

FEDERAL AND STATE HEALTH PLAN REPORTING

FACT SHEET



IMPORTANT POINTS TO CONSIDER

This fact sheet provides an overview of certain employer reporting requirements for federal and state laws. It is specifically designed to assist employers with employees participating in **GuideStone’s self-funded group health plans**. The information below is based on the nature of the GuideStone® plan as a multiple employer, self-insured church health plan. These comments are not intended to address situations in which employers have employees with health coverage outside GuideStone.

FEDERAL LAW REPORTING REFERENCE CHART

FEDERAL & STATE LAWS — HEALTH PLAN REPORTING		
Filing	Type of Information	Reporting
<i>Form 5500</i>	The <i>Form 5500</i> Series is part of the Employee Retirement Income Security Act’s (ERISA) overall reporting and disclosure framework, which is intended to assure that employee benefit plans are operated and managed in accordance with certain prescribed standards.	Not required for GuideStone’s health and welfare plans.
Centers for Medicare and Medicaid Services (CMS) Disclosure	Each year, employers with health plans that provide prescription drug coverage to Medicare-eligible individuals must disclose to CMS whether that coverage is creditable or non-creditable. The annual disclosure must be provided within 60 days after the start of the plan year.	As a part of GuideStone’s plan administrator services to the employer, GuideStone reports directly to CMS every plan year.
W-2 reporting	The Affordable Care Act (ACA) requires employers to report the cost of coverage under an employer-sponsored group health plan on an employee’s <i>Form W-2, Wage and Tax Statement</i> , in Box 12, using Code DD.	Not required for GuideStone’s health and welfare plans per IRS Notice 2012-9 .
Patient-Centered Outcomes Research Institute (PCORI) fee	PCORI fees are considered an excise tax and are calculated under IRC 6651. PCORI fees apply to health insurers and plan sponsors offering self-funded health insurance plans. The fee must be submitted via <i>Form 720</i> by July 31 annually and needs to be paid using the Electronic Federal Tax Payment System (EFTPS).	As a part of the GuideStone’s plan administrator services to the employer, GuideStone files <i>Form 720</i> and pays PCORI fees on behalf of all participating employers. A separate PCORI fee may apply for employers that operate Health Reimbursement Arrangements (HRAs). Employers should seek a qualified tax professional to determine if a separate fee is applicable for their ministry.

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Section 6055 and 6056 Reporting

1095-B Health Coverage	This form reports to responsible individuals the months for which they and their dependents were enrolled in minimum essential coverage (MEC) at GuideStone during the applicable reporting period.	GuideStone completes and makes available to plan participants in accordance with current guidelines.
1094-B Transmittal of Health Coverage Information Returns	This form is used to transmit to the IRS copies of Form 1095-B and reports the total number of Form 1095-Bs included in the batch.	GuideStone reports this information to the IRS each year.
1095-C	This form reports to an applicable large employer (ALE) employee any offers of coverage made by the employer and the employee's share of the lowest-cost monthly premium for self-only minimum value coverage. Copies of these will accompany Form 1094-C to the IRS.	Must be completed by all ALEs.
1094-C	This form is used to transmit to the IRS copies of Form 1095-C and reports the total number of Forms 1095-Cs included in the batch.	Must be completed by all ALEs.

STATE LAW MINIMUM ESSENTIAL COVERAGE (MEC) REPORTING REFERENCE CHART

STATE LAWS — MEC REPORTING			
Filing	Type of Information	Reporting	Where to Report
Health plan reporting for California	<p>Beginning January 1, 2020, the federal Forms 1094-C and 1095-C must be filed with the State of California to report enrolled employees who are California residents (whether or not full time) by March 31 following each coverage year (e.g., first filing is due for the 2020 year and is due by March 31, 2021)</p> <p>The federal Form 1095-C must also be provided to employees (compliance with IRS ACA requirements is sufficient for these purposes).</p>	GuideStone will handle state reporting for all employers by submitting Form 1095-B to the state Franchise Tax Board.	<p>The forms must be filed with the California Franchise Tax Board (electronic filing required if over 250 forms will be filed).</p> <p>Draft instructions for filing are available here.</p> <p>Registration for electronic filing is due to begin October 5, 2020.</p>
Health plan reporting for District of Columbia	<p>Beginning January 1, 2019, the federal Forms 1094-C and 1095-C (or 1094-B and 1095-B) that are filed with the IRS must be filed with the District of Columbia by the date that is 30 days after the IRS deadline for submitting Forms 1095-C (including any extensions granted by the IRS).</p> <p>The federal Form 1095-C must also be provided to employees (compliance with IRS ACA requirements is sufficient for these purposes).</p>	GuideStone will handle state reporting for all employers by submitting Form 1095-B to the Office of Tax and Revenue.	<p>The forms must be filed with the Office of Tax and Revenue by uploading files through MyTax.DC.gov.</p> <p>Guidance is available here.</p>

