columbus, OH
614 326 4722

East Lansing, MI
517 349 3226

Grand Rapids, MI
248 735 7249

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 8506

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
713 625 1017
713 625 1082

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
913 339 0800

San Antonio, TX
210 979 7470

Wichita, KS
316 263 3211

WESTERN

Fresno, CA
559 256 6212

Irvine, CA
949 885 1200

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
858 678 2000
858 678 2132

San Francisco, CA
415 291 1567

San Jose, CA
408 436 7000

Seattle, WA
800 456 1415

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