

FTB File Exchange (FX) System – MEC IR Registration and Enrollment Guide

2025

Guide for employers, organizations, and carriers to electronically file Information Returns, to complete the registration steps for an e-Services Account, and complete enrollment steps in the Minimum Essential Coverage Information Reporting Program (MEC IR).

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1 What's New This Year

- Schema Versions:
 - There are no new schema versions for the File Exchange Schema and Information Returns Schema. Please refer to the latest schema files available on the Minimum Essential Coverage (MEC) Information Reporting (IR) <u>Technical Specifications webpage</u>. Test transmissions formatted according to these schemas will be accepted starting October 1, 2025.
- Test Cycle Process for Existing Transmitters:
 - Although Transmitters who have already tested with FTB do not need to retest again to obtain new Production CA-TCC, annual testing is highly **recommended**. Production CA-TCCs will automatically be extended.
- Test Cycle Process for New Transmitters:
 - New Transmitters are required to complete a Testing cycle to obtain Production CA-TCC and to transmit Production files for the 2025 Tax Year. The Testing cycle for the 2025 Tax Year will open October 1, 2025.
 - o For more information, please refer to the <u>FTB File Exchange System 1094</u> <u>1095 Testing Specifications</u>.

2 Introduction

Beginning January 1, 2020, all California residents must have qualifying health insurance coverage, qualify for an exemption from the requirement to have coverage, or pay a penalty when filing their state tax return. In addition, insurance providers and certain employers must now report coverage information to the California Franchise Tax Board (FTB) each year by March 31, with an automatic extension to May 31. For more information about the filing deadline, please refer to Section 11 in the FTB File Exchange System – 1094 1095 Technical Specifications – Part 2.

This FTB File Exchange System - MEC IR Registration and Enrollment Guide provides an overview of California's Minimum Essential Coverage (MEC) Information Reporting (IR) Program. It is designed to familiarize insurance providers, employers, and organizations who file Information Returns electronically on behalf of insurance providers and employers how to complete the registration and enrollment steps in order to meet their reporting requirements for California.

This publication <u>does not</u> address individual taxpayers filing health care information with a California Income Tax Return.

2.1 Supporting Publications

This publication should be used in conjunction with the most current version of the following publications:

- Pub 3895B California Instructions for Filing Federal Forms 1094-B and 1095-B
- Pub 3895C California Instructions for Filing Federal Forms 1094-C and 1095-C
- FTB File Exchange System 1094 1095 Technical Specifications <u>Part 1</u> and <u>Part 2</u>
- FTB File Exchange System 1094 1095 Testing Specifications

The FTB File Exchange System – 1094 1095 Technical Specifications <u>Part 1</u> and <u>Part 2</u> come with supporting documents referred to as the Technical Specifications Package. The supporting documents include Extensible Markup Language (XML) Schemas, Business Rules, and Open API Specifications.

2.2 About the California MEC IR Program

The California MEC IR Program, one component of California's Health Care Mandate (HCM), is similar to the federal Affordable Care Act Information Returns (AIR) Program. Organizations need to register online, submit an enrollment form, and complete a testing cycle before transmitting taxpayer data to FTB. A few differences are highlighted throughout this publication.

The MEC IR Program covers the electronic submission of the following Information Returns beginning in process year 2025:

- 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

Electronic submission of the above listed Information Returns is done through FTB's File Exchange (FX) System. This publication does not contain information or procedures for how to file the Information Returns electronically. It does contain information and procedures for the registration and enrollment steps that must be completed prior to electronically filing the returns.

For more information on how to electronically file the Information Returns, please see the FTB File Exchange System – 1094 1095 Technical Specifications Part 1 and Part 2.

For more information on the electronic filing requirement, please refer to FTB Publication 3895B - California Instructions for Filing Federal Forms 1094-B and 1095-B, and FTB Publication 3895C - California Instructions for Filing Federal Forms 1094-C and 1095-C.

IMPORTANT: The MEC IR Enrollment Form can only be submitted through FTB's website. FTB does not have an automated enrollment option, or a paper enrollment option.

2.3 Communications and Help Desks

The MEC IR Program uses <u>Subscription Services</u>, FTB's email notification service, to share information regarding program changes, technical issues, and other updates. Go to **ftb.ca.gov** and search for **subscription services** to sign up for the **Health Care Mandate** list.

FTB has two Help Desks to assist with the MEC IR Program:

- 1. <u>The e-Services Help Desk</u> is the first point of contact for e-Services (MyFTB) Account Registration, Account Log In issues, or Account Updates (resetting password, updating email address, etc). If you experience e-Service Account issues, the Responsible Official should call the applicable number below:
 - Phone 800-353-9032
 - Phone 916-845-2829 outside the United States
 - Available weekdays, 8am to 5pm PST, closed on <u>state holidays</u>

The e-Services Help Desk contact information is also listed on the MEC IR Help page.

