

1095 Items for Discussion

Data Reporting and 1095As

1. Validating data before submission to IRS
 - a. Working with carriers, especially in states where they collect premium
 - b. Use of 834s
 - c. Retroactive terminations in grace period cases
2. Testing/cleaning up data problems with IRS before sending out 1095As in January
 - a. Start discussing data elements/requirements with IRS early
 - b. When to start testing with IRS
 - c. When to start monthly reporting
 - d. IRS will use monthly data in checking tax filings
 - e. Lack of 1095A will hold up return where tax filing or monthly data indicates Marketplace enrollment
 - f. Discrepancies between monthly data and 1095A/tax filing may hold up some or all of refund
3. Mailing of PDF
 - a. Need to prepare for large mailing initiative
4. Explanatory letter to go with 1095A mailing
 - a. CA developing letter and vetting it with tax preparers (multiple languages)
5. Posting PDF of 1095A to enrollee's accounts in addition to mailing
 - a. Best practice by FFM and many SBMs to make tax filing easier
6. Providing web calculator for determining applicable benchmark plan (SLCSP)
 - a. Need "reasonable" method for full pay Marketplace enrollees to find the relevant benchmark plan
 - b. Calculator is best practice because easiest to access and use
 - c. Plus tables will not work in states with age rating where benchmark depends on number of covered individuals in the household and their ages
 - d. Can SBMs get calculator from third party or otherwise share in developing tool?
7. Process for correcting 1095As
 - a. Tax filer with even minor discrepancy will be asked to get corrected 1095A from issuing SBM
 - b. IRS will intervene and ask SBM to correct if tax filer is unsuccessful
 - c. Best practice to have expedited process to correct 1095As
 - d. Will likely require an amended return if corrected 1095A postdates tax filing

Customer Service

1. What questions should be referred to IRS
 - a. IRS answers tax questions
 - b. Will have scripts, many posted on web site but more for their call centers
 - c. Goal is to get scripts as soon as possible
 - d. Also to understand IRS call center decision tree, especially which calls will be referred back to SBMs
2. What questions should SBM be prepared to answer
 - a. All non-tax questions

- b. Questions on APTCs, 1095s, benchmark plans, household composition
 - c. Should SBM get involved in reconciliation issues
- 3. Planning for workload bump
 - a. Is it best to have dedicated line at least for 1095A questions
 - b. Determining the timing and intensity be of service surge related to 1095A mailing
 - c. Staffing for surge
- 4. Training Navigators, agents, and other community partners
 - a. Are there community partners beyond the assister community (eg, tax assisters)
 - b. When should training begin
 - c. NY is seeking CAP grant
 - d. Role of tax preparers and insurers
 - e. What other resources may be available
- 5. Developing SBM scripts
 - a. Start to build an FAQ
 - b. Determine which questions require more than simple script
 - c. Use material developed by CMS-IRS task force addressing this issue for FFM states