

# **Health Savings Account Plan Details**

## **Contents**

Overview	1
Eligibility	2
Employees enrolled in Medicare or TRICARE	2
Enrollment and changes	4
New hire or newly benefit-eligible employees	4
Rehired employees	4
Life event changes	4
Annual enrollment	4
Mid-year enrollments or changes	4
Account information and communications	5
Customer Identification Program (CIP) verification	5
Contributions to an HSA	6
Annual limits	6
How it works	6
Core contributions	7
Your contributions	<i>7</i>
Catch-Up contributions	7
Match contributions	7
Contributions outside of payroll	8
Rollovers	8
Administrative information about contributions	8
When HSA contributions cease	9
Qualified health care expenses	10
How to access your HSA funds	11
If you leave BMO	11
Pairing with a Limited Purpose Flexible Spending Account (LPFSA)	12
About your HSA	13
HSA Base Account	13
Smart-Choice Investment Platform	13
Fees	13
Portability	13
Smart-Choice Frequently Asked Questions	14
A final note	16



## **Overview**

A Health Savings Account (HSA) is an optional, tax-advantaged savings vehicle available to individuals covered under a qualified high deductible health plan (HDHP). An HSA allows you to use before-tax dollars to pay for out-of-pocket healthcare expenses like medical, dental, vision and other health expenses you would normally have to pay for with post tax money.

If you enroll in BMO's Consumer Choice Plan (a qualified high deductible health plan), you may be eligible for the Health Savings Account administered by Smart-Choice. The money you contribute to your HSA through payroll is deducted before taxes are applied and is then automatically deposited into your HSA.

#### Triple tax advantages of an HSA

A great feature of the HSA is there are 3 opportunities to save in taxes.

- 1. The contributions you make to your HSA are tax-free, which reduces your taxable income.
- 2. Any earnings you accumulate on your HSA are tax-free.
- 3. You can withdraw funds directly from your account to pay for eligible health care expenses at any time without any federal or state taxes or penalties.

The money in your HSA rolls over year over year, so you can use your funds to cover qualified expenses now or in the future. You own the HSA account, and it's yours to keep when you leave or retire from BMO.

Service provider	For	Contact information	
WealthCare Saver	Health Savings Account custodian	<ol> <li>Within Workday, click on the "Reimbursement Accounts" tab.</li> <li>Under "Reimbursement Accounts" select your Health Savings         Account. This will direct you to the Smart-Choice platform to access your Health Savings Account.     </li> <li>Human Resources Centre (HRC): 1-888-927-7700</li> </ol>	
		Smart-Choice Accounts	
	Health Savings	PO Box 64009	
Smart-Choice	Account	The Woodlands, TX 77387-4009	
	administration		
		Human Resources Centre (HRC): 1-888-927-7700	
BMO U.S. Benefits	Enrolling and making changes to your annual contribution for before-tax payroll deductions	<ol> <li>Within Workday, click on the My Benefits &amp; Retirement app.</li> <li>Under "My Benefits &amp; Retirement", click on the Employees in Canadand US (on BMO Network) link if you are logged into the BMO Network for single sign-on access or click on the Employees in Canadand US (off BMO Network) link if you are accessing from a non-BMO network.</li> <li>Then click the Enroll in your benefits tile.</li> <li>Human Resources Centre (HRC): 1-888-927-7700</li> </ol>	



## **Eligibility**

To be eligible for BMO's HSA, you must meet the following criteria:

- be covered by BMO's Consumer Choice Plan, which is considered a qualified high deductible health plan;
- not be covered by any other non-HDHP medical coverage (including coverage by a foreign or government plan - such as TRI-CARE, a spouse or domestic partner's non-HDHP health care plan or a Traditional Health Care Flexible Spending Account\*);
- not be enrolled in any Medicare benefits (see "Employees enrolled in Medicare" section);
- not be claimed as a dependent on another person's tax return.

## **Employees enrolled in Medicare or TRICARE**

Employees that are covered on Medicare or TRICARE are not permitted by the IRS to contribute or receive contributions to an HSA. The rules governing HSAs for Medicare enrolled individuals or individuals that may soon be enrolling in Medicare are complex so we encourage you to review the "Enrolled in Medicare" section of IRS Publication 969 for more information and/or consult with your tax advisor.

