



To Whom It May Concern:

I am writing on the behalf of the National Association of Health Underwriters, a professional association representing over 100,000 licensed health insurance agents, brokers, general agents, consultants and employee benefits specialists. NAHU members who work directly with applicable large employers (ALEs) to help meet their employer-reporting needs reviewed with great interest the draft Form 1095-C for ALEs to use to report 2020 health coverage offerings to employees.

Our organization appreciates the inclusion of eight new codes to address circumstances when employees are offered an individual coverage Health Reimbursement Arrangement (ICHRA). However, due to the addition of line 17 related to ICHRA in part two, and the increase in the number of rows to list "covered individuals" from six to 13 in part three, the draft Form 1095-C now will require two printed pages rather than one. **Unless the Form 1095-C draft is reformatted, printing costs for 1095-C statements mailed to employees will double.** In the current economic climate, this cost increase will be unwelcome news to ALEs. To help reduce printing costs and use less paper, NAHU requests that the IRS reformat the final version of Form 1095-C so that it, once again, will be a one-page statement.

In addition, the new specification that employers identify a ZIP code on line 17 raises some concerns. Clearly, a ZIP code is needed if any employer offers employees an ICHRA for accurate premium-calculation purposes. However, the ICHRA regulations allow ALEs choice when determining which ZIP code to use and, for ALEs that offer traditional group coverage or elect not to offer group coverage, the ZIP code field does not seem relevant at all. NAHU members request clarification about the need for the ZIP code field, particularly for those employers that do not offer an ICHRA. Perhaps this issue will be addressed when your agency releases the draft instructions for Forms 1094/1095-C.

Regarding the instructions for Forms 1094/1095-C, we ask that your agency release the draft of those as soon as possible. The ZIP code issue is just one example why ALEs, their advisors and employer-reporting vendors do not just need to review the draft 1095-C form, but also need to review it in concert with accompanying draft instructions. Vendors need them immediately so that they can begin making necessary system adjustments. Brokers must review them so that they can begin educating their clients, particularly any clients that may have switched to offering an ICHRA. Finally, ALEs need rules to review to gather accurate information and prepare adequately for the resources that will be needed for the reporting season ahead.

Thank you for your attention to our concerns. If you have any questions, or if NAHU can be of assistance as you move forward to finalize the 2020 employer reporting forms and instructions, please do not



hesitate to contact me at either (202) 595-0787 or jtrautwein@nahu.org.

Sincerely,

A handwritten signature in black ink, which reads "Janet Stokes Trautwein". The signature is written in a cursive style with a large, looping initial "J".

Janet Stokes Trautwein
Chief Executive Officer
National Association of Health Underwriters