TAX GUIDE

Reconciling the Premium Tax Credit on Form 8962

FORM 1095-A: Tips & Tricks for Tax Preparers

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</u> <u>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 the last day of the tax filing season, 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.)

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demal Revenue Service		gov/Form1	095A for instructions an	d the latest informatio	n.	000-1206 04041 W	
A DE DO-DARIOS	t Information						
1 Marketplace identifier		2 Marketp	lace-assigned policy number	3 Policy issuer's nar	ne		
4 Recipient's name				5 Recipient's SSN	5 Recipient's SSN 6 Recip		ient's date of birth
7 Recipient's spouse's n	ame			8 Recipient's spous	e's SSN	9 Recip	ient's spouse's date of birt
10 Policy start date		11 Policy te	rmination date	12 Street address (inc	cluding apartme	nt 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						
	red individual name		B. Covered individual SSN	C. Covered individual date of birth	D. Coverage	start date	E. Coverage termination dat
16							
16							
18							
19							
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Part III Coverag	e Information						
		thly enrolin	ent premiums B. Month	nly second lowest cost s an (SLCSP) premium	silver C.	Monthly : prem	advance payment of ium tax credit
Part III Coverag		thly enrollm	ent premiums B. Month pl	nly second lowest cost s an (SLCSP) premium	silver C.	Monthly : prem	advance payment of jum tax credit
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Part III Coverag Month 21 January	A. Mon		p	an (SLCSP) premium	silver C.	prem	ium tax credit
21 January 22 February 23 March	A. Mon		p	an (SLCSP) premium	silver C.	prem	ium tax credit
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Coverage Month 21 January 22 February 23 March 24 April 25 May 26 June 27 July	A. Mon		p	an (SLCSP) premium	Silver C.	prem	ium tax credit
Coverage Month 21 January 22 February 23 March 24 April 25 May 26 June 27 July 28 August	A. Mon		p	an (SLCSP) premium		prem	ium tax credit
Coverage Month 21 January 22 February 23 March 24 April 25 May 26 June 27 July 28 August 29 September	A. Mon		p	an (SLCSP) premium	C.	prem	ium tax credit
Coverage Month 21 January 22 February 23 March 24 April 25 May 26 June 27 July 28 August 29 September 30 October	A. Mon		p	an (SLCSP) premium	C.	prem	ium tax credit
Coverage Month 21 January 22 February 23 March 24 April 25 May 26 June 27 July 28 August 29 September 30 October	A. Mon		p	an (SLCSP) premium	Silver C.	prem	ium tax credit

• 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:

- It is incorrect, perhaps because a change in family size was not reported.
- It is missing. This happens when someone paid the full premium. Other marketplaces routinely leave this space blank.
- 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.



Multiple Forms 1095-A

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

- Changed marketplace plans during the year.
- 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, 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: Tips & 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 nondependent, 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.

