HEALTH & WELFARE PLAN LUNCH GROUP

April 2, 2015

ALSTON & BIRD LLP

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- 1. 6055/6056 Reporting & Disclosure Rules Practical Applications (update)
- 2. Draft Forms

6055/6056 Reporting and **Disclosure Rules**

Practical Applications (update) Ashley Gillihan, Esq. ashley.gillihan@alston.com

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6055

- Why?
 - To give IRS and Taxpayers information necessary to administer the individual mandate!!!!!

- · Who?
 - Entity that provides coverage
 - · Insurance carrier—if fully insured
 - · "Plan Sponsor" if self-insured
 - Each member of a controlled group whose employees participate in a health plan
 - Each employer participating in a MEWA
 - » What if MEWA is maintained by "bona fide association"?
 - If plan is multi-employer plan, joint board of trustees, association, or committee who maintains the plan
 - If a plan is maintained by union (but not a multi-employer plan), the employee organization is the plan sponsor

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- · Who?
 - Third Party may file on behalf of coverage provider BUT coverage provider remains liable
 - What steps must third party take to file on behalf of a coverage provider?
 - Special rule for governmental entities that allows governmental entity to designate another, related governmental entity as the party responsible for filing (to the extent the designated entity agrees in writing)

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- What?
 - Identify <u>all individuals</u> covered under a plan providing minimum essential coverage at least one day of any month DURING THE CALENDAR YEAR
 - Includes employees, retirees, dependents, independent contractors, qualified beneficiaries, "alternate recipients" covered pursuant to a QMCSO, non-employee board members
 - 6055 regulations refer to Code Section 6724 regulations for rules regarding solicitation of dependent SSN
 - The "3 requests" requirement
 - » When the relationship begins
 - » By December 31 of the year in which the relationship begins
 - » By December 31 of the next year
 - Use DOB if unable to receive the dependent's SSN

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- What?
 - Plan year not relevant; all reporting is done on a calendar year basis
 - No description of coverage needed
 - Only reporting for those covered under a plan that qualifies as MEC generally
 - What is MEC?
 - Any group health plan that provides other than excepted benefits
 - Affordability not relevant
 - Minimum value not relevant

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- How?
 - Generally, coverage providers will use 1094/1095-B series to report MEC enrollments to IRS and "responsible individuals"
 - <u>HOWEVER</u>, if plan is *self funded* and sponsored/maintained by *applicable large employer member*, then
 - <u>MUST</u> use 1094/1095-C series to report any individual who was an employee in any month of the calendar year, and his/her dependents, who were covered under the self-insured MEC plan at least one day of any month in the calendar year
 - May but not required to use C-Series to report individuals covered under self-insured MEC plan who were not employees at any time during the year
 - If C-series not used for non-employee covered individuals, then use B-Series.

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- How?
 - Send to last known address of "responsible individual"
 - Employee
 - · Former employee
 - Parent
 - Alternate recipient covered pursuant to QMCSO
 - Other individual who enrolls themself and others
 - Qualified beneficiary ex-spouse?
 - First class mail
 - Electronic if advance consent provided by responsible individual

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- When?
 - In the year following the calendar year being reported
 - To IRS:
 - March 31 if filing electronically
 - February 28 if filing paper forms
 - To primary responsible individual: January 31

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- Why?
 - So IRS can administer employer shared responsibility requirements
 - So IRS and taxpayers can administer the premium tax credit/subsidy under Code Section 36B
 - Although any employee can qualify for credit/subsidy, no reporting for credit/subsidy related reporting required for other than full-time employees

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- Who?
 - Each applicable large employer member
 - Each member of the controlled group of corporations ("ALE member") that constitute an applicable large employer is independently responsible for reporting
 - Third Party may file on behalf of ALE member BUT ALE member remains liable
 - » Special rule for governmental entities (same rule as applicable under 6055)

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- What?
 - Identify all employees who were full-time employees (as defined by 4980H) at least one *full month* during the year
 - Identify the coverage that was offered, if any, during months that the employee was a full-time employee was made during the months that the employee was full-time employee
 - If coverage was not offered for an entire month, identify whether any
 exceptions to excise tax apply
 - E.g. employee not employed during that month
 - E.g. employee part time during the month
 - E.g. employee in limited non-assessment period
 - If coverage offered during a month, indicate whether coverage was affordable or not in such month

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• What?

