

2023 Information Reporting Checklist

Information returns and individual statements for the 2022 calendar year will be filed and furnished in early 2023.

1. Determine if you are a reporting entity (and what type) to understand applicable reporting requirements:
 - **Section 6055 Reporting Entities.** Self-insuring employers that provide **minimum essential health coverage** are required to report information on this coverage to the IRS and to covered individuals under Internal Revenue Code Section 6055.
 - **Section 6056 Reporting Entities.** Employers with **50 or more full-time employees** (including FTEs) are required to report information to the IRS and to their full-time employees about their compliance with the pay or play rules under Internal Revenue Code Section 6056.
2. Begin compiling the [required information](#) for Section 6055 reporting and/or the [required information](#) for Section 6056 reporting.
3. Review the IRS Forms and Instructions to prepare for compliance:
 - [Forms 1094-B](#) and [1095-B](#) (along with instructions) are available for **Section 6055** reporting entities.
 - [Forms 1094-C](#) and [1095-C](#) (along with instructions) are available for **Section 6056** reporting entities (or employers that are subject to **both** reporting provisions).
4. Determine whether to hire a **third party** to fulfill reporting responsibilities (reporting entities will still be liable for the failure to report information and furnish statements).
5. For Section 6056 reporting entities, determine whether you will use the [general method](#) of reporting or a [simplified alternative method](#) to satisfy the reporting requirements.
6. If the reporting entity plans to furnish statements **electronically** for the first time for 2022 (filed and furnished in early 2023), or if prior consents only applied to the statements required to be furnished in prior reporting years, ensure that affirmative consent is obtained from individuals/employees prior to furnishing (Section 6056 reporting entities **must also** ensure that certain notice, hardware, and software requirements are met).
7. Remember to comply with the information reporting deadlines:

A [proposed rule](#) issued on Nov. 22, 2021, extended the annual furnishing deadlines under both Sections 6055 and 6056 for an additional 30 days. This rule is in proposed form and has not been finalized. However, reporting entities may rely on the proposed rule even before it is finalized. Reporting entities are generally encouraged to furnish statements to individuals as soon as they are able.

Section 6055 Deadlines (Forms 1094-B and 1095-B):

- Due to a [proposed rule](#) extending the annual furnishing deadline, employee statements must be furnished **on or before March 2, 2023**.
- Information returns must be filed **no later than Feb. 28, 2023** (or March 31, 2023, if filed electronically).

Section 6056 Deadlines (Forms 1094-C and 1095-C):

- Due to a [proposed rule](#) extending the annual furnishing deadline, employee statements must be furnished **on or before March 2, 2023**.
- Information returns must be filed **no later than Feb. 28, 2023** (or March 31, 2023, if filed electronically).

Note: Forms 1095-B and 1095-C **must be electronically filed** if the employer is required to file **at least 250 of the specific form**.