

Summary of IRS Sections 6055 & 6056 Reporting Requirements

	Section 6055 Information Reporting of Minimum Essential Coverage (MEC)	Section 6056 Information Reporting for Applicable Large Employers on Health Insurance Coverage Offered by Employer-Sponsored Plans
Group Size	Small, Large*	Large*
Who Reports to the IRS?	Insurer (fully insured) Plan Sponsor (self-insured)	Applicable Large Employer (ALE)
IRS Due Date	2/28/2016 (or 3/31/2016 if filed electronically) and annually thereafter	2/28/2016 (or 3/31/2016 if filed electronically) and annually thereafter
What is reported to the IRS?	<ul style="list-style-type: none"> Name, address, TIN for "responsible individual" Name, address, TIN for each individual covered Months for which each individual was enrolled (for at least one day) and entitled to receive benefits Any other information required. Group health plans must also provide: <ul style="list-style-type: none"> Name, address, EIN of sponsor 	<ul style="list-style-type: none"> Name, address, and employer identification number (EIN) of the ALE Name and telephone number of the ALE's contact person (which can be an employee or agent of the ALE) Calendar year for which the information is reported Certification as to whether the ALE offered its full-time employees and their dependents the opportunity to enroll in minimum essential coverage under an eligible employer-sponsored plan, by calendar month Months during the calendar year that minimum essential coverage under the plan was available Each full-time employee's share of the lowest cost monthly premium (self-only) for coverage providing minimum value offered to that full-time employee under an applicable employer-sponsored plan, by calendar month Number of full-time employees for each month during the calendar year Name, address and taxpayer identification number (TIN) of each full-time employee during the calendar year and the months, if any, during which the employee was covered under the plan (the TIN of the spouse or dependent is not required) Any other information prescribed by forms or instructions
Reporting Period	First effective for coverage provided in 2015	First effective for coverage offered (or not offered) in 2015
Purpose	Allows individuals to prove they had coverage and are therefore not subject to the individual penalty	Allows the IRS to identify noncompliance with the employer mandate and assess penalties on employers that do not comply
Who provides a statement to individuals?	Insurer (fully insured) Plan Sponsor (self-insured)	Applicable Large Employer
Statement Due Date	1/31/2016 and annually thereafter	1/31/2016 and annually thereafter
What is reported to the individual?	<ul style="list-style-type: none"> All the information reported to the IRS Policy number (if applicable) Name, address and contact information for reporting entity 	<ul style="list-style-type: none"> All the information reported to the IRS The name, address, and EIN of the ALE member

*A large employer is an employer that alone, or combined with members in its controlled group, has 50 or more full-time equivalent employees.

Summary of Forms Required for 6055 & 6056

	Required Form 6055 Reporting	Required Form 6056 Reporting
Individual (on-Marketplace)	Form 1095-A (sent by Marketplace)	N/A
Individual (off-Marketplace)	Form 1095-B (sent by Insurer)	N/A
Small Group Employer fully insured (both SHOP Marketplace and off-Marketplace)	Form 1095-B (sent by Insurer)	N/A
Small Group Employer self-insured	Form 1095-B (Employer Responsibility)	N/A
Applicable large employer (fully insured)	Form 1095-B (sent by Insurer)	Form 1095-C Sections I, II
Applicable large employer (self-insured)	Form 1095-C (Employer Responsibility)	Form 1095-C All sections (6055 + 6056)
Self-insured Non-employer Group (Employee Organization* or Multiemployer Plan*)	Form 1095-B (Plan Sponsor Responsibility)	Form 1095-C Sections I, II by applicable large employer or, by arrangement, the administrator of a multiemployer plan.
Insured Non-employer Group (Employee Organization* or Multiemployer Plan*)	Form 1095-B (sent by Insurer)	Form 1095-C Sections I, II by applicable large employer or, by arrangement, the administrator of a multiemployer plan.
Student Health Insurance Plan	Form 1095-B (sent by Insurer)	N/A

*An "employee organization" is any labor union or organization of any kind in which employees participate and which exists for the purpose of dealing with employers concerning an employee benefit plan (including group health plans) or other matters involving employment relationships. An employee organization can also be an employee beneficiary association.

*A "multiemployer plan" is a plan where more than one employer is required to contribute pursuant to one or more collective bargaining agreements between one or more unions and more than one employer.