

ACA Reporting Requirements Guide

IRS Code Sections 6055 and 6056 / Forms 1094 and 1095

Color Key (Indicates Responsibility)

Orange = Individuals	Purple = Marketplace	Blue = Insurance Carrier	Green = Employer
Form	1095-A Health Insurance Marketplace Statement	1095-B Health Coverage	1095-C Employer-Provided Health Insurance Offer and Coverage
Purpose	Helps the IRS to verify the person had medical health coverage to satisfy the individual mandate.	To verify that individuals have minimum essential coverage that complies with the individual coverage requirements.	To verify compliance with the employer "shared responsibility" mandate. Also used to establish employee eligibility for premium tax credits if the employer does not offer affordable and adequate coverage.
Who is responsible for Providing	The Health Insurance Marketplace	Insurance Carrier	Employers (both fully insured and self-funded) with 50 or more full-time or full-time equivalent employees
Provided to	Individuals who purchased insurance through the Marketplace (federal or state-based)	The IRS and to all covered employees and former employees of both small and large <i>fully insured</i> employer and direct individual policyholders	The IRS and any individual employed in a full-time position at the time during the preceding calendar year (even if the employee has since left employment or retired)
Deadline	Due to individuals by January 31 annually for prior calendar tax year	Due to employees by January 31 annually for prior calendar tax year	Due to employees by January 31 annually for prior calendar tax year
Form	8962 Premium Tax Credit (PTC)	1094-B	1094-C
Purpose	To calculate the amount of your PTC and reconcile it with any advance premium tax credit paid. Form 1095-A provides information needed to complete this form.	This is a transmittal form insurers use to transmit 1095-B forms	This is a transmittal form employers use to transmit 1095-C forms.
Who is responsible for providing	Individuals who receive the advance premium tax credit or want to claim the premium tax credit	Insurance carrier	Employers (both fully insured and self-funded) with 50 or more full-time or full-time equivalent employees
Provided to	IRS (file with tax return)	IRS	IRS
Deadline	Due to IRS by April 15 annually for prior calendar tax year	Due to IRS by February 28 annually; March 31 if filed electronically*	Due to IRS by February 28 annually; March 31 is filed electronically
* If more than 250 statements, must be filed electronically			

Online resources

It is important that employers read the regulations and other information that affects them. The IRS has produced several online documents to assist employer's with reporting requirements.

[Detailed Instructions for Forms 1094-C and 1095-C](#)

Web Address: [IRS.gov/instructions/i109495c/ar01.html](https://www.irs.gov/instructions/i109495c/ar01.html)

[Q & A's on Employer Reporting of Offers of Health Insurance Coverage \(Section 6056 / Form 1095-C\)](#)

Web address: [IRS.gov/Affordable-Care-Act/Employers/Questions-and-Answers-on-Reporting-of-Offers-of-Health-Insurance-Coverage-by-Employers-Section-6056](https://www.irs.gov/Affordable-Care-Act/Employers/Questions-and-Answers-on-Reporting-of-Offers-of-Health-Insurance-Coverage-by-Employers-Section-6056)

[How are HRAs and FSAs Affected?](#)

Excepted benefits (HRAs and FSAs) are generally not required to provide 6055 reporting (Forms 1094-B and 1095-B). The only exception would be HRAs that are *not* integrated with an employer's groups medical plan, which would typically be plans that cover only retirees and/or former employees.

Please consult with your own legal and tax advisors for advice specific to your business.

While every attempt has been made to ensure the accuracy of this information as of the publication date, federal and state rules and interpretations of the ACA continue to evolve, and every employer's circumstances are unique.