

Form 1095-C—Untangling the Puzzle of Lines 14 and 16 Codes

Line 14: Offer of Coverage

Employers must indicate what type of coverage was *offered* to an employee, not the coverage *selected* by the employee (e.g., family coverage offered but enrolled in employee-only coverage). An employer has “made an offer of coverage,” per the ACA, only if it would have provided health coverage every day of the calendar month (Cobra excluded). Alternatively, the “All 12 Months” box may be completed if the same offer applies to all 12 months.

LINE 14 CODES	APPLICABILITY	ACTION
1A	Minimum Essential Coverage (MEC) providing Minimum Value (MV) offered to full-time employee, and at least MEC offered to spouse and dependents. Employee contribution for self-only coverage is \$93.18 or less (for 2015).	Leave Line 14 blank
1B	MEC providing MV offered to employee only.	Insert Code
1C	MEC providing MV offered to employee and at least MEC offered to dependents (no spouse).	Insert Code
1D	MEC providing MV offered to employee and at least MEC offered to spouse (no dependents).	Insert Code
1E	MEC providing MV offered to employee and at least MEC offered to dependents and spouse. (If employee contribution for self-only coverage is more than \$93.18 for 2015, use Code 1E.)	Insert Code
1F	MEC offer NOT providing MV was made to employee, or employee and spouse or dependents, or employee, spouse and dependents.	Leave Line 14 blank
1G	Coverage offered to employee who was not a full-time employee for any month and who enrolled in self-insured coverage for one or more months.	Leave Line 14 blank
1H	No offer of coverage to the employee, or the offer was not MEC	Leave Line 14 blank
1I	Qualifying Offer Transition Relief for 2015: Employee (and spouse or dependents) received no offer of coverage, received an offer that was not a qualifying offer, or received a qualifying offer for less than 12 months.	Leave Line 14 blank

Line 16: Applicable Section 4980H Safe Harbor

Line 16 help the IRS administer the employer shared responsibility provisions—and provides an opportunity for an employer to indicate an exception to a penalty. This line is optional, but employers should provide it, if applicable.

LINE 16 CODES	APPLICABILITY
2A	Employee not employed any day of the month.
2B	Employee is not a full-time employee or was full-time but did not enroll in offered coverage or the coverage ended due to termination.
2C	Employee enrolled in coverage offered
2D	Employee is in a limited non-assessment period
2E	Multiemployer interim relief guidance applies
2F	Section 4980H affordability Form W-2 safe harbor
2G	Section 4980H affordability federal poverty line safe harbor
2H	Section 4980H affordability rate of pay safe harbor
2I	Non-calendar-year transition relief

If more than one code applies to Line 16, use the following guidelines:

If 2E and any other Code series 2 applies, enter 2E

If 2C and any other Code series 2 applies other than Code 2E, enter 2C

If 2B and 2D apply, enter 2D