



Benefits Administration Letter

Number: 15- 202

Date: May 1, 2015

Subject: Employer Shared Reporting Responsibilities under Internal Revenue Code Sections 6056 and 4980H

Beginning in 2015, applicable large employers (ALEs) are subject to the Employer Shared Responsibility (ESR) provisions under sections 6056 and 4980H of the Internal Revenue Code (IRC). ALEs are required to file information to the Internal Revenue Service (IRS) about the health insurance offered to eligible full-time employees and must also provide information to their full-time employees about their health insurance offer and coverage. To assist agencies in their administration of these provisions, OPM has provided guidance on its website at: <http://www.opm.gov/ESR>.

ALEs are required to report health insurance information for calendar year 2015 to the IRS by no later than February 29, 2016, or March 31, 2016, if filed electronically. Employers are required to furnish employee statements electronically by February 1, 2016. To assist agencies and their payroll providers, this BAL includes links to applicable IRS guidance and technical requirements for reporting, including the new AIR system and the IRS schema for Information Returns. We strongly encourage agencies and their Shared Service Centers (SSCs) to review the information available at the IRS website and to take action to become informed and, as appropriate, to register for the Affordable Care Act Information Returns (AIR) system at your earliest opportunity. Agencies should be aware that the AIR system is the only mechanism for filing information returns electronically to the IRS. For agencies that have designated a SSC to report on their behalf, they should maintain regular communication with their SSC regarding the IRC reporting requirement.

Affordable Care Act Information Returns (AIR) System

The AIR system is administered by IRS and allows for information returns and transmittals to be filed electronically. Registration is required to access this system. Software Developers, Transmitters and Issuer/Payers (Submitters) must complete the ACA Information Return Transmitter Control Code (TCC) Application and receive a TCC in the mail prior to electronically filing Information Return (AIR) Forms 1094-B, 1094-C, 1095-B and 1095-C.

Information about registering for the AIR system:

<http://www.irs.gov/for-Tax-Pros/Software-Developers/Information>Returns/Affordable-Care-Act-Information>Returns-AIR-Program-Did-You-Know%3F>

AIR Program Overview and Dates for AIR Working Group Meetings:

<http://www.irs.gov/for-Tax-Pros/Software-Developers/Information>Returns/Affordable-Care-Act-Information>Returns-AIR-Program-Overview>

Questions and Answers on Reporting of Offers of Health Insurance Coverage by Employers (Section 6056)

<http://www.irs.gov/Affordable-Care-Act/Employers/Questions-and-Answers-on-Reporting-of-Offers-of-Health-Insurance-Coverage-by-Employers-Section-6056>

Tax Year 2014 Schemas for Affordable Care Act Information Returns (AIR)

[http://www.irs.gov/for-Tax-Pros/Software-Developers/Information>Returns/Tax-Year-2014-Schemas-for-Affordable-Care-Act-Information>Returns-\(AIR\)](http://www.irs.gov/for-Tax-Pros/Software-Developers/Information>Returns/Tax-Year-2014-Schemas-for-Affordable-Care-Act-Information>Returns-(AIR))

Affordable Care Act Assurance Testing System (AATS) Information

The ACA AATS is the IRS's testing system for information returns and will open for testing July 2015 for Information Returns that will be processed in 2015.

<http://www.irs.gov/for-Tax-Pros/Software-Developers/Information>Returns/Affordable-Care-Act-Assurance-Testing-System-Information>

If you have any questions regarding this Benefits Administration Letter please contact Julia Elam at 202.606.1560 or email ESR@opm.gov.

Sincerely,

John O'Brien
Director