



Gallagher

Insurance | Risk Management | Consulting

Quick Reference Tool: What is Included in W-2 Reporting

Coverage	Yes	No
Primary medical	✓	
Prescription drug	✓	
HIPAA excepted dental (not integrated with group health plan)		✓
HIPAA excepted vision(not integrated with group health plan)		✓
Long-term care		✓
Medicare supplemental*	✓	
Medicare Advantage*	✓	
Health Savings Accounts (HSAs)**		✓
Health Reimbursement Arrangements (HRAs)		✓
Qualified Small Employer Health Reimbursement Arrangements (QSEHRAs)**		✓
Accident, disability and disability (AD&D)		✓
On-site medical clinics (but only if employer charges COBRA premium)	✓	
Self-insured plans not subject to COBRA (e.g., church plans)		✓
Employer contributions to multiemployer plans		✓
Employer contributions to health FSA (including flex credits employee elects to apply)	✓	
Employee contributions to HIPAA excepted benefit paid on <u>after-tax</u> basis (e.g., hospital or fixed indemnity plan or specified disease or illness insurance)		✓
Employer contributions or employee contributions paid on <u>pre-tax</u> basis for hospital or fixed indemnity plan, or specified disease or illness insurance	✓	
Employee salary reduction contributions to health FSA		✓
Workers' compensation		✓
Liability insurance, Credit-only insurance, Automobile medical insurance		✓
Coverage provided by a governmental entity for members of military of military families		✓
Excess reimbursements of highly compensated individuals under IRC section 105(h)		✓
Wellness benefits that provides medical benefits and employer charges COBRA premium	✓	

Coverage	Yes	No
Employee assistance plan that provides counseling and/or treatment and employer charges COBRA premium	✓	
Incidental employee assistance or similar benefit under an LTD Contract (or referral only plan)		✓
Executive medical coverage (includes executive physical and screenings and supplemental coverage)	✓	
Health insurance costs for self-employed individuals		✓
Health insurance cost for 2% shareholder in Subchapter S-corporation if includable in income		✓

*Limited to employers with fewer than 20 employees because of the Medicare Secondary Payer rule

**Employer contributions (and any employee contributions made under a cafeteria plan) to an HSA should be included.

Note:

Although the IRS released final ICHRA regulations in January 2021, the Biden Administration issued a memorandum on January 20, 2021 freezing certain regulations pending review by the new administration. As a result, employers will need to wait until further action is taken by the Biden Administration to rely on the final ICHRA regulations.

The intent of this analysis is to provide general information regarding the provisions of current federal laws and regulation. It does not necessarily fully address all your organization's specific issues. It should not be construed as, nor is it intended to provide, legal advice. Your organization's general counsel or an attorney who specializes in this practice area should address questions regarding specific issues.