<p>Health plan reporting for Massachusetts</p>	<p>Form MA 1099-HC must be distributed to primary subscribers who are residents of Massachusetts, and Form MA 1099-HC information must be reported to the State of Massachusetts (as applicable) by January 31 after each coverage year (forms and instructions available here).</p> <p>The Health Insurance Responsibility Disclosure (HIRD) form must be filed by December 15 each year.</p>	<p>Employers are responsible for these state reporting requirements.</p>	<p>The forms must be reported to the Massachusetts Department of Revenue through the MassTaxConnect (MTC) account service.</p> <p>Instructions are available here.</p> <p>HIRD reports must be submitted through the MassTaxConnect (MTC) account service; information on the HIRD form filing requirements is available here.</p>
<p>Health plan reporting for New Jersey</p>	<p>Beginning January 1, 2019, the federal <i>Forms 1095-C</i> (or <i>1095-B</i>) must be filed with the State of New Jersey for each primary enrollee who was a New Jersey resident and to whom the filer provided minimum essential coverage. Forms must be filed by March 31, 2023, for the 2022 tax year.</p> <p>If the ACA reporting requirement is repealed, the State of New Jersey will create new forms.</p> <p><i>Form 1095-C</i> (or <i>1095-B</i>) must also be furnished to each primary enrollee who was a New Jersey resident by March 2 after each coverage year. Form distribution requirements differ from federal guidelines as each primary enrollee must receive a mailed copy.</p>	<p>GuideStone will handle state reporting for all employers by submitting <i>Form 1095-B</i> to the New Jersey Division of Taxation.</p>	<p>The forms are filed with the New Jersey Division of Taxation using the Division of Revenue and Enterprise Services' electronic MFT SecureTransport service (if under 100 forms will be filed, Form NJ-1095 can be used to file one form at a time). Filers will need an MFT SecureTransport service account.</p> <p>Filing guidance is available here.</p>
<p>Health plan reporting for Rhode Island</p>	<p>Beginning January 1, 2020, federal <i>Forms 1095-C</i> (or <i>1095-B</i>) must be filed with the State of Rhode Island for each primary insured who was a Rhode Island resident by January 31 after each coverage year.</p> <p><i>Form 1095-C</i> (or <i>1095-B</i>) must also be furnished to each primary insured who was a Rhode Island resident by January 31 after each coverage year.</p>	<p>GuideStone will handle state reporting for all employers by submitting <i>Form 1095-B</i> to the Division of Taxation.</p>	<p>The forms are filed with the Division of Taxation.</p> <p>Additional guidance on the submission requirements is expected but not yet issued.</p> <p><i>Form 1095-C</i> (or <i>1095-B</i>) must also be furnished to each primary insured who was a Rhode Island resident by January 31 after each coverage year.</p>

<p>Health plan reporting for Vermont</p>	<p>Currently, there are no employer reporting requirements under the Vermont health insurance individual mandate. However, in the event that the requirement for MEC providers to furnish a statement of coverage to individuals under the ACA is suspended or eliminated for any taxable year, each employer, health insurance carrier and other entity providing MEC to residents of Vermont shall submit a return to the Department of Taxes containing the same information required under the ACA's reporting requirements.</p>	<p>Currently, no individual mandate reporting required.</p>	<p>Currently, no employer or health plan reporting or distribution requirements under the Vermont health insurance individual mandate. In the event reporting is required, reporting will be done to the Department of Taxes.</p>
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SUMMARY

As a reminder, it will be important for employers to obtain competent tax and legal advice regarding completion of these forms, as GuideStone cannot provide specific advice regarding the employer's operation.

GuideStone is not authorized to provide legal or tax advice. We always encourage employers to consult with their own advisors with respect to their specific facts and circumstances.



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This material is based on the Reporting and Disclosure Guide for Employee Benefit Plans prepared by the U.S. Department of Labor's Employee Benefits Security Administration with assistance from the Pension Benefit Guaranty Corporation and GuideStone's understanding of the applicable laws applicable to church plans. They are made available by GuideStone for information purposes only, do not constitute legal or tax advice, and are not a substitute for legal or tax advice from qualified counsel. The subject matter of these materials, and GuideStone's understanding, are subject to change as additional federal and state laws, regulations and guidance are enacted and released. Your situation may be affected by laws not referenced here.