

2025 ACA Employer Reporting Requirements

6055 – Minimum Essential Coverage (MEC)

Requires health insurers (carriers) and sponsors of self-insured health plans to provide covered individuals and the IRS with information on MEC for a calendar year (CY). Information in this report is used to administer the **Individual Mandate, where required by state law.**

6056 – Applicable Large Employer (ALE)

Requires ALEs to provide full-time employees (FTEs) and the IRS with information regarding an offer of health plan coverage during the CY. Information in this report is used to administer the **Employer Mandate.**

Forms

“B” Forms (1094-B and 1095-B)¹

- Used by health insurance carriers, small employers with self-insured (level funded) health plans, and multiemployer plans to report individuals who had MEC in the CY
- **1094-B** – *Transmittal Form* – cover page for submission of all Forms 1095-B to the IRS
- **1095-B** – identifies a specific individual’s (and any covered family member’s) health coverage

“C” Forms (1094-C and 1095-C)²

- Used by ALEs to report offers of coverage to FTEs to satisfy the employer mandate and by self-insured ALEs to report MEC
- **1094-C** – *Transmittal Form* – cover page for submission of all Forms 1095-C to the IRS
- **1095-C** – identifies each FTE and information regarding the offer of coverage; also provides information on employees/individuals and family members covered by the self-insured plan

Employer Reporting Obligations

Employer to Employees	What Form/Parts?	To Whom?	When?
Insured, under 50 FTEs	No employer action. Carrier provides Form 1095-B when requested by individual	No employer action. Carrier provides Form 1095-B to covered individuals by March 2, 2026.	No employer action. Carrier provides Form 1095-B to covered individuals by March 2, 2026.
Self-insured, under 50 FTEs	Form 1095-B (all parts except II)	Covered individuals*	March 2, 2026
Insured (or no coverage), 50 or more FTEs	Form 1095-C (parts I and II)	All FTEs*	March 2, 2026
Self-insured, 50 or more FTEs	Form 1095-C (all parts)	All FTEs and all covered employees/individuals*	March 2, 2026

*When employee requests.

Employer to IRS	What Form?	When?
Insured, under 50 FTEs	No employer action. Carrier obligation.	No employer action. Carrier obligation.
Self-insured, under 50 FTEs	<ul style="list-style-type: none"> • Form 1094-B (transmittal form) • All Forms 1095-B 	March 31, 2026 if filing electronically*
Insured (or no coverage), 50 or more FTEs	<ul style="list-style-type: none"> • Form 1094-C (transmittal form) • All Forms 1095-C 	March 31, 2026 if filing electronically*
Self-insured, 50 or more FTEs	<ul style="list-style-type: none"> • Form 1094-C (transmittal form) • All Forms 1095-C 	March 31, 2026 if filing electronically*

***Effective January 1, 2024: Electronic filing is required if filing 10 or more forms (applies to all types of information returns - including W2s and 1099s).**

Instructions for 1094/1095 B Forms:
<https://www.irs.gov/pub/irs-pdf/i109495b.pdf>

Instructions for 1094/1095 C Forms:
<https://www.irs.gov/pub/irs-pdf/i109495c.pdf>

- Form 1094 B: <https://www.irs.gov/pub/irs-pdf/i1094b.pdf>
- Form 1095 B: <https://www.irs.gov/pub/irs-pdf/i1095b.pdf>

- Form 1094 C: <https://www.irs.gov/pub/irs-pdf/i1094c.pdf>
- Form 1095 C: <https://www.irs.gov/pub/irs-pdf/i1095c.pdf>