

LEGAL UPDATE



2025 ACA Reporting: Final C Series Forms Released; Draft B Series Forms & C Series Instructions Available

In June 2025, the Internal Revenue Service (IRS) released draft 2025 forms for Affordable Care Act (ACA) reporting under Internal Revenue Code Sections 6055 and 6056. Thereafter, the IRS published draft instructions for the C series forms and on Oct. 2, 2025, the agency finalized Forms 1094-C and 1095-C. **However, the IRS has not yet released final forms or draft instructions for the B series forms (1094-B and 1095-B).**

- 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. Draft instructions have not yet been released.
- The **2025 Forms 1094-C and 1095-C** are 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. [Draft instructions](#) for 2025 are available but have not yet been finalized.

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 may be furnished to individuals upon request. To do so, reporting entities must post a clear and conspicuous notice on their websites informing individuals of the availability of these forms. Alternatively, reporting entities can provide Forms 1095-B and 1095-C to individuals by **March 2, 2026**. Reporting entities should continue to comply with applicable state reporting requirements, which may differ from federal obligations.

No major changes were made to the final or draft forms, or the draft C series instructions, for 2025 reporting.

Action Steps

Employers should become familiar with the final and draft forms and available instructions for 2025 calendar year reporting, keeping in mind that the **draft forms should not be relied upon for filing**. The draft C series instructions emphasize that the formatting directions they contain are for the preparation of paper returns. When filing forms electronically, the formatting set forth in the IRS' XML Schemas and business rules must be followed.

Employers should continue to monitor for the release of the 2025 draft B series instructions and final Forms 1094-B and 1095-B, and stay informed of any additional IRS updates to ensure full compliance with their reporting obligations.

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 \(Section 6056\)](#)