

# SUMMARY OF NEW ACA 1095/1094 EMPLOYER REPORTING REQUIREMENTS

## Purpose of Forms

**1095-B** is issued to employees who were provided “minimum essential coverage” during the year. This form is also filed with the IRS.

**1094-B** is the transmittal form for 1095-Bs.

**1095-C** is issued by applicable large employers (ALEs) to employees to provide information about the coverage offered to the employee for purposes of documenting eligibility of the employee for a subsidy when coverage is acquired through an Exchange, and for purposes of compliance with the employer shared responsibility (employer mandate) rules. Part III is used by ALEs with self-insured health plans to provide documentation that coverage was provided to an employee that constituted “minimum essential coverage.” This form is also filed with the IRS.

**1094-C** is the transmittal form for 1095-Cs, but it also includes information about whether the employer met the requirements for the applicable year with regard to its shared responsibility (employer mandate) obligations.

## Small Employers (Not “Applicable Large Employers”)

### Fully insured health plan

**1095-B:** Insurance carrier/issuer required to prepare and file for each covered employee for which minimum essential coverage was provided (and 1094-B, the transmittal form). Form must be provided to each covered employee and the IRS.

**1095-C:** Not applicable.

### Self-insured health plan

**1095-B:** Someone must file for the employer (see special rules for multiemployer plans) along with Form 1094-B, the transmittal form. Form must be provided to each covered employee and the IRS.

**1095-C:** Not applicable

## Applicable Large Employers (ALEs)

### Fully insured health plan

**1095-B:** Insurance carrier/issuer required to prepare and file for each covered employee for which minimum essential coverage was provided (and 1094-B, the transmittal form). Form must be provided to each covered employee and the IRS.

**1095-C:** Required (other than Part III) for each employee meeting stated criteria, along with the 1094-C transmittal form. Employer is responsible for preparing, providing to employees, and filing with the IRS.

### Self-insured health plan

**1095-B:** Not required. The information that would be reported on this form is included in Form 1095-C, Part III.

**1095-C:** Required (including Part III) for each employee meeting stated criteria (generally any employee who worked full time for any month of the year), along with the 1094-C transmittal form. Employer is responsible for preparing, providing to employees, and filing with the IRS.

*This sample document is provided for general information purposes. It does not constitute professional advice. It is a generic document that is not specifically designed for your organization. We have provided it as a matter of professional courtesy for you to consider, together with your legal counsel, as you determine policies and/or provisions of your governing documents that are appropriate for your organization. In establishing your organization's policies or provisions of your governing documents, you should consider, together with your legal counsel, your unique operational, financial, and legal circumstances.*