#### Eligibility for BMO's Taxable Cash Core Contribution

If you are enrolled in the Consumer Choice Plan and Medicare or TRICARE, BMO provides a core contribution in the form of taxable cash on your paycheck once per year, in lieu of an HSA contribution. We request that you earmark the money to be used for your out-of-pocket medical expenses. If you are covered by Medicare or TRI-CARE or will be newly enrolling in Medicare or TRI-CARE for the subsequent plan year, please notify BMO U.S. Benefits by emailing BMOHR.USBenefits@bmo.com.

Base Salary Tier	Taxable Cash Amount (EE Only / Family)		
\$70,000 or less	\$500 / \$1,000		
\$70,001 - \$130,000	\$250 / \$500		
\$130,001 – or more	\$0		

#### **Age 65 Distributions**

Once you reach age 65, you can take penalty-free distributions from your HSA for any reason. However, in order to be both tax-free and penalty-free the distribution must be for a qualified health care expense. Withdrawals made for other purposes will be subject to ordinary income taxes.



#### **Using HSA Funds**

If you have an existing balance in your HSA while you are covered by Medicare, you can continue to use your available funds to pay for your eligible medical, prescription, dental and vision expenses tax and penalty-free.



<sup>\*</sup>Please note that you are permitted to be covered by a Limited Purpose Flexible Spending Account.



If you are newly eligible or transitioning to Medicare during the plan year. The month Medicare coverage begins, change your HSA contribution to zero dollars to avoid a tax penalty. Keep in mind that after you enroll in Medicare, you may continue to withdraw money tax-free from your HSA to help pay for qualified medical expenses such as deductibles, premiums, copayments, and coinsurance.

Delay enrolling in Medicare if you want to continue contributing pre-tax to your HSA. You will also need to delay collecting Social Security retirement benefits to avoid automatic enrollment in Medicare Part A and B.

Important Note: If you delayed enrolling in Medicare at your initial eligibility date, Medicare Part A may be backdated up to 6 months prior to your actual enrollment date (but not earlier than your initial eligibility date). HSA contributions are not allowed during this backdated coverage period.

The first month of Medicare entitlement will be retroactive for individuals who delay the commencement of Medicare Part A benefits, those individuals must **use extra care when determining the amount of your contributions.** The limit on annual HSA contributions is reduced by 1/12 for each month during the year that the HSA account holder is not HSA eligible (i.e., because of Medicare entitlement). Those reductions apply equally to months of ineligibility due to retroactive coverage. For example:

- If an individual applies in July and becomes entitled to Medicare Part A coverage retroactive to January 1 of that year, the individual will not be eligible to make any HSA contributions for the year (and if contributions were already made for that period, they will need to be timely distributed to avoid the excise tax on excess contributions).
- If an individual applies in November and Medicare Part A coverage is retroactive to May 1 of that year, contributions would be limited to 4/12 of the annual limit (assuming the individual had HDHP coverage and no other disqualifying coverage for the period from January through April). Contributions for the period of eligibility could be made after the individual's HSA eligibility ends but would have to be made no later than the due date (without extensions) of the tax return for the year in which the period of eligibility occurred.

For questions about taxes, please consult a tax professional.

#### Can Someone Over Age 65 Contribute to an HSA?

Yes, so long as he or she is not enrolled in Medicare Part A, B, C, or D, or any other Medicare benefit. Consider this example: Jean is age 66 and will retire at age 68. She has decided to delay receiving Social Security benefits until she retires. Because Jean is over age 65, she could apply for Medicare Part A. But she will not be entitled to Medicare unless she applies for it. She will be eligible for HSA contributions until she applies for Medicare or becomes entitled to Medicare by beginning her Social Security benefits, so long as she meets the other requirements for being an HSA-eligible individual (e.g., she has HDHP coverage and no other impermissible coverage, and she cannot be claimed as anyone else's tax dependent). If her entitlement to Medicare Part A is retroactive, Jean will lose her HSA eligibility on the retroactive entitlement date, not the date she applied, so she will need to adjust her contributions accordingly.



