

Publication 5165

Guide for Electronically Filing Affordable Care Act (ACA) Information Returns

for

Software Developers and Transmitters (Processing Year 2016)

March 17, 2016

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Change History

| Date | Summary of Changes | Changes Marked |
|-----------|--|-------------------|
| | | Markeu |
| 3/17/2016 | Deleted Error Prefix "AIRFE" from Table 6-1 | No |
| 3/17/2016 | Added text to clarify that xpath reference is only for schema validation errors for Tax Year 2015 (FS2016) | Yes |
| | | |

1 Introduction

Publication 5165, *Guide for Electronically Filing Affordable Care Act (ACA) Information Returns (AIR) for Software Developers and Transmitters (Processing Year [PY] 2016)*, outlines the communication procedures, transmission formats, business rules and validation procedures for returns transmitted electronically through the AIR system. To develop software for use with the AIR system, Software Developers, Transmitters, and Issuers should use the guidelines provided in this publication along with the Extensible Markup Language (XML) Schemas published on IRS.gov. The procedures in this publication should be used when the following information returns are transmitted electronically:

- Form 1094-B, Transmittal of Health Coverage Information Returns
- Form 1095-B, Health 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

Note: This publication does not contain information or procedures for filing Forms 1095-A.

The transmittal Forms 1094-B and Forms 1094-C provide information about the Issuer of the ACA Information Returns and the Forms 1095-B and 1095-C provide information about the covered individuals. The procedures in this publication should also be used in conjunction with the most current version of the following publications:

- **Publication 4557** *Safeguarding Taxpayer Data: A Guide for Your Business*: The purpose of this Publication is to provide information on legal requirements to safeguard taxpayer data. The target audience is non-government businesses involved in the preparation and filing of income tax returns.
- **Publication 4600** Safeguarding Taxpayer Information Quick Reference Guide for Businesses: The target audience is non-government businesses involved in the preparation and filing of tax returns. The purpose of this Publication is to provide information on requirements to safeguard taxpayer information, safeguarding techniques, and data security incidents.
- **Publication 5164** *Test Package for Electronic Filers of Affordable Care Act (ACA) Information Returns (AIR)*: This publication contains general and program specific testing information for use in completing the ACA Assurance Testing System (AATS) process for business submissions. AATS is a process to test software and electronic transmissions prior to accepting Software Developers, Transmitters, and Issuers into the AIR program.

The following guides/documents provide additional guidance for filing electronically through AIR.

- AIR Submission Composition and Reference Guide This guide provides:
 - o Guidance to IRS external partners (Software Developers, Transmitters, and Issuers) with composing submissions and transmission files that are sent to the IRS for processing
 - o Description of the interaction between AIR, the Trading Partners through the Information Submission Services (ISS) User Interface (UI) and Application to Application (A2A) channels
- Automated Enrollment for ACA Providers, "The External Guide" The IRS developed this guide for the Affordable Care Act Information Returns (AIR) Application's authorized contacts who want to use Automated Enrollment (AE) to enroll A2A Client Application Systems into the IRS Application to Application (A2A) channel. The purpose of this document is to describe the User Interface (UI) for the AE Application. The AE application provides authorized delegated users the ability to enroll and update Application System Identifications (ASID) using the Integrated Enterprise Portal (IEP).

AIR publications and guides can be found on IRS.gov at Affordable Care Act Information Returns (AIR) Program.

1.1 Background

In March 2010, Congress passed two pieces of legislation that the President later signed into law: the Health Care and Education Reconciliation Act (HCERA) of 2010 and the Patient Protection and Affordable Care Act (PPACA). The HCERA and the PPACA are collectively referred to as the ACA.

To support new ACA regulations that were effective on January 1, 2015, the Internal Revenue Service (IRS) will receive and process information returns reporting on individual's health insurance coverage from insurance companies, self-insured companies, and large businesses and businesses that provide health insurance to their employees.

The Forms 1094/1095-B and Forms 1094/1095-C are classified as information returns and fall under Section 6011(e)(2)(A) of the Internal Revenue Code which provides that any person, including a corporation, partnership, individual, estate, or trust, who is required to file 250 or more information returns, must file such returns electronically. The 250 or more information return requirement applies separately for each type of return and separately to each type of corrected return.

Note: All filers are encouraged to file information returns electronically even if they file less than 250 information returns.

All filing requirements apply individually to each reporting entity as defined by its separate Tax Identification Number (TIN). For example, if a corporation with several branches or locations uses the same EIN, the corporation must aggregate the total volume of returns to be submitted for that EIN and apply the filing requirements to each type of return accordingly.

Issuers should retain a copy of information returns (or have the ability to reconstruct the data) for at least three years from the reporting due date.

1.2 Communications

IRS worked in partnership with many AIR stakeholders to develop the information contained within this publication. Your continued cooperation is requested.

On occasion, you may need to contact IRS regarding electronic filing issues, including AIR topics. A Help Desk has been designated as the first point of contact for electronic filing issues. Software Developers, Transmitters, and Issuers should contact the Help Desk at 1-866-937-4130 for assistance in the following areas:

- ACA Application for Transmitter Control Code (TCC)
- ACA Assurance Testing System (AATS) or Communication Testing
- Transmission issues
- Strong authentication for Application to Application (A2A)
- Rejects
- Technical questions on schemas or business rules

Inquiries regarding issues with the AIR System and the new development of the forms related to the ACA Program may be sent to the <u>airmailbox@irs.gov</u>.

1.2.1 IRS Web Site

For information regarding the AIR system and filing Affordable Care Act Information Returns go to <u>Affordable Care Act Information Returns (AIR) Program</u>. The following resources are available on this webpage:

- ACA Assurance Testing System (AATS) Testing System Information
- ACA Information Return (AIR) Program Did You Know?
- ACA Information Return (AIR) Program Overview
- ACA Information Return (AIR) Schemas and Business Rules

If you encounter an issue or limitation that prevents an information return from being submitted electronically through AIR, and the solution is not posted on IRS.gov for the Affordable Care Act Information Return (AIR) webpage, please call 1-866-937-4130. The AIR staff will then work on making the appropriate corrections or assisting with the issue or limitation. Until corrections can be implemented, AIR will develop "workarounds", which are temporary changes to allow the return to be transmitted electronically. Workarounds are posted by Tax Year (TY) under the "Known AIR Electronic Filing Issues and Solutions" heading.

AIR uses QuickAlerts, an IRS e-mail service, to disseminate information quickly regarding AIR issues to subscribers. This service keeps tax professionals up to date on AIR issues throughout the year, with particular emphasis on issues during the filing season. After subscribing, customers will receive "round the clock" communications about issues such as electronic specifications and system information needed for Software Developers, Transmitters, and Issuers to transmit the information returns Forms 1094/1095-B and Forms 1094/1095-C to IRS. New subscribers may sign up through the "subscription page" link located on the QuickAlerts "More" e-File Benefits for Tax Professionals page.

2 General Information about AIR

AIR accepts the following information return transmittals and documents in TY 2015 (PY 2016):

- Form 1094-B, Transmittal of Health Coverage Information Returns
- Form 1095-B, Health 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

AIR will process each submission and provide a status and detailed acknowledgement for the Transmitter. Generally, the Form 1095-B and 1095-C will be submitted with their associated transmittals, Form 1094-B and Forms 1094-C; however, in certain circumstances, the Form 1094-C can be submitted alone.

Note: Please refer to Publication 1220, "Specifications for Electronic Filing of Form 1097,1098,1099,3921,3922,5498 and W-2G", for non-ACA Information Return test instructions; all other information returns can be electronically transmitted through Filing Information Returns Electronically (FIRE).

2.1 Uniquely Identifying the Transmission

The XML Schemas for Forms 1094/1095-B and Forms 1094/1095-C include elements designed to uniquely identify ACA Information Returns transmissions, submissions within the transmission, and records within the submission. Transmitters must generate unique identifiers (IDs) and maintain them along with their associated transmissions. Unique IDs are used to simplify and increase the precision of communications, replacements and corrections.

Transmitters uniquely identify each Transmission with a Unique Transmission ID (UTID). However, Corrections and Replacements utilize the Receipt ID which is generated by AIR in combination with the Submission and Record Identifiers as described in Section 7.2 Transmitting Corrections.

A transmission will contain one or more submissions. A transmission must not contain included submissions of Forms 1094/1095-B and Forms 1094/1095-C.

Each transmission will be identified via the **Unique Transmission ID** (UTID).

The format for the UTID includes various fields separated by colons (:) as follows:

• UUID – a **universally unique identifier** (UUID) is an identifier standard defined by the Internet Engineering Task Force (IETF) in Request For Comments (RFC) 4122. The UUID consists of a 16-octet (128-bit) number. This is a mandatory field: the UUID is represented by 32 hexadecimal digits, displayed in five groups separated by hyphens. For example:

550e8400-e29b-41d4-a716-446655440000

- Application ID the Application ID will be SYS12 and is a mandatory field.
- Transmitter Control Code is an alphanumeric field that will contain the Transmitters TCC and is mandatory.
- Reserved is an empty field (no space between colons).
- Request Type the Request Type defines the types of request which must be "T" (Transactional) and is mandatory.

The UTID for the transmission will be (See Figure 2-1):

• 550e8400-e29b-41d4-a716-446655440000;**SYS12**;**BB002**;:T

Unique Transmission Identifier (UTID)

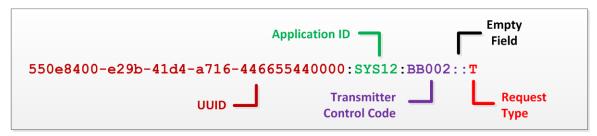


Figure 2-1: Layout of Unique Transmission Identifier (UTID)

Every ACA transmission that AIR receives will be checked to ensure that the UTID is unique (has not been previously submitted to the AIR system). If a UTID is found not to be unique, the transmission is rejected and no further processing occurs on the transmission.

The Submission Identifier (SID) construct is applicable to all *transmittal records* (Forms 1094) within a transmission regardless of the type of information return. Each Form 1094 within a transmission will include a SID that will start at one and increment by one for each subsequent Form 1094 within the transmission. Do not include leading zeros. The SID is defined in the xml schema as a non-negative integer which, while having an upper bound, is sufficiently large enough that the 100 MB Form Data File constraint dictates the number of submissions that can be included in a transmission.

A submission will contain one or more Form 1095-B or Form 1095-C. The Record Identifier (RID) construct is applicable to all *recipient* (Form 1095) records within a submission regardless of the type of information return. Each recipient record in a submission will include a RID that will start at one and increment by one for each subsequent record in the submission.

2.2 Validating Unique IDs

IRS validates that this protocol is followed and will reject transmissions when any one or more of the following conditions apply:

- The UTID is not unique or does not conform to the pattern assigned in the XML Schema
- Transmission, Submission or Record identifiers are missing, duplicated or out of order
- Submission and Record sequence numbers are not sequential

3 Submitting the ACA Application for Transmitter Control Code (TCC)

If you are an employer or insurance issuer/carrier responsible for filing 250 or more ACA Information Returns, you are required to file them electronically. ACA Information Returns must be filed through AIR using an ACA Transmitter Control Code (TCC). ACA Information Returns may not be filed using any other Transmitter Control Code (FIRE TCC) or Electronic Filing Identifier (EFIN or ETIN).

Who should apply for an ACA Transmitter Control Code?

If you are transmitting information returns to the IRS or if you are developing software to file information returns electronically, you must apply for one or more TCCs using the ACA Application for Transmitter Control Code (TCC) available online from e-services on irs.gov. A single application can be used to apply for multiple roles and the necessary TCCs. If you are an employer or insurance issuer/carrier using a 3rd party to prepare and transmit you information returns to the IRS, you do not need to obtain a TCC. The table below provides examples of who should apply for a TCC.