- It doesn't matter for 6056 purposes whether coverage is fullyinsured or self-insured, or even whether coverage is offered at all.
- If an employer is an ALE member, and the employer has at least one employee who qualified as a 4980H full-time employee, 6056 REPORTING IS REQUIRED!!!!!

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- How?
 - Use 1094/1095-C series to report to IRS and full-time employees.
 - Send to last known address of full-time employee
 - · First class mail
 - Electronic if advance consent provided by responsible individual
 - Relief for full-time employee reporting for:
 - Full-time employees who received a "Qualifying Offer" for all 12 months
 - Relief not applicable with respect to such full-time employees who actually enrolled in a self-insured plan
 - Employers subject to Qualifying Offer Method Transition Relief (only for 2015)
 - Relief for reporting to IRS and full-time employees under 98% offer method

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- When?
 - In the year following the calendar year being reported
 - To IRS:
 - · March 31 if filing electronically
 - February 28 if filing paper forms
 - To full-time employee: January 31

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Key Clarifications in Instructions

- Clarity on 6055 reporting by ALE members for individuals who are not employees at any time during calendar year but are enrolled in self-insured plan
 - May use C-series form to report non-employee covered individuals
- Reporting relief for full-time employees who receive a qualifying offer for all 12 months not available if actually enrolled in a self insured plan.
- Offer to spouse conditioned on reasonable objective restrictions still considered an offer even if spouse doesn't meet condition
 - E.g. spouse is eligible to enroll only if not eligible for other employer coverage is "reasonable" objective restriction

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- ABC Company is a member of a controlled group of corporations that qualifies as an ALE. The other ALE Members in the same controlled group are:
 - 123, Inc.
 - XYZ Company
 - Acme Inc.
- During 2015, ABC had 1000 total employees each month except for November and December, when ABC had 1200.
- During 2015, ABC offered coverage to only 80% of its full-time employees (and dependent children) each month.
- ABC sponsors a self-insured medical plan ("Plan").
- In 2015, ABC made a qualifying offer for all 12 months under the Plan to one or more full-time employees.
- In total, ABC had 500 full-time employees.
- In addition, ABC had 200 part-time employees who enrolled in the Plan.

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1095-C: Example #1

- Bob is employed by ABC on April 15, 2015. Bob is hired into a full-time position.
- ABC's health plan imposes a 60 day waiting period on full-time employees. Thus, if Bob enrolls, his coverage will be effective June 15, 2015.
- · Bob is offered the following coverage:
 - Coverage under Option A, a HDHP health plan for which the employee contribution for self only coverage is \$92.00 per month. The HDHP provides minimum value. Coverage for the spouse and dependent children (if any) is also offered.
 - Coverage under Option B, a PPO for which the employee contribution for self only coverage is \$150 per month. Coverage for the spouse and dependent children (if any) is also offered.
 - Bob does *not* enroll in the health plan.

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- Same facts as example #1 except that the employee contribution for the HDHP is \$100 per month.
- ABC uses the W-2 affordability safe harbor.
- Coverage is "affordable" for Bob under the W-2 safe harbor.

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1095-C: Example #3

- Joe is employed by ABC on October 18, 2014. Joe is hired as a part-time employee.
- ABC offers coverage to part-time employees who average the requisite hours of service over the initial measurement period, which is 11 months in duration and begins on the first day of the month following the date of hire.
- Joe's initial measurement period began November 1, 2014 and ended September 30, 2015.
- Joe averages 30 hours of service per week during the initial measurement period ending September 30, 2015. Consequently, Joe qualifies as a full-time employee for each month of the stability period beginning December 1, 2015.
- Joe is only offered coverage under one option under the plan—a PPO that provides minimum value for which the employee contribution for self only coverage is \$90 per month. Coverage is also offered for the spouse and dependent children (if any).
- Joe enrolls himself and his spouse for the month of December 2015.

