

Affordable Care Act Employer Reporting Overview

With the Affordable Care Act (ACA), employer reporting requirements for health plan information and participant coverage-related data are in effect. Under section 6056, applicable large employers are required to provide an annual statement to each full-time employee detailing the employer's health coverage offer. Under section 6055, employers (of all sizes) that provide minimum essential coverage under a self-insured plan are required to provide an annual statement, which includes information about covered dependents, to employees and former employees who were enrolled in the plan.

What are the forms?

The ACA reporting forms for employers include:

- Form 1095-C - Employer-Provided Health Insurance Offer and Coverage
- Form 1094-C - Transmittal of Employer-Provided Health Insurance Offer and Coverage Information Returns
- Form 1095-B - Health Coverage
- Form 1094-B - Transmittal of Health Coverage Information Returns

The 1095-C form includes information about the health insurance coverage offered to the employees by the employer, and is used by applicable large employers who are fully-insured or self-insured (different parts of the form are completed depending on whether the employer is fully-insured or self-insured). A 1095-C is issued to each applicable employee, and copies of the 1095-C forms are submitted to the Internal Revenue Service, along with the transmittal 1094-C form.

The 1095-B form includes information for employees and dependents who had minimum essential coverage for some or all months during the year, and is typically used by small employers who are self-insured. A 1095-B is issued to each applicable employee, and copies of the 1095-B forms are submitted to the Internal Revenue Service, along with the transmittal 1094-B form.

Refer to the diagrams below for summarized information on the ACA forms and to determine which forms are to be issued to the employees and submitted to the Internal Revenue Service for your organization.

Summary of Forms

1094 Forms - Transmittal reports submitted to IRS

1095 Forms - Detail reports provided to employees (and copies submitted to IRS)

B Forms - Reports if minimum essential coverage

C Forms - Reports offers of health coverage and enrollment in health coverage

Forms to File				
	Fully-Insured		Self-Insured	
	< 50 FTEs	> 50 FTEs	< 50 FTEs	> 50 FTEs
Forms to employees	None	1095-C (Parts I & II only)	1095-B	1095-C (All Parts)
Forms to IRS	None	1094-C (plus 1095-C copies)	1094-B (plus 1095-B copies)	1094-C (plus 1095-C copies)

What information is on the forms?

To see the forms, along with the information included on each, and the detailed instructions for completing the forms, access the following websites:

- Form 1095-C - <http://www.irs.gov/pub/irs-pdf/f1095c.pdf>
- Form 1094-C - <http://www.irs.gov/pub/irs-pdf/f1094c.pdf>
- Instructions for Forms 1094-C and 1095-C - <http://www.irs.gov/pub/irs-pdf/i109495c.pdf>
- Form 1095-B - <http://www.irs.gov/pub/irs-pdf/f1095b.pdf>
- Form 1094-B - <http://www.irs.gov/pub/irs-pdf/f1094b.pdf>
- Instructions for Forms 1094-B and 1095-B - <http://www.irs.gov/pub/irs-pdf/i109495b.pdf>

When generating the forms in the School Accounting System, the basic employer and employee information for name, address, and federal ID (social security number) will be populated from the data already entered in the Payroll module. The information in Part II on the 1095-C forms for the offer of coverage will need to be entered for each applicable employee within the Employee File. (**Tip:** An adjustment option is available to complete these fields of information for a group of employees.) For organizations that are self-insured, the information for covered individuals included on Part III on the 1095-C forms (for large employers) or on Part IV on the 1095-B forms (for small employers) can be imported into the School Accounting System using a file containing the necessary data obtained from your third-party administrator. According to the Internal Revenue Service, the estimated average times to complete the forms are: 12 minutes for 1095-C form (per employee), 4 hours for 1094-C form, 10 minutes for 1095-B form (per employee), and 1 minute for 1094-B form.

Which employees to include on forms?

Depending on the specific forms being generated, different groups of employees will be included. For fully-insured large employers, issue a 1095-C form with only Parts I and II completed (and include on 1094-C form) for each employee who was a full-time employee during any month in the year (as based on the measurement period(s) prior to the current year's stability period(s)), regardless if the employee is enrolled in the health coverage or not. For self-insured large employers, issue a 1095-C form with all parts completed (and include on 1094-C form) for each employee who was a full-time employee during any month in the year (regardless if enrolled in the health coverage or not, and based on the measurement period(s) prior to the current year's stability period(s)), and also all part-time and no-time (i.e. retired or COBRA) employees enrolled in the health coverage. For self-insured small employers, issue a 1095-B form (and include on 1094-B form) for each employee enrolled in the health coverage, including full-time, part-time, and no-time (i.e. retired or COBRA) employees. Refer to the diagram below to determine which employees are to be included on the specific forms for your organization.

Employees Included on Forms			
Type	Employer Size	Forms	Employees
Fully-insured	> 50 FTEs	1095-C (Parts I & II only) 1094-C	All full-time employees, whether or not enrolled in health coverage
Self-insured	> 50 FTEs	1095-C (All Parts) 1094-C	All full-time employees, whether or not enrolled in health coverage, and also all part-time and no-time employees enrolled in health coverage
Self-insured	< 50 FTEs	1095-B 1094-B	All full-time, part-time, and no-time employees enrolled in health coverage
Fully-insured	< 50 FTEs	None	None