## **Enrollment and changes**

## New hire or newly benefit-eligible employees

As a new employee or an employee who becomes newly benefit-eligible, you have 31 calendar days (includes your hire date or benefit-eligible status date) to make your benefit elections. If you chose to enroll in the Consumer Choice Plan, you will also be eligible to make an HSA election. Your HSA election will be effective on the first of the month based on your coverage effective date in the Consumer Choice Plan.

Please note: If you enroll in the Consumer Choice plan mid-year there may be tax considerations you will want to factor in when deciding what you should contribute to your HSA for the year. Refer to the "Lastmonth rule" section of IRS Publication 969 or consult with your Tax Advisor for more information.

## **Rehired employees**

If you are an eligible rehired employee and want to make contributions to your HSA, you must re-enroll. However, if you are rehired within 30 days of your termination date, your benefit elections in effect on the date of your termination will automatically be reinstated without a break in coverage.

## Life event changes

If you experience a qualified life event and you newly enroll in the Consumer Choice Plan, you will also be eligible to make an HSA election. Your HSA election will be effective on the same date of your coverage effective date in the Consumer Choice Plan.

**Please note:** If you enroll in the Consumer Choice plan mid-year there may be tax considerations you will want to factor in when deciding what you should contribute to your HSA for the year. Refer to the "Lastmonth rule" section of IRS Publication 969 or consult with your Tax Advisor for more information.

#### **Annual enrollment**

To continue contributing to your HSA, you must <u>re-enroll</u> each year through the My Benefits & Retirement app via <u>Workday</u> because your previous year's election does not automatically carry forward.

## Mid-year enrollments or changes

Unlike most of the other benefits plans, you are allowed to newly enroll or make changes to your HSA election during the year (as long as you are concurrently enrolled in the Consumer Choice Plan). To make changes to your HSA election throughout the year, enroll through the My Benefits & Retirement app via Workday.



## **Account information and communications**

After your initial HSA is opened, you can expect the following communications:

- A letter from Smart-Choice containing your Smart-Choice debit card, important HSA information, regulatory disclosures, and contact information.
- If required, a letter from Smart-Choice requesting documentation in order to complete your enrollment (see Customer Identification Program (CIP) verification).
- A quarterly account statement is available on the Smart-Choice platform detailing your account activity.
- An IRS Form 1099-SA and IRS Form 5498-SA, either by mail or electronically (based upon your elected delivery preference).
  - IRS Form 1099-SA is provided for each HSA distribution type you made in the tax year. You will
    receive a separate 1099-SA for each type of distribution made during the tax year. The five
    distribution types are: normal, excess contribution removal, death, disability, and prohibited
    transaction.
    - This information is used to complete IRS Form 8889. This form will be sent usually by January 31<sup>st</sup> for the previous calendar year if you had distributions during the tax year.
  - IRS Form 5498-SA provides you with all the contributions made to your Health Savings Account in the tax year. You have until April 15th to make contributions for the prior tax year. This information is used to complete IRS Form 8889. This form will be sent usually by May 31<sup>st</sup> for the previous calendar year.

## **Customer Identification Program (CIP) verification**

Smart-Choice is required by law, under Section 326 of the USA Patriot Act, to verify the identity of anyone requesting an HSA. Usually this happens behind the scenes without issue, but occasionally outdated or missing information will cause Smart-Choice to reach out for more information. If you are flagged during the CIP process, Smart-Choice performs additional background review before releasing the enrollment.

Smart-Choice may close out the account if you are unable to supply the proper forms of identification being requested. All remaining funds will be returned, and tax reporting may be conducted for the period of time the account was open.

Maintaining the confidentially of personal information and ensuring a high level of privacy is of the utmost importance. Smart-Choice has various options available for sending the requested documents. If you have any follow up questions, please contact 1-888-927-7700 from 8:00 a.m. to 5:00 p.m., Central Time, Monday through Friday.



## Contributions to an HSA

#### **Annual limits**

The IRS sets annual limits on the amount that can be contributed to an HSA. The amount that can be contributed is based on the coverage level of your qualified HDHP coverage (i.e., employee-only coverage, or any coverage level other than employee-only). The annual limits apply to all contributions to your account whether they were made by you or BMO. The annual limits also apply across all HSAs you or your dependents may own and have contributed to in a given year. If you previously contributed to another HSA during the year, you will need to account for those contributions when considering what you should elect for the BMO HSA.

