

Hot ACA & Health Care Issues: What You Need to Know

Tami Simon
August 24, 2015

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Agenda

- Beltway Buzz
 - What lies ahead for employer-sponsored health plans
 - Legislation
 - Regulations
 - Wellness is making me sick
- A Busy Bee Season for SCOTUS
 - *Obergefell v. Hodges*
 - Other litigation to watch
- Exchange a Hive of Drama
 - *King v. Burwell*
 - Public
 - Private
- What Employers are Buzzing About
 - Future workforce strategy
 - Do you have a people strategy?
 - The Multi-Generational Workforce
 - Engagement



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Beltway Buzz

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What Lies Ahead for Employer-Sponsored Health Plans - Legislation

- The Affordable Care Act will continue to dominate the Congressional agenda
 - Possible exception is wellness program legislation – although, legislation not likely until after the EEOC issues more guidance
 - Rumor that EEOC GINA guidance coming soon
 - ACA 40% excise tax repeal
 - Streamline ACA reporting
- Two types of ACA legislation lie ahead
 - Full ACA repeal attempts – unlikely to pass the Senate
 - Technical modifications/targeted repeal – e.g., H.R. 30
 - Would revise the ACA's definition of full time employee (from 30 to 40 hours per week)
 - Passed the House of Representatives; could not attract enough votes in the Senate to avoid filibuster
 - President Obama threatened to veto
- “Must pass” legislation – Need to keep the US Governments lights on!!!



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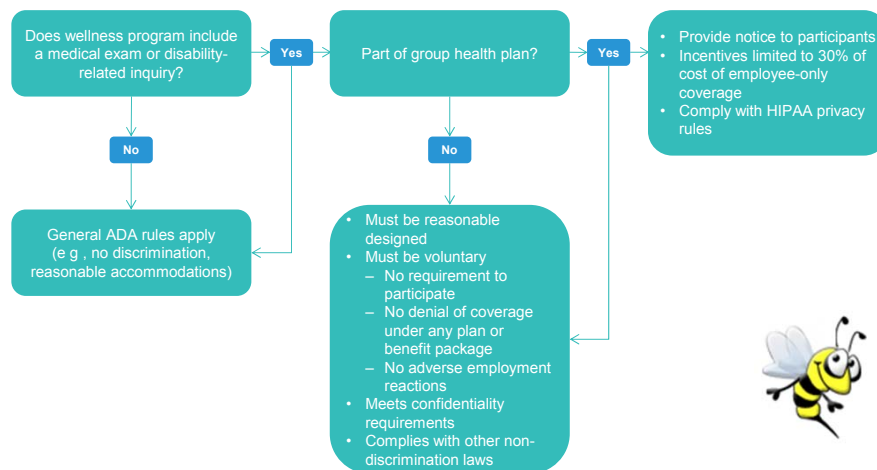


What Lies Ahead for Employer-Sponsored Health Plans - Regulations

- Cafeteria plan change in election rules and final regulations
- Auto-enrollment guidance
- Nondiscrimination rules for insured plans
- Rules on benign discrimination in wellness plans and other wellness program regulations
- Tweaks to shared responsibility reporting and forms
- Guidance on tax on high-cost health plans



Wellness guidance is making me sick ADA Proposed Regulations Analysis – Flow Chart



Common Wellness Program Designs and Applicable Laws

Component	ADA	HIPAA	GINA	Tax	Other
Nutrition classes	✓ (Reasonable accommodation)	✓ (Participatory program)			
Cash reward for walking a mile per day	✓ (Reasonable accommodation; family not addressed)	✓ (Activity-only program 30% max reward)			
Premium discount for meeting biometric standards – offered to employee and spouse	✓ (30% max reward; ee-only coverage)	✓ (Outcome-based program; 30% max reward)	✓		✓ (confidentiality/privacy, election change)
Tobacco surcharge if test shows presence of nicotine	✓ (30% max reward; ee-only coverage)	✓ (Outcome-based program; 50% max reward)			✓ (confidentiality/privacy, election change)
Achieve 3 biometrics within normal range, or show 2 improvement from previous year (including BMI) – employee only	✓ (30% max reward; ee-only coverage)	✓ (Outcome-based program; 30% max reward)			✓ (confidentiality/privacy)

