

Important State & Federal Reporting and Enrollment Extensions

March 25, 2020

New Jersey Extends Healthcare Reporting Deadline

On March 19, 2020, the NJ Department of Treasury announced that it [extended the deadline](#) for employers and coverage providers to file Forms 1095 with the New Jersey Division of Taxation. The deadline was extended from March 31, 2020 to May 15, 2020.

This filing requirement applies to both in-state and out-of-state employers (for self-insured plans) and coverage providers (for fully insured plans) that provided minimum essential health coverage to part-year or full-year residents of New Jersey in 2019, including insurers, employers, government agencies and multiemployer health plans (or “union plans”).

Was the New Jersey Furnishing Deadline Extended Also?

No. This March 2, 2020, deadline has not been extended. Employers and coverage providers were required to have provided primary enrollees with Forms 1095 by March 2, 2020. A coverage provider may send a single Form 1095 to a primary enrollee to satisfy both state and federal reporting requirements.

Have Any Other States with Healthcare Reporting Requirements Issued Filing Extensions?

Not at this time. While other states impose healthcare coverage reporting requirements (as discussed in our [prior eAlert](#)), including Massachusetts and the District of Columbia, these other states have not announced extended deadlines at this time.

States Extend Special Enrollment Periods on Exchanges

As of today’s date, ten (10) states are offering their uninsured residents another opportunity to sign up for a health plan on their ACA Exchanges this year, an additional open enrollment period referred to as a “special enrollment period” (“SEP”). This is a new way that states are helping their residents obtain coverage and get or stay healthy, which will help fight the COVID-19 pandemic.

Background on Exchange Open Enrollment Periods

The main motivation behind these SEPs is to help calm residents’ concerns about whether they will still be able to get

SYNOPSIS

NJ healthcare reporting deadline extended from March 31 to May 15, 2020, but deadline to furnish 1095-B/C forms to employees was not extended from original deadline of March 2, 2020.

10 states now offer a special enrollment period for uninsured residents to enroll in their ACA Exchange.

Federal ACA Exchange is also offering a special enrollment period if COBRA costs change because the former employer has stopped contributing.

covered after an Exchange's normal, annual open enrollment period window has passed. They want to make it as easy as possible for people to get coverage so that they aren't deterred from seeking appropriate medical attention, and as a result, continue to spread the virus.

If an SEP is available to a particular individual, it gives the individual 60 days to sign up for coverage on the Exchange. An SEP can be available for a number of reasons, including, for example, when an employee is terminated from employment, or when their COBRA continuation coverage has run out.

The states that have reopened ACA Exchanges during the COVID-19 health emergency are:

1. California¹
2. Colorado
3. Connecticut
4. District of Columbia²
5. Maryland
6. Massachusetts
7. Nevada
8. New York
9. Rhode Island
10. Washington

Additionally, the [federal ACA Exchange website](#) has clarified that employees can now qualify for a special enrollment period when "COBRA costs change because your former employer stops contributing and you must pay full cost."

We will continue monitoring all state healthcare compliance requirements in light of the COVID-19 health emergency.

If you have questions, please call your Corporate Synergies Account Manager or 866.CSG.1719.

¹ California announced on March 20 that its ACA Exchange will continue to allow residents to enroll through June 2020.

² The District of Columbia is allowing residents to sign up for coverage for reasons unrelated to the outbreak.

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