- ABC is a party to a collective bargaining agreement with the Professional Benefit Administrator's Union (PBAU).
- Under the agreement, PBAU will offer minimum value coverage to each full-time employee of ABC after 6 months (seniority attainment date). The cost of employee only coverage is \$10 per month. In addition to coverage for the employee, coverage is available for spouse and dependent children (if any).
- In exchange for offering coverage, ABC will begin making contributions in month 3 of the employee's employment.
- Union employee is hired January 1, 2015.
- PBAU makes a qualifying offer on June 1, 2015.
- Union employee does NOT elect coverage

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1095-C: Example #5

- ABC also sponsors a self-insured plan for a division of the company ("Division") that operates on an April 1 through March 31 plan year ("Fiscal Year Plan").
- Ray is a full-time employee of Division.
- Ray is not eligible for any of the calendar year plans sponsored by ABC and Ray satisfied the terms of eligibility in effect under the Plan on February 9, 2014.
- Ray is offered minimum value coverage for himself, spouse and dependent children (if any) that will be effective April 1, 2015 (if he enrolls).
- In addition, ABC satisfies the 95% substantially all test in April 2015.
- · Ray does not enroll.

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- Jody is a part-time employee of ABC. Jody does not qualify as a full-time employee at any time during 2015.
- ABC offers to part-time employees a self-insured MEC plan that is neither affordable nor provides minimum value.
- Jody enrolls himself and his spouse, Judy, in the plan. Coverage is effective for both April 15, 2015.
- Jody terminates employment on December 2, 2015 and does not elect COBRA. Consequently, coverage under the plan ends on December 2, 2015.

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Example #7:

- ABC offers COBRA continuation coverage to "qualified beneficiaries"
- In September of 2014, Jim and Jan Divorce.
- Jan was covered under the plan at the time of the divorce, and is therefore offered COBRA.
- Jan elects COBRA continuation coverage.
- Jan is enrolled in ABC's self-insured medical plan as a COBRA qualified beneficiary for all of 2015

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Example #8

- Jane is a full-time employee throughout 2015; however, Jane terminates employment on October 15, 2015.
- Jane was offered, and enrolled in coverage that constitutes a qualifying offer; however, that coverage ends October 15, 2015 due to her termination of employment.
- Jane is offered COBRA coverage.
- Jane does not elect COBRA.

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Form 1094-C

Department of the Treasury

Internal Revenue Service

Transmittal of Employer-Provided Health Insurance Offer and Coverage Information Returns

CORRECTED

OMB No. XXXX-XXXX

2014

▶ Information about Form 1094-C and its separate instructions is at www.irs.gov/f1094c.

Part I Applicable Large Employer Member (ALE Mem	nber)		
1 Name of ALE Member (Employer)	W 24	2 Employer identification number (EIN)	
3 Street address (including room or suite no.)	y — -,		
4 City or town	5 State or province	6 Country and ZIP or foreign postal code	ı
7 Name of person to contact	NO	8 Contact telephone number	
Name of Designated Government Entity (only if applicable)		10 Employer identification number (EIN)	
11 Street address (including room or suite no.)			For Official Use Only
12 City or town	13 State or province	14 Country and ZIP or foreign postal code	n
15 Name of person to contact		16 Contact telephone number	шшшшш
17 Reserved			
Part II ALE Member Information			
19 Is this the authoritative transmittal for this ALE Member? If "Y	es," check the box and continue.	If "No," see instructions	
20 Total number of Forms 1095-C filed by and/or on behalf of AL	E Member		
21 Is ALE Member a member of an Aggregated ALE Group? If "No," do not complete Part IV.			Yes No
22 Certifications of Eligibility (select all that apply):			
A. Qualifying Offer Method B. Qualifying Offer	Method Transition Relief	C. Section 4980H Transition F	Relief D. 98% Offer Method
Under penalties of perjury, I declare that I have examined this return and a	ccompanying documents, and to the	best of my knowledge and belief, they are	e true, correct, and complete.
Signature	Title		Date

