Form 1095-A

Reconciling the Premium Tax Credit on Form 8962

Is Form 1095-A correct?

Scrutinize Form 1095-A to make sure it reflects the taxpayer's account of coverage. Look for critical errors that will affect the PTC calculation, such as errors in premium, SLCSP, or APTC.

The taxpayer <u>should seek a corrected 1095-A if enrollment related information is incorrect</u>. This includes:

- Policy issuer's name (Part I)
- Policy start or end date (Part I, Part II)
- · Premium cost (Part III, Column A)
- APTC received (Part III, Column C)

Do not seek a correction for:

- Errors in demographic information, such as name, date of birth or social security number (Part 1)
- Errors to the SLCSP (Part III)—use a Marketplace Tax
 Tool to figure out the correct amount and use that on
 Form 8962

Special Rules Related to Coverage Information (Part III)

Column A: This is the <u>full premium</u>, including the amount paid with APTC

- It excludes the value of certain "extra" benefits, such as adult dental.
- If the premium is -0- but there is an APTC, the person likely didn't pay their premium. If they pay it by April 18, they can claim PTC for the month. If they do not, they must repay the APTC received for that month. (Enter as written on Form 1095-A.)
- If there are multiple rows with -0- and an APTC value, this is likely an error. Seek a corrected Form 1095-A.

Column B: This is the benchmark plan that helps establish the PTC amount. It's based on family size, ages, and location.

You may need to look up the SLCSP if:

- 1. It is incorrect, perhaps because a change in family size was not reported.
- 2. It is missing. This happens when someone paid the full premium. Other Marketplaces routinely leave this space blank.
- 3. There are multiple Forms 1095-A with conflicting information or the taxpayer otherwise thinks it's incorrect.

See <u>healthcare.gov/tax-tool</u> or your state's tax tool.

Column C: Advance payment of PTC

Remember: A person may be entitled to PTC even if no APTC was received. Do not assume someone is ineligible. If there is a premium amount in Column A for a month and no SLCSP or APTC and they appear eligible for the credit, enter the SLCSP to calculate the correct PTC.

		For	m 10	95-A						
1095-A Health Insurance Marketplace				e Statement	VOID		OMB No. 1545-2232			
	► Information about Form 1095-A and its separa is at www.irs.gov/form1095a.			parate instructions	CORRECTED		2015			
Part I Recipient Information										
1 Marketplace identifier	2 Marketpl	ace-assigned po	ce-assigned policy number 3 Policy issuer's name							
4 Recipient's name				5 Recipient's SSN		6 Recipi	Recipient's date of birth			
7 Recipient's spouse's name				8 Recipient's spous	e's SSN	ient's spouse's date of birth				
10 Policy start date	11 Policy te	rmination date		12 Street address (inc	12 Street address (including apartment no.)					
13 City or town	14 State or	province		15 Country and ZIP of	15 Country and ZIP or foreign postal code					
Part II Covered Individuals				1						
A. Covered individual name		B. Covered individual SSN		C. Covered individual date of birth	C. Covered individual D. Coverage date of birth		E. Coverage termination date			
16										
17										
18										
19										
20										
Part III Coverage Information										
Month A. Mon	thly enrollm	ent premiums		ly second lowest cost s an (SLCSP) premium	c.		dvance payment of um tax credit			
21 January							⊥			
22 February	Colum	nΔ		Column B		Col	umn C —			
23 March	Joidin	ША	L	Columni		COI	unine			
24 April										
25 May										
26 June										
27 July										
28 August										
29 September										
30 October										
31 November										
32 December										
33 Annual Totals										

Form 1095-A

Reconciling the Premium Tax Credit on Form 8962

Multiple Forms 1095-A

Some taxpayers will have multiple Forms 1095-A. This will happen if the taxpayer:

- Changed Marketplace plans during the year
- Updated their application with new information that resulted in a new enrollment
- Had family members enrolled in different Marketplace plans
- Had more than 5 family members in the same plan

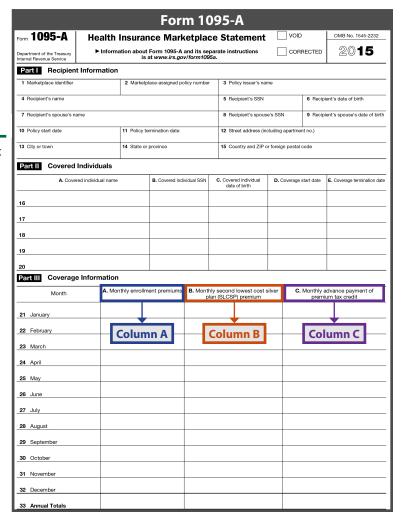
Entering Multiple Forms 1095-A on One Form 8962

Make sure everyone on the Forms 1095-A is also on the tax return. If not, this may be a Shared Policy Allocation.