Table 3-1: TCC Roles

| If | And | Then |
|--------------------------------------|---------------------------------|--------------------------|
| I am a commercial Software | I will transmit information for | Select both the Software |
| Developer developing software | employers or insurance | Developer role and the |
| and selling software packages to | issuers/carriers, | Transmitter role on your |
| employers and insurance | | application. |
| issuers/carriers, | | |
| issuers/carriers, | | |

| I am an employer or insurance issuer/carrier purchasing a software package, | I will transmit my own information returns | Select the role of Issuer on your application. Note : You may not use an Issuer TCC to transmit information returns for other employers or insurance issuers/carriers. |
|---|--|--|
| I am an employer or insurance issuer/carrier purchasing a software package, | I will transmit my own information returns and transmit for other employers or insurance issuer/carriers, | Select the role of Transmitter on your application. Note: The TCC for a Transmitter can be used to transmit your own returns and others. You may not use an Issuer TCC to transmit information returns for other employers or insurance issuers/carriers. |
| I am an employer or insurance issuer/carrier <u>developing</u> my own software package, or who has contracted with someone to develop a unique package for my sole use, | I will perform the software testing with the IRS <u>and</u> transmit my own information returns, | Select the role of Software Developer and Issuer on your application. |

Submitting the ACA Application for TCC begins with the Responsible Official and Contacts registering for eservices. For more information on the registration process, go to irs.gov Registration Services. Once the registration is complete, including the confirmation process, the Responsible Official can begin the application for TCC process.

Each Responsible Official will need to sign the Terms of Agreement using the PIN that was selected during the e-Services Registration process. Below are the available titles for Responsible Officials:

Table 3-2: Responsible Official Titles

| Business Type | Titles |
|--|---|
| Partnership and Limited Liability Partnership | Partner, General Partner, Limited Partner, LLC Member, Manager, Member, Managing Member, President, Owner, Tax Matter Partner (TMP) |
| Corporations, Personal Service Corporation and Limited Liability | President, Vice President, Corporate Treasurer/Treasurer, Assistant Treasurer, Chief Accounting Officer (CAO), Chief Executive Officer (CEO), Chief Financial Officer (CFO), Tax Officer, Chief Operating Officer, Corporate Secretary/Secretary, Secretary Treasurer, Member |

| Corporations | |
|---|--|
| Association, Credit Union, Volunteer Organization, State Government Agency | President, Vice President, Treasurer, Assistant Treasurer, Chief Accounting Officer, Tax Officer, Chief Operating Officer, Chief Executive Officer (CEO), Chief Financial Officer (CFO), Executive Director/Director, Chairman, Executive Administrator/Administrator, Receiver, Pastor, Assistant to Religious Leader, Reverend, Priest, Minister, Rabbi, Chairman, Secretary, Director of Taxation, Director of Personnel, Tax Officer |
| Sole Proprietor | Owner, Sole Proprietor, Member, Sole Member |

After all listed Responsible Officials have entered their PIN on the Terms of Agreement page, submit the application for processing. Note: All Responsible Officials and Contacts on the application must be registered with e-Services before the application can be submitted.

Responsible Official - individuals with responsibility for the authority over the electronic filing of ACA Information Returns operation at the firm or organization location. Responsible Official is also the first point of contact with the IRS who has authority to sign original/revised ACA Application for TCC, and is responsible for ensuring that all requirements are adhered to. At least two Responsible Officials will need to be listed on the application. All Responsible Officials will be required to sign the application. A Responsible Official can also be a Contact on the application.

Contact - individuals who may be responsible for transmitting and/or are available for inquiries from the IRS on a daily basis. There is a minimum of 2 required Contacts and a maximum of 10 contacts allowed per application.

The ACA Application for TCC contains three separate roles: Software Developer, Transmitter, and Issuer.

Complete the ACA Application for TCC if your firm or organization is performing one or more of the following roles:

- **Software Developer**: An organization writing either origination or transmission software according to IRS specifications.
- **Transmitter**: A third-party sending the electronic information return data directly to the IRS on behalf of any business.
- Issuer: A business filing their own ACA Information Returns regardless of whether they are required to file electronically (transmit 250 or more of the same type of information return) or volunteer to file electronically. The term issuer includes any person required to report coverage on Form 1095-B and any applicable large employer required to report offers of coverage on Form 1095-C and file associated transmittals on Form 1094-B or 1094-C.

These roles are not mutually exclusive, for example, a firm or organization may be both a Transmitter and a Software Developer. In addition to the roles the firm or organization will perform, the application will require the transmission method for Transmitters and Issuers or the transmission method(s) the software packages will support.

The application does not have to be completed in a single session. A tracking number is provided when the application is submitted or when the application is in "Saved" status.

Note: In certain situations the information submitted requires further review by the IRS before a TCC can be issued. In these cases, the IRS will contact the Responsible Official of record regarding any additional information that may be needed.

Once an ACA Application for TCC is processed and completed, TCCs, and Software IDs if applicable, are sent via USPS and are available on the summary screen of the applicant's online application. Applicants will receive a TCC for each role selected on their application.

3.1 Transmitter and Issuer TCCs

Depending on the roles selected on the application, one or more TCCs will be assigned. Each TCC will have an indicator of Test "T" or Production "P" and status of Active, Inactive, or Dropped. See the example below:

Transmitters, including Issuers, are issued a TCC in Production status, or "P"; however, the Form T/P Indicators associated with the TCCs are in Test "T", until required Communication Testing is completed.

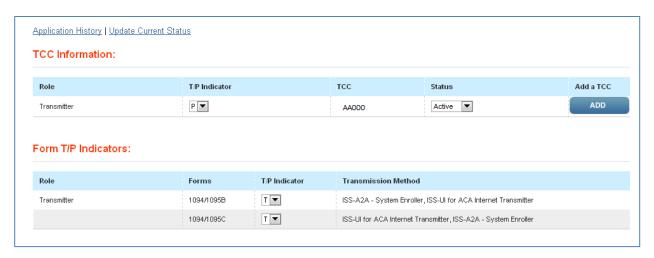


Figure 3-1: Example of Transmitter TCC and Form Status

Once the Communication Testing is passed, the associated Form T/P Indicators are moved to Production "P". When the Form T/P Indicators are moved to Production, the Transmitter or Issuer may only use the TCC to submit live data to Production..

3.2 Software Developer TCCs

After selecting the Software Developer role on the application, additional information about the transmission method and the software packages being developed is required. The TCC is permanently assigned to Test Status. The tax year(s) for the information returns supported, transmission method(s), form type, and software package type (Custom off the Shelf (COTS), Online, In-house) are also required. Each Software Package and Form has a

separate status; if your Software Package supports more than one Form (e.g. 1094/1095-B and 1094/1095-C), both Forms must be in Production before the Software Package is moved in Production.



Figure 3-2: Software Package Identifiers and Status Indicators

Software Package information must be updated annually online through the *ACA Application for TCC***.** New Software IDs will be assigned for each tax year. To update your application, the Responsible Official should go to the Application Details page and click the "Add" button under the Software Developer Package List.

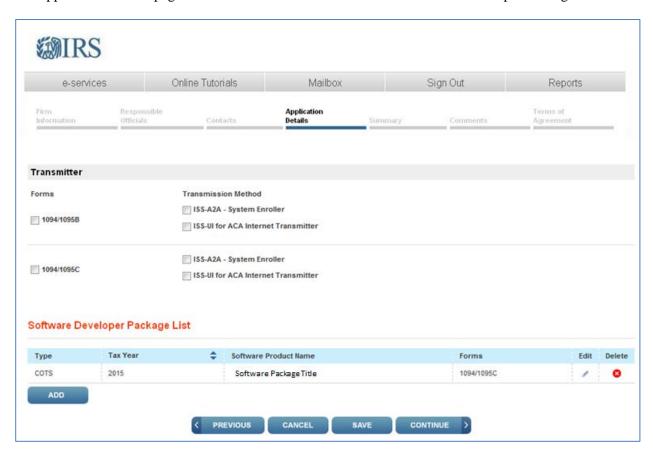


Figure 3-3: Add Software Developer Package

4 Transmissions and Data Structures

This section provides an overview of transmission methodology, transmission composition, as well as data structure needed to successfully transmit ACA Information Returns to the IRS. AIR data must be in properly structured Extensible Markup Language (XML) format and transmitted using services made available by the IRS via one of two possible channels.

The data exchanged between the Transmitters, including Issuers, and the ACA Information Return (AIR) system via XML messages or files conforms to the Simple Object Access Protocol (SOAP). There are two data communication channels between external clients and the AIR system.

- The ISS-UI channel –The data are exchanged in files with XML data structures using the HTTPS protocol (HyperText Transfer Protocol (HTTP) over a Transport Layer Security (TLS) connection).
- The ISS-A2A (A2A) channel –The data are exchanged in SOAP messages using the Web Services requestresponse model transport mechanism over an HTTPS connection.

4.1 Web Services

Transmitters can transmit ACA Information Return submissions using Web Services. The IRS uses SOAP with HTTP binding for the transmission file, which are SOAP messages transported over a HTTPS connection. A comprehensive understanding of Web Service SOAP messaging is necessary in order to create software capable of transmitting data to the IRS.

4.2 Transmission File and Soap Message

The transmission file for transmitting ACA Information Returns to the IRS is a MIME (Multipurpose Internet Mail Extensions) multipart document that contains two parts that conforms to "SOAP 1.1 with attachments" standard as given below:

- The first part of the multi-part document is the **SOAP envelope** (as described below) that contains transmission level information.
- The second part of the document is a **SOAP attachment** that contains the ACA Information Return Submissions.

SOAP is an XML based protocol used to encode the information in Web Service request and response messages before transmitting them over a network. A SOAP message is a simple XML document that consists of a SOAP Envelope with the following elements:

- A SOAP Header element that contains header information (ACA header, manifest and security elements)
- A SOAP Body element that contains request and response information and the reference to the MTOM attachment
- A SOAP Fault element containing errors and status information

The second part of the message, MIME (Multipurpose Internet Mail Extension) is the SOAP attachment which contains the ACA Information Return Submission(s) as an MTOM (Message Transmission Optimization Mechanism) encoded attachment. The data in the MTOM attachment must remain in uncompressed, native XML format. See example below.

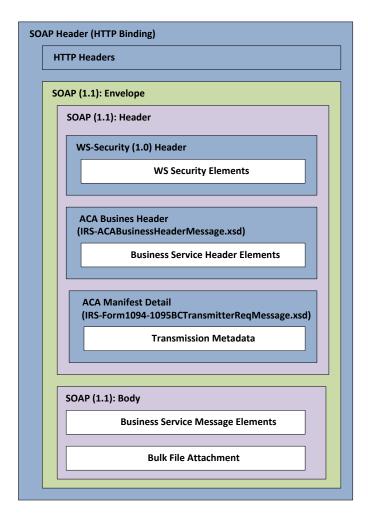


Figure 4-1: SOAP Message Structure

4.3 Transmission/Submission Definitions and Limitations

A transmission is defined as a separate package of electronic AIR documents including manifest, header and information return documents sent to the IRS.

Transmissions:

- Consist of one or more submission
- Must not contain submissions of different types (must not have both Forms 1094/1095-B and Forms 1094/1095-C in the same transmission)
- The MTOM attachment may not exceed 100 MB of uncompressed native XML

For the purposes of this document, a submission is defined as the combination of a single transmittal form and its associated information returns.

Submissions:

- The reported number of information returns on the transmittal form must match the actual number of information returns.
- If a submission is larger than 100 MB, it must be split into two or more transmissions in the following way:
 - o The first submission will consist of the Forms 1094 and as many Forms 1095 as will fit within the 100 MB limit

The subsequent submission(s) will include Forms 1094, and as many associated Forms 1095 as can be contained without exceeding the 100 MB size limit.