- The MEC FX Portal Help Desk is the point of contact for MEC IR Electronic Filing issues. The Responsible Official or Authorized User should contact the MEC FX Portal Help Desk via email FTBFXPortal@ftb.ca.gov regarding the issues below:
 - MEC IR Enrollment Issues
 - Transmission Issues
 - Rejected Transmissions, Submissions, and Records
 - Business Rules and Error Code Resolution
 - Updating Responsible Officials and Authorized Users

The MEC FX Portal Help Desk contact information is also listed on the MEC IR Help page.

2.3.1 Health Care Mandate (HCM) Website

For additional information about California's HCM, please see the <u>Health Care Mandate</u> <u>webpage</u>.

2.3.2 File Exchange (FX) System Website

Additional information about the FX System can be found on the Report Health Insurance Information MEC IR webpage.

2.4 Federal and State Differences

Several enrollment process differences between the Internal Revenue Service (IRS) and FTB registration are described at the end of each section in more detail.

3 Register to Participate in the California MEC IR Program

To electronically file Information Returns in the MEC IR Program, your organization *must* complete the following steps:

- Register for an e-Services Account. A Responsible Official must complete the registration.
- Submit the MEC IR Enrollment Form. This form must be processed, reviewed and approved by FTB.

Section 3 addresses the MEC IR Registration process.

Section 4 addresses the Enrollment Process.

Unlike the IRS, FTB *does not* require each Authorized User (as described in Section <u>4.2</u>) included on the MEC IR Enrollment Form to register for their own account. <u>Only one registration per organization is required.</u>

<u>**Do not**</u> use an existing MyFTB registration, Electronic Filing Identification Number (EFIN), or SWIFT account to participate in the MEC IR Program.

3.1 Who must register

A Responsible Official must complete the registration on behalf of the organization. This person will then be responsible for granting access to the e-Services Account for the other Authorized Users within their organization. <u>The Responsible Official should consider sharing the account credentials (username, password, and answers to the security questions) with another Authorized User in the event of departure from the organization.</u>

All Authorized Users will have equal access to the information and services in the e-Services Account.

All organizations who plan to submit MEC Information Returns electronically <u>must</u> complete the e-Services Account registration, including those who plan to use the Application to Application (A2A) transmission channel. This is the only way to submit the MEC IR Enrollment Form and receive the necessary transmission approval.

If your organization uses a third party to transmit your MEC IR data, you <u>do not need</u> to register. Organizations who plan to submit electronic MEC Information Returns without third party assistance or those who have developed transmission software to file electronically will need to register.

3.2 How to Register

A Responsible Official begins the registration process by selecting the registration option on the <u>Report Health Insurance Information MEC IR Webpage</u>.

Note: The Responsible Official who registers for the e-Services Account must be included on the MEC IR Enrollment Form as a Responsible Official and must provide the following information:

- The Responsible Official's name, date of birth, SSN, home address, and primary personal phone number. The information is *only used* to verify the Responsible Official's relationship with the organization and *will not* be visible to Authorized Users after registration. The Responsible Official *must be* part of your organization and *must have an SSN*. If an SSN is not assigned, you must call the e-Services Help Desk to have a number assigned for registration. Contact information for the e-Services Help Desk can be found in Section 2.3.
- Enter the organization's name and FEIN. If your organization does not have a FEIN, you must call the e-Services Help Desk to have a number assigned for registration. Contact information for the e-Services Help Desk can be found at the hyperlink in Section 2.3.
- Provide the Responsible Official's business email address and title within the organization.
- Create a username and password.
- Select security questions and provide answers for additional verification.
- Agree to the terms of use.

IMPORTANT: Since there is only one account for an organization, and in the event of departure from the organization, **before departure** the Responsible *Official should consider sharing* the username, password, and answers for the security question with an Authorized User who has access to the e-Services Account. *Please keep this in mind when you register.*

3.3 After Registering

FTB will send a confirmation message to the email address provided. It will contain a link that must be clicked *within 72 hours* in order to activate the account. Once the account is activated, you can log in to the File Exchange Portal (FX Portal) and submit your MEC IR Enrollment Form.

Note: An email notification will be sent to the email address provided at registration each time the account is accessed through the FX Portal.