BMO's Employer Contributions will be determined by your base salary in effect on September 30<sup>th</sup> of the prior year (or as of your hire date for new or rehired employees or your status change date for newly benefits-eligible employees). The base salary used to determine your HSA Employer Contribution eligibility and amounts will be locked in for the plan year.

	BMO HSA Employer Contributions (EE Only / Family)			
Base Salary Tier Structure	Fixed Core Contribution	Maximum Match Contribution	Maximum BMO Contribution	2023 IRS Total Limit
\$70,000 or less	\$500/\$1,000	\$250/\$500	\$750/\$1500	Employee Only: \$3,850
\$70,001 - \$130,000	\$250/\$500	\$250/\$500	\$500/\$1,000	All other coverage levels:
\$130,001 - \$175,000	\$0	\$250/\$500	\$250/\$500	\$7,750 Additional contribution for
\$175,001 or more	\$0	\$0	\$0	age 55 or older: \$1,000

If you enroll in the Consumer Choice plan mid-year there may be tax considerations, you will want to factor in when deciding what you should contribute to your HSA for the year. Refer to the "Last-month rule" section of IRS Publication 969 or consult with your Tax Advisor for more information.

#### **How it works**

HSA contributions will be available for withdrawal only when funds are deposited. You can use your Smart-Choice debit card or self-reimbursement direct deposit through automated clearing house (ACH). Through ACH you make a deposit from your HSA base account directly into a personal checking, savings or money market account.

There are a number of ways that your HSA may be funded:

• Core Contributions – If eligible, the up front, lump sum amount that BMO provides to you, determined by your base salary, that is **not** contingent on your HSA participation. (If eligible, you will



receive the Core Contribution by answering 'yes' to the HSA eligibility question during the enrollment process).

- Your Contributions The amount you elect to have deferred from your paycheck on a before-tax basis into your HSA.
- Match Contributions If eligible, the up front, lump sum amount that BMO provides to you, determined by your base salary, that <u>is</u> contingent on your HSA participation. (24 paychecks)
- Contributions outside of payroll Contributions you make directly into your HSA outside of payroll on an after-tax basis (see <u>Contributions outside of payroll</u>).
- Rollovers An amount you roll into your HSA from another qualified HSA.

#### Core contributions

When you enroll in the Consumer Choice Plan, you will receive BMO's Core Contribution, determined by your base salary. The Core Contribution will be deposited to your HSA as soon as administratively possible after your account has been established.

Employees that are covered on Medicare are not permitted by the IRS to contribute or receive contributions to an HSA (see <a href="Employees enrolled in Medicare">Employees enrolled in Medicare</a>).

#### **Your contributions**

Your HSA contributions will be automatically deducted from your paycheck *before-tax* and deposited in your HSA account. When you enroll in the HSA you will choose an annual election, which will then be divided over the number of payrolls\* that remain in the year.

\*Please note that HSA deductions are only taken on the 1<sup>st</sup> and 2<sup>nd</sup> paycheck of each month. For months that have a 3<sup>rd</sup> paycheck, no HSA deductions will be taken.

#### **Catch-Up contributions**

If you will reach age 55 or older by the end of the calendar year, you can make an additional \$1,000 Catch-Up contribution, regardless of your Consumer Choice plan coverage level.

#### **Match contributions**

If you choose to make your own contributions by enrolling in the HSA plan, you are eligible to receive BMO's match contribution, determined by your base salary. You will receive a dollar for dollar match up to the match Contribution limit depending on your Consumer Choice Plan coverage level, as soon as administratively possible.



If you are eligible to contribute to an HSA but your covered spouse/domestic partner (or child dependent if you are Employee + Children coverage) is ineligible for an HSA\* and you have no other covered dependents, you must limit your election to the Employee Only HSA limit. If you are also eligible for an Employer Contribution from BMO, you must also consider the Family Maximum BMO Contribution and subtract that from the Employee Only HSA limit.

