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Health Care Reform Alert

August 11, 2015

Draft Instructions and Revised Draft 2015 Forms for IRS Reporting Requirements

On August 7, the Internal Revenue Service (IRS) released draft instructions and revised draft 1095-B and 1095-C forms to be used for Affordable Care Act (ACA) Minimum Essential Coverage (MEC) and Large Employer reporting in 2016. The IRS has posted the 2015 draft instructions and forms at IRS.gov/draftforms as information only, and will post final versions at a later date.

The revised 2015 draft forms are generally unchanged from the versions [released on June 19, 2015](#). However, the IRS made several changes to the 2014 final instructions, including:

- **“B” form instructions for applicable large employers** – The draft instructions for forms 1094-B and 1095-B now allow applicable large employers (ALEs) the option to use the “B” forms to report coverage of individuals who are not considered full-time employees for any month during the calendar year.
- **“C” form instructions for applicable large employers** – The draft instructions for forms 1094-C and 1095-C require that ALEs continue to report all employees enrolled in self-insured coverage on the “C” forms – as part of MEC reporting.
- **30-day extension for IRS filing** – An automatic extension is granted if Form 8809 is submitted to the IRS on or before the filing due date.
- **30-day extension for providing forms to individuals** – An extension may be granted by submitting a letter to the IRS on or before the due date for providing forms to individuals.
- **Details on how to file corrected forms** – The draft instructions include details on filing corrected paper returns. Information on electronic filing corrections can be found on IRS Publication 5125.
- **Hand delivery** – Both sets of reporting may be hand delivered to individuals.
- **Reporting supplemental coverage** – The definition of a “plan sponsor” has been clarified for the purpose of reporting supplemental coverage by the same reporting entity as the health plan sponsor.

- **Reporting coverage offered under multiemployer plans** – Simplified reporting now available for reporting offers of coverage for employers with multiemployer arrangements that qualify for relief.
- **Reporting on COBRA participants** – Clarifications on how to report COBRA participants.

For more information on the final rules on this IRS information reporting, please read our [Reporting Requirements Fact Sheet](#).

Draft Instructions and Forms

[Instructions for Forms 1094-C and 1095-C](#)

[Form 1094-C](#) – Transmittal/“cover sheet” for Large Employer and self-insured MEC reporting (applicable large employers)

[Form 1095-C](#) – Report to individuals and the IRS information on coverage offered and self-insured MEC (applicable large employers)

[Instructions for Forms 1094-B and 1095-B](#)

[Form 1094-B](#) – Transmittal/“cover sheet” for MEC reporting (insurance carriers and self-insured small group employers)

[Form 1095-B](#) – Report to individuals and the IRS information on MEC (insurance carriers and self-insured small group employers)

We will keep you informed when final instructions and forms are made available.

We encourage you to bookmark Cigna's health care reform website, [InformedOnReform.com](#), where we will update information as future guidance and final rules are released.

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