LEGAL UPDATE

KEY DATES

ACA reporting for the 2025 calendar year is due in early 2026:

March 2, 2026

- Reporting entities must post a clear, conspicuous and accessible notice on their websites by this date, informing individuals that they may request a copy of Forms 1095-B or 1095-C.
- Alternatively, if a reporting entity chooses not to post the notice online, it may instead provide Forms 1095-B or 1095-C directly to individuals by this date.
- Reporting entities should continue to comply with applicable state reporting requirements, which may differ from federal obligations.

March 31, 2026

- Electronic IRS returns for 2025 must be filed by this date. Reporting entities that file at least 10 returns during the calendar year must file electronically.

2025 ACA Reporting Forms & Instructions Finalized

On Nov. 5, 2025, the Internal Revenue Service (IRS) issued final instructions for Affordable Care Act (ACA) reporting under Internal Revenue Code Sections 6055 and 6056. The release follows the IRS' earlier publication of the final reporting forms and draft instructions for the 2025 calendar year.

- The **2025 Forms** 1094-B **and** 1095-B **(and** related instructions**)** will be used by providers of minimum essential coverage—including self-insured plan sponsors that are not applicable large employers (ALEs)—to report under Section 6055.
- The **2025 Forms** 1094-C **and** 1095-C **(and** related instructions**)** will be used by ALEs to report under Section 6056 as well as for combined Section 6055 and 6056 reporting by ALEs that sponsor self-insured plans.

No major changes were made to the final forms or instructions for 2025 reporting.

Final Instructions Highlight Alternative Furnishing Method

Both sets of instructions clarify that reporting entities are no longer required to automatically furnish Forms 1095-B and 1095-C to individuals (as required under the original reporting rules). Instead, reporting entities may post a notice on their websites informing individuals that they can request a copy of the statement. The requirement to provide the statement is met if the notice is:

- Clear, conspicuous and reasonably accessible to all covered individuals;
- Timely posted, which for calendar year 2025 is by **March 2, 2026**;
- Retained on the website until **Oct. 15, 2026**; and
- Furnished to any requesting individual **by the later of Jan. 31, 2026, or 30 days after the date of the request**.

The instructions also outline the required content for the website notice, which remains unchanged from the prior reporting year.

Action Steps

Employers should become familiar with the forms and instructions for 2025 calendar year reporting and begin to explore options for filing ACA reporting returns electronically (e.g., they may be able to work with a third-party vendor to complete the electronic filing). Reporting entities that may be in a position to perform their own electronic reporting can review the IRS' ACA Information Returns (AIR) Program webpage.

Additional IRS Resources

The IRS provides the following resources for reporting entities:

- Information Reporting by Providers of Minimum Essential Coverage
- Q&As: Information Reporting by Health Coverage Providers (Section 6055)
- Information Reporting by Applicable Large Employers
- Q&As: Employer Information Reporting on Form 1094-C and 1095-C
- Q&As: Reporting of Offers of Health Insurance Coverage by Employers (Section 6056)

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