



***** ACA Reminder - Employer IRS Reporting Due in Early 2016 for Calendar Year 2015*****

As HealthTrust has previously notified you, the Affordable Care Act (ACA) includes new annual IRS reporting requirements that apply to employers of all sizes that provide medical plan coverage through HealthTrust. **Initial reporting will be due in early 2016 for coverage provided during calendar year 2015, regardless of plan year.**

All employers offering HealthTrust medical plans must report to the IRS and to each covered employee, early (non-Medicare eligible) retiree and COBRA beneficiary about their medical plan coverage, known as **Minimum Essential Coverage (MEC)**. Applicable Large Employers (ALEs), those with 50 or more Full-Time Employees and/or Full-Time Equivalent employees (FTEs), must also report additional information about offers and cost of coverage for Full-Time Employees (30 or more hours per week).

Update: On Monday, December 28, 2015, the IRS issued Notice 2016-4 which extends the due dates for ACA information reporting for Calendar Year 2015 for two months. This reporting applies to all employers offering HealthTrust medical plans.

Initial reporting for coverage provided during Calendar Year 2015 is now due to employees by 3/31/2016 and to the IRS by 5/31/2016 (or 6/30/2016 for employers filing electronically, which is required if 250 or more returns are filed).

- **Small Employers (fewer than 50 FTEs) Must Report** information on **Form 1094-B** to the IRS and information about covered individuals on **Form 1095-B** to each enrolled employee or other “responsible individual” (non-Medicare eligible retiree, COBRA beneficiary, or non-employee public official).
- **Applicable Large Employers – ALEs (50 or more FTEs) Must Report** information on **Form 1094-C** to the IRS and on **Form 1095-C** to all Full-Time Employees (IRS definition 30 hours or more per week), whether or not enrolled or offered coverage, and any other individual (e.g., Part-Time, non-Medicare eligible retiree, COBRA beneficiary, or non-employee public official) enrolled in the employer’s medical plan.
- **Links to the IRS Final 2015 Forms 1094-B and C and 1095-B and C and related instructions** are available by logging into your secure HealthTrust Member account at <https://healthtrustnh.org/Member/Moreinfo/hc-reform> (located under Healthcare Reform Resources in the purple box on the right side of the screen).

If you haven’t already, you should take the following basic steps to prepare for this IRS Reporting:

- ☐ Determine your status as a Small Employer or Applicable Large Employer (ALE) for 2015. If you are unsure of your status, complete the ALE test found at <https://www.healthtrustnh.org/Resources/ViewDocument/2577>.
- ☐ Review the 2015 Final IRS Guidance, Forms and Instructions which can be found by logging into your secure Member account at www.healthtrustnh.org and clicking on Healthcare Reform Resources in the purple box.

- ❑ Contact your HR or Payroll software vendor to determine if your software can store the necessary data and print the 1094 and 1095 Forms
- ❑ Collect Dependent SSNs based on IRS rules - 3 separate requests (an initial request and two annual requests) in order to avoid IRS penalties.

2015 MEC Reporting Data from HealthTrust

To assist you in complying with these IRS reporting requirements, in late December, HealthTrust will be distributing a detailed report (**2015 MEC Report - Data on Covered Individuals**) to each Member group that offers HealthTrust medical coverage. The report will include monthly enrollment data (including SSNs HealthTrust has on file) for individuals covered during 2015 under your HealthTrust medical plan.

More information about the IRS reporting requirements including recent HealthTrust webinars for Large and Small Employers, are available by logging into your secure Member account at <https://healthtrustnh.org/Member/Moreinfo/hc-reform> under **Recent ACA Presentations**.

For further information on how these IRS reporting requirements apply to your specific circumstances, please consult with your legal, tax or other professional adviser. If you have questions regarding this email, please contact your HealthTrust Benefits Advisor.

<p>This Healthcare Reform Update is provided for general informational purposes and does not constitute legal or tax advice.</p>
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