



Internal Revenue Service
Room 5203 P.O. Box 7604
Ben Franklin Station
Washington, D.C. 20044

January 3, 2020

Attn: CC:PA:LPD:PR (Notice 2019-63)
Transition Relief Related to Health Coverage Reporting Required by I.R.C. Sections 6055
and 6056 for 2019

Dear Sir/Madam:

On behalf of the National Association of State Comptroller's Payroll Information Sharing Group, we thank you for the opportunity to provide our views on Notice 2019-63: Transition Relief Related to Health Coverage Reporting Required by I.R.C. Sections 6055 and 6056 for 2019. We very much appreciate the Internal Revenue Service (IRS) issuing Notice 2019-63 to extend from January 31 to March 2, 2020 the due date for certain 2019 information reporting requirements under sections 6055 and 6056 addressing health insurance and information returns regarding coverage.

Notice 2019-63 states that "the IRS and Treasury Department will continue to evaluate whether an extension of the due date for furnishing statements to individuals under section 6056 and an extension of good-faith reporting relief under section 6056 will be necessary for future years." The notice specifically requests comment on this statement.

We applaud the IRS for recognizing the difficulty in implementing this provision for 2019; however, we respectfully request that the IRS make permanent the extension of the due date to provide employees forms 1095-B and 1095-C for future years. Employers pay employees in arrears, which means that work hours are not finalized for the previous year until January. Also, most offers of coverage are not finalized until mid-January. Due to information needed for filing not being available until mid to late January, issuance of accurate forms to employees by January 31st is very challenging and leads to unavoidable corrections. A permanent extension would allow for more accurate forms by utilizing more finalized hours and offers of coverage including accounting for any retroactive offer of coverage changes that may occur in mid to late January.

The IRS Advisory Council noted similar concerns in their [annual public report for 2019](#) stating that "the human resource and benefit administration systems have frequent retroactive entries meaning that in the absence of an extension, the IRS may be inundated with requests for an extension or issuers will be unduly burdened by the need to issue revised or corrective forms."



Absent an automatic extension for all employers, the IRS will receive a very large number of individual requests from employers for 30-day extensions. Providing a permanent extension of the due date for future years would reduce the need for numerous corrections, alleviate any unintentional errors and avoid an avalanche of individual extension requests.

Thank you for the opportunity to comment on the need for permanent extension in future years. Should you have any questions or desire any additional information, please feel free to reach out to our representative in Washington, Cornelia Chebinou, at (202) 624-5451 or cchebinou@nasact.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "J Piggott".

Jeremy Piggott, Co-Chair
Payroll Information Sharing Group

A handwritten signature in blue ink, appearing to read "Steve Nielson".

Steve Nielson, Co-Chair
Payroll Information Sharing Group