Disclaimer: This is a generalization; analysis depends on facts and circumstances

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Common Wellness Program Designs and Applicable Laws

Component	ADA	HIPAA	GINA	Tax	Other
Premium reduction if attest to not smoking	✓ (Reasonable accommodation)	✓ (Outcome-based program; 50% max reward)			
Reward for completing HRA – offered to employee and spouse	✓ (30% max reward; ee-only coverage; family not addressed)	✓ (Participatory program; not subject to max reward)	✓		
Weight loss challenge; reward is gift card	✓	✓		✓	✓
Age/gender appropriate preventive screenings; reward is health FSA contribution	✓	✓	✓		✓ (confidentiality/privacy; ADEA)

Disclaimer: This is a generalization; analysis depends on facts and circumstances

A Busy Bee Season for SCOTUS

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Obergefell v. Hodges:

Supreme Court Says “I Do” to Same-Sex Marriage

Effect on Health and Welfare Plans

- **Public sector employers** must treat a same-sex spouse like opposite-sex spouses for purposes of spousal benefits
- To the extent state insurance law requires coverage of same-sex spouses where spousal coverage is offered, a plan cannot purchase **insured coverage** that excludes same-sex spouses
- **Self-insured plans in the private sector** retain flexibility in deciding whether or not to offer same-sex spousal coverage, as ERISA preempts state and local laws that would otherwise affect plan administration
- What about **domestic partner coverage**?
- *Nevertheless* – risk of Title VII sex discrimination claim if the employer provides benefits to opposite-sex spouses but not same-sex spouses
 - State and local nondiscrimination laws, contractual provisions may also be in play

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Obergefell v. Hodges:

Supreme Court Says “I Do” to Same-Sex Marriage (cont.)

Effect on Health and Welfare Plans (cont.)

- Simplified **benefits administration**, since all legally married spouses – same-sex and opposite-sex alike – treated in a uniform manner under state law
 - Timing/effective date/retroactivity unclear, for now; could vary from state to state
- Employers **no longer required to impute state income** for same-sex spouse tax benefits, such as health insurance
 - Can discontinue “gross up” practices
 - Timing of changes and retroactive tax adjustments up to states
- Consider impact on:
 - Plan documents
 - Section 125 qualified status changes
 - HIPAA special enrollment rights

Other ACA-Related Cases

Contraceptive Coverage Mandate Challenges



Non-Profit Cases in the Spotlight

- Approximately 100 pending cases challenge the ACA's contraceptive coverage mandate
- Lower courts have enforced Supreme Court's 2014 decision in *Burwell v. Hobby Lobby*
- The so-called “non-profit” cases continue – issue likely to wind up in the Supreme Court

Other ACA Challenges

Many Procedural in Nature

- Challenges to the employer mandate
- Challenges to the transitional reinsurance program
- “Origination Clause” cases
- Transition policy cases
- ERISA Section 510 Interference Claims



Public Marketplaces and Private Exchanges = Hello Drama!

King v. Burwell: Marketplace Subsidies Remain Available



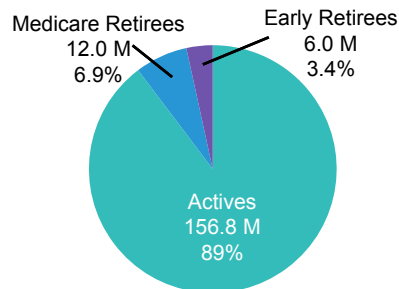
A Win for the Obama Administration

- 6-3 ruling, with Chief Justice John G. Roberts writing for the majority
- Reasoning that Congress passed the ACA “to improve health insurance markets, not destroy them,” the Court interpreted disputed language to refer to any marketplace – including FFMs
- Context, broader structure of ACA key
- Found Congress could not have intended the “death spiral” that would have resulted from the unavailability of subsidies in the FFMs
- *Sharply worded dissent (be honest, you enjoyed this...)*

Private Exchange Addressable Market

The addressable market within private exchanges is ~175 to 200 million lives...

