

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)¹

- 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)²

- 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	No employer action. Carrier provides Form 1095-B when requested by individual	No employer action. Carrier provides Form 1095-B to covered individuals by March 4, 2024.	No employer action. Carrier provides Form 1095-B to covered individuals by March 4, 2024.
Self-insured, under 50 FTEs	Form 1095-B (all parts except II)	Covered individuals	March 4, 2024
Insured (or no coverage), 50 or more FTEs	Form 1095-C (parts I and II)	All FTEs	March 4, 2024
Self-insured, 50 or more FTEs	Form 1095-C (all parts)	All FTEs and all covered employees/individuals	March 4, 2024

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