

Reminder: 2025 ACA Reporting Requirements for Applicable Large Employers

This is a reminder that if you were an **Applicable Large Employer (ALE) in calendar year 2025, you are required to complete your 1094-C/1095-C** for the 2025 calendar year. If your medical plan was level-funded, self-insured, or balance-funded at any time during calendar year 2025, you must also complete Part III of Form 1095-C to report covered individuals.

Key Deadlines

- **IRS Electronic Filing Deadline: March 31, 2026**
- **Employee Copy Distribution Deadline: March 2, 2026**

(All ALE filers must submit electronically to the IRS.)

Alternative Method for Furnishing Form 1095-C

As a reporting entity, you may use the **alternative furnishing method**, which allows you to provide **Form 1095-C to individuals only upon request**. To use this method, you must:

- Post a **clear and conspicuous notice** on your company website **by March 2, 2026**
- The notice must state that individuals may receive a copy of their 1095-C upon request
- The notice must include:
 - An **email address** for submitting requests
 - A **physical mailing address** where requests may be sent
 - A **telephone number** for contacting the reporting entity
- The notice must **remain posted on your website through October 15, 2026**

Since the 1095-C must still be reported to the IRS and we do not have a standard model notice to provide, many employers may find it simpler to furnish the 1095-C **forms to their employees** rather than setting up and maintaining an “on-request” notice process.

If your medical plan was level-funded, self-insured, or balance-funded at any time during calendar year 2025, you must also complete Part III of Form 1095-C to report covered individuals.”

State Reporting Requirements

If any of your employees live in the following jurisdictions, you may have **additional state ACA filing requirements**:

- California

- Massachusetts
- New Jersey
- Rhode Island
- District of Columbia
- Vermont (no penalty)

Assistance with Filing

Please check with your **payroll company** to confirm whether they can assist you with producing and electronically filing your ACA forms.

You may also choose any third-party vendor that meets your needs. Examples include:

[HR Service, Inc.com](http://HRService.com)

Yearli.com

[Efile4biz](http://Efile4biz.com)

Important: Towne does not advocate for, endorse, or represent any payroll or third-party ACA reporting service. These examples are provided solely for illustration; you may choose any vendor.

Summary for Applicable Large Employers

- File 1094-B/1095-C forms electronically with the IRS by **March 31, 2026**
- Provide employee copies by **March 2, 2026**, unless you use the alternative method
- Complete applicable **state-level filings**
- Coordinate reporting through payroll or a preferred third-party service

Please let us know if you have any questions. We wish you a successful filing season.