

# ACA Reporting Requirements: Gearing Up for 2016

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Even though the Affordable Care Act was enacted five years ago, questions related to the ACA continue to be one of the top benefit compliance issues that ERA receives on the Hotline. With 2016 around the corner, it is important that employers understand their required reporting responsibilities under the ACA.

There are basically two requirements.

- File Form 1095-B or C with the IRS, accompanied by a Form 1094-B or C transmittal.
- Furnish a copy of the 1095-B to the covered employee, COBRA recipient, parent, etc.

Within the 1095-B or C form, there are several sections that need to be completed. The employer size and whether the employer is fully funded or self-funded determine who (employer or insurer) completes and submits the information.

It is easy to get lost in the confusing numeric labels given to the ACA's reporting requirements. There are Section 6055 and Section 6056 reporting—and each has reporting requirements that are outlined on either the Internal Revenue Service Tax Form [1094-C](#), [1095-C](#), [1094-B](#) or [1095-B](#).

The following is a quick snapshot of which party needs to file and the forms needed in order to comply with the reporting requirement.

Entity Size	Insured Health Plan	Self-Funded Plan	<b>Both Self-Funded and Fully Insured Plan</b>
<b>Small Employer (less than 50 FTEs)</b>	1095-B is filed by the Insurer on the Employer's behalf.	1094/1095-B required by Employer.	Filing of 1094/1095-C for self-funded portion by Employer.  1094/1095-B filed by Insurer.
<b>Applicable Large Employer (greater than 50 FTEs)</b>	1095-B filed by Insurer. 1095-C, parts I and II only by Employer.	1095-C (parts I, II, and III) filed by ALE.	1095-C (parts I, II, III) filed by ALE for all who are covered under self-funded plan.

All employers must submit ACA reporting forms to the IRS on or before **February 29 by mail** (February 28 being a Sunday), or file electronically **by March 31**. Employers filing 250 or more forms must do so electronically.

As stated by the IRS, penalties will not be assessed for the 2016 filing period if an employer makes a good faith effort to report the information accurately and by the required deadline.

The forms themselves are not easy to complete, and most employers have contracted this service out to their payroll provider or a qualified third party. If you haven't contracted with a third party as of yet for your organization, time is running out.

If you feel really behind in understanding and complying with the requirements of the ACA, you might want to check out a recent pocket guide provided by Zenefits. They have attempted to make a very complex law easier to understand and to help you know what should be done in order to be compliant. Click [here](#) to view the guide.

As always, ERA is also here to provide support in addressing your ACA questions.