



IRS Releases Draft Forms for 2018 ACA Reporting

Issue Date: August 2018

Quick Facts:

- The Internal Revenue Service (IRS) recently released draft 2018 Forms 1094-C and 1095-C for Affordable Care Act (ACA) reporting.
- The draft forms reflect minor changes.
- The IRS expects to release final forms and instructions by year end.
- The IRS has also yet to release draft Forms 1094-B and 1095-B.

Overview

The Internal Revenue Service (IRS) recently released 2018 draft forms for reporting under Internal Revenue Code (Code) Sections 6055 and 6056. Neither the draft instructions for the 2018 forms nor the draft forms 1094-B or 1095-B have been released. The IRS expects to release final 2018 forms and instructions by the end of the year – in time for the next Affordable Care Act (ACA) reporting cycle in early 2019.

Reporting entities, including self-insured health plan sponsors that are not applicable large employers (ALEs), use Forms [1094-B](#) and [1095-B](#) to report information required under Section 6055.

ALEs use Forms [1094-C](#) and [1095-C](#) to report information required under Section 6056, as well as information required under Section 6055 for ALEs who sponsor self-insured plans.

The draft 2018 forms are substantially similar to the final 2017 versions. However, sections related to the reporting of employee names and covered individuals have been modified.

Background

The ACA created new reporting requirements under Code Sections 6055 and 6056. Under these rules, certain employers must provide information to the IRS about health plan coverage they did or did not offer or provide to their employees during the prior calendar year. Each reporting entity must file annually:

- a separate statement (Form 1095-B or 1095-C) for each individual who was provided with minimum essential coverage (for providers reporting under Section 6055), or for each full-time employee (for ALEs reporting under Section 6056), respectively; and
- a transmittal form (Form 1094-B or 1094-C) for all of the returns filed for a given calendar year with the IRS.

Due Dates

Reporting entities must furnish individual statements (Form 1095-B, 1095-C, or a substitute form) to full-time employees and individuals covered under self-insured health plans. The individual statements are due on or before January 31 of the year immediately following the calendar year to which the statements relate. Reporting entities must file forms with the IRS by February 28 if filed by paper and by March 31 if filed electronically.

Key Changes

The 2018 draft forms are largely unchanged from the 2017 versions. However, employers should take note of the following items:

- **Employee Name.** The 2018 draft Form 1095-C appears to require entry of the employee's middle initial in Part I. In prior versions of the form, an employee's full name was to appear in a single field, and the 2018 draft form has been modified to provide separate fields for an employee's first name, middle initial, and last name.
- **Covered Individual Name.** The 2018 draft Form 1095-C appears to require entry of a covered individual's middle initial in Part III. In prior versions of the form, a covered individual's full name was to appear in one editable field, and the 2018 draft form has been modified to provide separate fields for an individual's first name, middle initial, and last name.
- **Form 1095-C, Plan Start Month.** The 2018 draft Form 1095-C provides that the "Plan Start Month" box will remain optional for 2018.

No additional changes were included in the 2018 draft forms. However, the 2018 draft instructions for these forms may include additional changes or clarifications. In addition, the IRS may make changes to the draft forms before releasing final 2018 versions.

No Changes to Reporting Requirements

Despite ongoing efforts to repeal or modify the ACA, employers should know that ACA reporting and all other related mandates remain intact and are fully applicable for now. Consequently, ALEs and self-insured health plan sponsor must continue to comply with their ACA-related obligations.

Additional Resources

The IRS previously released the following materials which provide helpful guidance for employers subject to the reporting rules:

- [Q&As on Section 6055](#)
- [Q&As on Section 6056](#)
- [Q&As on Employer Reporting Using Form 1094-C and Form 1095-C](#)

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