



Published: June 11, 2015

PCOR Fee Filing Reminder for Self-Insured Plans

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The PCOR filing deadline is **July 31, 2015** for all self-funded medical plans and HRAs.

This is the third filing for plans with the following plan years. The amount for these plan years is **\$2.08 per covered life**.

- November 1, 2013 – October 31, 2014
- December 1, 2013 – November 30, 2014
- January 1, 2014 – December 31, 2014

This is the second filing for plans with the following plan years. The amount for these plan years is **\$2 per covered life**.

- February 1, 2013 – January 31, 2014
- March 1, 2013 – February 28, 2014
- April 1, 2013 – March 31, 2014
- May 1, 2013 – April 30, 2014
- June 1, 2013 – May 31, 2014
- July 1, 2013 – June 30, 2014
- August 1, 2013 – July 31, 2014
- September 1, 2013 – August 31, 2014
- October 1, 2013 – September 30, 2014

For the Form 720 and Instructions, visit: <http://www.irs.gov/uac/Form-720,-Quarterly-Federal-Excise-Tax-Return>.

The information is reported in Part II.

Please note that Form 720 is a tax form (not an informational return form such as Form 5500). As such, the employer or an accountant would need to prepare it. Parties other than the plan sponsor, such as third party administrators and brokers, cannot report or pay the fee.

Short Plan Years

Recently, the IRS issued FAQs that address how the PCOR fee works with a self-insured health plan on a short plan year.

Does the PCOR fee apply to an applicable self-insured health plan that has a short plan year?

Yes, the PCOR fee applies to a short plan year of an applicable self-insured health plan. A short plan year is a plan year that spans fewer than 12 months and may occur for a number of reasons. For example, a newly established applicable self-insured health plan that operates using a calendar year has a short plan year as its first year if it was established and began operating beginning on a day other than Jan. 1. Similarly, a plan that operates with a fiscal plan year experiences a short plan year when its plan year is changed to a calendar year plan year.

What is the PCOR fee for the short plan year?

The PCOR fee for the short plan year of an applicable self-insured health plan is equal to the average number of lives covered during that plan year multiplied by the applicable dollar amount for that plan year.

Thus, for example, the PCOR fee for an applicable self-insured health plan that has a short plan year that starts on April 1, 2013, and ends on Dec. 31, 2013, is equal to the average number of lives covered for April through Dec.

31, 2013, multiplied by \$2 (the applicable dollar amount for plan years ending on or after Oct. 1, 2013, but before Oct. 1, 2014).

See FAQ 12 & 13, <http://www.irs.gov/uac/Patient-Centered-Outcomes-Research-Trust-Fund-Fee:-Questions-and-Answers>.