

THE LOCAL CHOICE E-NEWS

Department of Human Resource Management State and Local Health Benefits Programs

January 3, 2020

Affordable Care Act (ACA) Reporting Update for Calendar Year 2019

Deadline 3: Online ACA Certification Due Date Extended to January 13, 2020

The annual ACA Certification is the final step in collecting information to file ACA reports for calendar year 2019. The online certification form is now available in SecurePass and must be submitted by **January 13, 2020**.

This certification requires verification of employer information and counts of employees by FEIN for each month of 2019 using the ACA definitions published by IRS. Groups using the same employer FEIN must be combined, submitted on this certification, and reported to IRS together. Groups who share the same FEIN have a designated primary group tasked with submitting certification on behalf of all groups. Any contact for the primary group can submit certification if they are registered for SecurePass (or subsequently register for access to SecurePass—see below for instructions).

Identifying Primary Groups Responsible for Submitting Certification:

- All groups, both primary and non-primary, have been included for distribution of this E-News.
- Non-primary groups will receive a separate email confirming that they are not the designated primary group and, therefore, are not responsible for submitting the certification. (This applies to only approximately 15 groups.)
- If you do not receive a separate email, as explained above, **YOU ARE THE PRIMARY GROUP RESPONSIBLE FOR SUBMITTING THE CERTIFICATION FOR YOUR FEIN OR FOR THE GROUPS THAT SHARE THE SAME FEIN.** Contacts who are not in the primary group cannot submit certification. Non-primary groups must provide ACA reporting information to the designated primary group.

Primary contacts follow these steps:

Step 1: Login to SecurePass to submit the ACA Certification.

SecurePass is the same system used to submit your TLC renewal. If you have your user name and password from submitting your renewal, you should be able to log into SecurePass using this link: <https://hurman.dhrm.virginia.gov>

First time users of SecurePass should use the attached document, [Helpful Information About SecurePass](#). This provides step-by-step access instructions. Each TLC group or the designated Primary Group must have a SecurePass account to submit the ACA Certification.

If you don't remember your user name and password for SecurePass, please follow instructions on pages 4-7 of the attached document.

IMPORTANT NOTE: Your user name and password for SecurePass may be different than HuRMan credentials.

Step 2: Enter information into the ACA Certification on-line form.

The following information is required to submit the ACA Certification for calendar year 2019:

- Monthly counts of full-time employees for the employer FEIN, by ACA definition.
- Monthly counts of total employees for the FEIN, by ACA definition, regardless of full-time, part-time, or hourly status.
- Name, title, and phone number for the primary employer FEIN.

ACA Certification counts are based on ACA definitions. You may use this link for IRS guidance:

<https://www.irs.gov/affordable-care-act/employers/determining-if-an-employer-is-an-applicable-large-employer>

Step 3: Submit the ACA Certification and keep a copy for your records.

A primary group contact may make corrections and re-submit the certification as many times as needed prior to the deadline. The certification on file after the deadline is the certification that will be used for reporting to the IRS.

Things you can do to manage ACA information in BES throughout the year:

- Be sure to collect an enrollment form from all new hires that are eligible for coverage – those that choose to waive coverage and those that choose to enroll. Be sure it includes the hire date and classification. The hire date is used to create the WP record.
- Be sure to term records for employees that waived coverage when they are no longer eligible for coverage.
- Review the reports posted to your HuRMan folder to be sure information in BES is accurate.
- **BES Enrollment Reports:** Available on the 3rd, 10th, 17th and 24th of each month

One report shows participants and the other shows corresponding covered dependents entered in BES for your group.

The reports posted on the 3rd, 10th, and the 17th show records effective the first of that month. The report posted on the 24th shows records effective the first of the next month. For example, the reports posted on September 3rd, 10th, and 17th show records effective September 1 and the report posted on September 24th shows records effective October 1.

- **BES Exception Report:** Available on the 3rd of each month

This report shows discrepancies found in BES that need attention.

For example, records with system-generated social security numbers (SSNs) that require follow-up are on this report.

Thank you for your attention and assistance in this major ACA reporting requirement. If you have questions, please contact tlc@dhrm.virginia.gov

Please do not reply to this e-mail. You may send inquiries to The Local Choice mailbox at tlc@dhrm.virginia.gov