



## ACA Reporting Requirements – Update for Large Employers (12/29/2023)

Under the Affordable Care Act, [Applicable Large Employers](#) (those employers with 50 or more full-time plus full-time equivalent employees) must provide all of their full-time employees (defined as employees who worked at least 30 hours per week/130 hours per month during the previous calendar year) with a Form 1095-C each year. Form 1095-C requires these large employers to report on whether or not they *offered* health insurance coverage to each and every one of their full-time employees, regardless of whether or not the employee actually enrolled in the coverage. **The deadline for Applicable Large Employers (ALEs) to issue Forms [1095-C](#) is March 1, 2024.**

In addition, Form 1095-C requires large employers to provide month by month reporting on whether or not the coverage offered met the ACA's definition of affordable. This is determined based on the employee's contribution for self-only coverage for the lowest cost plan the employer offers in which the employee was eligible to enroll. ALEs must also file this same information with the IRS, by sending to the IRS copies of all the Forms 1095-C, along with a Form 1094-C.

For 2023 reporting, the Forms 1095-C and 1094-C remain largely unchanged from prior years.

The 2023 Form 1095-C is on the IRS website at <https://www.irs.gov/pub/irs-pdf/f1095c.pdf>. The 2023 Form 1094-C is at <https://www.irs.gov/pub/irs-pdf/f1094c.pdf>. Instructions for both forms are also on the IRS website, at <https://www.irs.gov/pub/irs-pdf/i109495c.pdf>.

### Upcoming ACA Deadlines to mark on your calendar:

**February 28, 2024:** Paper filing deadline to the IRS. **Beginning January 1, 2024, the IRS will require electronic filing by employers that file 10 or more returns in a calendar year.** That means employers with 10 or more 1095-C forms will no longer be able to file paper copies and [must file electronically](#).

**March 1, 2024:** New annual deadline for providing [1095-C](#) forms to ACA full-time employees. This used to be due January 31, but an IRS rule issued in late 2022 permanently extended this deadline by 30 days.

**April 1, 2024:** File the [1094-C](#) and 1095-C information electronically to the IRS.

### Form 1095-B: Plan Sponsors and Insurers (including the Health Trust)

The ACA also requires all plan sponsors and insurers to report on health care coverage for all individuals covered under a health plan during the previous year. As plan sponsor of the MMEHT health plans, the Health Trust will once again provide a Form 1095-B to each policyholder who was covered under a Health Trust health plan anytime during 2023, and will

also provide that information to the IRS. **The Health Trust will mail Forms 1095-B to policyholders (covered employees) before March 1, 2024.**

As in prior years, if a Health Trust participating employer would like to receive a listing of those employees who will receive a Form 1095-B from the Health Trust, we are happy to provide you with that information. We will provide a spreadsheet to each employer who requests it, showing information related to their particular employees. We will email one spreadsheet to each requesting employer, to either the Town or City Manager, Executive Director, Finance Director, or Human Resources Director (whichever is appropriate). **If you wish to receive a copy of this spreadsheet for your employer group, or if you wish to designate someone to receive the spreadsheet, please send an email to Health Trust Director Kristy Gould at [kgould@memun.org](mailto:kgould@memun.org).**

Best wishes for a happy new year 2024!

*Please note that the Maine Municipal Association and the Maine Municipal Employees Health Trust are sharing this information to assist you with your compliance planning. We recommend that you contact your legal counsel with specific questions relating to this law.*