Column A: Add the premiums together.

Column B: If everyone is in the same state and enrolled in the same policy, the SLCSP should be the same on all Forms 1095-A for a given month. Enter that amount. If the enrollees are in different states, add the SLCSPs. When in doubt, look it up in the Tax Tool for your Marketplace.

Column C (entered in Column F of Form 8962): Add the amounts together.



Form 8962, Premium Tax Credit

Tips and Tricks for Complex Cases

Is this return in scope?

Yes, for someone with advanced certification unless:

- There is a **Shared Policy Allocation**: Form 1095-A covers at least one person on the taxpayer's return and one person <u>not</u> on the return. This may happen when taxpayers divorce or separate, or when the taxpayer enrolls in coverage with a non-dependent, such as an older child who has a tax-filing requirement.
- The **Alternative Calculation for the Year of Marriage** applies: The taxpayer got married during the tax year, someone on the tax return had APTC, and the normal PTC calculation results in a repayment of APTC. Unlike the Shared Policy Allocation, the taxpayer is not required to use this calculation. It is most useful if: the spouses' incomes are different and the lower-income taxpayer received the APTC, and if the marriage occurred late in the year.

Is the taxpayer eligible for PTC at all?

PROBLEM: The taxpayer is Married Filing Separately

What you'll see: A filing status of Married Filing Separately on the 1040 and a Form 1095-A

What to do: In general, the taxpayer is ineligible for the PTC and must repay the APTC, up to the cap. However:

Does an exception apply? Check the box at the top of Form 8962 if the taxpayer is either a survivor of domestic abuse or has been abandoned by their spouse.

If no exception applies:

- Does Form 1095-A include someone in the taxpayer's family and someone on another tax return? If so, it is a shared policy allocation and out of scope.
- Does Form 1095-A include only people on the taxpayer's return? The taxpayer is not eligible for PTC and must repay any APTC. On Form 8962, calculate Lines 1 - 5, skip Lines 6 - 8b. Complete lines 9 and 10. On Line 11 or Lines 12-23, only enter information in Column F. Do not enter the other columns of Form 1095-A.

PROBLEM: The taxpayer has income at or above 401% FPL

What you'll see: An FPL of 401% or higher on Line 5 of Form 8962

What to do: In general, the taxpayer is ineligible for the PTC and must repay all APTC, with no cap. However:

- Did you check the Alaska/Hawaii/Other 48 States box on Line 4? You must check one of those boxes to get a poverty line calculation.
- Can household income be reduced to 400% FPL or below through income adjustments? Consider the IRA or tuition and fees deductions.

Did you consider Married Filing Separately? While APTC must still be repaid, the repayment caps will apply. Factor in other effects of MFS, such as elimination of certain credits and the higher tax rate.

Troubleshooting: IRS Reject F8962-038: Form 8962, Line

If none of these options are available and income remains at 401% FPL or above:

- If no APTC, stop. Do not complete the rest of Form 8962.
- If APTC, skip lines 7 and 8. Complete lines 9 and 10. On Line 11 or Lines 12-23, only enter information in Column F. Do <u>not</u> enter the other columns of Form 1095-A.

