



Rhode Island Department of Revenue

Division of Taxation

PUBLICATION 2020-04
HEALTH INSURANCE MANDATE

INFORMATION FOR TAXPAYERS AND TAX PROFESSIONALS
NOVEMBER 5, 2020

Health Insurance Mandate: Reporting Requirements

Frequently Asked Questions

1. Who is subject to the reporting requirements?

Pursuant to R.I. Gen. Laws § 44-30-102(b)(1), the entities that are subject to the reporting requirements are the following:

- An employer or other sponsor of an employment-based health plan that offers employment-based minimum essential coverage to any resident of Rhode Island.
- The Rhode Island Medicaid single state agency providing Medicaid or Children's Health Insurance Program (CHIP) coverage.
- Carriers licensed or otherwise authorized by the Rhode Island Office of the Health Insurance Commissioner to offer health coverage.

Please note: If you are an employer, and if your insurer completes the reporting requirement listed under FAQ #2, there are no other reporting requirements expected of you.

2. What reporting is required?

- A. Pursuant to R.I. Gen. Laws § 44-30-102(d), applicable entities (see FAQ #1) are required to send **to the Division of Taxation**:
- Name, address, and TIN of the primary insured and the name and TIN of each other individual obtaining coverage under the policy;
 - The dates during which the individual was covered under minimum essential coverage during the calendar year; and
 - Such other information that the tax administrator may require
- B. Pursuant to R.I. Gen. Laws § 44-30-102(e), applicable entities are required to furnish **to the primary insured employee** a written statement containing the following:
- Name, address, and contact information of the person required to provide the return to the Tax Administrator; and
 - The information included in the return with respect to the individuals listed thereupon (that is the information that is provided under FAQ #2 A)

3. What are the file formats and technical specifications for the required reporting?

For submitting to the Division of Taxation, the following two options for file formats are acceptable:

- IRS Reporting Formats (AIRS)
 - o The Division of Taxation will accept 1095-A, 1095-B, and 1095-C returns so long as they comply with Rhode Island statutes/regulations described in FAQ #2 A. Returns will not be rejected if they contain the same information as described in Section 6055 as that section was in effect as of 12/15/2017.
 - o The same file(s) that get submitted to the IRS may be submitted to the State of RI.
- A flat file (a CSV file) containing the same information as the 1095B.
 - o A file format that you may use will be available by November 2020 and details will be posted on the Division of Taxation's website: (<http://www.tax.ri.gov/healthcoveragemandate/>).

We will accept any form or file format that is sufficient to comply with R.I. Gen. Laws § 44-30-102(d) requirements.

4. What will the process be for submitting the reports?

The Division of Taxation will provide a webpage where you will be able to upload your file(s). A link to this webpage will be available on the Division of Taxation's website (<http://www.tax.ri.gov/healthcoveragemandate/>). There is no pre-registration required to access this webpage. When you are ready to upload your file(s), you may navigate to this page where you will have an opportunity to enter your company's information, your contact information, and information about the file. There will be an opportunity to specify if the file that is being uploaded is an original file, a replacement file (to replace a file that was previously loaded as an original), or if it contains corrected data. You will receive a confirmation message in the webpage if your file is successfully uploaded.

5. How will the file be validated? What is the testing process?

There will be no test site or process for testing the report files. If there are any issues with your file, you will be contacted directly using the contact information provided during the file upload process. For those using the IRS standard format, it is expected that the files would have passed the IRS validation process.

6. How will I know if you successfully received my files?

If your files are successfully uploaded, you will receive a real time confirmation on the screen. If we encounter any issues with the file(s), you will be contacted using the contact information supplied during the file upload process.

7. What if I need to submit corrected data?

If data is determined to be incorrect after submitting the original files, the reporting entities may navigate to the same file upload page and upload a corrected file. There will be an opportunity to specify if the file that is being uploaded is an original file, a replacement file, or a correction file.

If you need to submit a corrected file after December 31st of the year in which it is due, please contact the Division of Taxation. You may email taxportal@tax.ri.gov and use the subject line “*Individual Mandate Correction File*”

Example: You submit a report on 1/31/2021 and you find that it contains errors. You have until 12/31/2021 to submit a corrected file. If you wish to submit a corrected file on or after 01/01/2022, then you must contact the Division before uploading a corrected file at the email address listed above.

8. The reporting deadline is January 31st. Will there be an extension?

The state reporting deadline is January 31st.

For Tax Year 2020 only: After evaluating IRS Notice 2020-76, the Division of Taxation will extend the state reporting deadline (1) **to individuals** to March 2, 2021 and (2) **to the Division** to March 31, 2021.

9. I am a small business, am I required to submit these reports?

The State of RI requires coverage information to be reported. If your insurer provides (or will provide) coverage information to the Division of Taxation and to the employees, then there is no additional reporting required from employers. If you are a small business, you may choose to utilize the flat file method described in FAQ #3. If this reporting will be a burden, please contact the Division of Taxation before the reporting deadline for assistance with this requirement at Tax.IndMandate@tax.ri.gov.

10. My business is out of state, but I employ RI residents. Am I required to report?

Yes, if you employ RI residents, you are subject to the reporting requirements. You may submit the same IRS Mandate reporting to us for your employees that are RI residents. If your population is small, you may choose to complete the reporting requirements using the flat file method described under FAQ #3.

11. Where should I look for the most up to date information?

Information pertaining to individual mandate reporting requirements will be posted on the Division of Taxation’s website (<http://www.tax.ri.gov/healthcoveragemandate/>).

You may subscribe to receive tax news (including but not limited to the Individual mandate) on <http://www.tax.ri.gov/> and look for “Subscribe for tax news”.

Please email questions regarding the individual mandate to Tax.IndMandate@tax.ri.gov.

DISCLAIMER

This document is a plain-language summary of certain areas of Rhode Island’s health insurance mandate. This document is for general information purposes only and is not a substitute for the Rhode Island General Laws, or for Rhode Island Division of Taxation regulations, rulings, or notices.

The Rhode Island Division of Taxation, part of the Rhode Island Department of Revenue, has normal operating hours from 8:30 a.m. to 3:30 p.m. business days. For more information, contact the Division of Taxation at (401) 574- 8829 or see <http://www.tax.ri.gov/contact>.