

# CHECKLIST | Complying With ACA Reporting Requirements for 2025

Presented by Bateman, Gordon & Sands, Inc

The Affordable Care Act (ACA) created reporting requirements under Internal Revenue Code (Code) Sections 6055 and 6056.

- Under **Section 6055**, self-insuring employers and other parties that provide minimum essential health coverage must report information on this coverage to the IRS and covered individuals.
- Under **Section 6056**, applicable large employers (generally, those with 50 or more full-time employees) are required to report information to the IRS and their full-time employees about their compliance with the employer shared responsibility (pay or play) rules and the health coverage they have (or have not) offered.

This checklist outlines key steps for employers to comply with the ACA’s reporting requirements. Keep in mind that a growing number of states have enacted their own health coverage reporting requirements. Employers need to comply with the federal ACA reporting requirements and any applicable state reporting requirements.

## Affected Employers

Determine if ACA Reporting Applies	Yes	No
<p>Select “yes” if your company is any of the following:</p> <ul style="list-style-type: none"> <li>• <b>Employers with self-funded health plans</b> (Section 6055 reporting);</li> <li>• <b>Applicable large employers (ALEs)</b> with either fully insured or self-funded health plans (Section 6056 reporting). An ALE is an employer that employed an average of at least 50 full-time employees, including full-time equivalents, on business days during the preceding calendar year.</li> </ul>		
<p>Employers who are not ALEs and have fully insured health plans are <b>not</b> subject to these ACA reporting requirements.</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>ALEs with self-funded plans are required to comply with both reporting obligations. However, to simplify the reporting process, the IRS allows ALEs with self-funded plans to use a single combined form to report the information required under both Sections 6055 and 6056.</p>		
<p><i>If you answered “No,” you can stop here. However, be sure to check any state health coverage reporting requirements that may apply to your organization.</i></p>		

## Information Required to be Reported

Sections 6055 and 6056 require the reporting of several data elements that are not required by taxpayers for preparing their tax returns or by the IRS for tax administration.

Compile Information for Section 6055 Reporting	Complete	N/A
In addition to general employer information, the <a href="#">required information</a> for Section 6055 reporting includes:		
<ul style="list-style-type: none"> <li>The name, address and taxpayer identification number (TIN) of <b>responsible individuals</b> (or date of birth if a TIN is not available). The responsible individual is generally the person who enrolls one or more individuals (which may include themselves) in minimum essential coverage (MEC). This may be the primary insured, employee, former employee, or other related person named on the coverage application.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> <li>The name and TIN (or date of birth if a TIN is not available) of <b>each individual covered under the policy</b> and the months for which the individual was enrolled in coverage and entitled to receive benefits.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>

Compile Information for Section 6056 Reporting	Complete	N/A
In addition to general employer information, the <a href="#">required information</a> for Section 6056 reporting includes:		
<ul style="list-style-type: none"> <li>A certification of whether the ALE offered its full-time employees (and their dependents) the opportunity to enroll in MEC under an eligible employer-sponsored plan, by calendar month.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> <li>The months during the calendar year for which MEC under the plan was available.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> <li>Each full-time employee's share of the lowest-cost monthly premium for self-only coverage providing minimum value offered to that employee, by calendar month.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> <li>The number of full-time employees for each month during the calendar year.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> <li>The name, address and Social Security number (SSN) or TIN of <b>each full-time employee</b> and the months (if any) during which they were covered under the eligible employer-sponsored plan during the calendar year.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>

