TIN Validation Error Correction Guide

A “Correction Needed” or “TIN Validation Failed” message indicates that the IRS found a Name/TIN combination on a 1095 form that does not match IRS records. These error messages can be confusing because the IRS does not specify which name(s)/TIN(s) caused the error, and there may be multiple errors of this type on a single form. This guide is intended to lead you through the process of correcting TIN errors so that your ACA filing can reach an “Accepted” status.

How do I know if I have a TIN Validation Error?
You will be informed of a TIN validation error via e-mail, within the product message center on the home page, and on the “Correction Report” which is available within the Form Filing History area. To access this report either click on the link displayed in the product message center or select the Form Filing History icon from Your Filing Home.

Form Filing History

Within Form Filing History, click on the yellow caution triangle. Then select the link called “View Correction Report” at the top right of the screen. A report will be downloaded that lists forms that need corrections, and the related error message. See Figure 2. The sample below indicates that recipients John Doe and Jane Smith both have TIN validation errors on their 1095-C form.

<table>
<thead>
<tr>
<th>Form Title</th>
<th>Payer TIN</th>
<th>Payer Name</th>
<th>Recipient TIN or DOB</th>
<th>Recipient Name</th>
<th>Error Message</th>
</tr>
</thead>
<tbody>
<tr>
<td>1095-C</td>
<td>12-3456789</td>
<td>ABC Company</td>
<td>123-45-6789</td>
<td>John Doe</td>
<td>TIN Validation Failed</td>
</tr>
<tr>
<td>1095-C</td>
<td>12-3456789</td>
<td>ABC Company</td>
<td>123-45-6789</td>
<td>John Doe</td>
<td>TIN Validation Failed</td>
</tr>
<tr>
<td>1095-C</td>
<td>12-3456789</td>
<td>ABC Company</td>
<td>123-45-6789</td>
<td>John Doe</td>
<td>TIN Validation Failed</td>
</tr>
<tr>
<td>1095-C</td>
<td>98-7654321</td>
<td>XYZ Corp</td>
<td>987-65-4321</td>
<td>Jane Smith</td>
<td>TIN Validation Failed</td>
</tr>
</tbody>
</table>

How do I know which name or TIN on the form is incorrect?
Unfortunately, the IRS does not provide specific information on TIN validation errors. The only information that is provided is the name and TIN of the recipient, however the TIN validation error could be the name/TIN combination for the recipient, or a covered individual of the recipient, or both. Since it is impossible to know which name/TIN combination caused the error, it will be necessary to validate all name/TIN fields on the form, both the recipient and covered individuals. Also note that if you find that the name/TIN field on the recipient is incorrect, you will also need to correct their information in the Covered Individuals section.

The Correction Report illustrated in Figure 2 indicates that John Doe, with Recipient TIN 123-45-6789, has three TIN validation errors on his Form 1095-C. However, since the IRS does not specify which Name/TIN fields on the form caused the errors, any of the following are possible and need to be validated:

- John Doe’s Name/TIN combination is incorrect in the Employee Name field AND in the Covered Individuals field and one other individual listed in the Covered Individuals section has an incorrect Name/TIN combination.
- John Doe’s Name/TIN combination is incorrect in the Employee Name field OR in the Covered Individuals field and two other individuals listed in the Covered Individuals section have incorrect Name/TIN combinations.
- Three individuals listed in the Covered Individuals section (not John Doe) have incorrect Name/TIN combinations.

This example also shows that Jane Smith has one TIN validation error on her Form 1095-C. Again, the error could indicate that the recipient Name/TIN information is incorrect, or that there is an incorrect Name/TIN in the Covered Individuals section of the 1095 form. Either of the following are possible and need to be validated:

- Jane Smith’s Name/TIN combination is incorrect in the Employee Name field OR in the Covered Individuals field.
- One individual listed in the Covered Individuals section (not Jane Smith) has an incorrect Name/TIN combination.

**How do I obtain the correct TIN information?**

Follow these steps to ensure you have met all requirements to obtain the correct Name/TIN information:

- Check your records (HR/Benefits, Payroll data) to verify that all Name/TIN combinations were entered correctly on Form 1095.
- Contact the employee or employer to validate the Recipient Name/TIN Combination and Covered Individuals Name(s)/TIN(s).
  
  - 1095-B Forms - Check with the sponsoring employer or responsible individual to validate the name/TIN information
  - 1095-C Forms - Check with your employee to validate the name/TIN information
- Contact your local Social Security Administration (SSA) office to determine if your information matches SSA’s information.
Once you have identified the incorrect Name/TIN fields and have obtained the correct data, you may enter a 1095 correction. Submit your corrected forms as soon as possible.

If you are unable to obtain the correct TIN for one or more recipients or covered individuals, delete the TIN data and enter the Date(s) of Birth in the appropriate fields. The IRS will accept date of birth if the TIN is not available.

**What if I can’t resolve a TIN issue?**
You may be unable to resolve a TIN issue if you can’t reach a particular employer or individual to validate their TIN or obtain their date of birth. It is also possible that you have taken all required steps and believe that your data is accurate. In these cases, **make sure you have documented your process thoroughly to avoid potential fines and penalties.** The IRS has outlined the following process for 1095 forms:

- Make an initial solicitation of Recipient and Covered Individuals’ TINs at an individual’s first enrollment or, if already enrolled by September 17, 2015, the next open season.
- If you do not receive the TINs, make the second solicitation at a reasonable time thereafter.
- If TINs are still not provided, make a third solicitation by December 31 of the year following the initial solicitation. You are not required to solicit a TIN from an individual whose coverage is terminated.

**How do I enter a 1095 correction?**
Follow the steps below to enter a 1095 correction:

- Either click on the link displayed in the product message center or select the Form Filing History icon from Your Filing Home. (See Figure 1).
- In Form Filing History, the forms with a “Correction Needed” status will be highlighted with a yellow caution triangle. Click on this triangle. (See Figure 1).
- Click on the blue “Correct” button to begin.
- All of the forms that need a correction will be loaded into Forms in Progress.
- Select the edit icon to edit and save each form. **To move quickly through the forms, select the previous employee and next employee arrow buttons. See Figure 3.**
When all changes are made, select “Next” on the Forms in Progress page to begin the checkout process.

**What is the deadline to correct TIN Validation errors?**  
You should correct your forms as soon as possible. You will have until November 30, 2016 to correct your 2015 forms.