

2026 Section 125 & Section 105(h) Health & Welfare Non-Discrimination Testing

VIRGINIA BANKERS
ASSOCIATION
Benefits Corporation

INTRODUCTION

We are excited to continue our partnership with MMA to provide Section 125 and Section 105(h) Non-Discrimination Tests for 2026. [Lauren Wang](#) will be our primary contact for the testing project this year. **Please refer to the email sent on Monday, May 4th for your unique and secure ShareFile Link to the data spreadsheet.**



The Spreadsheet contains 2 tabs:

1. **Definition of Terms** – no action needed (information only)
2. **NDT Template** – This is your bank's data*. See below "Data" and FAQ.

*Please note, the data included in the template is sensitive.



WEBINAR

We recognize completing the template can be challenging, so we are hosting a webinar to walk through the data requirements and allow the opportunity for questions.

We strongly encourage all administrators to attend to ensure NDT data is completed accurately.

The webinar will be on **Wednesday, May 6th at 11:00 am**. This webinar is free, but [registration is required](#). For those who can't attend, the webinar will be recorded and available once the session has concluded.



DATA

- The data in the template was extracted from bswift as of **April 1, 2026**.
- Only pre-tax benefits are included in the testing.
- **Columns requiring your input are highlighted in gray on the template (Tab 2: NDT Template).**

Confirm the data is accurate according to internal payroll records:

- **Enter any missing information**, especially for employees hired after 4/1/2026.
- **Compensation** represents what is currently loaded in bswift to calculate benefits. For most employers this will be what was loaded during the fall of 2025 for 2026 benefit salary. You do not need to change the amounts listed unless they are incorrect. The testing is based on benefit premium for the 2026 Plan Year. We will talk through this on the webinar.
- **HSA** information provided is what is housed in bswift. If your organization provides an HSA match outside of bswift, you will need to add this information.



COMPLETE

- 1 Access your unique and secure ShareFile link provided in the May 4th email. After logging in, select "Edit". Columns requiring your input are highlighted in gray on the template (Tab 2). All changes will save automatically as you go.
- 2 As you complete your data, refer to the "Data" section above, the FAQ below, and the 5/6 Webinar Recording. If you still have questions, please reach out to benefits@vabankers.org and/or [Lauren Wang](#).
- 3 Once you have completed your data, initial/date the Completion Confirmation section highlighted in yellow at the upper left of tab 2: NDT Template. MMA will run your data and reach out with any questions. Please complete this by June 5th, if not sooner.

FAQ

WHY DO WE COMPLETE TESTING FOR 2026 IN MAY?

We complete Non-Discrimination Testing in May because it allows us to capture the first few months of data, but also leaves enough time for adjustments if required. If the test reveals issues that need to be addressed, employers will have enough time to implement a solution for the remainder of the year, and ensure your plans remain in compliance. If this is necessary, MMA may be able to assist.

IS THE SHAREFILE LINK SECURE?

Yes! On May 4th, the VBA Benefits Corp emailed a unique and secure ShareFile link to HR Administrators. Your link takes you directly to your workbook, where you'll review/edit/sign off on your organization's data (tab 2). Columns requiring your input are highlighted in gray, and all changes will save automatically as you go. Once you have completed your data, initial/date the Completion Confirmation section highlighted in yellow at the upper left of tab 2: NDT Template. Rest assured, only the VBA Benefits Corp and MMA teams have access to your workbook within ShareFile. Please note that the VBA Benefits Corp has emailed the link to only one contact per employer. If you choose to forward this link to another HR Administrator, they may create a ShareFile account and access the data.

SHOULD I INCLUDE RECENTLY HIRED AND TERMINATED EMPLOYEES?

Yes. We have populated the information available from bswift as of 4/1/2026 into the NDT Template (tab 2). Please review/edit this data and add any missing information for your employees to ensure accuracy. This includes adding any hire and termination dates that might be missing, especially those hired after April 1st. For commissioned employees that have not been with the company for 12 months yet, please enter 75000 as the compensation amount.

WHAT IS AN "ALIEN" EMPLOYEE?

For purposes of the testing, an Alien Employee is a nonresident alien that does not receive U.S. source earned income.

WHAT SHOULD I DO IF I HAVE A QUESTION?

The VBA Benefits Corp will email the May 6th Webinar recording on May 7th. If you still have questions after reviewing the recording, please reach out to benefits@vabankers.org and/or [Lauren Wang](#).

WHAT'S THE DEADLINE FOR COMPLETING THE DATA?

Please review/edit/sign off on your organization's data by Friday, June 5, 2026. If you have any questions, please don't hesitate to reach out to benefits@vabankers.org and/or [Lauren Wang](#).