The conceptual structure of AIR SOAP MTOM attachments are depicted in Figure 4-2

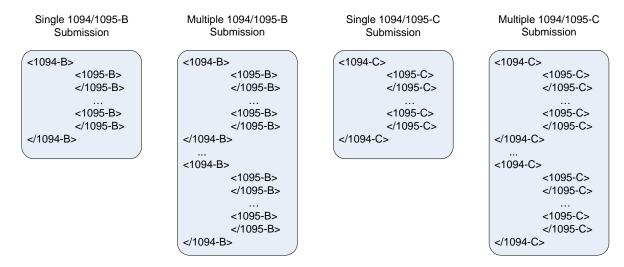


Figure 4-2: Conceptual Structure of IRS AIR SOAP MTOM Attachments

4.4 Transmitting Information Returns

Transmitters, including Issuers, transmit information returns to the IRS and receive a Receipt ID and other information relevant to the transmission as part of a synchronous session. Once the transmitter submits their Information Return, the transmission passes security scanning in the IRS Portal, the message schema validation performed in the IRS Portal passes, and the size of the message is checked at the IRS Portal to ensure it is within allowable constraints, processing continues. If any of these checks fail, an error prefixed with 'TPE' is returned to the transmitter. If every validation passes at the IRS Portal, the transmission reaches AIR. AIR will do initial validations such as Manifest TCC validation and generate Receipt ID to the transmitter.

The Receipt ID is returned to the transmitter almost immediately after successful transmission. For ISS-UI, the Receipt ID will be displayed via web browser upon successful transmission. For ISS-A2A, the Receipt ID will be part of the system-to-system response. If the transmission does not pass security or manifest schema validation at the portal level, the transmitter will receive a fault response but a receipt ID will not be provided. The Receipt ID does not provide proof that the ACA Information Returns in the transmission were either accepted or rejected. The Receipt ID does provide proof that the IRS received the file. The Transmitter must retrieve their Acknowledgement to obtain proof of acceptance or rejection.

The IRS has built two data communication channels that can be used to transmit AIR documents between Transmitters and Issuers and the AIR system. Both channels require the submissions to be self-contained in a single uncompressed XML formatted file. For detailed information regarding the IRS Submission File structure, including the XML Schema containing the required Tag Names/Element Names and Namespaces, refer to the AIR *Submission Composition and Reference Guide* located under the *ACA Information Returns Publications/Guides* table on irs.gov at Affordable Care Act Information Returns (AIR) Program.

4.4.1 Transmitting via the User Interface (UI) Channel

Transmitters or Issuers must have an active IRS account and have been approved to transmit ACA Information Returns. See Section 3 above for information about obtaining an account and applying for an ACA Information Return TCC. The Transmitter or Issuer will be required to log in to the IRS Registered User Portal (RUP) and

invoke the appropriate link for AIR. AIR will allow the Transmitter or Issuer to either transmit submissions to the IRS or retrieve acknowledgements for those transmissions from the IRS.

The web browser will allow for the client to upload an uncompressed native XML manifest file which includes all of the Transmitter information. The Forms 1094/1095-B or Forms 1094/1095-C data are included in an uncompressed native XML file. Once the required information is interactively entered, the client uses their Web Browser to browse for the respective uncompressed native XML file that contains Forms 1094/1095-B or Forms 1094/1095-C and uploads the file to the IRS.

The IRS consumes the transmission information, including the Form Data Files and performs security scanning on the inbound transmission. If threats such as SQL Injection, XML Bombs, viruses, etc. are detected, the IRS will reject the transmission and inform the Transmitter or Issuer of the rejection. If no security threats are detected, the IRS performs receipt processing on the transmission and returns a Receipt ID, the transmission file name, the UTID, and a Timestamp to the Transmitter's or Issuer's Web Browser as part of the synchronous session. The Receipt ID is the key information required for a Transmitter or Issuer to retrieve the acknowledgement for the respective transmission. As such, the Receipt ID returned to the Transmitter or Issuer should be kept with the transmission and protected from loss or deletion.

If the Transmitter or Issuer does not receive the Receipt ID for some reason (e.g., the session times out or is terminated) or it is accidentally lost or deleted, call the Help Desk, toll-free, at 1-866-937-4130 and request the Receipt ID for the transmission. The Help Desk assistor will require the user to identify themselves, their TCC and other relevant information and will provide the respective Receipt ID to the Transmitter or Issuer.

Data are uploaded in uncompressed native XML files using the HTTPS protocol. For more specific information on creating transmission files for the UI channel, refer to the AIR Submission Composition and Reference Guide located on irs.gov at Affordable Care Act Information Returns (AIR) Program.

4.4.2 Transmitting via the Application to Application (A2A) Channel

Transmitters can transmit ACA Information Return submissions using Web Services. The IRS uses SOAP with HyperText Transfer Protocol (HTTP) binding for the transmission file, which are SOAP messages transported over a HTTPS connection (HTTP over TLS – Transport Layer Security) protocol. A comprehensive understanding of Web Service SOAP messaging and Web Services Standards is necessary in order to create software capable of transmitting data to the IRS.

The Transmitter or Issuer will be required to include their digital certificate and a digitally signed hash of certain message structures in the WS-Security Header of the SOAP Message and invoke the appropriate URL for the Web Service endpoint that exposes the service that the Transmitter is invoking.

The ISS-A2A will perform authentication and authorization, threat mitigation, and initial validation. The ISS-A2A will return a fault if a transmission contains a threat, if a transmission fails initial validation, or if a connection with the endpoint cannot be established.

Transmitters or Issuers must have an active IRS account, have been approved to transmit ACA Information Returns, and have completed the Automated Enrollment application required to invoke the A2A channel. See Section 3 above for information about obtaining an account, applying for an ACA Transmitter Control Code (TCC), and completing the Automated Enrollment application.

The Transmitter will be required to include their digital certificate and a digitally signed hash of certain message structures in the WS-Security Header of the SOAP Message and invoke the appropriate URL for the Web Service endpoint that exposes the IRS-ACASubmitService within the ACAGetTransmitterBulkRequestService.wsdl.

Required information pertaining to the Transmitter or Issuer and the transmission are included as part of the SOAP message (in the SOAP Header) that is transmitted to the IRS in a SOAP Request message. The Forms 1094/1095-B or Forms 1094/1095-C data are included in an uncompressed native XML file that is attached to the SOAP Message as an MTOM encoded attachment.

SOAP messages are exchanged with the IRS using the Web Services request-response model transport mechanism using the HTTPS protocol. For specific information on creating A2A Messages, refer to the *AIR Submission Composition and Reference Guide*, which can be found at AIR User Guides & Publications.

The IRS consumes the SOAP message and performs security checks and XML Schema validation on the inbound transmission. If threats are detected or XML Schema validation fails, the IRS will reject the transmission and inform the Transmitter or Issuer of the rejection. If no security threats are detected, the IRS performs receipt processing on the transmission and returns a Receipt ID, the UTID, and a Timestamp to the Transmitter or Issuer in the SOAP Response message as part of the synchronous session. The Receipt ID is the key information required for a Transmitter or Issuer to retrieve the acknowledgement for the respective transmission. As such, the Receipt ID returned to the Transmitter or Issuer should be kept with the transmission and protected from loss or deletion.

If the Transmitter or Issuer does not receive the Receipt ID for some reason (e.g., the session times out or is terminated) or it is accidentally lost or deleted, call the Help Desk, toll-free, at 1-866-937-4130 and request the Receipt ID for the transmission. The Help Desk assistor will require the user to identify themselves and the UTID for the transmission in question and will provide the respective Receipt ID.

4.4.2.1 Strong Authentication

All external partner communication will need to support encryption using TLS 1.1 and TLS 1.2. Federal Information Processing Standards (FIPS) 140-2 compliant cryptography will be used for strong and secure communication between Transmitters and the IRS. The A2A registration and enrollment process for Transmitters and their application system is an automated process.

The user can log into the Information Submission Service (ISS) and access the Automated Enrollment (AE) application to enroll and maintain their application systems. The authorized user can perform the following functions relative to their A2A Client System ID (ASID) for their organization:

- Enroll, Update, Un-enroll ASID
- View a deleted ASID
- Inactivate, Activate ASID
- Replace the certificate for ASID

The Automated Enrollment for ACA Providers External Guide describes the automated enrollment process and can be found on the <u>AIR User Guides & Publications</u> page.

The IRS requires strong authentication when transmitting via the A2A channel, which will affect authentication techniques for all A2AWeb services. The strong authentication certificate/credential will replace the password and the ACA Information Returns Web Service endpoint Web Services Definition Language (WSDL) will accommodate this credential. Each Transmitter will be required to register their certificate with AIR through the AE

application. Software Developers must use the set of WSDL files provided by the IRS to build their application so that they can use strong authentication.

The AIR Submission Composition and Reference Guide, which can be found at AIR User Guides & Publications, is available which explains the integration and uses of this IRS-provided client code sample to support certificate-based authentication for AIR A2A Web services. In addition to the code itself, this guide provides necessary information for developers to use when integrating the new feature into client software that communicates with the IRS A2A Web services.

4.4.2.2 Certificate Management

The IRS requires the use of client digital (X.509) certificates issued by IRS-designated certificate authorities (see listing in Section 4.4.2.3 for a list of approved Certificate Authorities) to provide enhanced authentication of external partner application systems for A2A Web service processing. This capability is intended to mitigate threats defined in Treasury Department Publication 85-01, Department of the Treasury Information Technology (IT) Security Program, Vol. II, Handbook, Part 1, Sensitive Systems, Section 5.4.4.

To meet the requirements stated in the Treasury directive, the system will:

- 1. Provide verification of a digital signature of appropriate message parts produced using the private key for the X.509 certificate submitted with the authentication request, and shall prevent (fail) authentication if this verification fails.
- 2. Verify that a submitted X.509 certificate is properly formatted and is verified by appropriate CA signature, and shall prevent (fail) authentication if this verification fails.
- 3. Provide checks to ascertain that a submitted X.509 certificate has not been revoked, using most current Certificate Revocation List (CRL) resources from IRS-designated CAs, and shall prevent (fail) authentication if the certificate has been revoked. CRLs will be retrieved from each IRS-designated CA based on the schedule of available updates for that CA, so that the most up-to-date CRL will be made available for A2A authentication.
- 4. Provide checks to ensure that a submitted X.509 certificate has not expired, and shall prevent (fail) authentication if the certificate has expired.
- 5. Ensure that a submitted X.509 certificate matches a certificate previously registered for the application system using data stored in the IRS directory by an enrollment process, and shall prevent (fail) authentication if the match cannot be made.
- 6. Mitigate replay attacks for authentication.
- 7. Provide error handling by which any external failing strong authentication for any reason will receive a SOAP fault response message stating that "Authentication Failed."
- 8. Provide adequate capacity for A2A certificate-based authentication.
- 9. Ensure that authentication attempts and results are audited and incorporated into log files for audit and forensic purposes.
- 10. Accommodate external users that have one or more sites (and client certificates) associated with a single Public Key Infrastructure (PKI) sponsor.
- 11. Register valid certificates for each enrolled external application system using an automated enrollment process. The authentication credentials structure shall be changed for all A2A Web service requests to accommodate session-less requests.

A2A Transmitters must use digital certificates (X.509) versus passwords upon proper enrollment and registration of the certificate. Encryption of the signing key is important on your system. Do not store an unencrypted copy of the signing key on your system. The signing key should be stored in a standard encrypted key store.

The remainder of this section identifies the IRS approved Certificate Authorities where X.509 digital certificates may be obtained.

