



October 26, 2015

**RE: Information Reporting Requirements under Health Care Reform**

Dear Participating Employer:

Under health care reform, an Applicable Large Employer (ALE) must comply with reporting obligations under Internal Revenue Code Sections 6055 and 6056 to demonstrate compliance with the employer shared responsibility provisions under Internal Revenue Code Section 4980H. ALE's must file information returns with the Internal Revenue Service in addition to furnishing employees with statements about health coverage offered. If your business meets the definition of ALE (employing an average of at least 50 full-time employees on a controlled group basis), it must submit these returns and furnish employee statements beginning in early 2016, to report information about its coverage in 2015. **The Trust will not be able to do this for you. However, the Trust will provide you, on request, with the specific coverage information needed to complete the IRS forms (see below).**

This letter provides an overview on reporting requirements for full-time employees as it relates to coverage under the AGC Health Benefit Trust ("Trust"). The Trust provides this information to you so that your business can prepare to comply with its reporting obligations under health care reform. If you have any questions about your status as an applicable large employer or how your business will fulfill its reporting obligations, you should consult with your counsel or benefits advisor.

**IRS Information Returns**

An ALE must file a Form 1095-C for each full-time employee along with a Form 1094-C to the IRS. The table below outlines the key points to consider when completing these forms for an employee who was offered coverage under the Trust in 2015.

**Note:** This letter only addresses coverage under the Trust. If you have questions about reporting for those who were offered other coverage, you should consult your counsel, benefits advisor, or the coverage provider.

### Information to be Reported to the IRS

Coverage the ALE offered to full-time employees in the 2015 calendar year.

### Entity Responsible for Reporting to the IRS

Applicable large employer (or each applicable large employer member in a controlled group of entities)

### IRS Filing Deadline

February 29, 2016 (March 31, 2016, if filing electronically, required for 250 or more employees )

### Applicable IRS Returns

“C” Forms: Form 1094-C and Form 1095-C

### Form 1094-C (the “Transmittal”)

This form is essentially a “cover sheet” for the submission of the 1095-C forms to the IRS.

### Form 1095-C

One Form 1095-C must be filed for each full-time employee.

If the full-time employee received an offer of coverage under the Trust, only Parts I and II should be completed. BSI, on behalf of the Trust, will provide, on request, the coverage information needed to complete Lines 14 of Part II, including whether the Trust offers minimum essential coverage, whether the Trust offers minimum value, and whether the employee enrolled in coverage under the Trust. BSI anticipates availability of this information in November via its online tool SIMON and via secure email. You will access this information by submitting a request to BSI for a Medical Coverage Report. **NOTE:** BSI will not provide all information necessary for completion of Line 15 or 16. The applicable large employer must perform its own calculations in order to populate Line 15 and 16.

Part III “Covered Individuals” should be left blank. Information about covered individuals enrolled in a full-time employee’s coverage is only required to be reported if the employer offers employer-sponsored self-insured health coverage in which the employee or other individual enrolled.

**Note:** Information required for reporting will not automatically be provided. You must request a Medical Coverage Report for information to be provided to you on your covered employees.

### Employee Statements

ALE’s must also furnish a copy of the Form 1095-C generated for each employee reported to the IRS. The deadline to provide statements of 2015 coverage to full-time employees is **February 1, 2016.**

### **Minimum Essential Coverage Statements**

Health insurance issuers, self-insured employers, government agencies, and others that provide minimum essential coverage to an individual during a calendar year must file an annual information return with the IRS. As the medical plans offered by the Trust are insured, Regence is responsible for the distribution and filing of these returns and related participant statements.

### **Conclusion**

Please contact [service@agchealthplansnw.com](mailto:service@agchealthplansnw.com) if you have any questions or concerns about reporting coverage for full-time employees who were enrolled in the Trust.

Sincerely,

The Board of Trustees  
AGC Health Benefit Trust  
9450 SW Commerce Circle, Suite 200  
Wilsonville, OR 97070

Enclosure