

CLIENT | ALERT



Client Alert Applies To: Self-Funded, Fully-Funded, and Large Group

December 5th, 2020

IRS Extends Due Date for Providing 2019 Form 1095-C

The IRS has once again extended the due date by which “Applicable Large Employers” or “ALEs” (employers with 50 plus full-time or full-time equivalent employees) must provide a Form 1095-C to employees and participants from January 31, 2020 to March 2, 2020. The deadline by which ALEs must file their Forms 1094-C and 1095-C with the IRS remains the same: February 28, 2020, for paper submissions, or March 31, 2020, if filing electronically. The IRS uses this reporting by ALEs to determine if employers are subject to the ACA’s employer shared responsibility penalties.

The IRS’ notice also provides relief for insurance carriers who are generally required to provide a Form 1095-B to covered individuals. Because the individual penalty no longer applies, individuals do not need the Form 1095-B in order to calculate whether a penalty is due on their tax return. The IRS announced it will not penalize entities that do not provide a Form 1095-B under the following circumstances:

- The reporting entity must post a prominent notice on its website providing an avenue for covered individuals to request a Form 1095-B;
- The entity must provide a Form 1095-B within 30 days of a request.

Unfortunately, because the employer shared responsibility penalties still apply, employers continue to be subject to ACA reporting requirements.

Please visit www.moreton.com/category/compliance-updates/ for more information and to view other client alerts. This Client Alert was written by Carolyn Cox, Moreton & Company’s in-house corporate counsel who provides our clients with compliance services. For additional questions, please contact Carolyn at 801-715-7110 or ccox@moreton.com.

© 2019 by Moreton & Company

This Client Alert is intended to alert recipients to recent legal developments. It does not constitute the rendering of legal advice or recommendations and is provided for your general information only. If you need legal advice upon which you can rely, you must seek an opinion from your attorney.