

## 2020 ACA Reporting is Due in Early 2021

The IRS has released final 2020 forms and instructions for use in early 2021 to report under IRS Code Sections 6055 and 6056 for the 2020 calendar year.

- 2020 [Form 1094-B](#) and [Form 1095-B](#) (and related [instructions](#)) will be used by providers of minimum essential coverage (MEC), including self-insured plan sponsors that are not ALEs, to report under Section 6055.
- 2020 [Form 1094-C](#) and [Form 1095-C](#) (and related [instructions](#)) will be used by applicable large employers (ALEs) to report under Section 6056, as well as for combined Section 6055 and 6056 reporting by ALEs who sponsor self-insured plans.

The forms and 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 Forms 1095-B and 1095-C related to individual coverage HRAs (ICHRAs). Form 1095-B includes a new code G to be used on line 8, Origin of the Health Coverage, to identify coverage under an ICHRA. In addition, Form 1095-C includes new 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. Individual statements must be furnished by March 2, 2021, and IRS returns must be filed by Feb. 28, 2021 (March 31, 2021, if filed electronically).