Form 10	094-C (2014)	- 1		AET /	191		120215 Page 2
Part	ALE Membe	r Information – I	Monthly			7	
		(a) Minimum Es Offer I	ssential Coverage ndicator	(b) Full-Time Employee Count for ALE Member	(c) Total Employee Count for ALE Member	(d) Aggregated Group Indicator	(e) Section 4980H Transition Relief Indicator
		Yes	No		001		Translator Florior Indicator
23	All 12 Months		JUI		201	4	
24	Jan			MOT			
25	Feb			NUI	FIL		
26	Mar						
27	Apr						
28	May						
29	June						
30	July						
31	Aug						
32	Sept						
33	Oct						
34	Nov						
35	Dec						

Part IV Other ALE Members of Aggregated ALE Group

Enter the names and EINs of Other ALE Members of the Aggregated ALE Group (who were members at any time during the calendar year).

	Name	EIN	Name	EIN
36	UU		51 , 4 , 4	
37			52	
38			53	
39			54	
40			55	
41			56	
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45			60	
46			61	
47			62	
48			63	
49			64	
50			65	5 1004 C (0044)

Form **1094-C** (2014)

Codes for Section 4980H Transition Relief Indicator -- Form 1094-C Part III, Column (e)

A. 50-99 Transition Relief (ALEs with fewer than 100 full-time employees)

B.100 or more Transition Relief (ALEs with 100 or more full-time employees)

July 24, 2014 DO NOT FILE

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Form **1095-C**Department of the Treasury

Internal Revenue Service

Employer-Provided Health Insurance Offer and Coverage

VOID
CORRECTED

6015 OMB No. XXXX-XXXX

2014

▶ Information about Form 1095-C and its separate instructions is at www.irs.gov/f1095c.

Part I Em	ployee		Applicable Large Employer Member (Employer)																		
1 Name of emplo	yee			2	Social	security number	(SSN)	7 Name of 6	employer		1	1	1		8	Employer	identifica	tion num	ber (EIN)		
3 Street address	(including apartr	ment no.)				7		9 Street address (including room or suite no.)								10 Contact telephone number					
4 City or town		5 State or prov	vince	6 Country and ZIP or foreign postal code				11 City or town 12 State or pro					province 13 Country and ZIP or					foreign postal code			
Part II Em	ployee Off	er and Cov	verage	M																	
	All 12 Months	Jan	Feb	N	lar	Apr	May	June		July	А	ug	Sep	ot	Oct		Nov		Оес		
14 Offer of Coverage (enter required code)																					
15 Employee Share of Lowest Cost Monthly Premium, for Self-Only Minimum Value Coverage	\$	\$	\$	\$		\$	\$	\$	\$		\$		\$	\$		\$		\$			
16 Applicable Section 4980H Safe Harbor (enter code, if applicable)																					
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<u>Indicator Codes for Employee Offer and Coverage – Form 1095-C Part II, Line 14</u> <u>Code Series #1, Offer of Coverage</u>

- 1A. Qualified Offer: Minimum Essential Coverage providing Minimum Value offered to full-time employee with employee contribution for self-only coverage equal to or less than 9.5% mainland single federal poverty line and Minimum Essential Coverage offered to spouse and dependent(s).
- 1B. Minimum Essential Coverage providing Minimum Value offered to employee only.
- 1C. Minimum Essential Coverage providing Minimum Value offered to employee and at least Minimum Essential Coverage offered to dependent(s) (not spouse).
- 1D. Minimum Essential Coverage providing Minimum Value offered to employee and at least Minimum Essential Coverage offered to spouse (not dependent(s)).
- 1E. Minimum Essential Coverage providing Minimum Value offered to employee and at least Minimum Essential Coverage offered to dependent(s) and spouse.
- 1F. Minimum Essential Coverage not providing Minimum Value offered to employee, or employee and spouse or dependent(s), or employee, spouse and dependents.
- 1G. Offer of coverage to employee who was not a full-time employee for any month of the calendar year and who enrolled in self-insured coverage for one or more months of the calendar year.
- 1H. No offer of coverage (employee not offered any health coverage or employee offered coverage not providing Minimum Essential Coverage).
- 1I. Qualified Offer Transition Relief 2015: Employee (and spouse or dependents) received no offer of coverage, or received an offer of coverage that is not a Qualified Offer, or received a Qualified Offer for less than all 12 Months.

