



BENEFIT NEWS BRIEFS

A Look at the IRS Tutorial for E-Filing ACA Forms

The Internal Revenue Service (IRS) [Tutorial for Affordable Care Act \(ACA\) Application for Transmitter Control Code](#) is a very handy guide on “*How To*” register in order to be able to electronically file ACA Information Returns (IRS Forms 1094/95-B and 1094/95-C). The purpose of the registration application is to request authorization to electronically file those ACA Information Returns and to receive an ACA Transmitter Control Code (TCC). Electronic filing is required for filings involving 250 or more Forms in each series.

Plan Sponsors of multiemployer group health plans will need to distribute or arrange for distribution of Forms 1094/95-B, minimum essential coverage. Such Plan Sponsors **will not** need to file the Forms 1094/95-C **unless** they employ 50 or more full-time employees (FTEs). A very large Fund Office may have that many employees, but most probably have less the 50 FTEs.

When is Electronic Filing Required?

ACA information returns are subject to IRS Regulation [26 CFR 301.6011-2](#), which requires filers of 250 or more of any one type of information return to file electronically. Thus, if a filer is filing more than 250 Forms 1095-B, etc, the filer must file them electronically. The IRS encourages electronic filing even if not required. For more information on this e-filing requirement, go to <http://www.irs.gov/for-Tax-Pros/Software-Developers/Information>Returns/Affordable-Care-Act-Information-Return-AIR-Program>

The application for a TCC will allow filers to file the following ACA Forms:

- Form 1094-B, *Transmittal of Health Coverage Information Returns*
- Form 1095-B, *Health Insurance Coverage*
- Form 1094-C, *Transmittal of Employer-Provided Health Insurance Offer and Coverage Information Returns*
- Form 1095-C, *Employer-Provided Health Insurance Offer and Coverage*

See [Benefit News Briefs 2015-09](#) for a general overview of these Forms.

Who Will Be E-Filing?

Forms 1094-B and 1095-B will be used by self-insured multiemployer group health plans to report the provision of minimum essential coverage (MEC). A copy of the 1095-B should also be provided to the covered individual.

See [Benefit News Briefs 2015-13](#) for a detailed look at IRS Forms 1094/95-B.

Forms 1094-C and 1095-C will be used by Applicable Large Employers (ALEs)(≥ 50 full-time EEs) to fulfill the Code [Section 6056](#) Employer Shared Responsibility reporting requirements. This includes ALEs who contribute to a self-insured multiemployer group health plan.

See [Benefit News Briefs 2015-38](#) and [Benefit News Briefs 2015-40](#) for a detailed look at IRS Forms 1094/95-C.

IRS E-Filing Tutorial

The 20-page *Tutorial* has 18 screen shots with detailed explanations of each step. Individuals who will be registering for a TCC in order to file electronically would be well-advised to review the *Tutorial* in full before beginning registration.

The *Tutorial* notes that if an entity (Plan, TPA or employer) is performing one of the following functions it should complete the *ACA Application for TCC*:

- *Issuer*: Files their own ACA Information Returns.
- *Transmitter*: Sends electronic information return data directly to the IRS on behalf of any business.
- *Software Developer*: Writes origination or transmission software according to IRS specifications.

These roles are not mutually exclusive, for example, an entity could be both a Transmitter and Software Developer. Software developers will submit additional information on their application.

Information Needed To Complete the ACA Application for TCC

The tutorial lists the following information that is needed to complete the application:

- EIN.
- Legal business name, business type, physical and mailing addresses, and phone numbers.
- Responsible Officials and Contact Information including:
 - o Taxpayer Identification Number; (Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN))
 - o Date of birth (DOB) and US Citizenship
 - o Contact information including e-mail address, title, phone number

- The roles of organization.
- The forms that will be filed.
- The transmission method that will be used.

According to the *Tutorial*, the IRS will review the application information and supply a written confirmation as to whether the application was accepted or rejected into the program.

How to Access the Application

To access the *ACA Application for TCC*, the user must first login to [e-services](#) using a Username and Password. For more information on obtaining an e-services account or choosing a new password, see [Registration Services](#).

Completing the Application

The Tutorial notes that the *ACA Application for TCC* does not have to be completed in one session – good news for the harried user. The **typical process** for completing an application for most firms or organizations will consist of the following steps:

1. Each Responsible Official and Contact within the firm or organization must be registered and confirmed with e-services. For more information on e-services Registration, see [Registration Services](#).
2. A Responsible Official will begin the application and designate other individuals in the firm or organization who are authorized to be either a Responsible Official or Contact.
3. All Responsible Officials must sign the Terms of Agreement and submit the application.
4. After the application is completed and submitted, the IRS will perform checks before assigning the firm or organization the TCC(s).
5. All users authorized to access the application can modify and update the application as necessary. After an application has been submitted and accepted, authorized individuals within the firm or organization may update the application as needed.

BONUS!!!

Links to the handouts from recent IRS webinars that will be [repeated in August and September](#).

- [Employer Shared Responsibility and Information Reporting](#) - July 28
- [Information Reporting Requirements for Applicable Large Employers on Employer-Sponsored Health Coverage](#) - July 29
- [Information Reporting Requirements for Providers of Minimal Essential Coverage](#) - July 30

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