

January 9, 2017

Updated IRS Guidance on ACA Information Reporting by Employers

The IRS has released a [chart](#) and a [tax tip](#) to help employers understand the types of forms, the purpose of each, and noteworthy dates for filing 2016 health coverage information returns. IRS has also recently updated and expanded the employer FAQs with more answers to employers' questions about the Affordable Care Act (ACA) information reporting requirements and shared responsibility provisions:

- [Information Reporting by Employers on Form 1094-C and Form 1095-C](#)
- [Employer Shared Responsibility Provisions Under the Affordable Care Act](#)
- [Reporting of Offers of Health Insurance Coverage by Employers](#)

The Form 1094-C and Form 1095-C [FAQs](#) provide additional information on how employers are to complete the forms for calendar year 2016 that are to be filed in 2017. The FAQs may be used in conjunction with the Instructions for Forms 1094-C and 1095-C, which provide detailed information about completing the forms. Code Section 6056 requires every applicable large employer (ALE) member (generally, an employer that, along with other employers in its controlled group, employed on average at least 50 full-time employees or equivalents) to file a return with the IRS and furnish statements to full-time employees that reports the terms and conditions of the healthcare coverage provided to the employer's full-time employees during the year.

Employers, including non-ALE members, that provide self-insured coverage are subject to the reporting requirements of Section 6055. Section 6055 requires every health insurance issuer, sponsor of a self-insured health plan, government agency that administers government-sponsored health insurance programs and other entities that provide minimum essential coverage (MEC) to file annual returns with the IRS and furnish statements to individuals that reports certain information for each individual for whom MEC is provided. As noted in Question No. 1 of the [FAQs](#) under [Basics of Employer Reporting](#), ALE members that sponsor self-insured plans will combine section 6055 and 6056 reporting on Form 1095-C (employers that are not ALE members report on the Forms 1094-B and 1095-B).

- [Form 1095-C: Employer-Provided Health Insurance Offer and Coverage](#) is to be used to fulfill this requirement
- [Form 1094-C: Transmittal of Employer-Provided Health Insurance Offer and Coverage Information Returns](#) is to be used for transmitting Forms 1095-C to IRS

The IRS recently issued [notice](#) extending the due date for furnishing individuals with Forms 1095-C and 1095-B from January 31, 2017, to March 2, 2017. The IRS did not extend the deadline for filing the forms with the IRS.

Should you have general questions about this or any aspect of federal health insurance reform, contact your Conner Strong & Buckelew account representative toll free at 1-877-861-3220. For a complete list of Legislative Updates issued by Conner Strong & Buckelew, visit our online [Resource Center](#).



connerstrong.com



877-861-3220



news@connerstrong.com



[Change My Preferences](#)



INSURANCE | RISK MANAGEMENT | EMPLOYEE BENEFITS



[Click here to change your email preferences or unsubscribe from all communication.](#)