In cases where you are covering other dependents in addition to your ineligible dependent, as long as one or more of your dependents is eligible for the HSA, you would not be required to self-limit your contributions to the Employee Only Limit.



\*See Eligibility section for more information

Example: Assumes the employee is older than 55 and falls into the Base Salary Tier of \$70,000 or less.

2023 Adjusted Employee Contribution Limit	= \$3,350
2023 Maximum BMO Contribution – Family	- \$1,500
2023 Catch-up Contribution if you are Age 55+	+ \$1,000
2023 Employee Only HSA Limit	\$3,850

Keep in mind, you can still use your HSA to pay for your ineligible dependent's eligible expenses. Limitations due to ineligibility are only on the contributions.

#### Contributions outside of payroll

You can also make *after-tax* HSA deposits on your own and take an above-the-line deduction on your tax return, but you are limited to the annual limits on your total contributions. You have until April 15<sup>th</sup> to make contributions for the prior tax year. **This option is not recommended during the plan year.** 



**Please plan any after-tax contributions carefully.** It is important to note that if you make any contributions to your account outside of payroll that cause you to go over the IRS annual limits, your payroll deductions and BMO contributions may reject. It will be necessary to take action to correct your HSA contributions by either removing after-tax contributions from your account through a distribution or by refunding your before-tax deductions and possibly forfeiting BMO's contributions.

In most circumstances, if you are trying to fund more into your HSA during the plan year, you can achieve this by increasing your Annual Contribution Amount in the My Benefits & Retirement app via Workday. This allows you to receive the before-tax benefit on all your contributions and your payroll deductions will automatically be recalculated over the remaining pays to allow you to achieve your new annual contribution amount.

Making a direct contribution outside of payroll is typically best when you need to make a prior year contribution after that plan year has ended, or if there are not enough pays left in the plan year to achieve your desired Annual Contribution Amount.

#### Rollovers

You have the ability to roll over funds from another qualified HSA into your BMO HSA. Rollover contributions do not count towards the annual limits for the year and are not eligible for BMO's Match Contribution.

#### Administrative information about contributions

• Consumer Choice Plan mid-year tier changes — If you have a qualified life event during the year that changes your tier from Employee only to one of the Family level tiers, you will receive a one-time adjustment to true-up your Core Contribution amount and your Match Contribution amount (if applicable).



If you have a qualified life event during the year that changes your tier from one of the Family level tiers to Employee only, no adjustment will be made to the Employer Contributions that BMO has already provided.

- Once you reach age 65 and are enrolled in Medicare Parts A and/or B, your HSA account will remain
  open for withdrawals, but the IRS does not permit you to make additional contributions to an HSA. If
  you are making contributions to your HSA, you should go into the system to adjust your election to
  what you have already contributed to date or contact the HRC for assistance. If you choose to defer
  your enrollment in Social Security and Medicare Parts A and B, you can continue to contribute to
  your HSA.
- Your spouse/domestic partner is not eligible to make a Catch-Up contribution to your HSA. If your spouse/domestic partner, covered under the Consumer Choice Plan, is age 55 or older and qualifies for an HSA, he/she would have to open a separate HSA in order to make a Catch-Up contribution.

#### When HSA contributions cease

HSA contributions will automatically stop if:

- you do not complete Customer Identification Program Verification, if required (see <u>Customer</u> <u>Identification Program (CIP) verification</u>),
- your enrollment in the Consumer Choice Plan ends,
- you waive your HSA election coverage\*,
- you become ineligible to participate (see <u>Eligibility</u>),
- you inform us that you wish to opt out of receiving BMO's Employer Contributions,
- your employment with the Company ends for any reason,
- you become a participant in the BMO Long Term Disability Plan.



<sup>\*</sup>If you waive your HSA election, you may still be eligible to receive BMO's Core Contribution.

## **Qualified health care expenses**

You can use your tax-free HSA dollars for a wide variety of qualified medical, dental, vision and prescription drug expenses.

