



Maine Municipal Employees Health Trust

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To: Health Trust Participating Employers
From: Anne Wright, Director, MMEHT
Date: May 13, 2016
Re: Those Pesky Forms.....

It's been a while, and I certainly hope you didn't think I'd forgotten all of you out there, just waiting to read more about the Affordable Care Act in all its glory. But today, let's start out with a song.

Sung to the tune of "This is For All the Lonely People", which was a big hit for the group America back in 1974.

(Oh, I think I just dated myself. Please don't write back and tell me you were born in 1974. Or after 1974. And if you don't remember the song for some reason it's on YouTube.)

This is for all the large employers
Thinking you're done with ACA
Don't give up until you finish your 1094
And file it with the IRS

Okay, that's all I've got. But it does bring up a very important point. If you are an Applicable Large Employer, you provided all of your full-time employees with a Form 1095-C on or before March 31, 2016, as required by the ACA. That's great, and we are proud of you for doing that. But please, please, please don't forget to file your forms with the IRS!

The ACA requires that Applicable Large Employers file copies of all their Forms 1095-C, along with a Form 1094-C Transmittal, with the IRS. These forms must be filed on or before May 31, 2016, if you are filing paper forms. You have until June 30, 2016, to file if you are filing electronically.

Employers with **fewer than 250 employees** receiving a 1095-C **may** file paper forms. Employers with **250 or more employees** receiving a 1095-C **must** file electronically. (Note: If you have fewer than 250 employees who received a 1095-C, you **may** file electronically if you wish - in fact, the IRS says that "All filers are encouraged to file electronically even if you have less than 250 returns.") Here's a link to the IRS website, where you can find information on how to file your ACA Information Returns electronically: <https://www.irs.gov/for-Tax-Pros/Software-Developers/Information>Returns/Affordable-Care-Act-Information-Return-AIR-Program>. This website even includes a tutorial with step by step instructions on how to file electronically.

So, what do you need to file? As stated before, copies of each and every 1095-C form that you provided to your full-time employees. These must be accompanied by a Form 1094-C, which is

the “Transmittal of Employer-Provided Health Insurance Offer and Coverage Information Returns.” A copy of the 1094-C form for 2015 (fillable pdf) is attached to this email, for those of you who may decide to file paper copies of your forms.

Part I is pretty straightforward – it’s all information about the employer – name, address, who to contact, etc. Line 18 asks for the total number of Forms 1095-C included with the transmittal. Line 19 asks whether this is the authoritative transmittal for the employer. Remember, if the transmittal includes all Forms 1095-C for that employer, that is an authoritative transmittal. If there are multiple transmittals to the IRS – for example, if the town is filing the forms for the town employees and the school department (a part of the town) is filing forms for school employees – one of you must file the authoritative transmittal. The authoritative transmittal includes information on the total number of forms filed for the employer (in this case, the total number of forms filed for the school and the town together).

Lines 20 and 21 (which must be completed if this is an authoritative transmittal) refer to the total number of Forms 1095-C being filed on behalf of the employer, and ask whether the employer is part of an Aggregated Group. Line 22 asks for which Certifications of Eligibility you used (check all that apply). Don’t forget to sign and date page 1 of the form, then complete all the required information on page 2, indicating whether you offered minimum essential coverage, your full-time employee count, total employee count (including full-time and part-time employees), whether or not you are part of an Aggregated Large Employer Group, and which transition relief indicator you are using if you checked box 22 under Line 22 (on page 1). Page 3 of the form only needs to be completed by those employers that are part of an Aggregated Group.

The IRS instructions will help you walk through the 1094-C form; you can find those online at <https://www.irs.gov/pub/irs-pdf/i109495c.pdf>.

Remember – **paper forms must be filed** with the IRS no later than **May 31, 2016**. **Electronic filers** have until **June 30** – but because electronic filing involves testing and advance planning, it’s probably a good idea to start working on it now.

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.