



# Iron Workers' Locals 15 and 424

## Pension, Extended Benefit, Annuity and Apprenticeship Training Funds

321 RESEARCH PARKWAY • SUITE 210 • MERIDEN, CT 06450 • TEL 203-238-1204 • FAX 203-639-0815  
EXECUTIVE DIRECTOR, SUSAN A. HENDERSON TOLL FREE 1-800-982-3709

### LABOR TRUSTEES

JOSEPH P. TONER, Co-Chairman  
JAMES J. DOHENY, Secretary  
SHAUN McCAULEY  
MARK J. BUONO

### MANAGEMENT TRUSTEES

DAVID HUNT, Co-Chairman  
LOWELL KAHN  
RICHARD FITZGERALD  
MICHAEL O'SULLIVAN

To: Contributing Employers

From: Iron Workers' Locals No. 15 & 424 Extended Benefit Fund

### Re: Affordable Care Act's Requirements Applicable to Large Contributing Employers

The Affordable Care Act (ACA) has a number of reporting requirements for employers. One of these reporting requirements is to report enrollment in and eligibility for health coverage. **Reporting is voluntary for 2014.**

Reporting responsibility depends on both the employer's size and how the employer's health coverage is funded (i.e., whether health coverage is insured or self-insured).

ACA Sections 6055 and 6056 require large employers to report enrollment and eligibility information to the IRS. The ACA also imposes penalties on large employers who fail to offer affordable health coverage meeting minimum requirements.

To meet Section 6055 reporting responsibilities, enrollment in health coverage is reported on Form 1095-B (for insured coverage) or Part III of Form 1095-C (for self-insured coverage). To meet Section 6056 reporting responsibilities, eligibility for health coverage is reported on Part II of Form 1095-C.

Employers contributing to a multiemployer plan, such as the Iron Workers' Locals No. 15 & 424 Extended Benefit Fund (Fund), will be treated as having met its obligations to offer health coverage under IRC Section 4980H with respect to a full-time employee if the employer is required by a collective bargaining agreement (or appropriate related participation agreement) to contribute on behalf of that employee to a multiemployer plan that provides coverage to individuals who satisfy the plan's eligibility conditions, meeting the affordability and minimum value requirements and that offers coverage to those individuals' dependents.

The information below will assist contributing employers to understand the Fund's rules under the ACA and IRC Section 4980H. In addition, this will assist employers to complete reporting required to be submitted by large (50 or more full-time employees or equivalent) employers under Internal Revenue Code Section 6056. Specifically, the following information will assist a large contributing employer as it completes Form 1095-C for each of its full-time employees for whom the employer is required to contribute to the Iron Workers' Locals No. 15 & 424 Extended Benefit Fund. Please note that if a contributing employer is a large employer and employs other collectively bargained employees in different trades and/or covers employees through other avenues (insurance companies, Exchanges, etc.), then such large employers will need to obtain similar information as to those other employees from the entity (or entities) providing health coverage.

**1. MINIMUM ESSENTIAL COVERAGE**

The Fund provides minimum essential coverage, as defined in the ACA.

**2. MINIMUM VALUE**

The health benefits offered by the Fund meet the ACA's 60 percent minimum value standard.

**3. DEPENDENT COVERAGE**

The Fund extends coverage to eligible Iron Workers and to the following dependents:

- Spouses
- Biological children, lawfully adopted children (including those placed for adoption with a participant and any stepchild or foster child). These dependents are eligible for coverage through the end of the month in which they turn age 26.

**4. PREMIUMS/AFFORDABILITY**

Participants do not pay premiums to the Fund for self-only coverage. Because this amount is less than \$92.39 per month, the coverage is deemed affordable under the ACA.

The above reporting is mandatory for the 2015 calendar year to be reported on Form 1095-C and filed by February 28, 2016, if reporting electronically. You may wish to share this information with your accountant or insurance broker. More information is available from the IRS.

The Fund and its Board of Trustees believe this information will be helpful to you as your company attempts to comply with the various ACA requirements.