Known Issues and Solutions for TY2019
Forms 1094-B/1095-B, 1094-C/1095-C

Item #	Date Added	Form(s)	Element or Rule Number	Description of the Problem	Temporary Solution(s)
1	1/20/2020	1094/95-B 1094/95-C	BusinessNameControlTxt PersonNameControlTxt	These elements are optional in the schema and are not enforced with business rules, but should be included in the submission for TIN Validation purposes.	Please include all name controls.
2	1/20/2020	1094-B 1095-B 1094-C 1095-C	'TINRequestTypeCd'	This element is optional in the schema but enforced by Business Rules and should be included in submitted xml.	Include all 'TINRequestTypeCd' elements within the xml where applicable.
3	1/20/2020	1094-C	1094C-045-02 1094C-048-01 1094C-050-01 1094C-081-01	There may be instances where the correct count for Full-Time Employees and/or Total Employees is 0. These rules set and the submission is Accepted with Errors.	If the ALE is reporting coverage of only non full-time employees on Forms 1095-C, and the ALE had no total employees for the entire calendar year, the Full-Time Employee count and the Total Employee count reported on Form 1094-C may be 0 and a correction is not required.
4	3/12/2020	1095-C	1095C 019-03 1095C-020-03	A limit of 10,000 was added to these rules for TY2019. As a result, the rules are setting frequently.	Form 1095-C Instructions for Line 15 state that the amount reported on this line should be the employee's share of the lowest-cost, self-only minimum essential coverage providing minimum value that the employee offers. The Note emphasizes that this might not be the amount the employee is paying for coverage if the employee chose to enroll in more expensive coverage.
5	9/28/2020	1095-B 1095-C	Error data file	In some error data file Xpaths, the word "instance" is returned instead of the actual number (1, 2, 3, etc) For example, SHARED-008 error data file Xpath: <ns2:XpathContent>/Form109495CTransmittalUpstream/Form1094CUpstreamDetail/Form1095CUpstreamDetail/CoveredIndividualGrp[instance]/SSN</ns2:XpathContent>	We expect this issue will be resolved in AATS in November and in Production in January Filers will need to review all instances to determine which one has the error. In the example for SHARED-008, the filer should review all SSN/names in Part III to determine which individual has the error.