#### **Qualified health care expenses**

#### Deductible and coinsurance Dental and vision eligible expenses Common qualified · Doctor's office visits expenses Hospital care and clinic costs • Medical aids such as hearings aids, braces, orthopedic shoes, crutches and wheelchairs • Medical exams, X-ray, and laboratory services • Prescription drugs • Over-the-counter (OTC) medicines without a prescription, as well as menstrual care products Physical therapy In-home hospital beds Other qualified Nursing services • Renovation for handicap households expenses Transportation costs for medical care Treatment for alcohol and drug addiction

- For HSA purposes, expenses incurred before you establish your HSA aren't qualified expenses.
- Non-prescription medicines (other than insulin) are not considered qualified expenses for HSA
  purposes. A medicine or drug will be a qualified expense for HSA purposes only if it requires a
  prescription, is available without a prescription and you get a prescription for it or is insulin.
- For additional information about eligible expenses, go to <u>IRS Publication 502: Medical and Dental Expenses.</u>

#### Qualified expenses are those incurred by the following persons:

- You, your spouse, or dependents that you claim on your tax return (includes a domestic partner and/or domestic partner's children if you claim them as tax dependents).
- Any person you could have claimed as a dependent on your return (excludes anyone that filed a joint return with someone else or can be claimed as a dependent on someone else's return for the tax year or a person had a gross income of \$4,400 or more that filed their own return in the 2022 tax year).



## How to access your HSA funds

You can withdraw funds from your HSA using two primary methods: the Smart-Choice card and direct deposit.

#### How the Smart-Choice card works

Smart-Choice provides a debit card for use at pharmacies, medical, dental, and vision providers, to pay for qualified expenses from your HSA. You will have the option of using your debit card by signing for your purchases or using a PIN, depending on your merchant. You can only be reimbursed for qualified expenses incurred after your HSA is established.

- Before using your Smart-Choice card, make sure your account balance has the funds necessary to cover your transaction. The available balance on the Smart-Choice card is equal to the funds deposited in your HSA Base Account. You can obtain your account balance at any time on the Smart-Choice website.
- Choose "Credit" and provide your signature if prompted or use it as a debit card and use your PIN. The cost is then deducted directly from your HSA. You no longer have to pay out of pocket or wait to be reimbursed for your expenses.

#### How direct deposit works

As an alternative to the Smart-Choice card, Smart-Choice also offers Automated Clearing House (ACH) direct deposit. You can make self-reimbursement deposits from your HSA base account directly into a personal checking, savings, or money market account. You are not required to submit proof for HSA transactions, though it is recommended you save all receipts for tax purposes.

 This transaction is performed on the Smart-Choice website. Just enter the desired amount along with the appropriate account and routing numbers, and the funds will transfer automatically within two to three business days. You will need to set up this type of transaction which may take a few extra days for verification. No fee is associated with this transaction.

## If you leave BMO

Once you leave BMO, your HSA will be moved to an individual account, Smart-Choice HSA. This will occur 5 business days after Smart-Choice is notified of the eligibility loss. Once the account is updated, you will receive a letter with details on how to access your HSA directly at <a href="www.smartchoiceaccounts.com/hsa">www.smartchoiceaccounts.com/hsa</a>. Your funds will remain in the bank account, and You will have the same Smart-Choice web experience but will access the Smart-Choice platform directly and not through the BMO benefits site.

A new Smart-Choice card will be generated and triggered after the account is updated- this card will be applicable for HSA services and expenses. The new card should arrive a few days following the letter. There is an ongoing monthly account fee for the retailed HSA and investment fees will remain applicable as well. Smart-Choice customer care will be able to assist with any questions you may have regarding their HSA. If you were to return to BMO in the future, your HSA can be reaffiliated to BMO and the ongoing monthly fee will cease.



# Pairing with a Limited Purpose Flexible Spending Account (LPFSA)

A Limited Purpose Flexible Spending Account (LPFSA) is a flexible spending account option for employees enrolled in an HSA. The LPFSA is designed to work in conjunction with an HSA plan to provide additional before-tax savings opportunities for eligible dental and vision expenses only. Medical expenses cannot be reimbursed under this type of account because they can be covered by your HSA. Under IRS rules, you are not eligible to contribute to an HSA and be enrolled in a Traditional Health Care Flexible Spending Account at the same time.

