



McGohhan Brabender

## FLASH UPDATE

DECEMBER 3, 2016

### **1095 Distribution Deadline Extended**

The IRS has issued Notice 2016-70, which delays the deadline for providing a copy of the 1095 to covered individuals/full-time employees from January 31, 2017, to March 2, 2017.

<https://www.irs.gov/pub/irs-drop/n-16-70.pdf>

This notice also extends the good-faith compliance standard to the 2016 reporting year. You may recall, last year was supposed to be the only year the good faith standard applied. Now it has been extended.

Accordingly, the IRS will not issue penalties for incorrect or incomplete 2016 ACA reporting forms if you can show that you made a good-faith effort to comply with the reporting rules.

Keep in mind that the IRS filing due dates, however, are unchanged. Below is a breakdown of the due dates. Please note that only one date is being pushed back.

**Old Due Date for Providing** 1095 to Full-Time Employees and Participants: January 31, 2017

**New Due Date for Providing** 1095 to Full-Time Employees and Participants: March 2, 2017

**Due Date for Filing** 1094/1095 with IRS in Paper Format remains the same: February 28, 2017

**Due Date for Filing** 1094/1095 with IRS in Electronic Format remains the same: March 31, 2017