



**\*\*\* IMPORTANT BULLETIN \*\*\***

**TO:** All Large Group Health Clients  
**FROM:** Greenberg & Associates Insurance, LLC  
**DATE:** January 20, 2015  
**RE:** Large Group Employer IRS Reporting Requirements

Employers with 50 or more full-time employees (including full-time equivalents) will be required to report information required under IRC Section 6056 (and Section 6055 for self-insured Applicable Large Employers) about offers of health coverage and enrollment in health coverage for their employees. Reporting will begin Calendar Year 2015, with the first “paper filing” due March 1, 2016 (the last day of March if filed electronically). The annual due date is the last day of February, but, since February 28, 2016 is a Sunday, it will be due March 1<sup>st</sup> in 2016. The purpose of the filing is to provide the necessary information to the IRS by employers who are subject to the Affordable Care Act (ACA) “Shared Responsibility” Mandate. Note, however, even if your company qualifies for transitional relief in 2015 and will NOT be subject to any penalties under the Shared Responsibility Mandate, you WILL still be subject to the Large Group Employer Reporting Requirements for Calendar Year 2015!

On August 28, 2014, the IRS released DRAFT Instructions and Forms 1094-C, 1095-B and other forms applicable to the reporting requirements of the ACA. Form 1094-C is the Transmittal form for the Employer-Provided Health Insurance Offer and Coverage and Form 1095-C is the form used to report the Employer-Provided Health Insurance Offer and Coverage. Final instructions and forms have not yet been issued and are not expected until later this year. However, since the information required to complete the reporting requirement is complex and requires a lot of data gathering, reviewing the Draft Instructions and Forms at this time will provide valuable insight that you can use to develop your recordkeeping and reporting systems for 2015. Therefore, attached you will find the Draft Instructions and Forms 1094-C and 1095-B.

Also, in addition to the required annual reporting to the IRS, starting for Calendar Year 2015, A copy of IRS Form 1095-C, or, an alternative statement that includes the identical data must also be provided to your full-time employees by January 31, 2016 and every year thereafter.

At this time, we recommend that you review the Draft Instructions and Forms (if you haven’t already done so) with your CPA or Tax Attorney. Depending upon your status as a Fully-Insured or Self-Funded Health Plan, your filing requirements will most likely differ and it is important you have your Tax Advisor’s input regarding “your” specific requirements. You will want to address any shortfall in your current data collection and implement any necessary processes to collect the required data. In addition, it would be advisable to discuss with your payroll providers how they can assist you in the data gathering process. It is our understanding that many payroll vendors are developing software to assist their clients in this respect.

Sincerely,  
Sharon Greenberg and Adrienne Hutchins