Private exchange addressable market
Estimated number of lives¹ (millions), 2013



...and penetration is ~1% of the private exchange employer market today

Current private exchange market penetration

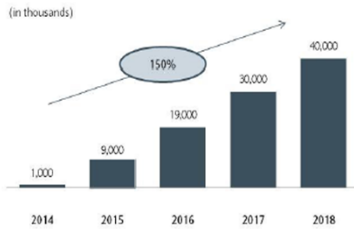


Note: (1) Active associate-to-lives multiplier is 1.65x

Source: U.S. Small Business Administration, U.S. Census Bureau, William Blair & Company, consensus estimates, company reports, EY analysis

Private Exchange Enrollment Projections

Private Exchange Enrollment Projections



Private exchanges could grow in membership to 40 million by 2018 according to a recent survey conducted by Accenture

Oliver Wyman estimates are right on top of the Accenture estimates

Source: Accenture Survey

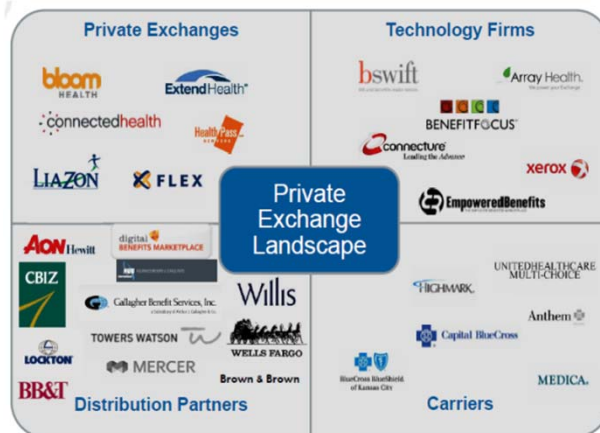
Barclays Midyear 2014 Survey Takeaways

- Just 2 of 175 employer groups utilized private exchanges (one ran their own)
- 30% were "considering" moving to private exchange – up 8% from our prior year survey
- 20% were "seriously considering" moving to private exchange

Source: Barclays presentation at February 5, 2015 PEEC event



Exchange Options



*Source: UHC Consultant Forum, March 27 2014



So what questions should you ask?

(AKA: Keeping 'em honest)