3.4 Federal and State Differences: Registration

<u>Table 1</u> below provides a summary of differences between the IRS Federal AIR Registration and the FTB State File Exchange (FX) System Registration.

| IRS | FTB | |
|---|--|--|
| Each Responsible Official and contact | Only one Responsible Official must register | |
| person must complete e-Services | for an e-Services Account | |
| Secure Access Authentication Process | | |
| Registration is tied to each individual | Registration is tied to the organization and | |
| Responsible Official and contact | the Responsible Official | |
| person | | |

Table 1: Federal and State e-Services Account Registration Differences

4 California MEC IR Enrollment Form

If you plan to transmit MEC Information Returns electronically, or develop software to file MEC Information Returns electronically, you must first register and activate an e-Services Account (described in Section $\underline{3}$). To enroll, submit the MEC IR Enrollment Form online from the FX Portal.

The MEC IR Program uses the same roles as the IRS AIR Program:

- Issuer a business filing their own Information Return data.
- Transmitter a third-party sending Information Return data on behalf of a business.

• **Software Developer** – an organization writing either origination or transmission software to file Information Returns electronically.

A single request can be used to enroll for multiple roles. Firm and Software Keys will be assigned after FTB approves the enrollment information.

4.1 Complete MEC IR Enrollment Form

After the Responsible Official logs into the FX Portal, they can begin the MEC IR Enrollment Form. The enrollment form does not need to be completed in a single session. Review the information you will need before you begin the MEC IR Enrollment Form.

4.1.1 Organization or Firm Information

The first portion of the MEC IR Enrollment Form requires information about the Organization or Firm including:

- Legal Business Name
- DBA Name (if different from legal name)
- Business Type (e.g., Corporation, LLC, Partnership)
- Physical Address
- Mailing Address (if different from physical address)
- Phone Number

4.1.2 Authorized User Information

The MEC IR Enrollment Form requires information about Authorized Users who will access the e-Services Account. The following information *must* be submitted for *each* Authorized User:

- Name
- User's Role (Responsible Official and/or Contact)
- Email Address
- Phone Number
- Area of Responsibility

Note: The Responsible Official listed on the MEC IR Enrollment Form must be the same Responsible Official who registered for the e-Services Account.

4.1.3 Initial Participation Information

The MEC IR Enrollment Form requires information about how the organization will participate in the MEC IR Program. This includes the following information:

- Program Role (Issuer, Transmitter, Software Developer)
- Transmission Method you will use (Application to Application or User Interface)
- Additional information to assist the FTB review of your enrollment form

Currently, Issuers and Transmitters are treated the same by the FX System. Any changes to this process will be described in a revised version of this publication.

4.2 Important Information for the Responsible Official and Authorized Users

The Responsible Official is the responsible individual who has authority over the filing of MEC Information Returns for their organization. FTB reviews the Responsible Official information provided during enrollment before approving and allowing the organization to participate in the MEC IR Program.

FTB requires the Responsible Official to be active on the MEC enrollment <u>at all times</u>. If a Responsible Official needs to be replaced, <u>you must submit the new official information</u> <u>for approval before you can remove the current one</u>. To make changes to the Responsible Officials, see Section 5.2.

Contacts should be available for inquiries from FTB related to technical participation in the MEC IR Program and/or issues with submitted data. You may also provide business contacts. If you need to replace or update a Contact, you must submit the contact's information. To make changes to Contacts, see Section <u>5.2</u>.

Each organization can have a *maximum* of 10 Authorized Users. An Authorized User can be both a Responsible Official and a Contact.

FTB will send a notification email to the e-Services Account registrant's email address when FTB receives the organizations MEC IR Enrollment Form.

4.3 Approval Process

FTB will review the MEC IR Enrollment form when it is received and may contact your business or one or more of the Authorized Users listed on the enrollment form as part of this review. Your enrollment will stay in Pending status while FTB conducts the review. The review process may take up to 10 business days to complete.

If FTB does not approve your enrollment, FTB will send a notification email to the email address associated with the e-Services Account. You must submit a new MEC IR Enrollment Form and correct the issues identified in your rejection email. For additional help or clarification, send an email to the MEC FX Portal Help Desk. Information for contacting the two FX System Help Desks can be found at the hyperlink in Section 2.3.

When your enrollment is approved, FTB will issue the necessary California Transmitter Control Codes (CA-TCC), and Secret Keys based on the activity to be performed. FTB will send an email to all Authorized Users when the CA-TCC/Secret Keys are available on FX Portal. The following are examples:

- California Transmitter Control Code (CA-TCC) for Testing
- Secret Key

For Application to Application (A2A) Transmitters, the Application Keys <u>must always be</u> <u>used together</u>. For FX Portal Transmitters, the system applies the Secret Key for you. The Secret Key is *only valid* for a specific organization and will be systematically renewed annually. A new Secret Key will be issued one month prior to the current Secret Key's expiration date in an effort to prevent interruptions to the ability to transmit MEC IR data.