epartn	ent of the Trea Revenue Servic hown on your r	e Go		Form 1040,	1040-SR		mation. ial security number		2022 Attachment Sequence No. 73
A. 1	ou cannot take	the PTC if your filing s	tatus is married filing sep	arately unless	you qualify	/ for an exception. See ir	istructions. If you qua	lify, ch	eck the box
Part	Annu Annu	al and Monthly	Contribution An	nount				~	
1	Tax family s	ize. Enter your tax fa	mily size. See instruct	ions				1	
2a	Modified AC	al. Enter your modifie	ed AGI. See instruction	ns		2a			
b	Enter the to	tal of your depender	nts' modified AGI. See	instructions		2b			
3	Household i	ncome. Add the amo	ounts on lines 2a and 2	2b. See instru	uctions			3	
4			ederal poverty line ame overty table used. a					4	
5	Household i	ncome as a percenta	ge of federal poverty li	ne (see instru	ctions)			5	
6	Reserved for	r future use							
7	Applicable fi	gure. Using your line	5 percentage, locate y	our "applicat	le figure"	on the table in the inst	ructions	7	
8a	Annual contrib	ution amount. Multiply li	ne 3 by		b Mon	thly contribution amou	nt. Divide line 8a		
		o nearest whole dollar a				2. Round to nearest wh		8b	
Part	Pren	nium Tax Credit	Claim and Reco	nciliation	of Adv	ance Payment o	Premium Tax	Cre	dit
10	See the inst	ructions to determin	f Policy Amounts, or Part e if you can use line 1° ompute your annual P	or must cor	nplete lin	es 12 through 23.	No. Continue	to lin	
	Annual Iculation	(a) Annual enrollment premiums (Form(s) 1095-A, line 33A)	(b) Annual applicable SLCSP premium (Form(s) 1095-A, line 33B)	(c) Ani contributior (line 8	amount	(d) Annual maximum premium assistance (subtract (c) from (b); if zero or less, enter -0-)	(e) Annual premium credit allowed (smaller of (a) or (F	(f) Annual advanc ayment of PTC (For 1095-A, line 33C)
11 .	Annual Totals								
	Nonthly Iculation	(a) Monthly enrollment premiums (Form(s) 1095-A, lines 21–32, column A)	(b) Monthly applicable SLCSP premium (Form(s) 1095-A, lines 21-32, column B)	(c) Mor contribution (amount fro or alternative monthly cal	amount n line 8b marriage	(d) Monthly maximum premium assistance (subtract (c) from (b); if zero or less, enter -0-)	(e) Monthly premiur credit allowed (smaller of (a) or (ŀ	(f) Monthly advance ayment of PTC (Forr 1095-A, lines 21–32 column C)
12	January								
13	February								
14	March								
15	April								
16	May								
17	June								
18	July								
19	August								
20	September								
21	October								
22	November								
23	December								
24			he amount from line 1					24	
25	Advance pa	yment of PTC. Enter	the amount from line	11(f) or add I	nes 12(f)	through 23(f) and ente	er the total here	25	
26	on Schedul	e 3 (Form 1040), line	is greater than line 2 9. If line 24 equals line	ne 25, enter	-0 Stop	here. If line 25 is gre	ater than line 24,		
			e to line 27					26	
Part			ss Advance Payn						
27			If line 25 is greater than					27	
28 29	Excess adv	ance premium tax c	ctions) redit repayment. Ente	or the smalle	r of line a	27 or line 28 here an	d on Schedule 2	28	
		line 2						29	1

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 <u>not</u> 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? Filing separate returns may reduce income to under 401% FPL and, 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.

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 not enter the other columns of Form 1095-A.

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.

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. Tax software will calculate the PTC amount.

NOTE: Tax preparers should disregard the above 401% FPL advice to the left for tax years 2021-2025. In these years, taxpayers earning above 400% FPL may be eligible for APTC; there is no upper income limit for APTC eligibility. Therefore, taxpayers are only liable to repay amounts received above the monthly premium tax credit allowed. Form 8962 has been updated accordingly for 2021-2025. There is still no cap on APTC repayment for taxpayers earning above 400% FPL.

Sample Form 1095-A: 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	\$301	\$288	\$87
22 February	\$301	\$288	\$87
23 March	\$301	\$288	\$87
24 April	- 0 -	\$288	\$87
25 May			
26 June			
27 July			
28 August			
29 September			
30 October			
31 November			
32 December			
33 Annual Totals			

Month	A. Monthly enrollment premiums	B. Monthly second lowest cost silver plan (SLCSP) premium	C. Monthly advance payment of premium tax credit
21 January	\$301		
22 February	\$301		
23 March	\$301		
24 April	\$301		
25 May	\$301		
26 June	\$301		
27 July	\$301		
28 August			
29 September			
30 October			
31 November			
32 December			

Sample Form 1095-A: Part III Coverage Information



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's eligibility or plan changed or when 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, PART III: Handling Large APTC Repayments

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 PTC (Tax Year 2022)				
Income (as % of federal poverty line)	Taxpayers Filing as SINGLE	Taxpayers Using Other Filing Statuses		
Under 200%	\$325	\$650		
200% – 299%	\$825	\$1,650		
300% – 399%	\$1,400	\$2,800		
400% and above	No cap (full repayment)	No cap (full repayment)		
Note: Amounts are indexed and change every year.	For additional vearly thresholds, see Yearly Thr	esholds Reference Guide		

Note: Amounts are maexed and change every year. For daantonal yearly thresholds, see <u>Yearly Thresholds Referenc</u>

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.
- There was an error in calculating the APTC amount because of an inaccurate income or family size calculation, not keeping the application current when circumstances changed, or a technical error by the marketplace.
- The taxpayer allowed coverage to auto-renew without updating income or household information.

Important! If the taxpayer is currently enrolled in marketplace coverage and has a repayment, they should contact the marketplace to adjust their current APTC now to avoid similar repayment in the next tax year.