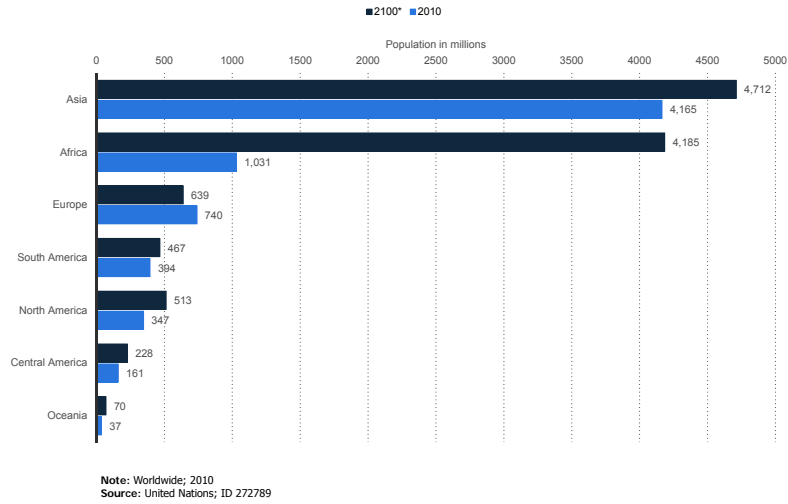


- Fees? Commissions?
- Number of insurers?
- Flexibility to design your own benefit program/structure?
- Self insured, fully insured, both?
- Cost shifting or real savings?
- Fringe benefits offered? Voluntary benefits?
- Contract terms and length?
- Who is the fiduciary? Who has liability?
- Limitations of liability? Indemnification clause?
- Access to specialists?
- Administration capabilities included? (e.g., claims, SBCs, payroll)
- Compliance services included? (e.g., compliance reviews, shared responsibility analysis, HIPAA, help with reporting)

What Employers are Buzzing About



Forecasting of the World Population for 2100 By Continent



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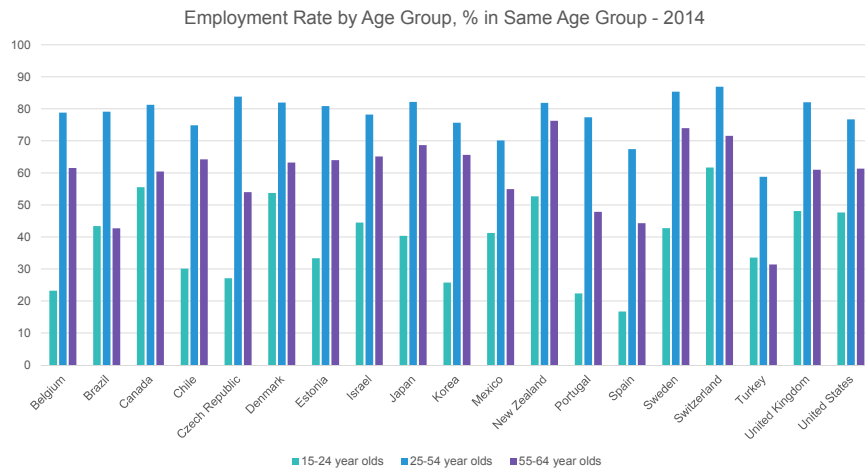
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Employment Rate by Age and Country



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Do you have a people strategy?

- Does your workforce help your organization meet its business goals?
- Do you have an overarching people strategy that is the north star for all HR, compensation and benefit strategies?
- Did you make workforce changes because of the ACA?
 - Avoid benefit obligations by restructuring jobs
 - Re-organize, re-design, or re-deploy people / work / jobs / functions to avoid or mitigate benefit obligations
 - Consider impact on associate value proposition and related messaging



The Multi-Generational Workforce

Generation	Career	Core Values & Perception of Work	Key Motivators	Communication	Work Environment
Matures (born 1909-1945)	<ul style="list-style-type: none"> • Dedication and self-sacrifice • Experience is the best teacher 	<ul style="list-style-type: none"> • Respect authority • Obligation • Loyal 	<ul style="list-style-type: none"> • Respect for experience 	<ul style="list-style-type: none"> • Top-down • Formal and written 	<ul style="list-style-type: none"> • Conformity, blending, unity ... team • "We first" mentality
Baby Boomers (born 1946-1964)	<ul style="list-style-type: none"> • Work is an anchor • Workaholic • Competitive 	<ul style="list-style-type: none"> • Personal growth and involvement • Opportunity 	<ul style="list-style-type: none"> • Feeling valued and needed 	<ul style="list-style-type: none"> • Person-to-person 	<ul style="list-style-type: none"> • Success is visible; trophies, plaques, certificates, etc.
Gen X (born 1965-1979)	<ul style="list-style-type: none"> • Concerned about work/life navigation • Do not automatically comply with leaders • Make decisions, evaluate risks and manage dilemmas 	<ul style="list-style-type: none"> • Fun and informality (success on own terms) • Contractual • Freedom to innovate 	<ul style="list-style-type: none"> • Autonomy 	<ul style="list-style-type: none"> • Direct and immediate 	<ul style="list-style-type: none"> • Eager to experiment and work as a team to solve problems • Prefer to avoid difficult people rather than engaging them constructively
Gen Y/ Millennial (born 1980-2000)	<ul style="list-style-type: none"> • May or may not desire long-term employer relationships • Decrease in career ambition in favor of more family time, and less travel/pressure • Flexible and persistent 	<ul style="list-style-type: none"> • Social • Means to an end 	<ul style="list-style-type: none"> • Engaging with bright, creative people 	<ul style="list-style-type: none"> • Voice and email • Want a lot of feedback 	<ul style="list-style-type: none"> • Desire flexible work arrangements • Believe work output should be evaluated, not how it's done • Highly skilled in social networking and team activities