## Filing Requirements

File Returns With IRS by Applicable Deadline in 2025	Complete
<p>For the 2024 calendar year, file returns electronically with the IRS by March 31, 2025.</p> <ul style="list-style-type: none"> <li>Under Code Section 6055, reporting entities will generally file <a href="#">Forms 1094-B</a> (a transmittal) and <a href="#">1095-B</a> (an information return).</li> <li>Under Code Section 6056, reporting entities file <a href="#">Forms 1094-C</a> (a transmittal) and <a href="#">1095-C</a> (an information return). Employers reporting under both Sections 6055 and 6056 (i.e., ALEs with self-funded plans) use a combined reporting method by filing Forms 1094-C and 1095-C.</li> </ul> <p><b>Extension Requests:</b> Reporting entities may receive an automatic 30-day extension to file with the IRS by completing and filing <a href="#">Form 8809</a> (Application for Extension of Time To File Information Returns) by the due date of the returns.</p> <p><b>Paper Reporting:</b> Before 2024, employers who filed fewer than 250 individual statements under Sections 6055 or 6056 could file their ACA returns on paper. However, now paper filing is only available to employers who file <b>fewer than 10 information returns</b> with the IRS for the year. The 10-or-more requirement applies in the aggregate to certain information returns, which means that a reporting entity may be required to file fewer than 10 of the applicable Form 1094 and 1095 but still have an electronic filing obligation based on other kinds of information returns filed (e.g., Forms W-2 and 1099).</p>	<input type="checkbox"/>
<p><b>Work with a third-party vendor to ensure electronic filing is completed through the <a href="#">ACA Information Returns (AIR) Program</a>.</b> In general, the AIR program is used by:</p> <ul style="list-style-type: none"> <li><b>Software developers</b> who develop software for creating electronic files for ACA information returns</li> <li><b>Transmitters</b> who will transmit information returns to the IRS on behalf of reporting entities</li> <li><b>Issuers</b> who have the capability to transmit information returns directly to the IRS on their own behalf</li> </ul> <p>The IRS’s electronic filing guidance is not generally intended to be used by employers who are required to file under Section 6055 or Section 6056, but it can provide some useful information on standards and procedures for returns transmitted through the AIR Program.</p>	<input type="checkbox"/>

Submit Waiver From Electronic Filing by the 2025 Deadline (If Applicable)	Complete	N/A
<p><i>If you are filing electronically, check the “N/A” box for this portion of the checklist. Note that the IRS <b>encourages electronic filing</b> even if a reporting entity is filing fewer than 10 returns.</i></p> <p>If a reporting entity is required to file electronically but wants to file on paper, it must submit <a href="#">Form 8508</a> (Application for Waiver from Electronic Filing of Information Returns) to the IRS <b>before Feb. 28, 2025</b> (the IRS recommends submission at least 45 days before this deadline).</p> <ul style="list-style-type: none"> <li>Use the formatting directions in the applicable instructions for the B series forms and C series forms for the preparation of paper returns.</li> </ul> <p>Keep any approved waiver for your records.</p>	<input type="checkbox"/>	<input type="checkbox"/>

## Furnishing Requirements

Furnish Statements to Individuals by Applicable Deadline in 2025	Complete
<p><b>For the 2024 calendar year, provide individual statements by March 3, 2025.</b> (Written statements must be provided to individuals within 30 days of Jan. 31, 2025. Because the deadline falls on a weekend, individual statements must be furnished by the next business day, which is March 3, 2025.)</p> <ul style="list-style-type: none"> <li>For 6056 reporting entities, Form 1095-C must be provided to <b>full-time employees</b>.</li> <li>For 6055 reporting entities, Form 1095-B must be provided to <b>responsible individuals</b> (may be the primary insured, employee, former employee or other related person named on the application). An <b>alternative method</b> of furnishing is available.</li> </ul>	<input type="checkbox"/>

Satisfy Requirements of Alternative Furnishing Method (If Applicable)	Complete	N/A
<p><i>If you are not using the alternative method of furnishing Form 1095-B, check the “N/A” box for this portion of the checklist.</i></p> <p>Section 6055 reporting entities that are using the alternative method of providing Form 1095-B to responsible individuals must satisfy the following requirements:</p> <ul style="list-style-type: none"> <li>Post a clear and conspicuous notice on its website by <b>March 3, 2025</b>, stating that responsible individuals may receive a copy of their statement upon request. The notice must include: <ul style="list-style-type: none"> <li>An email address;</li> <li>A physical address to which a request may be sent; and</li> <li>A telephone number to contact the reporting entity with any questions.</li> </ul> </li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>

- Retain the notice in the same location on its website through **Oct. 15, 2025**.
- Furnish the statement to a requesting individual within 30 days of the date the request is received. To satisfy this requirement, the reporting entity may furnish the statement electronically if the recipient affirmatively consents.

ALEs offering self-insured health plans are generally required to use Form 1095-C, Part III, to meet the Section 6055 reporting requirements instead of Form 1095-B. A self-insured ALE may use this relief for employees who are enrolled in the ALE's self-insured plan and are not full-time employees of the ALE, as well as for nonemployees (e.g., former employees) who are enrolled in the self-insured plan. **However, an ALE may not use the alternative method of furnishing for full-time employees who are enrolled in the self-insured plan.**

Use this checklist as a guide when reviewing your company's compliance with the ACA's reporting requirements for 2025. For assistance, contact Bateman, Gordon & Sands, Inc.