

# 2023 Employer Reporting Requirements

## 6055 – Minimum Essential Coverage (MEC)

Requires health insurers (carriers) and sponsors of self-insured health plans to provide covered individuals and the IRS with information on MEC for a calendar year (CY). Information in this report is used to administer the **Individual Mandate, where required by state law.**

## 6056 – Applicable Large Employer (ALE)

Requires ALEs to provide full-time employees (FTEs) and the IRS with information regarding an offer of health plan coverage during the CY. Information in this report is used to administer the **Employer Mandate.**

## Forms

### “B” Forms (1094-B and 1095-B)<sup>1</sup>

- Used by health insurance carriers, small employers with self-insured (level funded) health plans, and multiemployer plans to report individuals who had MEC in the CY
- 1094-B** – *Transmittal Form* – cover page for submission of all Forms 1095-B to the IRS
- 1095-B** – identifies a specific individual’s (and any covered family member’s) health coverage

### “C” Forms (1094-C and 1095-C)<sup>2</sup>

- Used by ALEs to report offers of coverage to FTEs to satisfy the employer mandate and by self-insured ALEs to report MEC
- 1094-C** – *Transmittal Form* – cover page for submission of all Forms 1095-C to the IRS
- 1095-C** – identifies each FTE and information regarding the offer of coverage; also provides information on employees/individuals and family members covered by the self-insured plan

## Employer Reporting Obligations

| Employer to Employees                     | What Form/Parts?  | To Whom?   | When?  |
|---|---|--|--|
| Insured, under 50 FTEs                    | <b>No employer action.</b><br>Carrier provides Form 1095-B when requested by individual | <b>No employer action.</b> Carrier provides Form 1095-B to covered individuals by March 1, 2024. | <b>No employer action.</b> Carrier provides Form 1095-B to covered individuals by March 1, 2024. |
| Self-insured, under 50 FTEs               | Form 1095-B (all parts except II)   | Covered individuals  | March 1, 2024  |
| Insured (or no coverage), 50 or more FTEs | Form 1095-C (parts I and II)  | All FTEs   | March 1, 2024  |
| Self-insured, 50 or more FTEs             | Form 1095-C (all parts)   | All FTEs and all covered employees/individuals   | March 1, 2024  |

| Employer to IRS                           | What Form?   | When?  |
|---|--|--|
| Insured, under 50 FTEs                    | <b>No employer action.</b> Carrier obligation.   | <b>No employer action.</b> Carrier obligation. |
| Self-insured, under 50 FTEs               | <ul style="list-style-type: none"> <li>Form 1094-B (transmittal form)</li> <li>All Forms 1095-B</li> </ul> | April 1, 2024 if filing electronically*        |
| Insured (or no coverage), 50 or more FTEs | <ul style="list-style-type: none"> <li>Form 1094-C (transmittal form)</li> <li>All Forms 1095-C</li> </ul> | April 1, 2024 if filing electronically*        |
| Self-insured, 50 or more FTEs             | <ul style="list-style-type: none"> <li>Form 1094-C (transmittal form)</li> <li>All Forms 1095-C</li> </ul> | April 1, 2024 if filing electronically*        |

**\*In 2024, any employer filing 10 or more forms to IRS will be required to file electronically- including W2s and 1099s**

Instructions for 1094/1095 B Forms:  
<https://www.irs.gov/pub/irs-pdf/i109495b.pdf>

Instructions for 1094/1095 C Forms:  
<https://www.irs.gov/pub/irs-pdf/i109495c.pdf>

- Form 1094 B: <https://www.irs.gov/pub/irs-pdf/i1094b.pdf>
- Form 1095 B: <https://www.irs.gov/pub/irs-pdf/i1095b.pdf>

- Form 1094 C: <https://www.irs.gov/pub/irs-pdf/i1094c.pdf>
- Form 1095 C: <https://www.irs.gov/pub/irs-pdf/i1095c.pdf>