* Adapted, in part, from Capital H Group

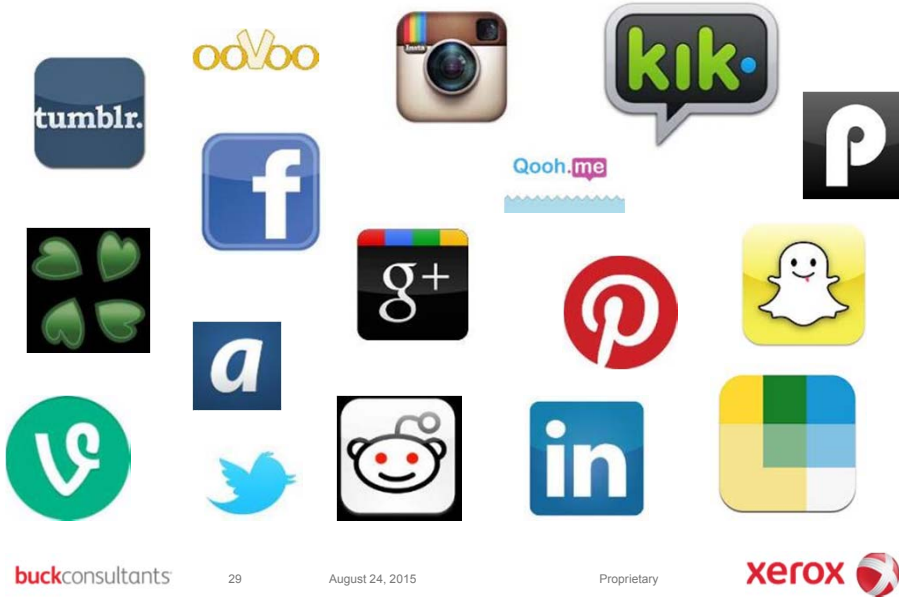
Aligning Total Rewards by Generation

Compensation <ul style="list-style-type: none"> Matures and Baby Boomers are more interested in traditional compensation forms Gen X and Y want market competitive compensation balanced with non-traditional rewards 	Benefits <ul style="list-style-type: none"> Organizations should be creative with the design of their benefits/compensation programs and policies (flexible schedules, telecommuting, tuition reimbursement, development, etc.) – enabling choice
Work Environment <ul style="list-style-type: none"> Gen X and Y desire a fun, social and informal work environment, rely on technology and direct communications Mentoring programs are a “win – win” Office space should respect older generations but encourage collaboration by all generations Technology and cultural norms encourage face-to-face and electronic communications to foster collaboration and minimize frustration and misunderstanding 	Training and Development <ul style="list-style-type: none"> Matures weight experience and longevity heavily with support from formal training programs Baby boomers believe they will get ahead if they work hard Gen X and Y tend to be more team based and interested in innovative problem solving Developmental assignments and team initiatives should be cross-generational; programs should capitalize on the experience and hard work of matures and boomers