Upon initial approval of your enrollment, only the CA-TCC for *Testing* is issued. The Test CA-TCC will be valid for all forms and is valid until it is explicitly disabled. After the Testing requirements have been satisfied, a CA-TCC for *Production* will be issued only for the forms the testing cycle has been completed. The Production CA-TCC will expire annually on December 15 and a new Production CA-TCC will be issued following completion of the next testing cycle.

Note: Transmitters who have already tested with FTB do not need to retest again to obtain new Production CA-TCCs. Production CA-TCCs will automatically be extended <u>but</u> <u>completing an annual test cycle is highly recommended</u>.

Note: <u>New Transmitters are required to complete a testing cycle to obtain a Production</u> <u>CA-TCC</u> and to transmit their production files for the 2025 Tax Year. The testing cycle for the 2025 Tax Year will open October 1, 2025.

For those who register for A2A transmission, FTB will issue the following keys for each registered software package when the enrollment is approved:

- Application ID (app_id)
- Application Key (app_key)

Transmitters must register each software package that interacts with the FX System using the A2A channel. Each software package receives a unique app_id and app_key.

The Application Keys <u>must always be used together</u>. Application Keys <u>are only valid for a specific software package</u> and will be systematically renewed annually. Only one Application Key (app_key) is active at a time. A new app_key will be issued one month prior to the current app_key expiration date in an effort to prevent interruptions and ensure keys may be retired without disrupting the transmitter's ability to use the A2A channel. An Application ID (app_id) is valid until it is explicitly disabled.

Additionally, Authorized Users can maintain their app_id and app_key. Refer to Section $\underline{5}$ to view information about maintaining your enrollment.

All assigned keys and codes display in FX Portal. FTB will send all Authorized Users a notification email to alert them that the codes and keys are available.

For information about how to use the CA-TCCs, Secret Key, app_id, and app_key for transmitting information, refer to the <u>FTB File Exchange System – 1094 1095 Technical Specifications webpage</u>, Technical Information, <u>Part 1</u> and <u>Part 2</u>. For a quick reference guide to CA-TCCs, Secret Key, app_id, and app_key, please refer to <u>Appendix – Keys and Codes</u>.

4.4 Before Transmitting MEC Information Returns to FTB

Before electronically transmitting MEC Information Returns to FTB, you must complete and pass a Testing cycle. This ensures the information sent to FTB is well-formed and can be used for processing. Please see the <u>FTB File Exchange System – 1094 1095 Testing Specifications</u> for details about the Testing cycle.

When the Testing cycle is completed and passed, FTB will issue a Production CA-TCC for the specific forms in which testing has been completed. The CA-TCC for Testing remains "Active" in case you need to transmit test data. You may test for additional forms after receiving your Production CA-TCC. Be sure to use the correct CA-TCC for the type of data you transmit Test or Production. *Completing an annual Test cycle is highly recommended*.

Note: Software Developers are not issued a CA-TCC for Production.

4.5 Federal and State Differences: MEC IR Enrollment Form

<u>Table 2</u> below provides a summary of differences between the IRS Federal AIR Enrollment and FTB State File Exchange (FX) System MEC IR Enrollment.

| IRS | FTB |
|---|--|
| Each Responsible Official must sign | One Responsible Official must sign using an |
| using their e-Services PIN | electronic signature |
| The TCC status indicator is either Test | Organizations are issued separate CA-TCCs |
| (T) or Production (P) | for Test and Production |
| You must log in to either the UI For | You always log in to your e-Services Account |
| ACA Assurance Testing System (AATS) | |
| or the UI Production System | |
| Forms have their own T/P indicator | FTB track testing at the form level |

Table 2: Federal and State MEC IR Enrollment Differences

5 Manage MEC IR Enrollment Information

When FTB approves your MEC IR Enrollment Form, you may need to manage your enrollment information or software packages.

5.1 Manage CA-TCC or Secret Key

The CA-TCC and/or Secret Key issued upon approval of the MEC IR Enrollment Form may need to be maintained. This includes the following updates:

- Remove a CA-TCC this option is selected when the Organization no longer participates in the MEC IR Program
- Deactivate and request new keys this option is selected when there is a security concern with the assigned CA-TCC or Secret Key.

The CA-TCC and Secret Key are managed from a page in the FX Portal. Select the item that needs to be updated and follow the prompts to provide additional information.

