

From: Bailey and Company Benefits Group
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Subject: ACA Reporting Requirements If More Than 250 1095Cs Are Issued

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news

This update is sent periodically to keep you informed of employee benefit plan issues that may impact your organization.



As you know, the reporting for the ACA is approaching. Applicable large employers must report whether an individual is covered by minimum essential coverage and that an offer of minimum essential coverage that provides minimum value was made to each full-time employee.

Applicable large employers, generally meaning employers with 50 or more full-time employees (including full-time equivalent employees) in the preceding calendar year, use Form 1094-C, Transmittal of Employer-Provided Health Insurance Offer and Coverage Information Returns, and Form 1095-C, Employer-Provided Health Insurance Offer and Coverage, to report the information required.

An Employer that issues more than 250 1095-C's is required to file the forms electronically. The deadline for electronic filing is March 31, 2016.

The Internal Revenue System says employers can now do a trial run of their electronic form filing for reporting requirements under the Affordable Care Act. This would provide a way to test for readiness in advance of the reporting deadlines.

The IRS has recently opened up its Affordable Care Act Assurance Testing system which allows employers to see if their reporting software is correctly filling out the 2014 Forms 1094 and 1095.

The IRS submission requirements for using the ACA Assurance Testing system advise software developers to "read the instructions carefully prior to preparing the submission."

“Code definitions for Offer of Coverage Codes and Safe Harbor Codes are defined in the instructions and are not provided in the narrative but must be included within your submission where appropriate,” the IRS cautions.

<https://www.irs.gov/for-Tax-Pros/Software-Developers/Information>Returns/Affordable-Care-Act-Assurance-Testing-System-Information>.

Employers can also request to waive the electronic reporting requirement by submitting Form 8508. The form for this waiver can be found [here](#). If you are interested in filing the waiver, please note the waiver must be filed at least 45 days before the filing deadline. Waivers are approved for specific tax years. If approved for the 2015 tax year, the 1094C/1095Cs and any corrections to those forms can be submitted on paper.

Below are links to the final versions of each form:

[2015 1095C Form](#)

[2015 1095B \(Transmittal\) Forms](#)

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