Example: Health Benefits for Today’s Workforce

	Gen Y	Gen X	Baby Boomers	Matures
Traditional Benefits	Expensive compared to usage (premiums higher than actual usage)	Appeal of lower deductible	Lower deductible, co-payments, variety of services	Most choose this option: lower deductible, co-payments, variety of services
Consumer Driven Benefits	Catastrophic coverage, low premium, flexibility to save	Appeal of saving options	Expensive compared to usage (deductible higher than premiums)	Not enough time to save, don't fully understand, expensive compared to usage (deductible higher than premiums)
Short-Term and Long-Term Disability	STD for injuries and maternity	STD for injuries and maternity	LTD for special conditions	LTD and STD for medical conditions
“Modern” Benefits	Gym subsidies, internet information, corporate social responsibility; flexible work arrangements; child care	Wellness, smoking cessation, flexible work arrangements; child care	Health assessments, coaches; may not utilize Internet	Most options not relevant or of importance

How do you socialize?



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Keys to Keeping GenZ Engaged & Productive

- **Flat**—Flatten organization structures, build working teams with multiple levels to encourage on-the-job knowledge sharing between generations
- **Short, targeted, accessible on-the-go**—Communicate only short and targeted information, using distribution channels accessible from mobile devices anywhere
- **“On demand”**—Maximize the number and value of activities (including learning and “how to” videos) that can be performed via web-based self-service
- **Experience, not training**—In job descriptions, goals, employee development plans and curriculums, focus on experience, not formal education, training, certifications, but don’t mind hand-holding and direction (result of helicopter parents)
- **Social**—Embed online collaboration tools and provide in-person social outlets for remote employees to connect in-person with their colleagues
- **Challenging**—Structure job duties and responsibilities in a way that demands multi-tasking, where there is no “typical” day, and innovative ways of thinking are frequently required
- **Flexible**—We may see a return of office (versus remote) workers, but GenZ will value having the option and the tools to do either or both
- **Accessible**—Whether for HR, managers, or the CEO, make phone numbers, email addresses and chat tools available so GenZ can reach out, be heard, get a response quickly

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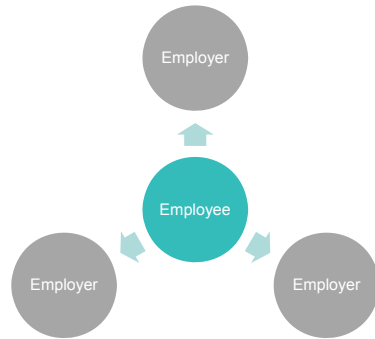
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Employees as Free Agents

The Trend



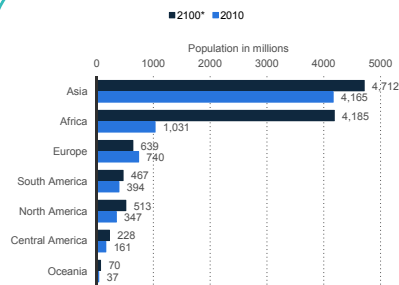
Appeals to a generation of multi-tasking, self-sufficient employees with an entrepreneurial spirit

The Implications

- Platforms for employers to source employees from a global pool of talent
- Crowd sourcing to find talent, including a two-way rating system
- Cash compensation (and other financial incentives) will become paramount and traditional employee benefits minimal or nonexistent
- Performance reviews as online ratings and commentary
- Recognition via online public forums
- Referrals based on degree of connection (think LinkedIn)
- Training and professional development on an employee's own dime (and time)
- Vacation not be paid; savvy employees will negotiate for an hourly rate that covers this lost opportunity cost
- Need to carefully monitor if such relationships ever cross the line from independent contractor to common law employee, or risk government audit and potential enforcement penalties

