

ACA INFORMATION REPORTING – BAD NEWS AND GOOD NEWS

Hodgson Russ Newsletter
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Practices & Industries

Employee Benefits

First, the bad news: The 2016 final forms and instructions for 1094-C and 1095-C are out. Form 1094-C can be found [here](#) and the instructions can be found [here](#). This release reminds us that the filing deadline is around the corner. Among other changes, new Series 1 indicator codes have been added – codes 1J and 1K – pertaining to conditional offers of spousal coverage.

Now, the good news. The IRS has extended the due date for furnishing to individuals the Forms 1095-B and 1095-C from January 31, 2017, to March 2, 2017. *IRS Notice 2016-70*. The automatic and “good cause” extension provisions in the regulations that govern the reporting requirements do not apply to further extend the March 2, 2017 due date for the individual filing. The Notice does not change the IRS filing deadlines: February 28, 2017 (for paper filings) and March 31, 2017 (for electronic filings). In more welcome news, the Notice extends the interim good faith compliance relief to the 2016 filings. If the 2016 forms are filed on time and completed in good faith, the IRS will not assess a penalty for incomplete or incorrect information.