Departi Interna	Form 8962 Premium Tax Credit (PTC) Department of the Treasory Information about Form 9962 and its separate instructions is at www.irs.gov/form8962. Name shown on your return Your social security number						OMB No. 1545-0074 2015 Attachment Sequence No. 73			
You c	You cannot claim the PTC if your filing status is married filing separately unless you are eligible for an exception (see instructions). If you qualify, check the box.							ack the box.		
Par	Δηηι	ial and Monthly	Contribution Am	ount						
1			r of exemptions from I		Form 10	140A, line 6d.	or Form	1040NR, line 7d	1	
2a	Modified A	GI. Enter your mo	odified		b Ente	r the total	l of yo	ur dependents'	2b	
3			ounts on lines 2a and 2	2b					3	
4			ederal poverty line amo						4	
5			ge of federal poverty lin						5	%
6			See instructions if you	entered less t	han 100	%.)				
	=	ntinue to line 7. u are not eligible to	receive PTC. If advar	nce payment	of the P	TC was mad	e, see the	e instructions for		
			nce PTC repayment an				-,			
7	Applicable F	igure. Using your line	5 percentage, locate y	our "applicab	le figure'	on the table	in the inst	tructions	7	
8a		tribution amount. N						. Divide line 8a by		
		7	8a			Round to whole			8b	-114
Par			: Claim and Reco							
ľ			licy Allocation, or Part V,							
10		ntinue to line 11. C	can use line 11 or must co ompute your annual P					No. Continue o		es 12-23. Compute entinue to line 24.
	Annual alculation	(a) Annual enrollment premiums (Form(s) 1095-A, line 33A)	(b) Annual applicable SLCSP premium (Form(s) 1095-A, line 33B)	(c) Anno contribution (line 8)	amount	(d) Annual r premium as (subtract (c) zero or less,	ssistance from (b), if	(e) Annual premium credit allowed (smaller of (a) or ((f) Annual advance payment of PTC (Form (s) 1095-A, line 33C)
_11	Annual Totals								_	
	Monthly Calculation (a) Monthly enrollment premiums (Formis) 1095-A, lines 21-32, column A) (a) Monthly maximum premium assistance, idenoral from line 8b or affernative marriage monthly contribution amount premium assistance, idenoral from line 8b or affernative marriage monthly contribution) (a) Monthly maximum premium assistance, idenoral from line 8b or affernative marriage monthly contribution) (a) Monthly maximum premium assistance, idenoral from line 8b or affernative marriage monthly contribution) (a) Monthly maximum premium assistance, idenoral from line 8b or affernative marriage monthly contribution) (b) Monthly maximum premium assistance (a) Monthly maximum (a) Monthly ma			F	(f) Monthly advance payment of PTC (Form(s) 1095-A, lines 21-32, column C)					
12	January									
_13	February								_	
14	March								\rightarrow	
15	April								-	
17	June								\dashv	
18	July									
19	August									
_20	September								_	
21	October								\dashv	
22	November December					-		 	\dashv	
24		ım tax credit. Enter t	he amount from line 1	1(e) or add lin	es 12(e)	through 23(e) and ente	er the total here	24	
25			the amount from line						25	
26 Net premium tax credit. If line 24 is greater than line 25, subtract line 25 from line 24. Enter the difference here and on Form 1040, line 96; Form 1040NE, line 45; or Form 1040NE, line 65. If you elected the alternative calculation for marriage, enter zero. If line 24 equals line 25, and Fezzo. Stop here. I line 25 is greater than line 24, lies wet his line blank and continue to line 27.						26				
	Part III Repayment of Excess Advance Payment of the Premium Tax Credit							T		
27 28	Excess advance payment of PTC. If line 25 is greater than line 24, subtract line 24 from line 25. Enter the difference here Repayment limitation (see instructions)				e ditterence here	27 28				
28					 f line 27	 or line 28 ho	re and or	Form 1040 line	28	
	29 Excess advance premium tax credit repayment. Enter the smaller of line 27 or line 28 here and on Form 1040, line 46; Form 1040A, line 29; or Form 1040NR, line 44						29			

Troubleshooting: IRS Reject F8962-038: Form 8962, Line 24 'TotalPremiumTaxCreditAmt' must be equal to Line 11E

SLCSP, even though those values appear on Form 1095-A.

'MonthlyPremiumTaxCreditAllwAmt').

'AnnualPremiumTaxCreditAllwAmt' or (the sum of Lines 12E through 23E

Correction: If the person is ineligible for PTC (because they have income over 400% FPL or because they are MFS), for lines 12-23, enter only the

numbers in column E (advanced PTC). Do not enter the premium cost or

Form 8962

SECTION: RECONCILING THE PTC, Page 3

Form 8962, Premium Tax Credit

Tips and Tricks for Complex Cases

Is the taxpayer eligible for PTC for a particular month?

PROBLEM: The taxpayer stopped paying premiums

What you'll see: Numbers in Columns B and C but no premium in Column A (-0-) for a month on Form 1095-A, Part III

What to do:

- The taxpayer can only collect APTC if the premium is paid by the tax return due date (without extensions).
 If the APTC is high and covers most of the premium, can the taxpayer make the (late) premium payment? It may be more cost-effective to pay the premium than to repay the APTC! When the premium is paid, ask for a corrected Form 1095-A.
- If the premium payment has not and will not be made, enter the SLCSP and APTC and leave Column A blank.
 Note: There should never be consecutive months like this. If so, there is an error on Form 1095-A.
- Even if the taxpayer isn't eligible for PTC, he or she is still considered to have coverage for the month, despite nonpayment of premium.

