

# PROVIDING THE BENEFITS BALANCE™

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### Minimum Essential Coverage Reporting: IRS Releases Final Forms and Instructions for 2017 Forms 1094 and 1095 B and C

The IRS has released the final Forms 1094-B, 1095-B, 1094-C, and 1095-C for calendar year 2017 reporting. Employers are required to report in early 2018 for calendar year 2017. You can find the forms for calendar year 2017 reporting here:

1094/1095-B	1094/1095-C
<a href="#">1094/1095-B Instructions</a> <a href="#">Form 1094-B (transmittal)</a> <a href="#">Form 1095-B</a>	<a href="#">1094/1095-C Instructions</a> <a href="#">Form 1094-C (transmittal)</a> <a href="#">Form 1095-C</a>

### What Changed?

For calendar year 2017, the 6055 and 6056 reporting process seems to have stabilized. One notable difference is the removal of the "Section 4980H Transition Relief" box from line 22 of Form 1094-C, as this transition relief is no longer available to employers. There are no substantive changes to the B Forms for 2017, and the instructions are also mostly unchanged.

For purposes of determining affordability of employer-sponsored coverage when using the Qualified Offer method, the instructions note inflation adjustments to the 9.5% threshold, increasing the percentage to 9.66% for plan years beginning in 2016 and 9.69% for plan years beginning in 2017. (This percentage will drop to 9.56% for plan years beginning in 2018. See [IRS Publication](#) for details.)

### Who Is Required to Report?

**1094-B and 1095-B:** These forms are used by [insurers, self-insuring employers, and other parties that provide minimum essential health coverage](#) (regardless of size, except for large self-insuring employers) to report information on this coverage to the IRS and to covered individuals. *Note:* Self-insuring employers with less than 50 full-time or full-time equivalent employees will use these forms to report information on coverage to the IRS and to covered individuals. Self-insuring employers with 50 or

more full-time or full-time equivalent employees will use the C forms—see *below*.

**1094-C and 1095-C:** [Applicable large employers](#) (generally those with 50 or more full-time employees, including full-time equivalents or FTEs) will use Forms 1094-C and 1095-C to report information to the IRS and to their employees about their compliance with the employer-shared responsibility provisions (“pay or play”) and the health care coverage they have offered. Employers subject to both reporting provisions (generally self-insured employers with 50 or more full-time employees, including FTEs) will satisfy their reporting obligations using the C Forms.

### **Information Reporting Deadlines**

The upcoming deadlines for submitting Forms 1094 and 1095 B or C are as follows:

#### **To the IRS:**

If filing on paper – February 28, 2018

If filing electronically – April 2, 2018

Any employer who would like to file electronically should [refer to the IRS for more information on the AIR Program](#), which requires at least 30 days for testing for first-time users. Please note that employers submitting more than 250 forms *must* file electronically.

#### **To Individuals:**

Both Form 1095-B and 1095-C are due to the person identified as the “responsible individual” by January 31, 2018.

#### **Questions:**

If you have any questions, please contact your MedCost Benefit Services Account Manager or MedCost Compliance at [Compliance@medcost.com](mailto:Compliance@medcost.com).