Declining Labor Pool

The Trend



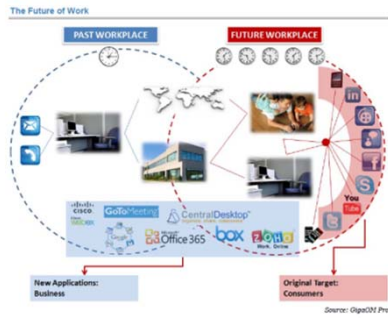
The U.S. workforce will continue to shrink; globally, difficulty recruiting workers in Canada, Brazil, Mexico, France, and Germany + an influx of younger workers in Australia, China, India, Japan and Russia

The Implications

- Need better and more efficient ways to find, attract and keep the right people
- **Data analytics** to predict workforce needs and will be commonplace and essential
- Improved mechanisms for collecting and integrating global workforce data into analytics will enable organizations to identify talent outside of local or regional markets
- If **US immigration policy** is adjusted to allow for "guest workers" or tiers of citizenship based on work status, then the market may expand in certain industries
- Increased urbanization could have an impact on where companies are located (and what they have to pay) to be near talent pools
- Tension between commuting and environmental concerns will grow and employers will need to address employee priorities
- Corporate housing in city centers may be offered to enable employees to own property outside of the city while avoiding a long commute
- Employers will turn to technology to get the job done, including robotics and other forms of AI

Technology Changes Jobs

The Trend



GenZ's technological eagerness and nimbleness will propel quicker technology developments

The Implications

- More sensory-recognition software
- "Knowbots" that pull relevant information from databases
- Increased employee and employer mobility and remote work environments
- Increased around-the-clock workforce access
- Smarter devices with better language and search capability
- Miniature multi-function wireless tools
- Global wireless access
- Increased wearable technology for both personal and professional use
- Office spaces with sensors to adjust temperature, lighting, modular workspace—and furniture that adjusts to individuals
- Virtual conferencing with 3-D participant images
- Automated cloud-based process management with collaborative workflow tools that eliminate the need for email
- Reduced travel budgets and the need for office space leading to more "hoteling" workspaces

Sources: zboostworkforce, Office of the Future: 2020 Survey and Report, staffing agency OfficeTeam



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Questions



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Additional Resources

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Resources

Resources on <http://www.services.xerox.com/hr-consulting>

Go to:

- Research and insights > FYI
- Research and insights > Legislate
- Research and insights > Podcasts
- Research and insights > Surveys

Health Care Reform Reporting/Disclosure/Payment Timeline

	2014	2015	2016	2017	2018	2019	2020 +
W-2 Reporting of Health Coverage	Reporting for prior calendar year by January 31						
SBCs	Distribute during each open enrollment, and when first eligible for benefits; material modification of information contained in the SBC must be provided no later than 60 days before the effective date, if the modification occurs other than during open enrollment						
Marketplace Notice	Notice must be provided within 14 days of the employee's start date; annual notice to all employees not required.						
6055 and 6056 Reporting	Initial hours tracking	Shared responsibility effective	Reporting for prior calendar year; statements to employee/individual due by January 31 and by March 31 to the IRS				
PCORI Fee	Payment for prior calendar year by July 31; last payment is for 2018 year, payable by July 31, 2019						N/A
Reinsurance Fee:							
HHS Notice of Covered Lives	By Dec 5 for 2014	By Nov 15 for 2015	By Nov 15 for 2016	N/A	N/A	N/A	N/A
1 st Payment	N/A	January 15 for 2014 year	January 15 for 2015 year	January 15 for 2016 year	N/A	N/A	N/A
2 nd Payment	N/A	November 15 for 2014 year	November 15 for 2015 year	November 15 for 2016 year	N/A	N/A	N/A
Obtain Health Plan Identifier	Registration delayed	Delayed indefinitely; unclear whether this will still be required					
Cadillac tax	N/A	N/A	N/A	N/A	Tax first effective	No guidance yet on reporting.	