4.4.2.3 Authorized Certificate Authorities

Digital certificates bind digital information to physical identities and provide non-repudiation and data integrity. Before you begin the Automated Enrollment (AE) process, each entity should obtain one valid digital certificate issued by an approved Certificate Authority (CA). AE only recognizes and accepts digital certificates issued by IRS approved certificate authorities, listed below.

| Certificate Authority | Type of Certificate |
|--|--|
| Identrust ACES SSL, naming a server | Go to <u>Identrust</u> and choose the Certificates menu and the type of ACES (currently <u>ACES</u> SSL). The type to choose is "ACES SSL Server". |
| Identrust ACES Business Representative, naming an individual | Go to identrust and choose the Certificates menu and the type of ACES (currently ACES Business Representative). The type to choose is "ACES Business Representative". |
| ORC ACES Business Representative, naming an individual | Go to ACES ORC and follow the "Get Certificate" button. When you reach the "Select a Certificate" screen, choose "Business Representative". Please note that we have not tested with the Government Representative types and do not know if they will work with our system. We don't expect state and local governments to use ORC Government Representative certificates. |
| ORC ECA, naming a server | Go to ORC ECA and select "Order Component/Server Certificates". On the screen for order, please choose "Server Certificates". |

4.5 Retrieving Acknowledgements

Transmitters, including Issuers, must have an active IRS account and have been approved to transmit ACA Information Returns. See Section 3 above for information about obtaining and account and applying to for an ACA Application for TCC. AIR will allow the Transmitter or Issuer to either transmit submissions to the IRS or retrieve Acknowledgements for those transmissions from the IRS. The transmission Acknowledgement consists of the status of transmission and includes any details of errors that were found when the IRS processed the XML transmission file (Form Data File). The status of the transmission includes one of the following:

 Processing (the IRS has not completed processing the transmission. no XML Error Data file or MTOM encoded attachment is included)

- Accepted (the IRS has successfully processed and accepted the transmission, no XML Error Data file or MTOM encoded attachment is included)
- Accepted with errors (the IRS has successfully processed and accepted the transmission with some errors, an XML Error Data file or MTOM encoded attachment is included containing the details)
- Partially Accepted (the IRS has successfully processed the transmission, accepted and rejected one or more submissions contained in the transmission, an XML Error Data file or MTOM encoded attachment may or may not be included)
 - No fatal errors were identified while processing the transmission metadata
 - At least one submission within the transmission was accepted (with or without errors)
 - o At least one submission within the transmission was rejected as unusable data (exceeded threshold)
- Rejected (the IRS rejected the transmission as it could not be processed successfully an XML Error Data file or MTOM encoded attachment may or may not be included)
- Not Found (The Receipt ID in the request was not found, no XML Error Data file or MTOM encoded attachment is included)

The details of errors found when IRS processed the XML file are made available to the Transmitter via display on their web browser (UI channel) or are included in an XML file attached to the SOAP Response in an MTOM encoded attachment (A2A channel). In the event that the error detail exceeds the 100 MB limit, the error reporting will be truncated and a message indicating that the error detail was truncated will be included in the file.

4.5.1 Retrieving Acknowledgements via the UI Channel

Transmitters may request a status of the transmission. IRS' response to this request will also include a detailed acknowledgement which will contain details such as any business rules validation errors, and TIN validation failures. The Transmitter or Issuer will be required to log in to the IRS Integrated Enterprise Portal (IEP) and invoke the appropriate URL for AIR. The Transmitter shall select the option to retrieve acknowledgements.

Once the required information is interactively entered, the user submits the request. The Receipt ID and the TCC are the key information required to retrieve the Acknowledgement for the respective transmission. As such, the Receipt ID returned should be kept with the transmission and protected from loss or deletion.

Note: When retrieving acknowledgements via the UI Channel, no XML files are required to be uploaded.

The IRS retrieves the transmission status and, if processing errors were identified by the IRS, provides the capability to view the error detail as part of the synchronous session. From the UI Channel, the Error Data File may also be downloaded by the transmitter for detailed analysis of the corrections required.

For details on how to construct and receive status and acknowledgementssee *AIR Submission Composition and Reference Guide* on irs.gov under <u>AIR User Guides & Publications</u>.

4.5.2 Retrieving Acknowledgments via the A2A Channel

The Transmitter or Issuer will be required to include their digital certificate and a digitally signed hash of the message in the WS-Security Header of the SOAP Message and invoke the appropriate URL for the Web Service endpoint that exposes the IRS-ACAAckngService service within the ACAGetTransmitterBulkRequestStatus.wsdl. The Receipt ID is the key information required for a Trading Partner to retrieve the Acknowledgement for the respective transmission. As such, the Receipt ID returned to the Third Party should be kept with the transmission and protected from loss or deletion.

Required information pertaining to the Transmitter or Issuer and the transmission are included as part of the SOAP message (in the SOAP Header) that is transmitted to the IRS in a SOAP Request message.

The IRS consumes the SOAP message and performs security scanning and XML Schema validation on the inbound transmission. If threats are detected or XML Schema validation fails, the IRS will reject the transmission and inform the Transmitter or Issuer of the rejection. If no security threats are detected, the IRS retrieves the acknowledgement including the status and the error data file (if processing errors were identified by the IRS), and returns them in the SOAP Response message as part of the synchronous session. The file (if included) is an uncompressed native XML formatted file that will not exceed 100 MB attached to the message as an MTOM encoded attachment.

4.6 XML Overview for AIR

The IRS uses XML, a language that specifies the structure and content of electronic documents and files to define the electronic format of ACA Information Returns. This section explains some of the elements of an XML document.

4.6.1 AIR XML Schema Package Structure

This section describes the AIR XML Schema file structure and how the schemas will be packaged as of the date this publication was issued.

Schemas for a given ACA Information Return are developed by the respective projects and submitted to the IRS Unstructured Data Practice (UDP) Group. The UDP Group integrates the project XML Schemas into a standard ACA XML Common Library. The ACA XML Common Library consists of several common XML Schema building blocks as follows:

- IRS-CAC.xsd contains common aggregate components
- IRS-CBC.xsd contains common basic components
- IRS-SDT.xsd contains specialized data types

The ACA XML Common Library is built following IRS Enterprise Standards, Naming, and Design Rules.

The common XML Schema building blocks are packaged into a COMMON folder within the XML Library structure as follows:

```
XML Library n.n
COMMON
```

The ACA XML Library for AIR includes the following folders:

EXT

IRS-EXT-ACA-AIR-7.0.xsd

MSG

Various .xsd and .xml – contains the Message, Form Data File, Manifest File, and Error Data File

SRV

 $ACAGetTransmitterBulkRequestService - \ the \ WSDL \ for \ the \ transmission \ endpoint \ ACAGetTransmitterBulkRequestStatus - \ the \ WSDL \ for \ the \ retrieve \ acknowledgements \ endpoint \ endpoint \ acknowledgements \ endpoint \ endpoint$

In addition to the schema files, there are five business rule files, one for each Form 1094-B, Form 1094-C, and Form 1095-C and one for the Manifest/Header. The schema and business rule files can be found on the irs.gov <u>AIR Program page</u>.

4.6.2 AIR XML Structure

For more information on how to compose submission and transmission files sent to IRS for processing using the AIR System, refer to the *AIR Submission Composition and Reference Guide* posted to <u>AIR User Guides & Publications</u>.

When entering character data into an XML document, it is important to ensure that the specified encoding supports the characters provided. By design, AIR uses Unicode Transformation Format-8 (UTF-8). AIR does not support any other encoding scheme (for example, UTF-16 and UTF-32).

4.6.3 Prohibited and Constrained Special Characters

Software Developer, Transmitters, and Issuers must not include certain special characters in any character data included in the XML of the SOAP message or the XML file attached to the SOAP message. The following special characters must not be included in any of the data fields for either Forms 1094/1095-B or Forms 1094/1095-C transmissions:

| Character | Character Description |
|-----------|-----------------------|
| | Double Dash |
| # | Hash Key |

Table 4-1: Special Characters Not To Be Included in Any Data Field

A transmission which contains any of the special characters identified in Table 4-1, either in the SOAP Message or in the XML file, will be rejected upon receipt by the IRS.

• Example 1: If a record has a last name data field containing MyCorp #10, then the transmission must not include the hash key/pound sign so that the data field instead contains MyCorp 10.

Example 1: If a record has an address data field containing NoPlaceWay-Suite 4, then the transmission must not include the double dash so that the data field instead contains NoPlaceWay-Suite 4.

The following special characters must be escaped before they are included in any of the data fields for the transmission of either Forms 1094/1095-B or Forms 1094/1095-C transmissions:

| Character | Character Description | Character Allowed? | Escape Characters | Escape Character Allowed |
|-----------|-----------------------|--------------------|-------------------|--------------------------|
| & | Ampersand | Rejected | & | Allowed |
| 4 | Apostrophe | Rejected | ' | Allowed |
| < | Less Than | Rejected | < | Allowed |

Table 4-2: Allowable Characters

Note: Any special characters that have not been listed in the Table 4-1 or Table 4-2 will be allowed as-is. Certain elements may be restricted by XML schema data element definitions.

4.6.4 Tag Names

Each field on an ACA Information Return document is identified using an XML tag name within the XML schema.

Tag names were created using the following conventions:

- A meaningful phrase with the first letter of each word capitalized and using no spaces (upper Camel case)
- A length of not more than 30 characters
- Standard abbreviations to meet the tag name 30 character limit

The Tag Names, also known as Element Names were standardized by IRS for all ACA Information Return forms. A notional example of a simple XML element that identifies the record number in a submission would be:

```
<xsd:element ref="UniqueRecordID" minOccurs="1" maxOccurs="unbounded"/>
```

A notional example of a complex XML element that identifies all of the data elements required for Form 1094-B would be:

```
kxsd:complexType name="Form1094BUpstreamDetailType">
    <xsd:annotation>
        <xsd:documentation>
            <Component>
                <DictionaryEntryNm>Form 1094-B Upstream Detail Type</DictionaryEntryNm>
                <MajorVersionNum>2</MajorVersionNum>
                <MinorVersionNum>0</MinorVersionNum>
                <VersionEffectiveBeginDt>2015-04-20/VersionEffectiveBeginDt>
                <VersionDescriptionTxt>Initial version/VersionDescriptionTxt>
                <DescriptionTxt>Form 1094-B - Transmittal of Health Coverage Information Returns/DescriptionTxt>
            </Component>
        </xsd:documentation>
    </xsd:annotation>
    <xsd:sequence>
        <xsd:element ref="SubmissionId"/>
        <xsd:element ref="TestScenarioId" minOccurs="0"/>
        <xsd:element ref="irs:TaxYr"/>
        <xsd:element ref="BusinessName" minOccurs="0"/>
        <xsd:element ref="irs:BusinessNameControlTxt" minOccurs="0"/>
        <xsd:element ref="irs:TINRequestTypeCd" minOccurs="0"/>
        <xsd:element ref="irs:EmployerEIN"/>
        <xsd:element ref="ContactNameGrp" minOccurs="0"/>
        <xsd:element ref="ContactPhoneNum" minOccurs="0"/>
        <xsd:element ref="MailingAddressGrp" minOccurs="0"/>
        <xsd:element ref="Form1095BAttachedCnt" minOccurs="0"/>
        <xsd:element ref="Form1095BUpstreamDetail" maxOccurs="unbounded"/>
        <xsd:element ref="JuratSignaturePIN" minOccurs="0"/>
        <xsd:element ref="irs:PersonTitleTxt" minOccurs="0"/>
        <xsd:element ref="irs:SignatureDt" minOccurs="0"/>
    </xsd:sequence>
    <xsd:attribute name="recordType" type="xsd:string" use="required"/>
    <xsd:attribute name="lineNum" type="xsd:integer" use="required"/>
    <!-- recordType and lineNum are COTS Mandatory Element-->
</xsd:complexType>
```

Figure 4-3: Example of Complex XML Element

4.6.5 Attributes

Attributes provide additional information or describe a constraint of a data element.

• The first letter of the first word of an attribute name is lower case; the first letter of each subsequent word is capitalized (lower camel case).

