



# Employer *Bulletin*

Employer Communication Center 608-266-3285

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etf.wi.gov

## New Employer Reporting Requirements for Health Insurance Coverage

As a Wisconsin Public Employer who participates in the State of Wisconsin group health insurance program, you may be responsible under the federal Affordable Care Act (ACA) for reporting the provision of Minimum Essential Coverage (MEC) health insurance to your employees and their covered dependents. Please consult with your tax advisor or attorney to determine your reporting responsibilities under the law.

The Internal Revenue Service (IRS) and the Department of the Treasury provide extensive information for employers to assist in the implementation of the reporting requirements of the ACA. Below, ETF has compiled a list of useful links to some of the available information:

- [IRS Employer ACA Information](#)
- [IRS ACA Applicable Large Employer information](#)
- [IRS Q&A on Provider Reporting](#)
- [Department of the Treasury Fact Sheet](#)
- [IRS Q & A for Employers](#)

## Frequently Asked Questions

### 1. As an employer, what information and data can I get from ETF in order to meet my reporting requirements?

ETF provides data that employers may access to complete some of the IRS required forms under the ACA. The myETF Benefits System (MEBS) provides much of this in the “Health Insurance Dependent Inquiry” report for insured subscribers and their dependents as described below.

The data listed in the bullets below is available in MEBS under the tab Enrollment Reports, specifically in the report *Health Insurance Dependent Inquiry*. This report is a snapshot as of the time of the day it is pulled from the system. It can be exported and saved into Excel.

Report Examples:

- Covered Individual
- Covered Individual SSN
- Covered Individual DOB (date of birth)
- Covered Individual months of coverage

**2. I know that I need to report dependent Taxpayer Identification Numbers (TIN). How can I obtain a TIN if they are not readily available?**

A significant number of dependents of employees are missing Taxpayer Identification Numbers (typically a Social Security number) in the MEBS system. ETF is aware that many health plans have been contacting employees to obtain missing TIN's during 2015.

Please note the following guidance from the IRS as described in this IRS Tax Tip:

“Reporting of TINs for all covered individuals is necessary for the IRS to verify an individual’s coverage without the need to contact the individual. If health coverage providers are unable to obtain a TIN after making a reasonable effort to do so, the provider may report a covered individual’s date of birth in lieu of a TIN. A health coverage provider will not be subject to a penalty if it demonstrates that it properly solicited the TIN.”

**3. Am I required as an employer to report for people who retired from my local governmental entity?**

If you have non-Medicare retirees in the It’s Your Choice Access Health Plan (formerly the Standard Plan) or State Maintenance Plan (SMP) that are covered under your employer-paid plan, referred to as “employer-paid annuitants,” you will be responsible for ACA reporting, as these covered individuals appear on your monthly premium invoice.

ETF is not reporting for local retirees who are employer-paid annuitants. For retirees who are *not* employer paid annuitants, see Question 6 below.

**4. How do I determine the Employee Share of Lowest Cost Monthly Premium for Minimum Value Coverage?**

For local employers in the Wisconsin Public Employers Group Health Insurance Program, ETF suggests that you use the employee share of the lowest cost single coverage plan that’s offered in the county the employer is located in. If you have employees who report to work in multiple counties, use the county where the employee reports to work.

**5. Do all plans offered under the Wisconsin Public Employers Group Health Insurance Program offered to state and local employers exceed the federal minimum value standard?**

Yes, per the actuarial certification of the Group Insurance Board’s consulting actuary.

**6. Who is responsible for reporting this information for retirees and continuants?**

ETF will provide the 1095-C form to certain non-Medicare retirees and Medicare retirees who cover non-Medicare dependents that participate in a self-funded health plan, which is the It’s Your Choice Local Access Health Plan (formerly the Standard Plan) or the State Maintenance Plan (SMP). ETF is not providing the form to participants in a fully-insured plan or those who have Medicare as their primary coverage.

For COBRA continuants, ETF will provide employers with a full data file of COBRA continuation enrollees. This file will be available to you on ETF’s secured FTP file server. Once the file is available, you will receive a notification email from ETF with the location of the file. ETF anticipates the first files will be available by the week of November 20, 2015. This initial file will be partial year data compiled through November 4, 2015. ETF will provide an additional file in the beginning of January 2016 that will provide you with new and changed information that occurred from 11/05/2015 to 12/31/2015.

The Department of Employee Trust Funds does not discriminate on the basis of disability in the provision of programs, services or employment. If you are speech or hearing impaired and need assistance, call the Wisconsin Relay Service toll free at 7-1-1 or 1-800-947-3529 (English) 1-800-833-7813 (Español). If you are visually or cognitively impaired, call 1-877-533-5020 or (608) 266-3285 locally. We will try to find another way to get the information to you in a usable form.

This *Employer Bulletin* is published by the Wisconsin Department of Employee Trust Funds. Questions should be directed to Employer Communications Center toll free at 877-533-5020 or local at 608-266-3285. Employer agents may copy this *Bulletin* for further distribution to other payroll offices, subunits or individuals who may need the information. Copies of the most recent *Employer Bulletins* are available on our Internet site.

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