FYI Alert

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FYI® Alert
For Your Information®

Volume 38 | Issue 87 | June 26, 2015

High Court Says "I Do" to Same-Sex Marriage

Today, in a 5-4 decision, the Supreme Court ruled that same-sex couples have a constitutional right to marry. The Court held that the 14th Amendment's equal protection and due process clauses guarantee this right, and thus require all states to permit and recognize same-sex marriages. The outcome of this historic case is certainly significant in terms of social policy and has important consequences for some employee benefit plans.

Background

In the 2013 decision of *United States v. Windsor*, the Supreme Court declared unconstitutional Section 3 of the Defense of Marriage Act (DOMA), which limited marriage to a union between one man and one woman under federal law. (See our [July 12, 2013 FYI in-Depth](#).) As a result of the decision, for federal law purposes, the terms "spouse" and "marriage" now include same-sex spouses. That is, under federal law, employee benefits provided to legally married individuals are treated the same regardless of the gender of the individuals involved.

The *Windsor* decision, however, did not address the treatment of same-sex marriages for purposes of state law. A steady stream of litigation around the country has considered the issue. The majority of courts have struck down state same-sex marriage restrictions, finding them unconstitutional under the 14th Amendment. (See our [FYI in-Depth](#) from [June 22, 2015](#) for a discussion of the litigation.) In contrast, the US Court of Appeals for the 6th Circuit upheld same-sex marriage bans in Michigan, Ohio, Kentucky and Tennessee, overturning the decisions of the lower federal courts in those states.



With the conflict in the circuits, the Supreme Court took up this issue to answer two specific questions: does the 14th Amendment require a state to permit same-sex marriage and does it require a state to recognize those marriages legally performed in another state?

The Decision

Today, the [Supreme Court](#) ruled that same-sex couples have a constitutional right to marry. Justice Anthony M. Kennedy, writing the majority opinion, said that marriage is a fundamental right inherent in the liberty of the person, and under the 14th Amendment's due process and equal protection clauses, same-sex couples may not be

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FYI® Alert
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Volume 38 | Issue 85 | June 25, 2015

High Court Upholds ACA Subsidies in Federally Facilitated Marketplaces

In a 6-3 decision authored by Chief Justice John G. Roberts, the US Supreme Court held today that low-income subsidies are available to offset the cost of coverage purchased in federally facilitated marketplaces (FFMs). For individuals receiving subsidies in the FFMs and for employers, this eagerly anticipated ruling affirms the status quo. The individual mandate and employer shared responsibility assessments — and associated reporting requirements — remain unchanged.

Background

The Affordable Care Act (ACA) called for each state to establish an American Health Benefit Exchange (exchange or marketplace) through which individuals can purchase affordable health coverage. If a state did not establish its own marketplace by January 1, 2014, the federal government established a federally facilitated marketplace (FFM) on the state's behalf. At present, there are 27 FFMs, seven "partnership" marketplaces, and 17 state-based marketplaces (including the District of Columbia).

Under the ACA, individuals must obtain "minimum essential coverage" or face a tax penalty (i.e., the individual mandate). To help facilitate this purchase, the ACA added [Section 36B](#) to the Internal Revenue Code. Section 36B provides a subsidy in the form of a premium tax credit to qualified individuals who obtain coverage through a marketplace "established by a State." IRB regulations state that premium tax credits are available in the FFMs.



Focusing on the "established by a State" language from Section 36B, litigants have brought cases nationwide arguing that the subsidies should not be available in the FFMs. The Obama administration took the position that other provisions of the ACA, as well as the ACA's overall structure and purposes, show that subsidies should be available in FFMs — in addition to the state-based marketplaces. In *King v. Burwell*, the Fourth Circuit Court of Appeals ruled that subsidies are available through an FFM. In *Hallig v. Burwell*, on the other hand, a three-judge panel of the DC Circuit Court of Appeals (DC Circuit) held that the subsidies are not available through an FFM. For more information on these and

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