For instance, in the example of the simple XML element *Form1095BUpstreamDetail* above, maxOccurs="unbounded" identifies that there is no limit to the number of Forms 1095B that can be included in the XML (e.g., the 100 MB file size constrains the number of Recipient records that can be included in a submission).

4.6.6 Repeating Group

Repeating groups are specified in XML schema definitions using the minOccurs and maxOccurs facets on sequence or choice definitions. An example of a repeating group is as follows:

```
<xsd:element ref="EmployerCoveredIndividual" maxOccurs="unbounded"/>
```

The reference element EmployerCoveredIndividual is a required element and there are no constraints as to how many of these elements can be included in the submission. The reference element resolves to the eFile Type EmployerCoveredIndividualType:

```
<xsd:element name="EmployerCoveredIndividual" type="EmployerCoveredIndividualType">
```

EmployerCoveredIndividualType is a complex data element that includes the nodes Covered Individual Name, Social Security Number or Data of Birth, and several other indicators required for the repeating group. All of the elements of the EmployerCoveredIndividualType repeat as each EmployerCoveredIndividual is reported.

The ability to repeat information within the XML Schema is the electronic equivalent of attaching additional forms when there is insufficient space on the form to include all of the information that must be filed (e.g., If there are more than six covered individuals, complete one or more additional Forms 1095-B, Part IV).

4.6.7 AIR Schema and Business Rules

A schema is an XML document that specifies the data elements, structure and rules for the transmission manifest and each form or document. In addition to formats defined by schemas, information returns must also adhere to business rules, which provide a second level of validation for information returns forms processed by the AIR System.

Within the XML schema, data elements are the basic building blocks of an XML document. Schemas recognize two categories of element types: simple and complex. A simple type element contains only one data type and may only have documentation attributes, such as description or line number. A complex type element is an element that has one or more attributes or is the parent to one or more child elements.

The Transmitter and Issuer have the responsibility to provide information as specified by IRS forms, instructions and regulations. The software used to transmit AIR documents to the IRS, must be capable of putting the information in the specified schema while also abiding by all applicable business rules.

IRS created a XML schema for each of the different types of ACA Information Returns (Form 1094-B, Form 1094-C, Form 1095-B, and Form 1095-C), Transmission File, and Acknowledgement File. Each schema also has a respective set of business rules that are used during AIR validation.

Each year, new legislation and/or improvements to IRS programs impact the IRS forms and processing procedures. The IRS evaluates these changes to determine if updates to the XML schemas and business rules are necessary.

When schemas are posted to IRS.gov, IRS will identify when the schemas are available in the AATS and Production environments. Software Developers are not required to retest when new schemas (minor or major) are posted. However, the IRS strongly recommends the use of AATS to retest when Software Developers update their software in response to schema changes.

Note: If there are critical changes required due to late legislation changes, national disasters, or errors identified during testing or production, the IRS may issue updated XML schemas and business rules after December and during the Processing Year (PY).

XML Schema and business rules can be found under the *Additional AIR Information* heading at the IRS web site <u>AIR Program page</u>.

General Information about Version Numbers follows.

Each version of the XML schemas and the corresponding business rules have a unique version number assigned. It is important to note the following principles regarding version numbers:

- Each information return's schema version has an associated set of business rules with the same version number. This ensures that each updated schema version includes an updated set of business rules.
- The "Form*nnnn*UpstreamDetailType" complex element includes a documentation element and dictionary entry name that identifies the form including the major and minor version numbers of the schema for each return type as well as the effective begin date for the XML Schema. For example, the "Form1095BUpstreamDetailType" from the IRS-Form1094-1095BTransmitterUpstreamMessage.xsd file shown below identifies the schema version as v1.0 with an effective date of 2015-01-27.

Figure 4-4: 1095-B Upstream Detail Type

• Each business rule document's version number identifies the version and effective begin date of the business rules.

• The "Active Validating Schema Version" specifies the business rules and schema version that will be used to validate an information return that has been received by the IRS during a timeframe. This provides a mechanism for different versions to be accepted at the same time. It also enables an older version to be validated against a newer version's set of schemas and business rules. The IRS will publish all valid schema/business rule versions.

The active validating schema version will be the most recent schema version posted to IRS.gov. IRS will provide the "Start" dates when schemas are available in Production and AATS. These "Start" dates also represent when the latest schema posted becomes the active validating schema.

4.4.8 Validating Schema Versions

Throughout the year, multiple versions of XML schemas and business rules may be posted to IRS.gov., depending upon whether a change to the schema is major or minor; AIR may not require that the schema version used to submit the return data match the schema version used by AIR during validation. In general, there is one active validating schema version for each return type in a tax year. The schema/business rules tables will include the Start dates and End dates, if applicable, for AATS and Production. The IRS strives to limit the number of schema and/or business rule revisions, especially after production opens.

Minor Schema Changes - When IRS issues revised schemas for a return type and changes the increment
for the minor number, AIR continues to accept returns composed using previous schema versions. When
the minor number is changed, IRS allows Software Developers to decide for themselves whether they need
to use the new version or not based on what is included in their tax preparation software and what changes
were made to the schemas.

Returns may be composed using previously published schema versions but IRS will only validate against the "active validating schema version" when the return is processed. For example:

If the current schema version is 1.0 and the schema change is minor, IRS will assign the new number 1.1. The active validating schema version is 1.1. AIR will continue to accept returns composed using version 1.0. However, all returns (whether composed with version 1.0 or 1.1) will be validated with the new version, 1.1.

• Major Schema Change - When IRS issues revised schemas for an information return type and changes the increment for the major number, all returns must be composed by software using the new version. If information returns are composed using previously published schema versions, they will not validate against the active validating schema version when the return is processed and will be rejected.

For example, if the current version is 1.1 and the IRS decides it can no longer accept information returns composed using schema version 1.1 (or v1.0), it will assign the new major number 2.0. The active validating schema version is 2.0. Returns submitted with 1.1 or earlier will be rejected for using an unsupported schema version.

Software Developers and Transmitters should select the applicable form type on the AIR Schemas and Business Rules page to get information about all active and prior year schemas and business rules used by the AIR Production and AATS.

Below is an example of the information provided regarding the schema released for ACA AIR:

| Version | Date Posted | AATS Dates | Production Dates |
|----------|-------------|---|--|
| 2015v1.0 | 8/24/2015 | Start Date:Not Valid for AATS End Date: Not Valid for AATS | Start Date: Not Valid for Production End Date: Not Valid for Production |

The schema/business rules tables will include the AATS and Production Start dates and End dates if applicable. IRS always strives to limit the number of schema and/or business rule revisions, especially after production opens.

4.6.8.1 Example of Schema Versioning

The XML Schema and Business rules are posted on irs.gov at <u>Affordable Care Act Information Returns (AIR) Schemas and Business Rules</u>. The site provides information and technical guidance for software developers and transmitters who are interested in developing software for AIR for Tax Year 2015. Included are the XML Schemas, Business Rules, Release Memorandums and specific instructions.

Below is a sample of the AIR Forms XML Schemas Versioning:

Figure 4-5: Schema Samples for AIR Forms

5 Transmission Methods for AIR

Transmitters can transmit ACA Information Return submissions using Web Services or Web Application. The following sections describe the specific details.

5.1 Transmitting Through the ISS-A2A Channel

Transmitters can transmit ACA Information Return submissions using Web Services. The IRS uses SOAP with HyperText Transfer Protocol (HTTP) binding for the transmission file, which are SOAP messages transported over a HTTPS connection (HTTP over TLS – Transport Layer Security). A comprehensive understanding of Web Service SOAP messaging is necessary in order to create software capable of transmitting data to the IRS.

The Transmitter or Issuer will be required to include their digital certificate and a digitally signed hash of the message in the WS-Security Header of the SOAP Message and invoke the appropriate URL for the Web Service endpoint that exposes the service that the Transmitter is invoking.

The ISS-A2A will perform authentication and authorization, threat mitigation, and initial validation. The ISS-A2A will return a fault if a transmission contains a threat, if a transmission fails initial validation, or if a connection with the endpoint cannot be established.

5.2 Transmitting Through the ISS-UI Channel

Transmitters or Issuers must have an active IRS account and have been approved to transmit ACA Information Returns. See Section 3 above for information about submitting the ACA Application for Transmitter Control Code (TCC). The Transmitter, including Issuer, will be required to log in to the IRS Integrated Enterprise Portal (IEP) and invoke the appropriate URL for AIR. AIR will allow the Transmitter or Issuer to either transmit submissions to

the IRS or retrieve Acknowledgements for those transmissions from the IRS. The Transmitter shall select the option to transmit submissions to the IRS.

The Forms 1094 and Forms 1095 data file and manifest file are included in an uncompressed native XML file. Once the required information is interactively entered, the client uses their Web Browser to browse for the respective uncompressed native XML file that contains Forms 1094 and Forms 1095 along with the uncompressed native XML file and uploads the files to the IRS.

5.3 Threat Mitigations in AIR Transmissions

The ISS will only accept XML file attachments and will run security checks on each message and attachment before routing to IRS AIR back-end systems.

All files being transmitted through the ISS-A2A or ISS-UI channels will be checked for threats. In the event the system detects a threat in the Transmission File, the following steps will be taken:

- ISS will perform threat mitigation and initial validation on authorized connections.
- The Transmission will be rejected and an error response will be returned.
- The Transmitter must remove the infected data and then retransmit the file.

Table below defines fault codes and messages from the ISS.

Table 5-1: List of TPE Errors

| Fault Code | Service Leg | Channel | Reason | Fault Message |
|------------|-------------|---------|---------------------------------------|---|
| TPE1001 | Request | A2A/UI | Message Delivery Failure | Unable to route request to web Service Provider |
| TPE1102 | Request | A2A/UI | Service Window Closed | Requested service is not available at this time. Please resubmit during normal operation hours |
| TPE1105 | Request | A2A/UI | XML is not well-formed | Message not formatted properly and/or cannot be interpreted. Please check message and try again |
| TPE1106 | Request | A2A/UI | SOAP message does not conform to WSDL | Request message violates WSDL schema specification |
| TPE1107 | Request | A2A/UI | Message is too large | Request message exceeds maximum size limit |

| Fault Code | Service Leg | Channel | Reason | Fault Message |
|------------|-------------|---------|---|--|
| TPE1108 | Request | A2A/UI | Potential Code Injection | Request message contains unexpected content |
| TPE1109 | Request | A2A/UI | Potential SQL Injection | Request message contains unexpected content |
| TPE1110 | Request | A2A/UI | Potential Document Structure Threat | Request message contains unexpected content |
| TPE1112 | Request | A2A/UI | HTTP compression Failure | Request message must be sent using HTTP compression |
| TPE1114 | Request | A2A/UI | Message not MTOM encoded | Request message must be MTOM encoded |
| TPE1126 | Request | A2A/UI | Failed to connect to the SiteMinder Policy Server | Unable to authenticate connectivity at this time. Please try again later |
| TPE1128 | Request | A2A/UI | Failed to authenticate in SiteMinder | Unable to authenticate credentials. Please try again. |
| TPE1129 | Request | A2A/UI | Failed to be authorized via SiteMinder | Unable to authenticate credentials. Please try again. |
| TPE1130 | Request | A2A/UI | Request contains Invalid Test File Indicator Field | Failed to retrieve a valid Test File Indicator |
| TPE1131 | Request | A2A/UI | Request message UTID is either missing or invalid | Invalid UTID was identified on the Request Message |
| TPE1201 | Request | A2A/UI | Attachment is malformed | Message attachment not formatted properly and/or cannot be interpreted. Please check message and try again |

| Fault Code | Service Leg | Channel | Reason | Fault Message |
|------------|-------------|---------|---|--|
| TPE1203 | Request | A2A/UI | Potential Code Injection in Attachment | Request message attachment contains unexpected content |
| TPE1204 | Request | A2A/UI | Potential SQL Injection in Attachment | Request message attachment contains unexpected content |
| TPE1205 | Request | A2A/UI | Potential Document Structure Threat in Attachment | Request message attachment contains unexpected content |
| TPE1206 | Request | A2A/UI | Extra attachment(s) | Request message contains more than one attachment. Please resubmit with only one attachment |
| TPE1207 | Request | A2A/UI | Missing attachment(s) | This web service requires an attachment to be included with request message. Please add attachment to request and resubmit |
| TPE2001 | Response | A2A | Consumer is unreachable | Unable to deliver response message to service consumer |
| TPE2111 | Response | UI | Error parsing the Receipt ID from the Response message | Parse Receipt ID from Response message using XPath |
| TPE2112 | Response | UI | Error parings the Timestamp from Response Message | Parse Timestamp from Response Message using XPath |
| TPE2113 | Response | UI | Error parsing the UTID from Response Message | Parse UTID from Response Message using XPath |

| Fault Code | Service Leg | Channel | Reason | Fault Message |
|------------|-------------|---------|--|---|
| TPE2114 | Response | UI | Error parsing the Error Codes from Response Message | Parse Error Code from Request Message using XPath |
| TPE2115 | Response | UI | Error parsing the Error Messages from Response Message | Parse Error Message from Response Message using XPath |
| TPE2201 | Response | A2A | There is an excess number of attachments in the response | Response message contains unexpected content |
| TPE2202 | Response | A2A | The attachment in the response exceeded maximum size limit | Response message contains unexpected content |

5.3.1 Threat Mitigation through ISS-A2A

ISS-A2A will perform threat mitigation and initial validation on authorized connections. ISS-A2A will return a fault if a transmission contains a threat, if a transmission fails initial validation, or if a connection with the endpoint cannot be established.

