



Form 1095-C & 1094-C Employer Filings Due in Early 2016
Greg Perez, The Employers Benefit Group, LLC, June 25, 2015

The following is a summary of recently requested questions and items related to the preparation of IRS Forms 1095-C and 1094-C concerning a plan sponsor's health plan information in calendar year 2015.

Filing Due Dates

The forms are due to employees by February 1, 2016 and to the IRS by March 31, 2016 if filing electronically. If you file on a paper basis, the due date is February 29, 2016.

Entities that Must File — All Applicable Large Employers (ALE)

- Employers with 50 or more full-time employees and equivalents in 2014 are deemed ALEs for 2015 and must file.
- This includes not-for-profit organizations, church groups and public entities.
- Exempt employers with less than 50 full-time employees and equivalents in 2014, who are self-funded.
- Employers under 50 full time employees, if self-funded.
- Carriers will send Form 1095-B to employees in insured plans.

When to establish the basis of reporting status:

- Month-to-month tracking of your employees required.
- Did you offer full-time employees and dependents:
 - Minimum Essential Coverage (MEC)
 - Coverage of Minimum Value (MV)
 - At an "affordable" cost to the employee
 - Report information based on calendar year regardless of the employer's plan year
- *The reporting of employees must be consistent from month-to-month:*
 - On the first day of the month, or
 - On the last day of the month, or
 - First day of first payroll period of the month, or
 - Last day of last payroll period of the month

Purpose of the Filing

- Information regarding the health insurance coverage offered.
- Enrollment information regarding the enrollees' minimum essential coverage.
- Information used to determine any shared responsibility payments due to the IRS and the amount of payment.
- Information is used to determine any employees' eligibility for a premium tax credit.
- Any safe harbor or other relief available.

Medicare, Medicaid and Military Coverage

The employer does not need to report Medicare, Medicaid or military eligible employees. The form is entitled "Employer-Provided Health Insurance Offer and Coverage," and these are not employer provided coverages.

Other Information the Individual Employee and Dependents May Receive as Applicable:

- The insurance company will send 1095-B for insured plans.
- The applicable government agencies (Medicare, Medicaid, Defense) will send 1095-B to the individuals about their coverage for any covered months.
- The insurance marketplace (exchanges) will send 1095-A to the individuals about their coverage for any covered months
- The employer sends 1095-C stating the months covered under the following codes:
 - 1A. Minimum essential coverage providing minimum value offered to you with an employee contribution for self-only coverage equal to or less than \$1,108.65 (9.5% of the 48 contiguous states single federal poverty line) and minimum essential coverage offered to your spouse and dependent(s) (referred to here as a Qualifying Offer). This code may be used to report for specific months for which a Qualifying Offer was made, even if you did not receive a Qualifying Offer for all 12 months of the calendar year.
 - 1B. Minimum essential coverage providing minimum value offered to you and minimum essential coverage NOT offered to your spouse or dependent(s).
 - 1C. Minimum essential coverage providing minimum value offered to you and minimum essential coverage offered to your dependent(s) but NOT your spouse.
 - 1D. Minimum essential coverage providing minimum value offered to you and minimum essential coverage offered to your spouse but NOT your dependent(s).
 - 1E. Minimum essential coverage providing minimum value offered to you and minimum essential coverage offered to your dependent(s) and spouse.
 - 1F. Minimum essential coverage NOT providing minimum value offered to you, or you and your spouse or dependent(s), or you, your spouse, and dependent(s).
 - 1G. You were NOT a full-time employee for any month of the calendar year but were enrolled in self-insured employer-sponsored coverage for one or more months of the calendar year. This code will be entered in the All 12 Months box on line 14.
 - 1H. No offer of coverage (you were NOT offered any health coverage or you were offered coverage that is NOT minimum essential coverage).
 - 1I. Your employer claimed "Qualifying Offer Transition Relief" for 2015 and for at least one month of the year you (and your spouse or dependent(s)) did not receive a Qualifying Offer.

- Not, that an employer must also provided a contact number at which further information about the health coverage may be requested.

Timely Due Dates For 2015 Calendar Year

- ▶ 1095-C Distribution
 - To the employee by February 1, 2016
 - To the IRS as an information return attached to 1094-C
- ▶ 1094-C Distribution
 - To the IRS as a transmittal document for 1095-C
 - If Paper filing, required by February 29, 2016
 - If Electronic filing, required for groups with 250 or more Form 1095-Cs, by March 31, 2016.

Reporting for Other Supplemental Employee Benefits Plans

Plan	Reporting Required
▪ Separate and independent Plans:	
○ Dental Plans	No
○ Vision Plans	No
▪ FSA plan	No
▪ HRA plan, as part of primary plan	No
▪ Wellness plan	No

Next Steps to Take in 2015

1. Learn about 2015 reporting requirements.
2. Review ownership structures of related companies, analysis of controlled group status.
3. Develop system to document each employee’s full-time or part-time status month-by-month.
4. Develop process to collect information about both offers of coverage and enrollment month-by-month.
5. Discuss reporting requirements with the health plan’s insurer, administrator and payroll provider determine specific responsibilities to meet timely reporting and filing requirements.

Please contact The Employers Benefit Group at (310) 775-6069 if you wish to review or discuss further the 2015 reporting requirements.