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Health Care Reform Alert

September 18, 2015

Final 2015 Forms and Instructions for IRS Reporting Requirements

On September 17, the Internal Revenue Service (IRS) released final forms and instructions to be used for Affordable Care Act (ACA) Minimum Essential Coverage (MEC) and Applicable Large Employer reporting, first due in January 2016 for coverage offered in calendar year 2015. This includes final versions of:

- Forms 1094-C and 1095-C (for Applicable Large Employer reporting and self-insured large group MEC reporting)
- Forms 1094-B and 1095-B (for insurance carrier and small employer MEC reporting)
- The accompanying instructions

There are minor changes to some of the forms and both sets of instructions.

Changes to Forms 1094-C and 1095-C (Applicable Large Employer Forms)

Form 1094-C is identical to the previous draft form except a URL link change, now www.irs.gov/form1094c.

Form 1095-C is now available at www.irs.gov/form1095c and has three changes from the draft Form to the Instructions for Recipients on page 2.

- **Line 10.** The telephone number to call with questions can also be used to report information errors on the form and ask that they be corrected.
- **Line 14.** Explanation that coverage reported does not include coverage offered through a multiemployer plan due to membership in a union.
- **Line 14.** Code 1A removed the dollar value to report coverage providing minimum value of self-only coverage, employee contributions equal to or less than 9.5% of the 48 contiguous states single federal poverty line vs. equal or less than \$1,108.65.

Changes to the Instructions for Forms 1094-C and 1095-C

The instructions include new information about these topics:

- The Qualifying Offer Method and transitional relief for 2015

- Multiemployer arrangements
- Reporting COBRA coverage
- Reporting coverage for individuals who have both medical coverage and a Health Reimbursement Arrangement (HRA)
- Employees who have TRICARE or Veterans coverage
- Counting the total number of employees per month on the 12th day of the month (as well as other days previously announced)

Changes to Forms 1094-B and 1095-B (MEC Reporting Forms)

Form 1094-B is identical to the previous draft form.

Form 1095-B has one change from the draft form that allows insurers to include only the last four digits of their Employer Identification Number (EIN).

Changes to the Instructions for Forms 1094-B and 1095-B

- Copies of Form 1095-B provided to individuals may include only the last four digits of Social Security Numbers (SSNs) or EINs. Forms filed with the IRS must include the complete numbers.
- Employee or dependent SSNs may be left blank if the individual does not have a SSN.
- The instructions provide information about what to report for an individual who has more than one type of MEC.
- Beginning in 2017 (for 2016 coverage), insurers must report catastrophic health plan coverage sold through the Marketplace. Reporting this coverage is optional but encouraged in 2016.
- Clarification that insurers must identify employers that sponsor coverage through an association or MEWA but not multiemployer plan.

Final Instructions and Forms

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

("Applicable large employers" (i.e., those subject to the employer mandate), self-insured plans complete the entire Form 1095-C)

[Form 1094-C \(a transmittal/cover sheet\) to the IRS](#)

[Form 1095-C to both the IRS and individuals](#)

(If its plan is insured, the applicable large employer will only complete Parts I and II of Form 1095-C)

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

(Insurance carriers and small employers with self-insured plans use these forms)

[Form 1094-B \(a transmittal /cover sheet\) to the IRS](#)

[Form 1095-B to both the IRS and individuals](#)

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.