Faults differ from errors – a fault is an issue during transmission, whereas an error is the result of business rules processing failure. The Fault Generation process is common to each of ISS-A2A process flows. Fault messages generated to ISS-A2A are always routed to the Service Consumer. Errors will be logged, and the ISS-A2A operations teams will be notified.

5.3.2 Threat Mitigation through ISS-UI

If an error has occurred upon upload of the form and manifest file, the user will be returned to the upload page with an error marked in red. The upload page and upload error page are shown below.

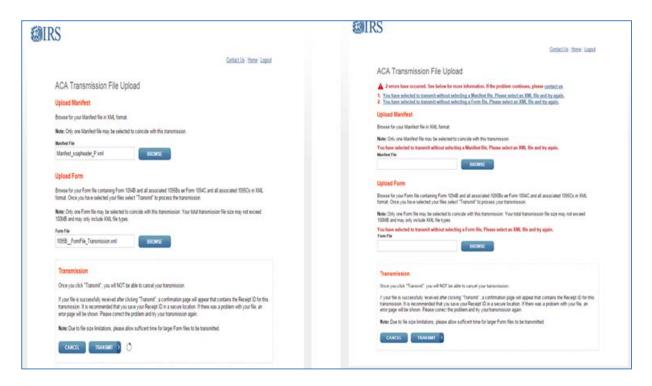


Figure 5-1: Example of UI Upload Page

If an error has occurred upon submission status requests, the Transmission Status Details page will display an error table depicting the error codes and corresponding error details. The transmission status page can be seen below.

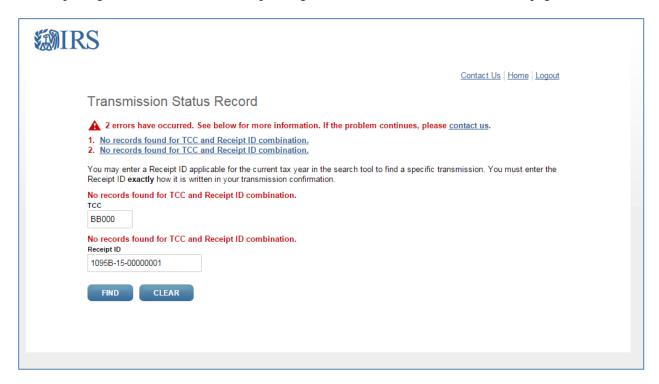


Figure 5-2: UI Upload Page Showing the Search Error

6 Validating the Transmission and Return Data

This section explains how AIR will perform validations of the transmission and return data via schema validations, Transmission Header and Manifest validation, and business rule checks.

When AIR receives a transmission, the following tasks are executed in order:

- a) The Receipt ID and Timestamp are generated
- b) Basic Manifest Validations such as TCC validations are performed in Sync session
- c) If any conditions fails in TCC or Software ID AIR will stop processing
- d) The Receipt ID, Timestamp, and Unique Transmission ID are returned to the Transmitter
- e) The Form Data File attached to the transmission is read and written to persistent storage
- f) Verify "Attachment Byte Size Number" by calculation and comparison
- g) Verify that the UUID extracted from the ACA Business Correlation ID is unique for the Transmitter Control Code (TCC) extracted from the ACA Business Correlation ID
- h) Verify Transmission Type Code, TaxYear and Vendor Information
- i) Verify duplicate file validation
- j) XML Schema Validation is executed in the XML Form Data File
- k) The XML Form Data File is queued for processing against the AIR Business Rules
- 1) Errors identified during processing against the AIR Business are written to the AIR database and inserted into an XML Error Data File that will be returned to the Transmitter in the Acknowledgement

When errors are identified with the transmission or AIR cannot read or write the XML Form Data File to persistent storage, the transmission will be rejected and the appropriate error code and description will be returned to the Transmitter in the SOAP Response message.

If the XML Form Data File fails XML Schema validation, the transmission will be rejected. The appropriate error code and description relevant to XML Schema validation will be returned when the Transmitter retrieves the Acknowledgement for the respective transmission.

When business rule errors are identified during processing the XML Form Data File, AIR will record the error codes and descriptions and return those errors in a XML Error Data File attached to the Acknowledgement SOAP Response message as an MTOM encoded attachment.

Note: When entering a foreign address, AIR will only accept certain foreign country codes which are aligned with the codes that the Modernized e-File (MeF) application accepts. The list of allowable foreign country codes that IRS accepts is found at the following link: www.irs.gov/countrycodes.

6.1 Transmission Validation

This section describes the checks that are made on the transmission and the errors that will be returned to the Transmitter if the transmission is rejected before it can be saved for further processing.

Error Prefix

General Description

Severity

Action

AIRER (File Read Error)

Unable to process request – cannot read or persist XML File

Transmission Rejected
SOAP Response to transmission message

Transmitter resolves on read error, AIR resolves on

Table 6-1: AIR Error Categories

| Error Prefix | General Description | Severity | Action |
|---|---|-------------------------------------|---|
| | | | write error |
| AIRRE (File Read Error) | Unable to process request – cannot read or persist XML File | Transmission Rejected | Transmitter notified via SOAP Response to transmission message Transmitter resolves on read error, AIR resolves on write error |
| AIRSH (XML Schema Validation Error) | Error occurred during XML Schema Validation – missing data elements or schema not well formed | Transmission Rejected | Transmitter notified via the Acknowledgement Transmitter resolves |
| AIREX, AIRMFAIRDP (Duplicate File) | The XML File is a duplicate | Transmission Rejected | Transmitter notified via the Acknowledgement Transmitter resolves |
| AIREX, AIRMFAIRCR (Correction validation failure) | Correction Information provided is invalid | Transmission Rejected | Transmitter notified via the Acknowledgement Transmitter resolves |
| AIRTN (TIN Validation Error) | TIN and Name do not match IRS records | Transmission Accepted with Error | Transmitter notified via the Acknowledgement Transmitter is expected to correct the data and send correction record to IRS |
| AIRBR (Business Rule Validation Error) | Error occurred while processing the record against the business rules | Transmission Accepted with Error | Transmitter notified via the Acknowledgement Transmitter is expected to correct the data and send correction record to IRS |
| | | | |

6.1.1 Missing or Multiple Attachments

Checks for missing or multiple attachments occur during the transmission synchronous process.

AIR first validates that one and only one XML File is attached to the transmission. If there are no files attached, AIR will reject the transmission and return the appropriate error code and error description. If there is more than one XML File attached to the transmission, AIR will reject the transmission and return the appropriate error code and error description.

6.1.2 Error Reading or Persisting the XML File

Errors reading or persisting the XML File occurs during the transmission synchronous process.

AIR extracts the XML File from the MTOM encoded attachment, reads the file and stores the file to persistent storage. If AIR cannot read, or persist, the XML File, AIR will reject the transmission and return an error code with a prefix *AIRER*.

6.1.3 Manifest Verification Failure

Manifest verification checks occur after receipt processing (reading and persisting the XML Form Data File).

AIR will perform the following checks against the data included in the Manifest and return any errors found when the transmitter retrieves the Acknowledgement for the transmission:

- Verify that the Test File Indicator is set to "P" (PROD)
- Verify that the Transmitter Control Code (TCC included in the ACA Business Correlation ID) is valid, in the "Active" status, and authorized to transmit the Information Returns included in the transmission
- Verify that the TCC is authorized (Meaning Roles Issuer or Transmitter) to transmit the forms in the transmission and that the forms are in the "P" status
- Verify that the Software ID is authorized for PROD and in the "P" status
- If any conditions fails in TCC or Software ID AIR will stop processing
- Verify "Attachment Byte Size Number" by calculation and comparison
- Verify that the UUID extracted from the ACA Business Correlation ID is unique for the Transmitter Control Code (TCC) extracted from the ACA Business Correlation ID
- Verify Transmission Type Code, Tax Year and Vendor Information
- Verify duplicate file validation

Note: If an error occurs during TCC authorizations, processing stops at that point for security reasons and the remainder of the Manifest is not validated.

If the above verifications fail, AIR will reject the transmission and return an error code with a prefix AIRMF.

6.1.4 Duplicate XML File Detected

Duplicate file checks occur after the Transmitter has successfully submitted the transmission to the IRS.

AIR checks the computed MD5 Checksum and the size of the XML Form Data File against previously processed XML Files submitted by the respective TCC. If the checksum that AIR identified from the XML Form Data File on persistent storage match a XML Form Data File previously transmitted by that TCC, the file will be rejected as duplicate and return an error code with prefix *AIREX*, *AIRMF*.

6.1.5 XML File Schema Validation Failure

XML Schema Validation occurs after the Transmitter has successfully submitted the transmission to the IRS.

IRS recommends each return be run against a validating parser prior to being submitted to IRS. This pre-validation is intended to identify the majority of potential error conditions and minimize the chance of receiving errors. A validating parser compares the XML document to the defined elements and attributes of the schemas to ensure a well-formed document that adheres to the XML Schema is transmitted to the IRS. Schemas provide the basic

definition for elements – field length, data type, prescribed patterns, enumerations, etc. Data integrity depends on each data element complying with the data format specifications. If the ACA Information Return preparation software uses the IRS-defined XML schemas to create the XML information return, there should be no data format errors in the return. The AIR system verifies this by validating each return in the transmission file against the schemas.

The information return documents must conform to the version of the XML schema they specify. AIR conducts XML schema validation on the XML File before processing. Any schema validation failures are reported back to the originating entity. If the XML does not conform to the XML Schema (missing required elements or XML not well formed), AIR will reject the transmission and return an error code with a prefix *AIRSH*.

The Error Data File contains the error codes, the error descriptions, and the Xpath reference (only for schema validation errors (AIRSH) for Filing Season 2016) to the element found to be in error.

Note: When an error is found during schema validation, processing stops once schema validation completes. No Business rules will be applied to the submission, and if the error is found in the manifest, the submission (xml archive) will not be schema validated either. It is important that transmission files be run through a validating parser to find any errors before transmitting.

Note: When entering a foreign address, AIR will only accept certain foreign country codes which are aligned with the codes that the Modernized e-File (MeF) application accepts. The list of allowable foreign country codes that IRS accepts is found at the following link: www.irs.gov/countrycodes.

