



IRS Releases Final 2015 1094/1095 Forms and Instructions *ACA Reporting Deadlines Approaching*

By Emily Tonkovich

The January 2016 ACA reporting deadline is quickly approaching. Large employers who do not have a plan in place for capturing the information and completing the reporting must address this *immediately*.

Many payroll vendors can provide varying levels of assistance; however most have fall 2015 deadlines for accepting new clients. Some vendors' deadlines have already passed. **Benefit advisors cannot complete this tax filing for clients and do not have access to all of the information required to complete the filing.**

The IRS recently released the final forms and instructions. Our [August 2015 Compliance Alert](#) provides a general overview of the reporting requirements. These requirements apply to employers with 50 or more full-time employees/full-time equivalents. Additional Information on how to determine employer size is available on the IRS's [website](#). Below is an overview of which forms employers will use:

- Small fully insured employers do not report. However, small employers who offer HRAs may have a reporting obligation and should review the HRA section.
- Small self-funded employers will use Forms 1094-B and 1095-B.
- Large fully insured employers will use Forms 1094-C and 1095-C Parts I & II.
- Large self-funded employers will use Forms 1094-C and 1095-C Parts I, II, & III.

The finalized instructions provide clarification as to how employers should report COBRA and HRAs.

Reporting COBRA

The instructions explain how employers should report an offer of COBRA for a terminated employee:

Employer Type	Self-Funded	Fully Insured
Small	Use Forms 1094/1095-B to report on <i>individuals</i> who enrolled in COBRA	Do not report
Large	Report on 1095-C - use Code 1H on line 14 and Code 2A on line 16 May use Part III to report on <i>individuals</i> who enrolled COBRA	Report on 1095-C - use Code 1H on line 14 and Code 2A on line 16.

Reporting HRAs

The instructions explain how employers should report HRAs on 1095-B (small employers) or 1095-C (large employers). Whether and how an employer reports an HRA depends on employer size, funding type, and whether the individual enrolled in both the HRA and/or employer-sponsored medical plan.

Employer Type	Enrolled in HRA & Employer's Medical Plan	Enrolled in Employer's Medical Plan Only	Enrolled in HRA Only	Not Enrolled in HRA or Employer's Medical Plan
Small Self-Funded	Report based on type of one coverage (likely the medical plan) on Form 1095-B	Report medical plan on Form 1095-B	Report HRA on Form 1095-B	Do not report
Small Fully Insured	Do not report	Do not report	Report HRA on Form 1095-B	Do not report
Large Self-Funded	Report based on one type of coverage (likely the medical plan) on Form 1095-C*	Report medical plan on Form 1095-C*	Report HRA on Form 1095-C*	<i>*Complete Form 1095-C Parts I & II if full-time employee</i>
Large Fully Insured	Report based on one type of coverage (likely the medical plan) on Form 1095-C*	Report based on medical plan, do not complete Part III on 1095-C*	Report HRA on Form 1095-C*	<i>*Complete Form 1095-C Parts I & II if full-time employee</i>

**Remember, fully insured and self-funded large employers will always report on the type of coverage offered (if any) to a full-time employee on Form 1095-C Parts I & II regardless of whether the employee enrolled coverage.*

Links to Forms and Instructions

[1094/1095-C Instructions](#)

[1094-C](#)

[1095-C](#)

[1094/1095-B Instructions](#)

[1094-B](#)

[1095-B](#)

Disclaimer: This article is for informational purposes only and is not intended to be legal or tax advice. Please consult with an attorney or tax advisor for further guidance.

Benefit Review Services, Inc.
43370 Mound Road
Sterling Heights, MI 48314
586.997.1700
www.benefitreview.com

To view all articles, click [here](#).