

Paperwork Burden Reduction Act for 1095 Delivery

For the 2025 plan year, the IRS continues to allow employers and insurers to furnish Forms 1095-B and 1095-C only upon individual request, in lieu of automatically distributing them to every covered individual, under the alternative furnishing method provided by Notice 2025–15 Paperwork Burden Reduction Act.

What this means

You are not required to automatically mail Form 1095-B or 1095-C to all employees or covered individuals.

Instead, you **must implement a process** where those forms are made available upon request, and have systems in place to furnish them correctly.

» To use the alternative furnishing method lawfully, follow these steps:

1. Post a Clear, Conspicuous, Accessible Notice

When: By the due date for furnishing – March 3, 2026 (January 31 + 30-day extension).

Where: On a publicly accessible website (public facing or benefits portal that all covered individuals can reach).

Content Requirements:

- Plain-language statement that “Covered individuals may request a copy of their 2025 Form 1095-B/C”
- Include an email address, physical address, and telephone number for submitting requests.
- Use sufficient font size and visual emphasis to grab attention.

2. Maintain the Notice

Keep the notice posted in the same location through October 15, 2026.

3. Accept Requests from Covered Individuals

Ensure your organization has reliable procedures to receive and record requests via email, mail, or phone by covered individuals.

4. Furnish Form 1095 upon Request

Within 30 days of a request, or by January 31, 2027, whichever is later, furnish the Form 1095 by:

- » Mail,
- » In-person, or
- » Electronically, if the individual has provided prior consent (and hasn't withdrawn it).

5. File with IRS as Usual

- » Continue to prepare and e-file all required Forms 1094-C/1095-C (or 1094-B/1095-B) with the IRS.
- » Due by March 31, 2026, if filing electronically (more than 10 returns).

6. Track Consent for Electronic Delivery

If offering electronic copies, implement a process to obtain and record affirmative electronic consent, and ensure that individuals can withdraw it anytime.

By posting the required notice by March 3, 2026, and following the request-and-furnish process, you can lawfully opt out of mailing Form 1095s automatically, saving time and money — while maintaining full compliance with IRS rules for the 2025 plan year.

Any Questions: contact Beth at 320-220-2445

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