The table below includes notional samples of schema validation business rules.

Table 6-2: Schema Validation Business Rules

| Error | Error Description Text | Error | Action |
|----------|--|-----------|-----------------------|
| Code | | Category | |
| AIRSH100 | The XML data has failed schema validation – missing required element(s) | XML Error | Transmission rejected |
| AIRSH101 | The XML data has failed schema validation – format error – XML not well formed | XML Error | Transmission rejected |

6.1.6 Business Rule Errors

Business rule checks occur after the Transmitter has successfully submitted the transmission to the IRS.

To the extent possible, the AIR business rules have been standardized across all information returns currently available in AIR. As additional information returns migrate to the modernized architecture, the associated business rules for those returns will be rewritten to maintain the standardization across all form types.

Transmitters should not include optional XML element tags if they do not have data values for them.

The following error information will be returned to the transmitter when IRS identifies errors associated with a business rule:

- a. AIREX, AIRMF Validate correction information
- AIRTN500 TIN and Name provided do not AIRTN500 TIN and Name provided do not match IRS records
- c. AIRBR400 AIRBR499 (1094-B data consistency check)
- d. AIRBR500 AIRBR599 (1094-B data cardinality check)
- e. AIRBR600 AIR BR699 (1095-B data consistency check)
- f. AIRBR700 AIRBR799 (1095-B data cardinality check)
- g. AIRBR800 AIRBR899 (1094-C data consistency check)
- h. AIRBR900 AIRBR999 (1094-C data cardinality check)
- i. AIRBR1000 AIRBR1099 (1095-C data consistency check)
- j. AIRBR1100 AIRBR1199 (1095-C data cardinality check)

Because TY 2015 (PY 2016) ACA Information Return filing is mandatory, IRS will reject transmissions or submissions due to business rule errors. However, in future years, information returns will be subject to data quality checks and rejected if the data is deemed unusable by the IRS.

Business rules for the AIR forms will be posted to Affordable Care Act Information Returns (AIR) Program.

6.2 Status Record for Information Returns

Once a transmission has been successfully submitted to the IRS, the Transmitter can retrieve the Acknowledgement for that transmission using the Receipt ID the IRS returned during the transmission session. The status of the transmission is included in the Acknowledgement. Regardless of if the information return is being processed or has completed processing, the Transmitter can request the Acknowledgement.

Note: Transmitters should wait at least 10 minutes after the Receipt ID is received to request the Acknowledgement for a transmission. During peak processing periods, the Acknowledgement may not be ready for several hours, or even days, after the Receipt ID is received.

If the Transmitter invokes the UI channel, an option is available to retrieve the Acknowledgement. If the Transmitter invokes the A2A channel, the Transmitter can request the Acknowledgement at the appropriate URL for the Web Service endpoint that exposes the *IRS-ACAAckngService* service within the *ACAGetTransmitterBulkRequestStatus.wsdl* file.

Below are the values and their descriptions included in the Status Record for information returns.

Transmission
Status

The transmission was accepted (no fatal errors were identified while processing the transmission metadata) and all submissions within the transmission were accepted and no errors were found during processing

The transmission was rejected for one of the following reasons:

A fatal error was identified while processing the transmission metadata

Schema validation failed on the Form Data File

Table 6-3: Status Values and Descriptions

| | Each and Every Submission within the Transmission was rejected |
|----------------------|--|
| Processing | The transmission identified by the Receipt ID was successfully submitted to the IRS. The IRS has not completed processing the XML File. |
| Partially Accepted | The transmission was accepted and no fatal errors were identified while processing the transmission metadata At least one submission within the transmission was accepted (with or without errors) At least one submission within the transmission was rejected as unusable data (exceeded threshold) |
| Accepted with Errors | The transmission was accepted (no fatal errors were identified while processing the transmission metadata) At least one submission (and possibly all submissions) within the transmission was accepted but errors were identified that require correction No submissions within the transmission were rejected |
| Not Found | The Receipt ID provided was not found |

An Acknowledgement that contains a status of "Accepted", "Partially Accepted", "Accepted with Errors" or "Rejected" provides proof that the ACA Information Returns in the transmission were either Accepted or Rejected.

6.3 Acknowledgement Schema

AIR returns an Error Data file with the Acknowledgement when errors are found in the transmission. The same data file is shared by all ACA Information Returns (Forms 1094/1095-B and Forms 1094/1095-C). The table below explains some of the elements in the Acknowledgement:

Table 6-4: AIR Forms Acknowledgement Schema Elements

| Element Name | Explanation |
|----------------------|--|
| UniqueTransmissionId | The UTID AIR derived from the ACA Business Correlation ID (See Section 2.1 of this document) |
| TransmitterControlCd | The Transmitter Control Code that submitted the transmission – must match the TCC provided in the Acknowledgement request |
| ShipmentRecordNum | A value computed by AIR TCC+2 character alphanumeric • A value computed by AIR – TCC+00 The two zeros appended to the TCC are static and constant in the ShipmentRecordNum for all transmissions processed through AIR |
| ReceiptId | The Receipt ID returned to the Transmitter when this transmission was submitted to IRS |
| FormTypeCd | The Form Type included in the transmission |
| Timestamp | A Timestamp when the Acknowledgement was provided to the |

| Element Name | Explanation |
|--------------------------|--|
| | Transmitter |
| SubmissionStatusCd | One of: Processing Accepted Partially Accepted Accepted with Errors Rejected Not Found |
| ErrorMessageDetail | A specific error code and error description of the error |
| DocumentSystemFileNm | The name of the uncompressed native XML file in the MTOM encoded attachment – applies only when a file is attached |
| CheckSumAugementationNum | The MD5 checksum value computed against the uncompressed native XML file in the MTOM encoded attachment – applies only when a file is attached |
| AttachmentByteSizeNum | The Byte size of the uncompressed native XML file in the MTOM encoded attachment – applies only when a file is attached |

6.4 Generating Acknowledgement Files

Once the transmission is received, the XML Form Data File is read and written to persistent storage, and checks are made on the transmission manifest data, the Receipt ID, Timestamp, and Unique Transmission ID are returned to the Transmitter as part of the synchronous session. The AIR System responds with a receipt for the transmission or an error explaining what was wrong, if anything, with the transmission. The XML Form Data File is then queued for processing within AIR.

When AIR receives a status request, an Acknowledgement file is generated indicating the status of the transmission (Processing, Partially Accepted, Accepted, Accepted with Errors, Rejected, Not Found) and is available for the Transmitter to retrieve. Transmitters should wait at least 10 minutes after the Receipt ID is received to request the Acknowledgement for a transmission. During peak processing periods, the Acknowledgement may not be ready for several hours, or even days, after the Receipt ID is received. The Acknowledgement includes an uncompressed native XML Error Data File that contains errors found during validation. If there no errors are found during validation, the Error Data File is not included in the Acknowledgement and the transmission processing status will be "Accepted".

Note: The XML Error Data File attached to the Acknowledgement is constrained to 100 MB. If the number of validation errors identified result in the XML File exceeding the 100 MB constraint, the file will be truncated and a message will be inserted at the end of the file indicating that the file was truncated.

The Transmission Acknowledgement will include:

- Unique Transmission ID
- Transmitter Control Code
- Shipment Record Number for the transmission

- Receipt ID
- Form Type Code
- Timestamp
- Submission Status Code: Processing, Partially Accepted, Accepted, Accepted with Errors, Rejected, Not Found
- Error Message Detail
 - o Error Message Code (Error Code)
 - o Error Message Text (Error Code Description)
 - o XpathContent (link to error location within the transmitted Form Data File)
- Document System File Name
- Checksum Augmentation Number (MD5) if a file is attached to the Acknowledgement
- Attachment Byte Size Number

Refer to the items in the Acknowledgement Schema (in the *IRS-Form1094-1095BCTransmitterRespMessage.xsd* file), for all of the items that can be included in the information return Acknowledgement.

7 Corrections and Replacements

7.1 Corrections Process

Corrections can only be made to previous submissions that have been Accepted or Accepted with Errors. Transmissions containing correction records must only contain corrections and should not include any "Originals". The unique identifiers assigned by AIR allow corrections to the specific record(s), both transmittal records (Forms 1094) and information return records (Forms 1095). Corrections may be filed for the following form types:

- Form 1095-B
- Form 1094-C
- Form 1095-C

Note: Although both the Form 1094-B and Form 1094-C are transmittal forms, the Form 1094-B is purely a transmittal document and, therefore, does not require corrections. The Form 1094-C contains additional information that may need correction.. The Form 1094-C can be submitted alone when a correction is required to the 1094-C form itself. Otherwise, the Form 1094-C must be submitted with one or more "corrected" Forms 1095-C.

The correction process can be utilized when:

- The IRS notifies the Transmitter, or Issuer, of one or more errors on the transmittal (Form 1094-C only) or information returns (Forms 1095-B or Forms 1095-C) filed.
- The Transmitter, or Issuer, identifies one or more errors on the transmittal (Form 1094-C only) or information returns (Forms 1095-B or Forms 1095-C) filed.

If, after submitting a correction, the IRS identifies a subsequent error, or if the Transmitter, including Issuer, identifies a subsequent error, you must utilize the Unique IDs associated with the correction. The original record may only be corrected once.

When an error is identified, submissions and records are uniquely identified within a transmission by combining the ReceiptId, SID, and RID, using the pipe symbol "|" as separator, and returning them to the Transmitter as follows:

URID = ReceiptId|SID|RID

Unique Submission Identifier (USID) and Unique Record Identifier (URID) enable:

- IRS to report errors to Software Developers, Transmitters, Issuer that are precisely related to the specific record(s) within the submission and the transmission
- Transmitters to send corrected records to the IRS precisely identifying the record to be corrected
- Both IRS and Transmitters to track transmissions and submissions

For example, the Form 1094 data located in submission 10 of a transmission would have a USID as follows:

USID= 1094B-15-00700283|10

The Form 1095 data located in record 2 of submission 10 of a transmission would have a URID as follows:

URID= 1095B-15-00700283|10|2

See the figure below illustrating multiple corrections to a single record.

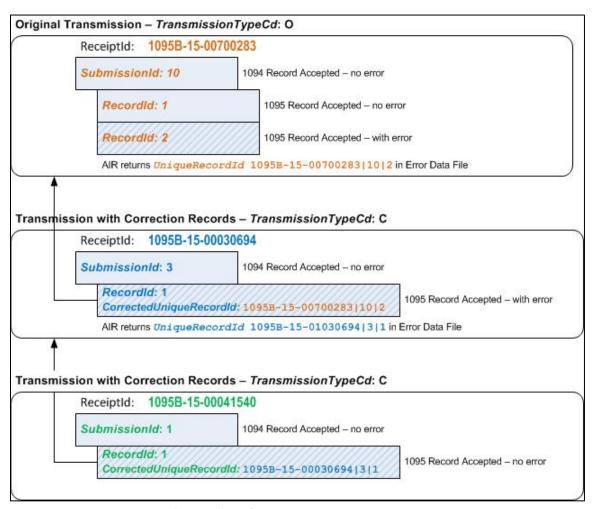


Figure 7-1: Reference Records to be corrected

If an original submission requires corrections to both the Form 1094-C and Forms 1095-C:

- 1. File a correction to the Form 1094-C, with <u>no associated Form 1095(s) attached</u>. Populate the Corrected Unique Submission ID (CUSID) with the USID that the IRS returned in the MTOM encoded attachment in the Acknowledgement.
- 2. File a separate submission with a Form 1094-C, without the correction indicator and only completed through the GovEntityEmployerInfoGrp (Part I of the form), along with corrections to any erroneous Form 1095-Cs associated with the Applicable Large Employer (ALE) or Designated Government Entity (DGE). Populate the Corrected Unique Record ID (CURID) with the URID that the IRS returned in the MTOM encoded attachments in the Acknowledgement.