#### **Benefits of a LPFSA**

Enrolling in a LPFSA allows you the flexibility to use FSA dollars for dental and vision expenses, while preserving your HSA funds for other purposes, including simply saving those funds for the future.

With a LPFSA, you can contribute up to \$3,050 for dental and vision expenses for 2023. This limit is in addition to the HSA annual limits.

Funds in a LPFSA are available to use right away to pay for eligible dental and vision expenses. This means you do not have to wait until the funds have been contributed into your account.

You can carry-over up to \$610 of unused funds into the following year to continue to use for your eligible dental and vision expenses.

#### Stacked Smart-Choice card

If you enrolled in the LPFSA and the HSA, dental and vision expenses will be deducted first from your LPFSA balance and medical expenses will be deducted from your HSA balance.

This "stacked" feature allows the LPFSA balance to pay first for any dental and vision expenses to preserve your HSA balance. Once the LPFSA balance is depleted, dental and vision expenses are automatically deducted from your HSA balance.

The "stacked" feature of the Smart-Choice card is only applicable to those employees enrolling in the LPFSA and the HSA. If enrolled in an HSA delivered through another bank, the Smart-Choice card will only reflect your LPFSA balance.

Eligible Expenses	LPFSA*	HSA
Approved prescription and health care supplies	No	Yes
Medical copays and deductibles	No	Yes
Dental services	Yes	Yes
Vision care services and products	Yes	Yes

<sup>\*</sup>You may be asked to submit proof of the expenses.



## **About your HSA**

#### **HSA Base Account**

The Smart-Choice HSA Base Account is an interest-bearing deposit account with an optional investment feature. This FDIC-insured account is maintained in your name at Smart-Choice. All contributions to the HSA will be initially credited to the Base Account, and all distributions from the HSA will be withdrawn from the Base Account. Funds in this account are owned entirely by you, the account holder, and not subject to use-it-or-lose-it rules.

#### **Smart-Choice Investment Platform**

The HSA Base Account will pay interest monthly according to Smart-Choice balance-based interest rate tiers. Contributions you make to your Smart-Choice HSA give you the freedom to make your own decisions on how you pay for current healthcare expenses and save for future ones. Once you reach a \$1,000.00 balance in your HSA Deposit Account, you will have the opportunity to invest additional funds.

The Smart-Choice HSA investment account features a broad range of competitive investment options as well as access to powerful tools and resources to help you plan for your future and make informed decisions when determining an HSA asset allocation that meets your life circumstances and HSA investment objectives.

#### **Fees**

As an active employee you will not pay any on-going maintenance fees for your HSA. A flat monthly fee of \$2.50 will be applied to accounts that hold an investment balance. The fee allows for unlimited trades. The fee will be deduction from your base balance.

If you leave BMO, your HSA is converted to a customer account at Smart-Choice and maintenance fees will apply.

## **Portability**

Portability is one reason many people view the HSA as a *long-term* savings vehicle. Rather than use up each year's HSA contributions on current expenses, you can pay those expenses with other money (including your Limited Purpose Flexible Spending Account, subject to certain restrictions) and let your HSA grow for the future. At year-end, any money left in your HSA rolls over to the next year automatically.

Your HSA is yours to keep, even if you change plans, jobs or retire. You have the option to rollover your HSA balance to another qualified HSA if you choose to. HSA funds are non-forfeitable.

#### IMPORTANT INFORMATION

- There is no ATM access with this plan.
- You are responsible for withdrawing funds for qualified expenses and maintaining receipts per the IRS guidelines, or you will be subject to income taxes and a 20% penalty.
- You are solely responsible for keeping receipts and records of reimbursements for tax purposes.



## **Smart-Choice Frequently Asked Questions**

#### What can I purchase with my card?

Use your HSA debit card to pay for eligible health care expenses. It should only be used at health care-related locations.

#### How do I activate my card?

Your Smart-Choice card will be automatically activated the first time you swipe it.

## Should I select "Debit" or "Credit" when asked by a merchant or directed by a point-of-sale system to choose a payment method?

When making a purchase using a keypad or screen, you can choose "Credit" for a signature-based transaction or "Debit" and enter your PIN.