Sample Form 1095-A: PART III Part III Coverage Information						
Month	A. Monthly enrollment premiums	B. Monthly second lowest cost silver plan (SLCSP) premium	C. Monthly advance payment of premium tax credit			
21 January						
22 February	\$301	\$288	\$87			
23 March	\$301	\$288	\$87			
24 April	\$301	\$288	\$87			
25 May	- 0 -	\$288	\$87			
26 June						
27 July						
28 August						
29 September						
30 October						
31 November						
32 December						

PROBLEM: The taxpayer paid the full premium for one or more months but may be eligible for PTC

What you'll see: A premium in Column A but nothing in Columns B or C on Form 1095-A, Part III

What to do:

- The taxpayer might have paid the full premium because he or she was disputing an eligibility determination or reported a change in circumstances that adjusted the APTC to zero.
- The taxpayer may still be eligible for a premium tax credit for that month!
- First, ensure the person is otherwise eligible for the premium tax credit for the month (see Form 8962 Instructions, p.2). Then, enter the SLCSP in Column B, using the Tax Tool for your marketplace. TaxWise will calculate the PTC amount.

Part III Coverage Information							
Month	A. Monthly enrollment premiums	B. Monthly second lowest cost silver plan (SLCSP) premium	C. Monthly advance payment of premium tax credit				
1 January	\$301						
2 February	\$301						
3 March	\$301						
4 April	\$301						
5 May	\$301						
6 June	\$301						
7 July	\$301						
B August							
9 September							
October							
1 November							
32 December							

PROBLEM: The taxpayer has multiple Forms 1095-A for the same month

What you'll see: Multiple forms 1095-A with an overlapping month for at least one person in the tax household

What to do: This happens when the taxpayer updated their income or household members with the Marketplace or made a plan change. It's also possible that family members enrolled in different plans. See Form 8962 Instructions for Lines 12-23.

- In Columns A and C, add the monthly premiums and APTC from the Forms 1095-A.
- In Column B, if individuals in your coverage family enrolled in separate policies in the same state, you will receive a Form 1095-A for each policy. The Marketplace should have entered the same SLCSP premium. If the enrollees are in different states, add the SLCSPs. When in doubt, look it up in the Tax Tool for your Marketplace.

PROBLEM: The taxpayer is enrolled in other (non-marketplace) coverage in the same month

What you'll see: A Form 1095-B or -C with coverage or eligibility months that overlap with Marketplace coverage on Form 1095-A

What to do: In general, PTC is allowed if the Marketplace previously approved APTC. See Form 1095-B or -C instructions, Form 8962 instructions, or Publication 974 for more information.

Form 8962, Premium Tax Credit

Handling Large PTC Overpayments

Many tax preparers are seeing clients with large overpayments of PTC that they must repay on Form 8962, Line 29.

	Form 8962: Part III				
Pa	art III Repayment of Excess Advance Payment of the Premium Tax Credit				
27	Excess advance payment of PTC. If line 25 is greater than line 24, subtract line 24 from line 25. Enter the difference here	27			
28	Repayment limitation (see instructions)	28			
29	Excess advance premium tax credit repayment. Enter the smaller of line 27 or line 28 here and on Form 1040, line 46; Form 1040A, line 29; or Form 1040NR, line 44	29			

To minimize repayment, consider the following strategies:

Make sure Form 1095-A is correct and complete.

- Ask the taxpayer to contact the Marketplace if the form doesn't reflect premiums that were paid or if there are other errors.
- See tips and tricks for complex cases when a taxpayer may be eligible for PTC for a particular month

Consider income adjustments to reduce household income.

- If the taxpayer is eligible to claim an IRA deduction, remember that taxpayers can contribute to an IRA until the tax filing deadline.
- If someone on the taxpayer's return has tuition expenses, consider the Tuition and Fees deduction instead of an education credit

Consider married filing separately.

• The taxpayer will technically be ineligible for the PTC, but filing separately may cap repayment at a lower level based on income.

Repayment Caps for APTC					
Income (as % of federal poverty line)	Taxpayers Filing as SINGLE	Taxpayers Using Other Filing Statuses			
Under 200%	\$300	\$600			
200% – 299%	\$750	\$1,500			
300% – 399%	\$1,250	\$2,500			
400% and above	No cap (full repayment)	No cap (full repayment)			

Explanation: Why do overpayments happen?

For several reasons:

- Income or household may have changed since the application for subsidies was submitted. For example, someone may have gotten a new job or worked additional hours or someone who was expected to be a dependent was not claimed on the tax return.
- Technical error in calculating the 2015 PTC amount, such as certain income being entered but not counted in the PTC calculation.
- The taxpayer allowed 2014 coverage to auto-renew for 2015. For the federal marketplace, this meant that the 2014 PTC was kept the same for 2015, even though income, household and plan cost may have changed. (This process has been improved for 2016.)

Important! If the taxpayer is currently enrolled in Marketplace coverage and has a 2015 repayment, they should contact the Marketplace to adjust their 2016 APTC **now** to avoid similar repayments for the 2016 tax year!