



December 30, 2015

SECUREONESM

Benefit Administrators, Inc.

ACA News

Word has it that some payroll vendors (among others) are now struggling to complete the Affordable Care Act (ACA) IRS forms for their clients. We've heard about some vendors informing clients that they won't be able to do all the forms (specifically for retirees or COBRA enrollees). Other payroll vendors are implementing additional software or web portals for their clients to use to complete the forms themselves.

As we know you're aware (because you're on our email distribution list), large employers with 50 or more employees and smaller employers with self-funded health plans are required to report health coverage and offer of coverage information to individuals and the IRS in early 2016. While some employers are committed to completing those 1094 and 1095 forms internally, many groups are outsourcing the task. Of those outside firms, some are new vendors set up for this specific work; others are data management firms who already specialize in healthcare data (Health Decisions fits this category). Still others are payroll vendors who have recently added ACA Compliance to their menu of services.

However, we're now hearing that, as predicted, the payroll vendors are unable to successfully complete the forms because they don't have access to -- or don't have the skills to process -- enrollment data.



Let us become your Administration and Compliance Solution
for 2016 for the reporting in 2017.



Source: Health Decisions, Inc.

SMALL EXTENSION OF DUE DATES FOR ACA ALE AND MEC INFORMATION REPORTING

IRS announced a small extension of due dates for information reporting of minimum essential coverage under §6055 and reporting for applicable large employers under §6056 in IRS Notice 2016-4.

For furnishing to individuals the 2015 Form 1095-C, Employer-Provided Health Insurance Offer and Coverage, and the form 1095-B, the deadline was changed from February 1, 2016 to March 31, 2016.

For filing with IRS (not electronically) the Form 1094-C, Transmittal of Employer-Provided Health Insurance Offer and Coverage, and the Form 1094-B, Transmittal of Health Coverage Information Returns, the deadline was changed from February 29, 2016 to May 31, 2016.

For filing with IRS electronically, the Form 1094-C, Transmittal of Employer-Provided Health Insurance Offer and Coverage, and the Form 1094-B, Transmittal of Health Coverage Information Returns, the deadline was changed from March 31, 2016 to June 30, 2016.

According to IRS Notice 2016-4, these extensions apply automatically to all filers. However, the IRS is prepared to accept filings beginning in January 2016 and the IRS encourages employers and other coverage providers to furnish statements and file information returns as soon as they are ready.

Employers and other coverage providers that do not meet the extended due dates are still encouraged to furnish and file, and the IRS will take such furnishing and filing into consideration when determining whether to abate penalties for reasonable cause. The IRS will also take into account whether an employer or other coverage provider made reasonable efforts to prepare for reporting the required information to the IRS and furnishing it to employees and covered individuals, such as gathering and transmitting the necessary data to an agent to prepare for submission to the IRS.

SecureOne and Health Decisions will move forward with the original requirements by the IRS for our clients that we are providing "ACA" Reporting Compliance for.



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ACA News—cont.

NO OFFER/BUT STILL REPORT

Q: Is an employer subject to the Employer Shared Responsibility rules required to report on a full-time employee who is not offered coverage during a year?

A: According to the IRS webpage on Reporting of Offers of Health Insurance coverage by Employers (section 6056), an employer subject to the Employer Shared Responsibility rules is required to report information about the health coverage, if any, offered to each of its full-time employees, including whether an offer of health coverage was (or was not) made. This requirement applies to all applicable large employers (ALE) members, regardless of whether they offered health coverage to all, none, or some of their full-time employees.

For each of its full-time employees, the ALE member is required to file Form 1095-C with the IRS and furnish a copy of Form 1095-C to the employee, regardless of whether or not health coverage was or was not offered to the employee.

Even if an ALE member does not offer coverage to any of its full-time employees, it must file returns with the IRS and furnish statements to each of its full-time employees to report information indicating that coverage was not offered.



TRANSITION RELIEF

The IRS has posted on their website basic information on Transition Relief. SecureOne has attached a copy, here with our newsletter, from the IRS of what qualifies for Transition Relief in 2014 & 2015. Visit <https://www.irs.gov/Affordable-Care-Act/Employers/Transition-Relief>.

With SecureOne's Compliance Program, with our partner, Health Decisions, all ALE's that have elected to engage in the full benefits, have been taken care of for reporting due dates January 31st to February 28th, 2016 for the year 2015.

Our compliance program gets directly with the payroll vendor (monthly) and SecureOne (eligibility monthly). No dumping information the last month of the year.

***Look to utilize our Complete Administrative Services,
including full ACA Compliance in 2016!***

Our information is written and produced by SecureOne Benefit Administrators Inc. and is intended to inform our clients and agents that continue to support our administrative services. This information is general Information and should not be relied upon to provide legal or tax advice.