#### What is my PIN number?

You only need your PIN if your merchant requests that you use debit. A PIN number will be automatically assigned to your card. To view your PIN, open the dropdown menu next to your name and select Debit Card(s). Your PIN cannot be changed.

When making a purchase, if you are offered a choice, you may select the "Credit" option to sign your receipt instead of being required to provide a PIN number.

#### Can I use my card to buy health care-related items from Internet merchants?

Yes, as long as your purchases are for eligible health care expenses.

#### Is the Smart-Choice card like other debit cards?

No. Your Smart-Choice card can only be used for eligible expenses with health care-related merchants. You cannot access cash.

#### What if my card doesn't work at the point of sale or my transaction is declined?

You may have to pay with another form of payment. You may not be visiting an eligible health care-related merchant, or your HSA balance may be too low to pay for the transaction.

#### What if I don't have necessary HSA funds to cover the eligible health care purchases I need to make?

Your transaction will be denied if your account has insufficient funds. You can either use another payment method (cash, check or credit card) or pay a portion of the transaction with your remaining HSA funds and pay the balance using another payment method. You can reimburse yourself at a later time when the funds are available in your HSA.

#### What should I do if my card is lost, stolen, or damaged?

Contact Smart-Choice by contacting the HRC at 1-888-927-7700.



#### Do I need to save my itemized receipts?

It's always a good idea to retain your itemized receipts as proof of eligible purchases. If the IRS asks you to prove your HSA expenses were only used for eligible medical expenses, you will need these receipts.

Find additional resources on Smart-Choice through the My Benefits & Retirement app via Workday.

#### What if I contributed to an HAS at a former employer?

The annual limits also apply across all HSAs you or your dependents may own and have contributed to each year. If you previously contributed to another HSA during the year, you will need to account for those contributions when considering what you should elect for the BMO HSA.

Contribution Source	Example Employee Only	Example Family	Amount
Your YTD Contributions at <b>prior employer</b>	\$1,500	\$2,500	\$
+ Your YTD Employer paid Contributions at <b>prior</b> employer	+\$500	+\$0	\$
+ Your contributions at BMO	+\$1,350*	+\$4,250*	\$
+ BMO Contributions	+ \$500	+ \$1,000	\$
= Total (can't exceed <u>IRS Limits</u> )	=\$3,850 In this example can't exceed \$3,850	=\$7,750 In this example can't exceed 7,750	=\$

<sup>\*</sup>If you are 55+ you can add an extra \$1,000 to these totals. Refer to Annual limits for more information.

#### My contributions exceeded the IRS limits in the plan year, how do I correct?

If your BMO contributions cause you to exceed the IRS limits it will be necessary to take action to correct your HSA contributions by either removing after-tax contributions from your account through a distribution or by refunding your before-tax deductions and possibly forfeiting BMO's contributions. Call Smart-Choice at 1-888-927-7700 for more information.

#### How do I add or change my direct deposit information?

There are 2 ways to update this information:

- 1. Select the Get Reimbursed Faster section on the Home page.
- 2. Open the dropdown menu next to your name and select Profile to edit your reimbursement method.

#### How do I add a beneficiary to my account?

To add a beneficiary, go to the Account Summary page and choose the View Beneficiaries link. You can add beneficiary information on the next page.



## A final note

An HSA is not an employer-sponsored employee benefit plan. It is an individual trust or custodial account that you open with an HSA trustee/custodian to be used primarily for reimbursement of eligible health expenses as set forth in Code 223. The Company's role is limited to allowing you to contribute to your HSA on a before-tax basis through the Company's payroll. The Company has no authority or control over the funds deposited in your HSA. Neither your HSA nor the HSA component of the Company's Plan that allows you to contribute to your HSA on a before-tax basis is subject to the Employee Retirement Income Security Act of 1974 (ERISA).

BMO U.S. Benefits (<a href="www.bmousbenefits.com">www.bmousbenefits.com</a>) provides highlights of the Company's benefit Plans. While every effort was made to ensure its accuracy, it does not provide every plan detail, limit, or exclusion. The Plan documents, which govern these Plans, provide full details. The Company reserves the right to modify, amend, replace or discontinue any benefit or Plan at any time for any reason. If there are any discrepancies between this document and the legal plan documents, the plan documents shall rule.

