

RBA can significantly reduce your burden and cost of ACA reporting. In Q1 of 2016 we completed almost 40,000 employee 1095c's for our clients with very little Human Resource involvement. The average time spent by our clients HR Departments in producing 1095c's for their employees was less than 2 hours on average.

35 Questions to ask your ACA Vendor before you file next year.

Since the first year of mandatory reporting has proven the empty claims of many vendors, it's time to start shopping for a better solution. Here is a list of 35 questions to ask. Or you can call us: 800-836-0026.

1. **Do fully insured employers need to report?** If so, what type of reporting do they need to do [what forms, etc.]?
2. **Who ultimately gets** a reporting form from us as an employer? How does that change based upon if we are fully insured or self-insured?
3. **If we have multiple plan designs**, how does the reporting work?
4. **Does ACA reporting** involve protected health information (PHI)? If so, does your company enter into a Business Associate Agreement with its clients?
5. **When was your last HITECH audit?**
6. **Does your ACA reporting software** generate the codes for form 1095C? Does the software create the correct codes, or do we input these manually for each person?
7. **How long will the data be stored?**
8. **Could you explain the ACA reporting safe harbors?**
9. **If a group offers a Health Reimbursement Account** (which is considered a self-funded plan), in coordination with a traditional fully insured plan, how will this work in terms of ACA reporting?
10. **Can an employer qualify** for multiple forms of transitional relief?
11. **Is it necessary** for an employer to track enrollment declination?
12. **Does each employer** need to request a transmitter control code (TCC) from the IRS? If so, how?
13. **If we have an opt-out bonus**, how is that calculated and accommodated for in the ACA reporting?
14. **How does non-calendar year** transitional relief work?
15. **Who is responsible for managing different data?** Your ACA reporting solution will handle a significant amount of data relating to your employees, which must be tracked and reported as necessary for compliance. With this question, you want to determine who will be managing this information between your organization and the vendor you ultimately select – and even possibly your health insurance broker. It's important to know these details so there aren't any gaps in reporting that can result in penalties for non-compliance.
16. **How is data integrated to avoid duplicate entries?** With this question, you want to establish whether the solution relies upon a single database environment or multiple. When you're dealing with numerous sources of data, there's more likelihood for duplication.
17. **Does your system contain "Robust ACA Logic?"** This is critical if you have spent any amount of time looking at these forms – you will know that performing this reporting is MUCH MORE than just uploading a spreadsheet - the codes for these lines are based upon logic. Most systems do not have this logic built in, but rather it will be up to you to figure this out.

What if you decide to just file them incorrectly?

When your employees bring you letters from the IRS you will realize this was a bad decision.

Also, without robust logic built into the system there will be no accommodation for situations such as someone terminating in November/December and then electing COBRA in January. The codes for these situations are different.

18. **What factors impact cost?** Pricing will always be a factor in your ACA reporting solution, so find out how you'll be charged. Some cloud-based systems will charge you on a monthly basis, but only for those services you use.
19. **Have you determined your Qualifying Offer method?** The Qualifying Offer method will determine the applicable codes to be used when completing the 1095-C for employees, it is imperative you know that your solution can house your specific Qualifying Offer method and apply the applicable codes correctly. If you are responsible for determining the applicable codes per month per employee and entering on a spreadsheet, do you really have a "solution?"

20. **Is your company an IRS-authorized transmitter/submitter provider?** The IRS accepts a number of tax forms via electronic submission through Authorized E-File Providers, including those required under IRC Section 6055/6056. For ease of filing, make sure your ACA reporting solution enables you to file the necessary forms electronically if you are expected to file 250 or more forms.
21. **Is your system based on a monthly or look-back measurement period?** Under the ACA, Applicable Large Employers (ALEs) must offer health insurance coverage to full time employees or they face penalties for non-compliance. Organizations will typically determine full versus part time status by calculating the individual's hours of service, which is allowable under two different methods:
- Monthly Measurement
 - Look-Back Measurement

When researching ACA reporting vendors, it's important that you know which method their solution will accommodate. One or the other will be suitable for your existing measurement methods – or which calculation you intend to implement for ACA compliance purposes.

22. **How does your system track measurement, administrative and stability periods for new hires?** Tracking these time periods is essential under ACA regulation because they determine a new hire's eligibility for health insurance coverage – i.e., is the new hire working 30 or more hours per week or 130 hours per month? An ACA reporting solution must carefully record these time periods for every employee, including new hires; therefore, it's essential that you understand the functions behind the tracking features.
23. **Can your system utilize the measurement period for variable workers?** Variable employees, such as temporary workers and seasonal hires, are also measured for FT/PT hourly purposes to establish eligibility for health insurance coverage. An ACA reporting service must be able to track these time periods in order to maintain compliance. If you are an education institution, your tracking solution must be able to determine and track adjunct professors as well as coaches; you will need to determine your solution is capable of using the session method.
24. **How does your solution classify interns?** Interns can be considered either variable or seasonal employees under the ACA, a definition which depends upon the length of the internship and whether the employment is based upon a specific time of year. It's important that you discuss these options with your ACA vendor so you can prepare for taking on paid interns; unpaid interns are not subject to ACA requirements.
25. **Do you currently have access** to FTE Counts on a per payroll basis for all of 2015?
26. **If you have more than one EIN** (Federal Employer Identification Number), can your payroll/ACA reports combine all EINs?
27. **Do you have reports** to show average hours worked on weekly and monthly basis for all employees?
28. **Do you have a report** to measure your medical plans' affordability for all three safe harbors (W2, hourly rate & FPL)?
29. **Do you have automated alerts** for exceeding hours worked?
30. **Do you have automated e-mail alerts** for employee benefit eligibility dates?
31. **Will IRS forms 1095c and 1094c** be prepared and filed for you automatically by your payroll vendor?
32. **Does your payroll vendor** currently have fields in their system to enter parts II and III of 1095c (offer of coverage code, employee cost share, safe harbor code, dependents)?
33. **Does your payroll vendor** offer web and mobile App access to company benefit documents with electronic acknowledgement capability?
34. **Has your payroll vendor** increased your fees for ACA compliance?
35. **How many forms did they file in 2016?** How many were rejected?

For additional assistance with your ACA filing, call Lisa Allen, VP Regulatory Affairs: 800.836.0026, x230