

**August 29, 2014**

## **Draft Instructions for IRS Reporting on Individual and Employer Mandates**

On August 28, 2014, the Internal Revenue Service (IRS) released draft instructions for the reporting forms that will be used to report on individual and employer mandates. These instructions accompany the [draft forms released July 24](#). The instructions and forms will be used by applicable large employers, insurers and employers with self-insured plans. The IRS has posted the draft forms at [IRS.gov/draftforms](http://IRS.gov/draftforms) as information only, and will post final versions for actual filing at a later date.

The Final Rules on Minimum Essential Coverage (MEC) and Large Employer reporting were released on March 5, 2014, which we [alerted on March 7](#). The first reporting is required in early 2016 for the 2015 calendar year, however employers are encouraged to voluntarily report coverage information in 2015 for the 2014 calendar year.

### **What the Instructions Cover**

The drafts include general instructions and provide an overview of why the forms/reporting are required. They also cover basic information including:

- who must complete the forms
- how the transmittal forms need to accompany their respective 1095-B or 1095-C Forms
- where to mail paper forms or how to file electronic forms
- specific line by line instructions
- general directions for contact person, signature on form and phone number
- definitions of various terms used in reporting data
- minimum guidance on multi-employer arrangements
- transitional relief for off-calendar year plans

The IRS is hosting a [webinar on September 9, 2014](#), at 2:00 p.m. Eastern Time to describe how to report on minimum essential health coverage, effective in 2015. The IRS presenters will cover:

- Internal Revenue Code Section 6055
- Who is required to report
- What elements are required to be reported
- How do government entities designate reporting

Employers interested in attending must sign up on the [IRS Webinar Registration](#) site.

*Please note that Cigna cannot support any technical issues experienced with this event. The IRS has posted a PDF on how to [Test and Troubleshoot](#) technical problems.*

### **Draft Instructions and Forms**

As a reminder, there are two forms required for each set of information being reported, a transmittal form that serves as a cover letter as well as forms providing data on the individual or employer mandate. The instructions and respective forms to be completed and filed are as follows:

[Instructions](#) for employers to file Form [1094-C](#) (a transmittal/cover sheet) to the IRS only, and Form [1095-C](#) to both the IRS and named individuals. *If its plan is insured, the employer will only complete Parts I and II of Form 1095-C.*

[Instructions](#) for insurers to send Form [1094-B](#) (a transmittal /cover sheet) to the IRS only, and Form [1095-B](#) to both the IRS and named individuals for insured coverage only.

The IRS is open to comments on these instructions, which should be submitted to the [Comment on Tax Forms and Publications](#) page on [IRS.gov](#).

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.