



AFFORDABLE CARE ACT

Forms 1095: Reporting Requirements for Employers and Insurers

Large employers (those with 50 or more full-time equivalent employees), self-funded employers and insurers must file reports each year to both the IRS and their employees or members with information about their insurance coverage.

Individuals with fully insured, employer-sponsored health coverage will receive Form 1095-C from their employers and Form 1095-B will be available from their insurers. Those with coverage through a self-funded employer group will receive either a 1095-B (small groups) or 1095-C (large groups) from their employer. Individuals can use these forms to complete their federal tax returns and see if they are eligible for the Advance Premium Tax Credit on the Health Insurance Marketplace.

Individuals who purchase health coverage from the Health Insurance Marketplace will receive a **Form 1095-A** from the Health Insurance Marketplace. When they file their federal income tax returns, they will need these forms to reconcile any Advance Premium Tax Credit amounts they received. If individuals purchased a policy directly from an insurer, the insurer will provide them with Form 1095-B.

Form 1094-C Transmittal/cover sheet	Employer sends to IRS with Forms 1095-C
Form 1095-C Employer-Provided Health Insurance Offer and Coverage <ul style="list-style-type: none">• Self-funded, large group employers complete Parts I, II and III• Fully insured employers complete Parts I and II	Employer sends to IRS <i>Deadline for 2024 Reporting:</i> <i>Feb. 28, 2025 (paper), or March 31, 2025 (electronic)</i> Employer sends to employees <i>Deadline for 2024 Reporting: March 3, 2025*</i>
Form 1094-B Transmittal/Cover Sheet	Insurer and self-funded, small group employers sends to IRS with Forms 1095-B
Form 1095-B Health Coverage <ul style="list-style-type: none">• Fully insured plan members only• Self-funded, small group members	Insurer or self-funded, small group employers provide to IRS <i>Deadline for 2024 Reporting:</i> <i>Feb. 28, 2025 (paper), or March 31, 2025 (electronic)</i> Insurer or self-funded, small group employers provide to members <i>Deadline for 2024 Reporting: March 3, 2025*</i>

*Extended from the usual deadline to the next business day due to deadline falling on a weekend.

The IRS also provides instructions for completing these forms:

[Instructions for Forms 1094-C and 1095-C \(Employers\)](#)

[Instructions for Forms 1094-B and 1095-B \(Insurers or self-funded, small group employers\)](#)

NOTE: On December 23, 2024, President Biden signed into law the [Employer Reporting Improvement Act, H.R.3801](#) and the [Paperwork Burden Reduction Act, H.R.3797](#) which cover flexibilities for furnishing the 1095-B and 1095-C Forms to members and employees, including providing forms only upon request when certain conditions are met. Employers wishing to pursue these flexibilities should review the two Acts carefully with their Human Resources and Compliance professionals.

IMPORTANT NOTICE

This communication is provided for informational purposes only and does not constitute legal advice or legal opinions.

The information contained herein contains summaries of various portions of legislation addressing health care reform legislation and is subject to change without notice. This information is not a substitute for legal advice from your lawyers.

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