

Reminder: 2025 ACA Reporting Requirements for Level-Funded Employers

This is a reminder that if you were a **level-funded employer at any point in 2025** and are **not an Applicable Large Employer (ALE)**, you are required to complete your 1094-B/1095-B ACA reporting for the 2025 calendar year.

Key Deadlines

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

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

Alternative Method for Furnishing Form 1095-B

As a reporting entity, you may use the **alternative furnishing method**, which allows you to provide **Form 1095-B 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-B 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-B must still be reported to the IRS, and we do not have a standard model notice, many employers may find it simpler to furnish the 1095-B **forms to all covered individuals** rather than setting up and maintaining an “on-request” notice process.

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:

[Yearli.com](https://www.yearli.com)

[Efile4biz](https://www.efile4biz.com)

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

Summary for Non-ALE Level-Funded/Self-Funded Employers

- File 1094-B/1095-B 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.