

ADVANTAGE BENEFITS PLUS PREPAID BENEFITS CARD SUBSTANTIATION DETAILS

General Questions about Prepaid Benefits Card Substantiation

Employers and employees may have questions about the requirements for submitting receipts when the Advantage Benefits Plus Prepaid Benefits Card is used to pay for a service. This handout provides an explanation of the receipt substantiation requirements.



IRS Rules Govern Substantiation Requirements

The IRS has established specific guidelines that require all Flexible Spending Account (FSA) and Health Reimbursement Arrangement (HRA) transactions — even those made using a healthcare payment card — to be substantiated (verified that the purchase was an eligible medical expense).

The substantiation process is performed by Advantage Benefits Plus. We are very diligent in the execution of the substantiation process to avoid adverse tax consequences to employees as well as employers.

Common Misconceptions about Receipt Requirements

1. If the Advantage Benefits Plus Prepaid Benefits Card is used for an eligible service, no further receipts or documentation are needed to support the expense.
2. Any claim at a doctor, dentist or vision provider will not require receipts.

These misconceptions are **NOT TRUE...**

Not all services from a medical, dental, vision or a non IIAS pharmacy provider are eligible expenses. Therefore itemized receipts are required to verify the proper funding year, as well as eligibility. For example, a dentist may perform teeth whitening, which is not eligible for reimbursement.

IIAS and Auto Substantiation

Inventory Information Approval System (IIAS) is a new Federal Government mandated system used by pharmacy merchants that identifies eligible prescription and over the counter items and limits FSA and HRA healthcare payment cards to only those eligible items.

This system makes it easier for account holders to manage eligible over-the-counter and pharmacy expenses, since the merchants automatically substantiate purchases at the point of sale.

All supermarkets, grocery stores, department stores, and wholesale clubs are required to implement the IIAS merchant program or they cannot accept healthcare payment cards. For a regularly updated list of these stores and pharmacies, please choose the IIAS Merchants link on your consumer portal and look for retailers that are certified IIAS compliant.

Substantiation Processes

There are two ways purchases may be substantiated in compliance with IRS requirements:

Auto-Substantiation. A daily process is run to auto-substantiate debit card claims using the specific methods setup for the employer group. These methods include co-pay substantiation, recurring auto-substantiation, and Carrier substantiation. Examples include:

- *Copay matching:* charges that exactly match the dollar amount, for up to 5 times the dollar amount, for a copay under the employer's insurance plan. For example, a \$20, \$30, or \$40 charge at a doctor's office or 5 times those amounts.
- *Recurring claims:* charges that exactly match the provider and dollar amount for 3 previously approved and substantiated transactions. For example, a fixed monthly orthodontia payment.
- *Carrier Substantiation:* the process will attempt to substantiate the claim by looking for that claim in the carrier files for up to 60 days. This process uses the 'Last Received Date' on the most recent carrier file to do this comparison. If the claim is not found on a carrier file within 60 days, it will then switch to a 'Receipt Required' status.

Manual Substantiation. All purchases that do not qualify for auto substantiation must be manually substantiated with receipts or other documentation. Examples include:

- Doctor, dentist, and other provider visits where the amount paid is not equal to the copay.
- Prescription and over-the-counter transactions where the amount paid is not equal to the copay at a store that is not IIAS compliant.

Always Save Itemized Receipts

Employees should save their itemized receipts from every healthcare payment card transaction and all of the Explanation of Benefits (EOBs) they receive from health/pharmacy/dental plans.

An easy approach for keeping this information on hand is to upload copies of itemized healthcare payment card receipts and EOBs to the Dashboard page of the consumer portal where they will be stored electronically. Receipts can also be attached to the expense from the mobile app using the camera on your mobile device. Otherwise, designate an envelope or folder to store documentation in your personal files. Using this process will help employees find documentation if requested.

Information Required on Documentation

All receipts or documentation must include the following information:

- Name of person who incurred the service or expense
- Name and address of the provider or merchant
- Date of service for the amount charged
- Detailed description of the service
- Amount due for the service provided

EOBs contain all of the required information and are excellent sources of documentation. **Credit card receipts and canceled checks are insufficient. You may be asked to submit additional documentation to substantiate the expense.**

Receipts for over-the-counter (OTC) and prescription items do not need to include the person's name, but must display the name of the item (e.g. band aids).

Requests for substantiation

If substantiation of a debit card transaction is required, employees will be notified by email or an alert on the Consumer Portal home page. Debit card transactions that require substantiation are displayed through messages in both the Message Center on the home page and their account summary page. Employees may also see if a claim requires substantiation by logging into their online account or mobile app to check the status of the claim.

Summary:

- IRS rules require that all FSA and HRA claims be substantiated.
- If the claim cannot be auto-substantiated, the employee is required to submit documentation to support the claim.
- Employees should save itemized receipts and documentation for all healthcare services—even when they paid using their Advantage Benefits Plus Prepaid Benefits Card.
- Using IIAS compliant merchants for pharmacy and OTC purchases will significantly cut down on receipt requests.

