

# CLIENT ALERT

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## Final Instructions for IRS Reporting on Individual and Employer Mandates Released

Under the Affordable Care Act, large employers, or employers of any size who sponsor a self-funded plan will be responsible for providing statements to their employees that contain details about the cost of medical coverage. This information is due in January of 2016 for the 2015 calendar year. A “large” employer is one with 50 or more full time equivalent employees, including companies under common ownership. Note that while the Employer Mandate (Pay or Play) was delayed for employers with between 50-100 lives until 2016, the reporting responsibilities have not been delayed.

On February 9, 2015, the Internal Revenue Service (IRS) released the final 1094 B & C and 1095 B & C Forms, as well as instructions for their completion. Similar to the W-2, these forms will be used to the IRS and taxpayers for reporting health coverage and cost specific to each employee. Below is a chart which indicates the filing requirements based on employer size and medical plan funding.

Employer Size	Type of Medical Plan	Filing Responsibility	
		Section 6055 1095 B & 1094 B	Section 6056 1095 C & 1094 C
Small Employer	None inforce	N/A	N/A
Small Employer	Fully Insured	Insurance Company	N/A
Small Employer	Self-Insured	Employer	N/A
Large Employer	None inforce	N/A	Employer
Large Employer	Fully Insured	Insurance Company	Employer
Large Employer	Self-Insured	Employer Combined with 1095 C	
<b>PURPOSE</b>		Enforcement of Individual Coverage Mandate and to reconcile eligibility of Individual Subsidies	Enforcement of the Employer Shared Responsibility (Pay or Play) as well as eligibility of Individual Subsidies

These instructions and forms can be found on the [IRS website](#). We've also posted them at [www.chb-group.com](http://www.chb-group.com) under our Client Alerts Section.

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