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

The Internal Revenue Service (IRS) has released the final 2025 forms for Affordable Care Act (ACA) reporting under Internal Revenue Code Sections 6055 and 6056. While the final instructions have not yet been issued, draft instructions for the 2025 C series forms (Forms 1094-C and 1095-C) are currently available.

- The **2025 Forms 1094-B and 1095-B** are 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.

No major changes were made to the final forms for 2025 reporting.

Action Steps

Employers should become familiar with the final forms and available instructions for 2025 calendar year reporting. 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 final instructions for 2025, 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)

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