Health Care Reform Update: Employer Responsibility (Pay or Play) Delayed Until 2015

On July 2, the IRS announced that two provisions of the Affordable Care Act (ACA) that affect employers are delayed until 2015:

- Employer Responsibility (Pay or Play) penalties
- Requirement to report health insurance coverage offered to employees

The IRS plans to provide more details on the delay in the coming weeks. We will continue to keep you informed of the latest developments and their impact to you and your clients.

What it means for you and your clients

Employers will not pay any Employer Responsibility penalties for coverage offered in 2014 that does not meet minimum value or affordability requirements; penalties will begin in 2015 for coverage that does not meet the regulatory requirements.

- As a reminder, Employer Responsibility requires employers with 50+ full-time equivalent employees to offer health insurance that meets certain requirements or pay a penalty

Employers can report the health insurance they offer in 2014, but they are not required to do so until 2015

Other aspects of the ACA are **not delayed**, including:

- Reporting the cost of coverage on employees' W-2 forms
- 90-day waiting period limitation
- Requirement for **individuals** to have health insurance or pay a penalty