When correcting Form 1094-C entity data that also appears on associated Forms 1095-C (name and EIN), it is not necessary to submit changes to every associated Form 1095-C in order to correct that information on the Forms 1095-C. IRS internal systems will associate appropriate entity information to existing Form 1095-C records.

IRS will validate those transmissions containing corrections adhere to the following guidelines:

- Do not submit original and corrected documents in the same file. Corrections must be separate from original filings.
 - o File Corrections in a separate Transmission
 - o Do not include Correction Submissions and Original Submissions in the same Transmission
 - o Do not include Correction documents with Originals within a Submission
- If the transmission is identified as containing corrections in the Manifest (TransmissionTypeCd is 'C'), then the CorrectedInd in the Form Data File has to be set to "1" and must include either the CorrectedUniqueSubmissionId (if the correction is for Form 1094) or the CorrectedUniqueRecordId (if the correction is for Form 1095) which references the record that is being corrected.
- If a Correction is found to be in error and needs to be corrected, submit a Correction to the most recently accepted Correction File only one Correction per Unique Submission or Record ID
- Correction records will carry both a Record ID as well as the Unique ID of the 1094-C or 1095 Record to be corrected
 - For Form 1094-Cs use 'SubmissionId' and 'CorrectedUniqueSubmissionId'
 - o For Form 1095-Bs and Cs use 'RecordId' and 'CorrectedUniqueRecordId'
- Always include the complete record for Correction; do not supply only the Corrected data elements within the correcting record

Table 7-1: Form-Specific Rules for Filing Corrections

| Form | Correction |
|--------|--|
| 1094-B | Not currently available (No checkbox) |
| 1095-B | File 1095-B Corrections with an associated 1094-B record |
| 1094-C | File 1094-C Corrections with no 1095-C records attached |
| 1095-C | File 1095-C Corrections along with a 1094-C without the Correction box checked and with only |
| | Part I completed |

7.2 Transmitting Corrections

Transmissions containing Form 1094-C correction records include the following (see schema and business rules):

- A UniqueTransmissionId for the transmission
- *TransmissionTypeCd* set to s ("C" for corrections)
- A SubmissionId (SID) for the correction Transmittal/Payer record
- The *CorrectedUniqueSubmissionId* (CUSID) identifying the record that is being corrected
- Key data fields from the original record to be corrected, e.g., Name of ALE Member (Employer) and EIN.
 Note: these fields are necessary to allow the IRS to associate the correction record to the original record even when the Unique ID's don't match.

Transmissions containing Form 1095 correction records include the following (see schema and business rules):

- A *UniqueTransmissionId* for the transmission
- *TransmissionTypeCd* set to "C" for corrections
- A SubmissionId) for the Transmittal (Form 1094) record
- A *UniqueRecordId* of the correction record
- The Corrected-Unique-Record-Id (CURID) identifying the record that is being corrected
- Key data fields from the original record to be corrected, e.g., Recipient Name and TIN. Note: these fields are necessary to allow the IRS to associate the correction record to the original record even when the Unique ID's don't match.

The Transmitter must furnish corrected statements (physical paper forms) to recipients as soon as possible.

7.3 Replacement Process

7.3.1 Transmissions Rejected by the IRS Portal

When a transmission is rejected at the portal, the transmitter will receive an error code that is prefixed with 'TPE'.. The corresponding error description message will contain information about the errors that was detected. The table of error codes produced by the IRS Portal is included in Section 5.3 of this document.

When a transmission is rejected at the IRS Portal, the transmitter must fix the problem that caused the rejection and should resend the same transmission with no other changes. The only exception is if the transmission is rejected because the message size is too large (the Form Data File exceeds the 100 MB size limitation). In the case where the message size is too large, the transmitter must reduce the number of records in the Form Data File before resending the transmission.

7.3.2 Transmissions Rejected by the AIR

Replacement transmissions must be filed when a transmission is rejected by the AIR. When the AIR rejects the transmission, the error code returned to the transmitter will be prefixed with 'AIR'. Starting PY2016, AIR System will include submission level rejections along with Transmission level rejections. None of the records included in a transmission/submission that is rejected are maintained in IRS data stores. Thus, when a transmission is rejected by IRS, it must be replaced. The Manifest XML Schema includes an eFile type "*TransmissionTypeCdType*" that identifies the type of transmission as follows:

Table 7-2: Transmission Types

| Allowed Data Value | Description | |
|--------------------|---|--|
| 'O' | A transmission containing original records | |
| 'С' | A transmission containing correction records | |
| 'R' | A transmission containing replacement records | |

In addition, the Manifest XML Schema includes an element "OriginalReceiptId" which allows a transmission to reference another transmission. The transmitter receives a Receipt ID when they submit a transmission containing ACA Information Returns to the IRS.

The, Form Data File contains "OriginalUniqueSubmissionId" which allows a submission to be replaced. When submissions are replaced, the manifest data element 'OriginalReceiptId' is not used.

These identifiers allow for referencing a transmission that was rejected and must be replaced. The AIR XML Schemas can be found on the IRS web site at Affordable Care Act Information Returns (AIR) Schemas and Business Rules.

Only transmissions that contained original records (TransmissionTypeCd is 'O') that were rejected require a replacement transmission. If a transmission containing correction records is rejected (TransmissionTypeCd is 'C'), the transmitter must fix the problem that caused the rejection and simply resend the same transmission (TransmissionTypeCd remains 'C'). However, if a transmission containing original records is rejected (TransmissionTypeCd is 'O'), the transmitter must both fix the problem that caused the rejection and resend the same transmission as a replacement (TransmissionTypeCd is 'R').

2016 is the first year in which individual Original Submissions within a Transmission can be rejected by IRS and replaced by Transmitters.

The following are reasons for a rejection at the Transmission level or Submission level (Forms 1094/1095);

- a) A complete transmission can be rejected due to
 - A fatal error identified while processing the transmission metadata
 - > Schema validation failed on the Form Data XML

Note - The above situation will let the transmitters replace the entire Transmission.

Submission-Level Rejections can occur due to Business Rules Failures (ex: Form 1094 Incorrect or Missing Tax Year), which will lead to that particular Submission rejection (Form 1094 and its corresponding 1095 Forms).

Note - The above situation will let the transmitters replace only that rejected submission

Figure 7-2 depicts the replacement process where both the initial transmission and the first replacement attempt were rejected by AIR.

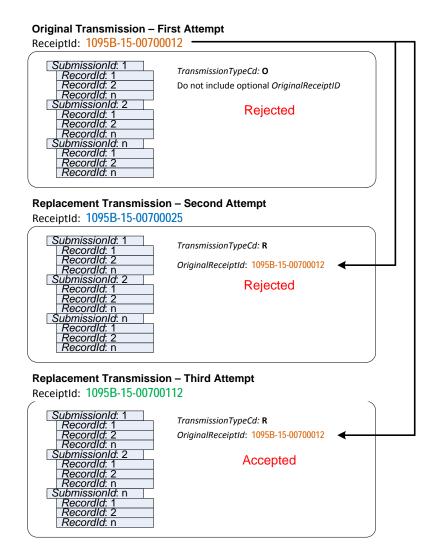


Figure 7-2: Replacing a Rejected Transmission

7.4 Transmitting Replacements

In Processing Year 2016, Transmitters will be able to replace rejected Transmissions, as well as rejected Submissions. The following sections explain the process for replacing a Transmission and a Submission. Replacements can only be transmitted only for previously rejected Transmissions or Submissions. Content (forms contained within) of the Replacement Transmissions or Submissions must be same as their corresponding rejected Original Transmissions/Submissions that are being replaced.

7.4.1 Transmission Replacements

Replacement transmissions must adhere to the following requirements (see schema and business rules for additional details):

- *TransmissionTypeCd* should be "R"
- OriginalReceiptId data element should contain the ReceiptId of the original transmission and must not be empty

- *OriginalUniqueSubmissionId* in the Form Data File should be *empty*. **If not Transmission will be rejected.**
- Replacement transmission should not include any additional replacing/new submissions

7.4.2 Submission Replacements

Replacement transmissions must adhere to the following requirements (see schema and business rules for additional details):

- TransmissionTypeCd should be "R"
- OriginalReceiptId data element Value should be empty If not, Transmission will be rejected
- OriginalUniqueSubmissionId in the Form Data File should NOT be empty
- Duplicate replacement Submission (s) included within the same transmission will be rejected.
- Replacement transmission should not include any new original/new submissions

8 Extension of Time to File

A request for an automatic 30-day extension of time to file ACA Information Returns will be available beginning in January 2016. The Form 8809, *Application for Extension of Time to File Information Returns*, cannot be filed through AIR. The extension requests can be submitted in three different ways:

| Method | FIRE TCC Needed | How to Submit |
|----------------------|-----------------|------------------------|
| Paper | No | Mail or Fax |
| Online Fillable Form | No | FIRE Fillable 8809 |
| FIRE | Yes | FIRE Electronic Record |
| | | Layout see Publication |
| | | 1220 |

Table 8-1: Extension Filing Methods

For more information on extensions for Information Returns see instructions for Form 8809 and Publication 1220.

Request for an Additional Extension of Time

Under certain hardship conditions you may apply for an additional 30-day extension if the initial extension of time to file is granted and the additional extension is filed before the expiration of the automatic 30 day extension. The electronic format can be used to file the additional extension of time to file; however it must accompanied by a paper Form 8809 documenting the reason for the delay and signed by the filer/issuer or an authorized signatory. Alternatively, a paper Form 8809, with the required documentation of the hardship, can be submitted to request an additional extension.

Extension of Time to Provide the Recipient Copy

The due date for furnishing the Form 1095-B and 1095-C to the recipients (employee/or covered individual) is January 31st. The request for an extension of time to provide the recipient copy must be postmarked by the date on which the statements are due to the recipients (January 31). The letter must contain the following; Issuer, Name, TIN, Address, Type of Return, Reason for Delay, statement saying the request is for recipient copies, and signature of the issuer or authorized agent. The request should be mailed to:

Internal Revenue Service, Attn: Extension of Time Coordinator, 240 Murall Drive, Mail Stop 4360, Kearneysville, WV 25430

You may submit the extension request through FIRE following the record layout defined in <u>Publication 1220</u> Section D; however, you must also provide the signed letter with the required elements to the above address. See <u>Publication 1220</u> for more information.

If the extension is granted, it will allow a maximum of 30 additional days to furnish copies to the recipients. No additional extensions are allowed.

9 Waiver from Filing Electronically

ACA Information Returns (Forms 1094/1095) are covered under Internal Revenue Code (IRC) section 6011(e). IRC 6011(e) requires filers of 250 or more information returns to file electronically. The electronic filing requirement does not apply if you apply for and receive a hardship waiver. If the filer is required to submit information returns electronically and fails to do so, and there is not an approved waiver on record, the filer may be subject to a penalty for failure-to-file electronically.

<u>Form 8508</u>, *Request for Waiver from Filing Information Returns Electronically*, is used to request a waiver from filing ACA Information Returns (Forms 1094/1095) for Tax Year 2015. A separate Form 8508 must be submitted for each employer or insurance issuer/carrier.

<u>Form 8508</u> may be filed beginning in January 2016 and should be filed at least 45 days before the due date of the information return. The form cannot be filed electronically and must be submitted to the address on the instructions Form 8508.

Refer to Publication 1220 for more information and Form 8508 for detailed instructions on completing the form.

10 Appendix Additional Resources

Standard Postal Service State Abbreviations and ZIP Codes Foreign Country Codes

For details on Name Control for Businesses, see Section 3.11 in Publication 4163

For details on Name Control for Individuals, see Exhibit 5 in Publication 4164

For details on Social Security and Taxpayer Identification Numbers, see Exhibit 6 in Publication 4164