

# LEGAL UPDATE



## KEY DATES

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

### 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.

### Statements Upon Request

Forms 1095-B and Forms 1095-C can be provided to individuals upon request. Reporting entities must notify individuals of their ability to receive a copy of their statement upon request by posting a clear and conspicuous notice on the reporting entity's website.

## Draft Forms for 2025 ACA Reporting Released

The Internal Revenue Service (IRS) has released draft 2025 forms for Affordable Care Act (ACA) reporting under Internal Revenue Code Sections 6055 and 6056. Draft instructions have not yet been released.

- The **2025 draft Forms 1094-B and 1095-B** are draft versions of forms that 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 draft Forms 1094-C and 1095-C** are draft versions of forms that 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 draft forms for 2025 reporting.** However, certain changes may be made once the forms are finalized.

### Individual Statements Upon Request

Under the original reporting rules, reporting entities were required to provide annual statements to each individual who is provided minimum essential coverage (under Section 6055) and each full-time employee of an ALE (under Section 6056). These statements were provided using Forms 1095-B and 1095-C.

However, pursuant to legislation enacted at the end of 2024, reporting entities are no longer required to send Forms 1095-B and 1095-C to covered individuals **unless a form is requested**. Reporting entities must give individuals timely notice of this option, and requests must be fulfilled by Jan. 31 of the year following the calendar year to which the return relates or 30 days after the date of the request, whichever is later. **This change applies to federal reporting requirements—employers should continue to comply with applicable state reporting requirements.**

### Action Steps

Employers should become familiar with the draft forms for 2025 calendar year reporting, keeping in mind that these are **draft versions only and should not be relied upon for filing**. Employers should also monitor future developments for the release of 2025 draft instructions.

### 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 Form 1095-C](#)
- [Q&As: Reporting of Offers of Health Insurance Coverage by Employers \(Section 6056\)](#)