

ACA ANNUAL REPORTING TIMELINE

The Affordable Care Act (ACA) requires insurers, small employers with self-insured health plans, and all Applicable Large Employers (those with 50 or more full-time and full-time equivalent (FTE) employees) to report certain information about health insurance to the IRS and provide covered individuals with an annual statement.



September - October

Determine if you had 50 or more full-time and FTE employees in the previous calendar year and what type of insurance (self-insured or fully insured) you offered, if any. You can use the FTE Calculator in RUN to help you determine how many full-time and FTE employees you had in the previous calendar year.

Note: Where the combined total of full-time and FTE employees in a controlled group is 50 or more, each individual employer is subject to reporting.

Based on this number and the type of coverage you offer, determine what Forms you must use to report, if any.

- **50 or more (Self-insured, Fully Insured or No Insurance):**
Complete and file Forms 1095-C and 1094-C
- **Less than 50 (Self-insured):**
Complete and file Forms 1095-B and 1094-B
- **Less than 50 (Fully Insured):**
Insurer is responsible for filing on behalf of the employer
- **Less than 50 (No Insurance):**
Reporting is not required

October - November

If you are required to report, gather the information you need to complete applicable Forms, such as:

- Employee's name, SSN or date of birth (if SSN is unavailable), and address;
- Employer's name, EIN, telephone number, and address;
- The months in which the employer offered coverage;
- The employee's share of the monthly premium for self only coverage (in certain cases);
- The months in which a safe harbor (or other situation) applied (e.g., the employee was not a full-time employee)

December

Inform employees that they will receive Form 1095-C or Form 1095-B in March, depending on which applies to your company.

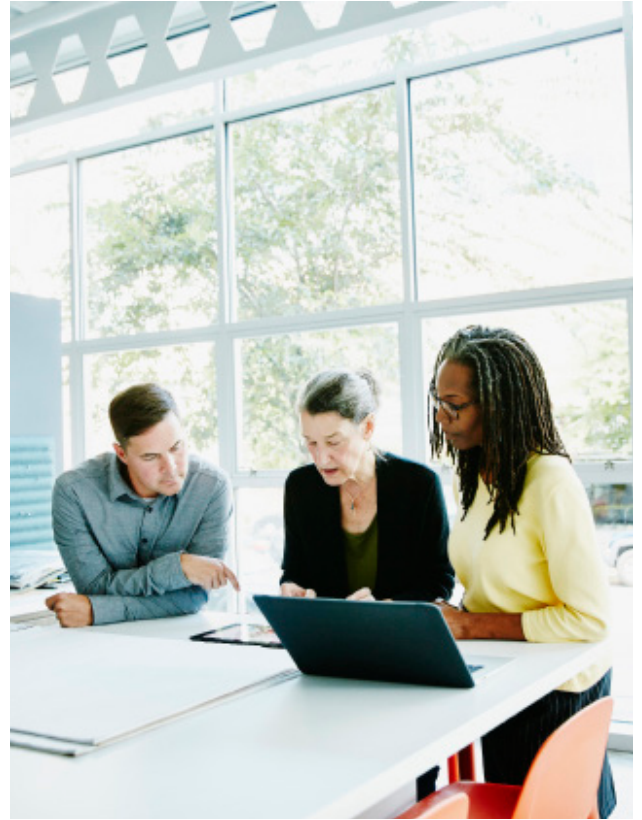
Confirm data collected for the Forms is still accurate and make appropriate changes if needed. Download your report from RUN to gather payroll data to help you complete the forms.

March 2

If you file a paper copy, the Forms must be filed with the IRS no later than March 2, 2026.

Provide annual statement (a copy of Form 1095-C or Form 1095-B), depending on which applies to your company) to employees by March 2, 2026. A law enacted in late 2024 gives employers and health insurance providers the option of either:

- Furnishing a copy of the annual statement (Form 1095-B or Form 1095-C) to full-time employees and covered individuals; or
- Providing a clear, conspicuous, and accessible notice that any individual to whom the form would otherwise be required to be furnished may request a copy of such statement, and upon request of any such individual, furnishing a copy of such statement to them no later than the later of January 31 of the year following the covered calendar year, or 30 days after the date of the request.



March 31

If you file electronically, the Forms must be filed with the IRS no later than March 31, 2026. Notably, the threshold for the requirement to file electronically has been lowered to 10.

To determine whether they meet this threshold, employers must add together the number of information returns (including Form 1095-B, Form 1095-C, and certain other forms) and the number of Forms W-2 they must file.

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