

## 2020 ACA Reporting is Due in Early 2021

The IRS has released [draft 2020 instructions](#) for Forms [1094-B](#) and [1095-B](#), and [draft 2020 instructions](#) for Forms [1094-C](#) and [1095-C](#) that employers will use in early 2021 to report under IRS Code Sections 6055 and 6056 for the 2020 calendar year. Draft forms related to this reporting were previously released in July 2020.

The draft instructions include a number of changes and clarifications related to 2020 reporting.

- The deadline for furnishing statements to individuals under Sections 6055 and 6056 has been extended to March 2, 2021.
- Good faith relief from penalties for reporting incorrect or incomplete information has been extended to 2020 reporting.
- The IRS has extended relief from penalties for reporting entities that furnish individual statements under Section 6055 only upon request for 2020 calendar year reporting.
- The “Plan Start Month” box on Form 1095-C is now required for 2020 reporting.
- Certain additions were made to the 2020 draft Forms 1095-B and 1095-C related to individual coverage HRAs (ICHRAs). Draft Form 1095-B includes a new code G to be used on line 8, Origin of Health Coverage, to identify coverage under an ICHRA. In addition, draft Form 1095-C includes additional codes in Code Series 1 for reporting offers of ICHRAs, as well as new lines for reporting required information.

Employers should become familiar with these forms and instructions for reporting for the 2020 calendar year. However, these are draft versions only, and should not be filed with the IRS or relied upon for filing.