<u>Code Series 2 Section 4980H Safe Harbor Codes and Other Relief for Employers - Form 1095-</u> C Part II, Line 16

- 2A. Employee not employed during the month.
- 2B. Employee not a full-time employee.
- 2C. Employee enrolled in coverage offered.
- 2D. Employee in a section 4980H(b) limited non assessment period.
- 2E. Multiemployer interim rule relief.
- 2F. Section 4980H affordability Form W-2 safe harbor.

- 2G. Section 4980H affordability federal poverty line safe harbor.
- 2H. Section 4980H affordability rate of pay safe harbor.
- 21. Non-calendar year transition relief applies to this employee.

 July 24, 2014

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- 1I. Qualified Offer Transition Relief 2015: Employee (and spouse or dependents) received no offer of coverage, or received an offer of coverage that is not a Qualified Offer, or received a Qualified Offer for less than all 12 Months.

<u>Code Series 2 Section 4980H Safe Harbor Codes and Other Relief for Employers - Form 1095-</u> C Part II, Line 16

- 2A. Employee not employed during the month.
- 2B. Employee not a full-time employee.
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Form **1095-C**Department of the Treasury

Internal Revenue Service

Employer-Provided Health Insurance Offer and Coverage

VOID
CORRECTED

6015 OMB No. XXXX-XXXX

2014

▶ Information about Form 1095-C and its separate instructions is at www.irs.gov/f1095c.

Part I Em	ployee		Applicable Large Employer Member (Employer)																		
1 Name of emplo	yee			2	Social	security number	(SSN)	7 Name of 6	employer		1	1	1		8	Employer	identifica	tion num	ber (EIN)		
3 Street address	(including apartr	ment no.)				7		9 Street address (including room or suite no.)								10 Contact telephone number					
4 City or town		5 State or prov	vince	6 Country and ZIP or foreign postal code				11 City or town 12 State or pro					province 13 Country and ZIP or					foreign postal code			
Part II Em	ployee Off	er and Cov	verage	M																	
	All 12 Months	Jan	Feb	N	lar	Apr	May	June		July	А	ug	Sep	ot	Oct		Nov		Оес		
14 Offer of Coverage (enter required code)																					
15 Employee Share of Lowest Cost Monthly Premium, for Self-Only Minimum Value Coverage	\$	\$	\$	\$		\$	\$	\$	\$		\$		\$	\$		\$		\$			
16 Applicable Section 4980H Safe Harbor (enter code, if applicable)																					
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<u>Indicator Codes for Employee Offer and Coverage – Form 1095-C Part II, Line 14</u> <u>Code Series #1, Offer of Coverage</u>

- 1A. Qualified Offer: Minimum Essential Coverage providing Minimum Value offered to full-time employee with employee contribution for self-only coverage equal to or less than 9.5% mainland single federal poverty line and Minimum Essential Coverage offered to spouse and dependent(s).
- 1B. Minimum Essential Coverage providing Minimum Value offered to employee only.
- 1C. Minimum Essential Coverage providing Minimum Value offered to employee and at least Minimum Essential Coverage offered to dependent(s) (not spouse).
- 1D. Minimum Essential Coverage providing Minimum Value offered to employee and at least Minimum Essential Coverage offered to spouse (not dependent(s)).
- 1E. Minimum Essential Coverage providing Minimum Value offered to employee and at least Minimum Essential Coverage offered to dependent(s) and spouse.
- 1F. Minimum Essential Coverage not providing Minimum Value offered to employee, or employee and spouse or dependent(s), or employee, spouse and dependents.
- 1G. Offer of coverage to employee who was not a full-time employee for any month of the calendar year and who enrolled in self-insured coverage for one or more months of the calendar year.
- 1H. No offer of coverage (employee not offered any health coverage or employee offered coverage not providing Minimum Essential Coverage).
- 1I. Qualified Offer Transition Relief 2015: Employee (and spouse or dependents) received no offer of coverage, or received an offer of coverage that is not a Qualified Offer, or received a Qualified Offer for less than all 12 Months.

