

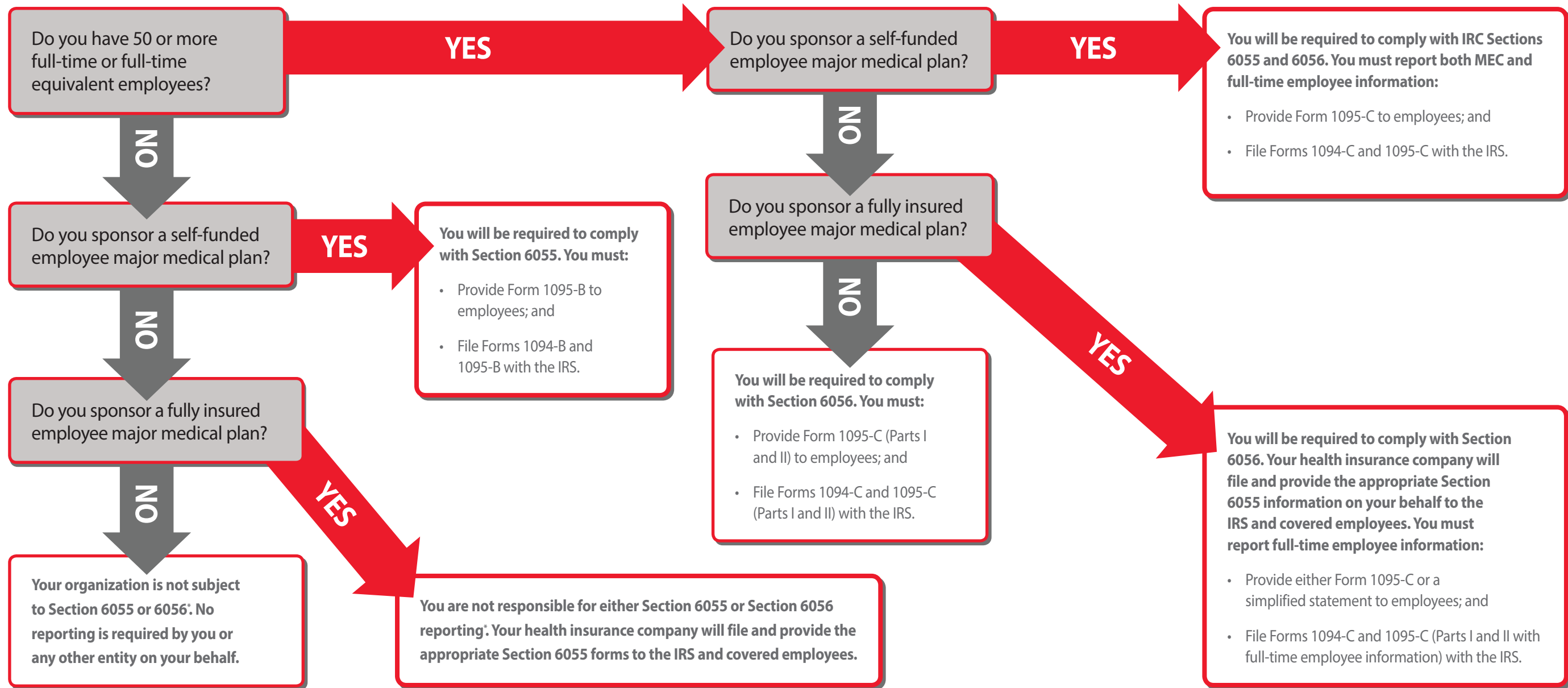
ACA EMPLOYER REPORTING OBLIGATIONS



Under the Patient Protection and Affordable Care Act (ACA) beginning in early 2016, employers must report to the Internal Revenue Service (IRS) and disclose to employees detailed data about their workforces and benefit offerings for the 2015 calendar year. Employers may use the flowchart below to help determine who has to file what. More information is available at: HCReducation.com/EmployerReporting. The following is a brief introduction.

All employers with 50+ full-time equivalent employees are required to provide information to employees and the IRS regarding their access to Minimal Essential Coverage (MEC) under Internal Revenue Code (IRC) Section 6055 and, with

respect to full-time employees as defined by the ACA, information of an offer of adequate and affordable coverage under IRC Section 6056. While employers with fully insured major medical plans can rely on the insurer to submit the information on MEC, Employers with insured and/or self-funded major medical plans have the responsibility to report the information under Section 6056 of the offer of adequate and affordable coverage to each full-time employee. This information must be reported using IRS Forms 1094-C and 1095-C. Reporting for each calendar year will be due to the employee by March 31 and to the IRS by June 30 (if filed electronically) of the following year.



This is only a high level summary that reflects our current understanding of select portions of the law, sometimes in the absence of regulations. All of the interpretations contained herein are subject to change as the appropriate agencies publish guidance. The most up-to-date summary of these rules is available on our website at HCReducation.com. American Fidelity Administrative Services, LLC does not provide tax or legal advice and you are encouraged to seek the advice of your legal counsel. Copyright 2015 American Fidelity Administrative Services, LLC.

**Employers with fewer than 50 employees will be required to file Forms 1094-C and 1095-C if they are members of a control or affiliated service group that collectively has at least 50 full-time or full-time equivalent employees.*