

CHECKLIST | Complying With ACA Reporting Requirements for 2026

Presented by Benefits Alliance Insurance Services, LLC

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 to covered individuals upon request.
- Under **Section 6056**, applicable large employers (generally, those with 50 or more full-time employees) are required to report information to the IRS, and to their full-time employees upon request, 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
Select "yes" if your company is any of the following: <ul style="list-style-type: none">• Employers with self-funded health plans (Section 6055 reporting);• Applicable large employers (ALEs) 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.		
Employers who are not ALEs and have fully insured health plans are not subject to these ACA reporting requirements.	☐	☐
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.		
<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>		

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 required information for Section 6055 reporting includes:		
<ul style="list-style-type: none"> The name, address and taxpayer identification number (TIN) of responsible individuals (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. 	☐	☐
<ul style="list-style-type: none"> The name and TIN (or date of birth if a TIN is not available) of each individual covered under the policy and the months for which the individual was enrolled in coverage and entitled to receive benefits. 	☐	☐

Compile Information for Section 6056 Reporting	Complete	N/A
In addition to general employer information, the required information for Section 6056 reporting includes:		
<ul style="list-style-type: none"> 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. 	☐	☐
<ul style="list-style-type: none"> The months during the calendar year for which MEC under the plan was available. 	☐	☐
<ul style="list-style-type: none"> 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. 	☐	☐
<ul style="list-style-type: none"> The number of full-time employees for each month during the calendar year. 	☐	☐
<ul style="list-style-type: none"> The name, address and Social Security number (SSN) or TIN (or date of birth if a TIN is not available) of each full-time employee and the months (if any) during which they were covered under the eligible employer-sponsored plan during the calendar year. 	☐	☐

Filing Requirements

File Returns With IRS by Applicable Deadline in 2026	Complete
<p>For the 2025 calendar year, file returns electronically with the IRS by March 31, 2026.</p> <ul style="list-style-type: none"> Under Code Section 6055, reporting entities will generally file Forms 1094-B (a transmittal) and 1095-B (an information return). Under Code Section 6056, reporting entities file Forms 1094-C (a transmittal) and 1095-C (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. <p>Extension Requests: Reporting entities may receive an automatic 30-day extension to file with the IRS by completing and filing Form 8809 (Application for Extension of Time To File Information Returns) by the due date of the returns.</p>	☐
<p>Work with a third-party vendor to ensure electronic filing is completed through the ACA Information Returns (AIR) Program. In general, the AIR program is used by:</p> <ul style="list-style-type: none"> Software developers who develop software for creating electronic files for ACA information returns Transmitters who will transmit information returns to the IRS on behalf of reporting entities Issuers who have the capability to transmit information returns directly to the IRS on their own behalf <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>	☐

Submit Waiver From Electronic Filing by the 2026 Deadline (If Applicable)	Complete	N/A
<p><i>If you are filing electronically, check the "N/A" box for this portion of the checklist. The IRS encourages electronic filing 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 Form 8508 (Application for Waiver from Electronic Filing of Information Returns) to the IRS before March 2, 2026 (the IRS recommends submission at least 45 days before this deadline).</p>	☐	☐

- Use the formatting directions in the applicable instructions for the B series forms and C series forms for the preparation of paper returns. Keep any approved waiver for your records.

Furnishing Requirements

Post Website Notice and Furnish Statements to Individuals Upon Request	Complete
<p>Reporting entities are no longer required to automatically send Forms 1095-B and 1095-C to covered individuals. Reporting entities can now post a notice on their websites informing individuals that they may request a copy of the statement.</p> <p>The requirement to provide the statement is met as long as the notice is:</p> <ul style="list-style-type: none"> • Clear, conspicuous and easily accessible to all covered individuals (the notice must include an email address, a physical address to which a request may be sent, and a telephone number to contact the reporting entity); • Timely posted, which for calendar year 2025 is by March 2, 2026; and • Retained in the same website location through Oct. 15, 2026. <p>In addition, any request must be fulfilled by the later of Jan. 31, 2026, or 30 days after the date of the request. The statement may be provided electronically if the recipient has affirmatively consented at any prior time.</p> <p>Reporting entities that choose not to use this alternative manner of furnishing may instead provide Forms 1095 to each covered individual and full-time employee (as applicable) by March 2, 2026.</p>	☐

Use this checklist as a guide when reviewing your company's compliance with the ACA's reporting requirements in 2026. For assistance, contact Benefits Alliance Insurance Services, LLC.