5.2 Manage Responsible Official and Authorized User Changes

The MEC IR Enrollment Form will need to be updated for changes to the Responsible Official(s), Authorized User(s), or any contact information.

 The Responsible Official who registered for the e-Services Account may not be modified through the FX Portal at this time. To update the Responsible Official information, Responsible Official or an Authorized User should contact FTB File Exchange System - MEC IR Registration and Enrollment Guide | 2025 the MEC FX Portal Help Desk via email FTBFXPortal@ftb.ca.gov. Information to contact the FX Portal Help Desk can be found at the hyperlink in Section 2.3.

• Changes to Authorized Users can be completed through the FX Portal and includes adding, removing, and updating Authorized Users.

5.3 Add a New Software Package

When a new software package will be used to transmit electronic Information Returns with the A2A channel, it must be added on the FX Portal. To add a new software package, navigate to the Software Package and Keys page and select add a software package. Follow the prompts to provide a name for your software package. When the software package information is submitted, a new app_id and app_key pair will be issued for the software package. The new app_id and app_key should be issued within 20 minutes of submission.

You do not need to add software packages if you transmit with the UI channel.

5.4 Manage a Software Package

The app_id and app_key pair issued for software packages may need to be maintained. This includes the following updates:

- Remove a software package: this option is selected when the software package will no longer be used to transmit information returns.
- Deactivate and request new software package keys: this option is selected when there is a security concern with the assigned app_id and app_key pair.

Manage the app_id and app_key pair from the Software Package and Keys page in FX Portal. To manage the app_id and app_key pair, select manage the software package. A page displays to select the appropriate management action for the selected software package. After you select the appropriate action, the software package is updated as specified.

5.5 Manage Transmission Role and Channel

The Transmission Role and Transmission Channel can be updated via FX Portal. This will allow Transmitters to choose to add an additional Role or Channel to their enrollment from what was initially selected.

After logging in, select view and manage enrollment. Then select either Business Role or Transmission Channel to make your updates.

Appendix – Acronyms

| Acronym | Definition |
|---------|--|
| A2A | Application-to-Application Transmission Method |
| ACA | Affordable Care Act |
| AIR | Affordable Care Act Information Returns |
| App_id | Application Identifier |
| App_key | Application Key |
| CA-TCC | California Transmitter Control Code |
| EFIN | Electronic Filing Identification Number |
| FTB | Franchise Tax Board |
| FX | File Exchange |
| НСМ | Health Care Mandate |
| IR | Information Reporting |
| IRS | Internal Revenue Service |
| MEC | Minimum Essential Coverage |
| XML | Extensible Markup Language |

Appendix – Glossary

| Term | Definition | | |
|-----------|--|--|--|
| FX Portal | A sub-system within the FX System that allows | | |
| | transmitters to communicate information with FTB, | | |
| | including enrollment to the MEC IR Program, | | |
| | transmission of information return files, and retrieval of | | |
| | acknowledgements. | | |
| FX System | The File Exchange (FX) System is comprised of the | | |
| | following three sub-systems: | | |
| | FX Portal | | |
| | FX API | | |
| | FX Hub | | |
| | For more information about the FX API and FX Hub sub- | | |
| | systems, see the FTB File Exchange System – 1094 1095 | | |
| | Technical Specifications publication. | | |

Appendix – Keys and Codes

| | Environment | Form Type | Expiration | Purpose | Where Used/Found | When Issued |
|-------------------|--------------------------------|------------------------------|--|---|--|-------------------------------------|
| Test CA-TCC | Test | All Types | Never (or until explicitly disabled) | Unique code for authenticating transmitter's test transmissions | In the UTID of the manifest | Upon Enrollment Approval |
| Production CA-TCC | Production | Forms that have tested | Annually - 12/15 | Unique code for authenticating transmitter's production transmissions | In the UTID of the manifest | Upon Testing Cycle Completion |
| Secret Key | Not Environment Specific | Not Form Type Specific | Annually - One year after issuance | Unique key for authenticating transmitter for A2A transmitters (Automatically applied for UI Transmitters) | In the authentication header signature process for A2A transmitters (Not applicable for UI Transmitters) | Upon Enrollment Approval |
| app_id | Not Environment Specific | Not Form Type Specific | Never (or until explicitly disabled) | Uniquely Identifies the Software Package for A2A transmitters | In the authentication header signature process for A2A transmitters | Upon Enrollment Approval |
| app_key | Not Environment Specific | Not Form Type Specific | Annually - One year after issuance | Unique key for authenticating software package for A2A transmitters | In the authentication header signature process for A2A transmitters | Upon Enrollment Approval |