



BENEFIT NEWS BRIEFS

IRS Issues Updated Guidance On Reporting Value of Health Care Coverage On W-2s Requirement Does Not Apply to Employees of Employers Contributing to Multiemployer Health Plans

The IRS recently released [Notice 2012-9, Interim Guidance on Informational Reporting to Employees of the Cost of Their Group Health Insurance Coverage](#), (commonly known as the "W-2 reporting requirement"). *Notice 2012-9* revises the prior guidance initially provided in *Notice 2011-28*. See [Client Bulletin 2011-18](#).

This informational reporting is required under the *Patient Protection and Affordable Care Act* (the *Affordable Care Act*) to provide information to employees on the cost of their health care coverage. The reporting does not cause employer-provided health care coverage to be taxable, even though the value is reported on a W-2.

Fortunately, employers who provide health coverage through a *multiemployer health plan* are NOT required to include the cost of coverage provided to an employee covered under a multiemployer plan on the Form W-2 for that employee. See Q&A 17 of FAQs.

Notice 2012-9 is applicable beginning with 2012 Forms W-2 (forms for the 2012 calendar year that employers give employees by the end of January 2013). This interim guidance is applicable until further guidance is issued.

Since employers that contribute to multiemployer plans do not have to report any health care cost information on the W-2s for employees covered by a multiemployer plan, we will not examine the guidance in detail but bring it to your attention as it has been a matter of interest to many. A copy of *Notice 2012-9* is available at: <http://www.irs.gov/pub/irs-drop/n-12-09.pdf>. A specially prepared document of just the *Frequently Asked Questions (FAQs)* that make up the guidance with a Table of Contents is available by "[clicking here](#)."

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