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## Health Care Reform Alert

January 4, 2016

### IRS Extends Information Reporting Due Dates

On December 28, 2015, the Internal Revenue Service (IRS) announced extended deadlines for 2015 Minimum Essential Coverage (MEC) and Large Employer Shared Responsibility reporting required to be completed in early 2016. Here are the changes:

2015 Report	Original Deadline	Extended Deadline
<b>Forms Sent to Individuals</b> Form 1095-B Form 1095-C	2/1/2016	3/31/2016
<b>Forms Filed with the IRS</b> Forms 1094-B and 1095-B Forms 1094-C and 1095-C	2/29/2016 – paper 3/31/2016 – electronic	5/31/2016 – paper 6/30/2016 – electronic

The IRS is prepared to accept reports beginning in January 2016. Employers and insurers are encouraged to provide the forms to individuals and file the reports as soon as possible.

The IRS indicated that no additional extensions will be granted. Employers and insurers that do not meet these extended due dates may be subject to penalties.

For 2015 only, individuals who file their federal income tax returns before receiving their 1095-B and 1095-C forms will not be required to amend their income tax returns once they receive their forms. They should keep their forms, once received, with their tax records.

### Overview of MEC and Large Employer Reporting

MEC (Section 6055) and Large Employer (Section 6056) reporting are required by the Affordable Care Act (ACA) to help the IRS administer compliance with the “individual mandate” and “employer mandate,” respectively. Reporting is completed on information from the previous calendar year.

As an insurer, Cigna is responsible for completing Forms 1094-B and 1095-B for MEC reporting on individuals covered under our **insured** medical plans, including those under our HMO service agreements.

Large employers (i.e. employers with 50 or more full-time and/or full-time equivalent employees) are responsible for completing Forms 1094-C and 1095-C for Large Employer reporting on the group health coverage they offered full-time employees and their dependents. And if these employers **self-fund** their medical plans, they should also use the C forms for reporting MEC on individuals covered under their **self-funded** plans.

Employers with less than 50 full-time and/or full-time equivalent employees that self-fund their medical plans must only report the MEC on individuals covered under their self-funded plans using the B forms.

For more information about these reporting requirements, review our [Reporting Requirements Toolkit](#).

[Read the IRS Notice on reporting extensions](#)

We encourage you to bookmark Cigna's health care reform website, <http://www.informedonreform.com/>, where we continuously update information as it becomes available.

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