



ACA Form 1095 – 2017 Coverage Reports

Understanding 1095 Coverage Reports

To help clients meet their ACA information reporting obligations¹, Health Plans will again distribute ACA Form 1095 Coverage Reports to the clients whose plans we administered in 2017. The 2017 Coverage Reports will be emailed to client contacts identified as having authority to access Protected Health Information (PHI) at the end of December, with all reports mailed by December 29, 2017. All enrollment changes submitted to Health Plans by December 15, 2017 will be reflected in the reports.

The data will help employers complete Forms 1095-C (for Applicable Large Employers) and Form 1095-B (for small employers)².

The purpose of the Forms 1095 is two-fold:

- To provide the IRS with the information it needs to determine whether an employer has met the requirements of the employer mandate, or may be subject to an ACA penalty; and
- To provide the IRS and employees with the information they need to document whether employees and dependents have met the requirements of the individual mandate, or may be subject to an ACA penalty.

Content of the 1095 Coverage Reports

The reports will list each individual covered under plans administered by Health Plans at any time during 2017, and will include the following data to help complete the Forms 1095:

- **For Parts I and III, Form 1095-C:**
 - Part I**—Items 1 through 6: covered employee name, address, SSN/ITIN (*Individual Taxpayer Identification Number*) or DOB
 - Part III**—Items a through e: covered employee and dependent names, SSNs or DOBs, and days covered each month
- **For Parts I and IV, Form 1095-B:**
 - Part I**—Items 1 through 7: covered employee name, address, SSN/ITIN (if available) or DOB
 - Part IV**—Items a through e: covered employee and dependent names, SSNs/ITINs or DOBs, and days covered each month

A sample 1095 Coverage Report is attached to this *Alert*, and includes a key to each data element. Clients will also be able to sort data by department and identify whether each individual's coverage is linked to active employment or some other status, such as COBRA or retirement.

The 1095 Coverage Reports will include how many days employees and dependents were covered during each month that Health Plans administered your plan during 2017.

Employers will need to obtain other required information from their personnel and payroll records, such as whether or not (and why) an employee was offered coverage, and the employee cost of self-only coverage.

Forms are due to employees by **January 31, 2018**.

Forms are due to the IRS by **February 28, 2018** if filing by mail, and by **April 2, 2018** if filing electronically.

Electronic filing is required for filing more than 250 forms.

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¹See [June 1, 2015 Compliance Bulletin](#)

²Applicable Large Employers (ALEs) are employers which averaged 50 or more full-time employees and full-time equivalents during the previous calendar year. All other employers are small employers.



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Important Information about Social Security Numbers

The 1095 Coverage Reports clients receive will include any SSNs or ITINs that have been supplied to Health Plans by our clients or covered members.

Under the ACA rules for reporting offers of health coverage to employees and dependents, employers are required to make, and should carefully document, at least three separate attempts to obtain any missing SSNs/ITINs:

Request 1: During initial enrollment, either at hire or during Open Enrollment.

Request 2: If not provided under (1), and:

- enrollment occurs before December in a given year, then by December 31 of that year;
- enrollment occurs in December, then by the following January 31.

Request 3: If not provided under (1) or (2), then the third and final attempt must be made by December 31 of the year following enrollment.

Until an SSN is received, a member's date of birth must be used to help the IRS confirm identity. If all three attempts are made and SSNs/ITINs are still not provided, employers sponsoring self-insured plans and insurers will continue to provide member date of birth for inclusion on the forms.

Who Gets Form 1095?

ALEs use Form 1095-C (1094-C for transmittal to the IRS), and small employers use Form 1095-B (1094-B for transmittal to the IRS).

ALEs offering self-funded plans must issue Forms 1095-C to:

- Employees who were full-time at any time during 2017, regardless of whether they were enrolled in coverage; and
- All other individuals (e.g., part-time employees, retirees, COBRA enrollees) who were enrolled in coverage at any time during 2017.

Small employers offering self-funded plans must issue Forms 1095-B to those enrolled in coverage at any time during 2017.

Links to the IRS 2017 Forms and Instructions (www.irs.gov)

For Applicable Large Employers (ALEs):

- [Form 1095-C: Employer-Provided Health Insurance Offer and Coverage Insurance](#)
- [Form 1094-C: Transmittal of Employer-Provided Health Offer and Coverage Information Returns](#)
- [Instructions for Forms 1094-C and 1095-C](#)

For Small Employers:

- [Form 1095-B: Employer-Provided Health Insurance Offer and Coverage Insurance](#)
- [Form 1094-B: Transmittal of Employer-Provided Health Offer and Coverage Information Returns](#)
- [Instructions for Forms 1094-B and 1095-B](#)

If you have any questions about these reporting requirements or the 1095 Coverage Report that we will send by December 29, 2017, please contact your Account Manager.

The information contained in this Compliance Alert is intended to provide a summary of our understanding of recent regulatory developments which may affect our clients' plans. It should not be construed as specific legal advice or legal opinion.