

Health Care Reform Update

Draft 2016 Forms 1094 and 1095 for Employers

IMPORTANT LINKS

- [Affordable Care Act](#) (HHS)
- [COBRA](#) (DOL)
- [Department of Labor](#)
- [Federal Marketplace](#) (HHS)
- [Medicare & Medicaid](#) (CMS)
- [Tax Credits & Deductions](#) (IRS)

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The IRS has released draft versions of the Forms 1094-B, 1095-B, 1094-C, and 1095-C that employers and insurers will use in early 2017 to report on health coverage offered in the 2016 calendar year.

Background

The Affordable Care Act (ACA) requires insurers, self-insuring employers, and other parties that provide minimum essential health coverage to [report information on this coverage](#) to the IRS and to covered individuals using Forms [1094-B](#) and [1095-B](#). Applicable large employers (generally those with **50 or more full-time employees**, including full-time equivalents) are also required 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 using Forms 1094-C and 1095-C.

2016 Draft Forms

The following draft forms are now available for 2016:

- [Draft Form 1094-B](#) (transmittal)
- [Draft Form 1095-B](#)
- [Draft Form 1094-C](#) (transmittal)
- [Draft Form 1095-C](#)

Key Changes For 2016

Notable changes from the 2015 forms include:

- The "Qualifying Offer Method Transition Relief" box is no longer on line 22 of Form 1094-C, as that transition relief was only available to employers with calendar year plans for 2015 reporting.
- Two new line 14 codes (codes 1J and 1K) will be available on Form 1095-C to reflect conditional offers of coverage to an employee's spouse.
- The "Instructions for Recipient" section of Form 1095-B now says that if the recipient or a member of his or her family received employer-sponsored coverage, that coverage may be reported on a Form 1095-C rather than a Form 1095-B. These instructions also tell recipients that certain lines may be left blank even if the recipient received employer-sponsored coverage.

For information on this subject, please log into your [HR Library account](#) which includes information on the above subject, as well as other State and Federal updates, laws and regulations concerning Employee Benefits, HR, and Reform.

Be sure to check out our [Legislation/Compliance](#) section on our website to stay on top of the latest news in Health Care Reform. If you have any questions, please feel free to reach out to your dedicated Brown & Brown broker consultant.

