



IRS extends income tax filing, HSA contribution deadlines

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In response to the ongoing COVID-19 pandemic, IRS [Notice 2020-18](#) extends the deadlines for health savings account (HSA) contributions, federal income tax filings and more. However, this relief does not affect the March 31 deadline for applicable large employers (ALEs) to file the health offer and coverage information returns required by the Affordable Care Act (ACA).

Federal income tax, HSA contribution extension

The 2020 deadline to file federal income tax returns has moved from April 15 to July 15. Postponement is automatic without any need to file an application for extension. The automatic deadline extension applies to income tax returns and payments for the 2019 taxable year. The extension also applies to estimated income tax payments for the 2020 taxable year, which are normally due on April 15. Interest, penalties and additions to taxes— if any — for late filings and payments will begin to accrue on July 16, 2020. IRS Q&As give more information, including specific IRS forms to which the relief applies.

HSA contribution deadline. The extended income tax filing deadline effectively extends the timeframe for making 2019 HSA contributions. HSA contributions for a designated year typically can be made from Jan. 1 of that year through the income tax filing deadline (typically April 15 of the next year). Because the filing deadline for 2019 federal income tax returns is now July 15, 2020, 2019 HSA contributions can be made up until that date.

State filing and payment deadlines not impacted. The IRS relief applies only to federal income tax payments. State filing and payment deadlines vary and are not always the same as federal filing and payment deadlines. Employers should check with state tax agencies for filing information.

No relief for ACA information returns

Under the ACA, ALEs and minimum essential coverage (MEC) providers must annually file health offer and coverage reports (Forms [1095-B](#) and [1095-C](#)) with the IRS. The 2020 deadline was Feb. 28 for paper filings and is March 31 for electronic filings. Notice 2020-18 does not change these ACA reporting due dates and specifically says “no extension is provided ... for the filing of any federal information return.” Large employers can submit [Form 8809](#) before March 31 to receive an automatic 30-day extension of the ACA filing deadline.

New Jersey filing deadline extended. New Jersey’s individual mandate requires health coverage providers, including insurers and self-insured group health plans, to submit copies of their IRS Forms 1095 to the state’s Division of Taxation each year. Recent New Jersey [guidance](#) extends the original deadline of March 31 for the 2019 reporting year to May 15, 2020. Health coverage providers must provide a copy of IRS Form 1095 for each primary enrollee who was a full-year or part-year New Jersey resident and received MEC in 2019. For filing purposes, a part-year resident is a primary enrollee who lived in New Jersey for at least 15 days in any month.

No Washington, DC, extension. Washington, DC, requires employers to report to the [Office of Tax and Revenue](#) on coverage provided to any employee who is subject to DC income tax withholding or has a DC mailing address (even if the employer doesn’t withhold and report DC taxes). For the 2019 coverage year, filings are due on June 30. The city has not announced any delay for filing these reports.

Related resources

Non-Mercer resources

- [Filing and payment deadlines Q&As](#) (IRS, March 24, 2020)
- [Updated guidance for health coverage filings](#) (New Jersey Treasury Department, March 23, 2020)
- [Notice 2020-18](#) (IRS, March 20, 2020)
- [Publication 969](#), Health Savings Accounts and other Tax-Favored Health Plans (IRS, annually updated)
- [Information reporting by applicable large employers](#) (IRS, regularly updated)

Mercer Law & Policy resources

- [ACA individual statement deadline and good faith relief extended again](#) (Dec. 4, 2019)
- [Roundup of selected state health developments — third-quarter 2019](#) (Oct. 28, 2019)

- [DC details employer reporting for individual health coverage mandate \(Aug. 20, 2019\)](#)
- [New Jersey posts update on health-coverage reports due in 2020 \(April 16, 2019\)](#)

Other Mercer resource

- [Stay informed on coronavirus \(regularly updated\)](#)

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