<u>Code Series 2 Section 4980H Safe Harbor Codes and Other Relief for Employers - Form 1095-</u> C Part II, Line 16

- 2A. Employee not employed during the month.
- 2B. Employee not a full-time employee.
- 2C. Employee enrolled in coverage offered.
- 2D. Employee in a section 4980H(b) limited non assessment period.
- 2E. Multiemployer interim rule relief.
- 2F. Section 4980H affordability Form W-2 safe harbor.

- 2G. Section 4980H affordability federal poverty line safe harbor.
- 2H. Section 4980H affordability rate of pay safe harbor.
- 21. Non-calendar year transition relief applies to this employee.

 July 24, 2014

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Internal Revenue Service

Employer-Provided Health Insurance Offer and Coverage

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6015 OMB No. XXXX-XXXX

2014

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4 City or town		5 State or prov	vince	6 Country and ZIP or foreign postal code				11 City or town 12 State or pro					province 13 Country and ZIP or					foreign postal code			
Part II Em	ployee Off	er and Cov	verage	M																	
	All 12 Months	Jan	Feb	N	lar	Apr	May	June		July	А	ug	Sep	ot	Oct		Nov		Оес		
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15 Employee Share of Lowest Cost Monthly Premium, for Self-Only Minimum Value Coverage	\$	\$	\$	\$		\$	\$	\$	\$		\$		\$	\$		\$		\$			
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<u>Indicator Codes for Employee Offer and Coverage – Form 1095-C Part II, Line 14</u> <u>Code Series #1, Offer of Coverage</u>

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<u>Code Series 2 Section 4980H Safe Harbor Codes and Other Relief for Employers - Form 1095-</u> C Part II, Line 16

- 2A. Employee not employed during the month.
- 2B. Employee not a full-time employee.
- 2C. Employee enrolled in coverage offered.
- 2D. Employee in a section 4980H(b) limited non assessment period.
- 2E. Multiemployer interim rule relief.
- 2F. Section 4980H affordability Form W-2 safe harbor.

- 2G. Section 4980H affordability federal poverty line safe harbor.
- 2H. Section 4980H affordability rate of pay safe harbor.
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Internal Revenue Service

Employer-Provided Health Insurance Offer and Coverage

VOID
CORRECTED

6015 OMB No. XXXX-XXXX

2014

Part I Em		Applicable Large Employer Member (Employer)																			
1 Name of emplo	yee			2	Social	security number	(SSN)	7 Name of employer									8 Employer identification number (EIN)				
3 Street address	(including apartr	ment no.)				7		9 Street add	10	10 Contact telephone number											
4 City or town 5 State or province				6 Country and ZIP or foreign postal code					11 City or town 12 State or pro						13	13 Country and ZIP or foreign postal code					
Part II Em	ployee Off	er and Cov	verage	M																	
	All 12 Months	hs Jan Feb		N	Mar Apr		May	June		July	А	ug	Sept		Oct		Nov		Оес		
14 Offer of Coverage (enter required code)																					
15 Employee Share of Lowest Cost Monthly Premium, for Self-Only Minimum Value Coverage	\$	\$	\$	\$		\$	\$	\$	\$		\$		\$	\$		\$		\$			
16 Applicable Section 4980H Safe Harbor (enter code, if applicable)																					
	vered Indiv		sured cove	erane chec	rk the	box and ente	er the inform	ation for e	ach co	wered in	dividus	a [-							
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<u>Indicator Codes for Employee Offer and Coverage – Form 1095-C Part II, Line 14 Code Series #1, Offer of Coverage</u>

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- 1I. Qualified Offer Transition Relief 2015: Employee (and spouse or dependents) received no offer of coverage, or received an offer of coverage that is not a Qualified Offer, or received a Qualified Offer for less than all 12 Months.

