



IRS Extends Deadline for Affordable Care Act Reporting

On December 28, 2015, the Internal Revenue Service issued Notice 2016-4, which extends the due dates for furnishing and filing the new Affordable Care Act reporting forms for the 2015 calendar year.

Background: All Applicable Large Employers (those with 50 or more full-time or full-time equivalent employees in 2014) will use Forms 1094-C and 1095-C to report information to the IRS and to their employees about their compliance with "pay or play" and the health care coverage offered to full-time employees (and their dependents) for at least one month during 2015.

Notice 2016-4: The due dates for employers to furnish to employees Form 1095-C is extended from February 1, 2016 to March 31, 2016. The due dates for employers to file with the IRS the Forms 1094-C and 1095-C is extended from February 29, 2016 to May 31, 2016, if not filing electronically, and from March 31, 2016 to June 30, 2016, if filing electronically.

The extended due dates apply only to the forms filed for the 2015 calendar year.

If you have contracted with a third-party vendor to assist with ACA reporting, we recommend discussing the deadline extensions with the service provider and determining whether the forms will be filed using the original or extended deadlines. The contract or statement of work may need to be amended to reflect any changes to the reporting obligations and deadlines.

For further information, please contact your BST advisor.