



Maine Municipal Employees Health Trust

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To: Health Trust Participating Employers
From: Anne Wright, Director, MMEHT
Date: December 16, 2016
Re: ACA Update - 1094-C, 1095-B, Spreadsheets, and a Question

Good afternoon!

Our last update provided you with information on the (very few and quite minor) changes to the Form 1095-C for the 2016 reporting year. This update will give you a listing of the (even fewer and just as minor) changes to the Form 1094-C, the transmittal form that you will use to provide the IRS with copies of all your Forms 1095-C.

But first, a couple of introductory notes.

1. Remember, the **Forms 1095-C and 1094-C only apply to Applicable Large Employers** - that is, those employers with 50 or more full-time plus full-time equivalent employees. Employers with fewer than 50 full-time/FTE employees are not required to provide Forms 1095-C to their full-time employees; nor are they required to file these forms with the IRS.
2. As the plan sponsor of your health plan, the **Health Trust will be sending out Forms 1095-B** to all employees (including retirees and COBRA participants) that were covered under a Health Trust health plan during calendar year 2016. We will send these forms out in January 2017, just as we sent out the 2015 forms in January of 2016.
3. And, just as we did last year, 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. In an effort to assist as many of these employers as possible, we will be making available a spreadsheet for each employer who requests it, showing information related to their particular employees. This information will be emailed to requesting employers, in a password-protected excel spreadsheet. We hope to have this information available in early January.

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 me an email with the subject line "2016 ACA 1095 Reporting Spreadsheet". All email requests should be sent to me at awright@memun.org.

4. A question for all of you. Would you be interested in attending an ACA Reporting Refresher workshop? Since this is only the second time you've had to complete and file your 1095-C forms, we thought that it might be helpful to offer a refresher course in what's required. The

class would most likely be held sometime in January; whether we hold one workshop or several depends on how many people might be interested in attending. If you think that this is something that would interest you, please send me an email with the subject line "I Love ACA Reporting!" Please email me at awright@memun.org.

And now - on to the Form 1094-C changes for this reporting year. Remember, the 1094-C is your transmittal form, and will need to be filed with the IRS (along with copies of all Forms 1095-C) by no later than February 28, 2017 (if filing paper forms) or March 31, 2017 (if filing electronically). Employers filing 250 or more Forms 1095-C must file electronically, while employers filing fewer than 250 Forms 1095-C may choose to either file electronically or via paper forms. Just remember, if you file electronically, it takes a while to get set up, so don't wait until March 31 to start!

The final Form 1094-C was issued by the IRS in October, and may be found on the IRS website, at <https://www.irs.gov/pub/irs-pdf/f1094c.pdf>. Instructions for completing the form may be found at <https://www.irs.gov/pub/irs-pdf/i109495c.pdf>. (These instructions include directions for completing both the 1095-C and 1094-C.)

Changes from last year's form are as follows:

Line 22, Certifications of Eligibility. Box B is now marked "Reserved", and will not be used in this year's reporting. Last year this box could be used by employers who took advantage of the 2015 Qualifying Offer Method Transition Relief (i.e., employers who certified that they made a Qualifying Offer to at least 95% of eligible full-time employees for at least one month in 2015).

Line 22, Certifications of Eligibility. Box C Section 4980H Transition Relief may only be used by employers with a non-calendar year health plan. This "Transition Relief" would apply to those Applicable Large Employers with fewer than 100 full-time plus full-time equivalent employees, and only for those calendar months in 2016 that fall within the 2015 plan year. *(Just a note: Health Trust health plans all renew on a calendar year basis, so this box does not apply.)*

Part III, column (a) Minimum Essential Coverage Offer Indicator. Checking "yes" in this column means that you offered minimum essential coverage to at least 95% of your eligible full-time employees (up from 70% in the 2015 reporting).

Part III, column (e) Section 4980H Transition Relief Indicator. This will only be used by employers with a non-calendar year health plan who have checked Box C Section 4980H Transition Relief on line 22, Certifications of Eligibility. *(As a reminder: This Transition Relief does not apply to employers offering a Health Trust health plan.)*

That's all for today - Have a great weekend!

Anne

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.