- 2A. Employee not employed during the month.
- 2B. Employee not a full-time employee.
- 2C. Employee enrolled in coverage offered.
- 2D. Employee in a section 4980H(b) limited non assessment period.
- 2E. Multiemployer interim rule relief.
- 2F. Section 4980H affordability Form W-2 safe harbor.

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Internal Revenue Service

Employer-Provided Health Insurance Offer and Coverage

VOID
CORRECTED

6015 OMB No. XXXX-XXXX

2014

Part I Em		Applicable Large Employer Member (Employer)																			
1 Name of emplo	yee			2	Social	security number	(SSN)	7 Name of employer									8 Employer identification number (EIN)				
3 Street address	(including apartr	ment no.)				7		9 Street add	10	10 Contact telephone number											
4 City or town 5 State or province				6 Country and ZIP or foreign postal code					11 City or town 12 State or pro						13	13 Country and ZIP or foreign postal code					
Part II Em	ployee Off	er and Cov	verage	M																	
	All 12 Months	hs Jan Feb		N	Mar Apr		May	June		July	А	ug	Sept		Oct		Nov		Оес		
14 Offer of Coverage (enter required code)																					
15 Employee Share of Lowest Cost Monthly Premium, for Self-Only Minimum Value Coverage	\$	\$	\$	\$		\$	\$	\$	\$		\$		\$	\$		\$		\$			
16 Applicable Section 4980H Safe Harbor (enter code, if applicable)																					
	vered Indiv		sured cove	erane chec	rk the	box and ente	er the inform	ation for e	ach co	wered in	dividus	a [-							
			Surca cov			DOB (If SSN is	(d) Covered		4011 00	vereu ii	Idividue) Months	of Covera	ge						
(a) Nar	me of covered in	idividuai(s)		(b) SSN		not available)	all 12 month	s Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec		
17																					
18																					
19																					
20																					
21								\perp													
22																					

<u>Indicator Codes for Employee Offer and Coverage – Form 1095-C Part II, Line 14</u> <u>Code Series #1, Offer of Coverage</u>

- 1A. Qualified Offer: Minimum Essential Coverage providing Minimum Value offered to full-time employee with employee contribution for self-only coverage equal to or less than 9.5% mainland single federal poverty line and Minimum Essential Coverage offered to spouse and dependent(s).
- 1B. Minimum Essential Coverage providing Minimum Value offered to employee only.
- 1C. Minimum Essential Coverage providing Minimum Value offered to employee and at least Minimum Essential Coverage offered to dependent(s) (not spouse).
- 1D. Minimum Essential Coverage providing Minimum Value offered to employee and at least Minimum Essential Coverage offered to spouse (not dependent(s)).
- 1E. Minimum Essential Coverage providing Minimum Value offered to employee and at least Minimum Essential Coverage offered to dependent(s) and spouse.
- 1F. Minimum Essential Coverage not providing Minimum Value offered to employee, or employee and spouse or dependent(s), or employee, spouse and dependents.
- 1G. Offer of coverage to employee who was not a full-time employee for any month of the calendar year and who enrolled in self-insured coverage for one or more months of the calendar year.
- 1H. No offer of coverage (employee not offered any health coverage or employee offered coverage not providing Minimum Essential Coverage).
- 1I. Qualified Offer Transition Relief 2015: Employee (and spouse or dependents) received no offer of coverage, or received an offer of coverage that is not a Qualified Offer, or received a Qualified Offer for less than all 12 Months.

- 2A. Employee not employed during the month.
- 2B. Employee not a full-time employee.
- 2C. Employee enrolled in coverage offered.
- 2D. Employee in a section 4980H(b) limited non assessment period.
- 2E. Multiemployer interim rule relief.
- 2F. Section 4980H affordability Form W-2 safe harbor.

- 2G. Section 4980H affordability federal poverty line safe harbor.
- 2H. Section 4980H affordability rate of pay safe harbor.
- 21. Non-calendar year transition relief applies to this employee.

 July 24, 2014

DO NOT FILE