

ACA Enforcement Begins

What Employers Need to Know about Letter 226J and the First Employer Mandate Penalty Assessments

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Happy Holidays! Love, the IRS



Back to the Basics



Letter 226J, an “Initial Proposal”



“Relief” and Other 2015 Specifics to Bear in Mind



- Conditional relief for mid-sized employers (50-99), but not for reporting
- Penalty A reduced by 80 employees instead of 30
- Penalties adjusted for inflation (Penalty A: \$2080; B \$3,120)
- “Good faith” reporting relief

Why me?

- Reporting errors
- Failure to use safe harbor for affordability
- Confused employees
- Failure to provide coverage
- Controlled group problem



ACA Reporting Errors



Responding to Letter 226J



- Extensions
- Reporting
- SBCs, pricing, waivers
- Appeals

What To Do Now?



- Review 2015 Reporting
- Organize payroll data
- Alert the mail room
- Clean-up ACA eligibility
- Consider Affordability Safe Harbors

Final Questions



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Thank You



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