

Final Forms and Instructions for IRS's 2025 ACA Reporting Available

EBIA Weekly (November 13, 2025)

2025 Forms 1094-B, 1095-B, 1094-C, and 1095-C; 2025 Instructions for Forms 1094-B and 1095-B; 2025 Instructions for Forms 1094-C and 1095-C

[1094-B](#)

[1095-B](#)

[1094-C](#)

[1095-C](#)

[B Form Instructions](#)

[C Form Instructions](#)

The IRS has released final forms and instructions for Affordable Care Act (ACA) information reporting for 2025. As a reminder, Forms 1094-B and 1095-B are filed by minimum essential coverage providers (such as health insurers and employers sponsoring self-insured health plans) to report coverage information in accordance with Code § 6055. Forms 1094-C and 1095-C are filed by applicable large employers (ALEs) to provide information that the IRS needs to administer employer shared responsibility penalties and eligibility for premium tax credits, as required under Code § 6056.

The forms are essentially unchanged from 2024. The B and C form instructions reflect changes implemented by the Paperwork Burden Reduction Act, noting that the Forms 1095-B and 1095-C no longer have to be automatically sent if employees are provided clear, conspicuous and accessible notice on the employer website that an individual can request a copy, notice is posted by March 2, 2026, and retained until October 15 of the filing year, and forms are furnished no later than January 31, 2026, or 30 days after the date of request. The penalty per return increases to \$340 for failure to file a correct information return or correct payee statement, with the total penalty not to exceed \$4,098,500 per calendar year. The affordability safe harbor and qualifying offer method are applied using the percentage as adjusted for 2025, which is 9.02%.

For calendar year 2025, Forms 1094 and 1095 (transmittals with statements) are required to be filed with the IRS by March 2, 2026, or March 31, 2026, if filing electronically. (Filers may extend these deadlines by application to the IRS using Form 8809.) Filers with ten or more returns in total must file their Forms 1094-B, 1095-B, 1094-C, and 1095-C electronically. Filers must consider in total almost all information return types (including these forms, and Forms W-2 and 1099) to determine if the ten-return threshold is met. Publications [5165](#) (guide for electronically filing ACA information returns for software developers and transmitters), [5258](#) (ACA AIR submission composition and reference guide), [5308](#) (guide for automated enrollment for ACA providers), and [5164](#) (test package for electronic filers of AIR) have also been revised.

EBIA Comment: With the issuance of the final forms and instructions—and availability of updated Publications 5165, 5258, 5308, and 5164 which provide technical details related to electronic filing—filers should have all the tools they need to prepare for filing the 2025 forms. Filers should note the Paperwork Burden Reduction Act and the Employer Reporting Improvement Act changes, including that forms can be delivered electronically with consent, the date of birth can be used if a TIN isn't available, and ACA penalty assessments have a six-year limit starting with returns due after December 31, 2024. For more information, see EBIA's Health Care Reform manual at Sections XXVIII ("Shared Responsibility for Employers (Play or Pay Penalty Tax)"), XXXVI.C ("Information Reporting of Minimum Essential Coverage (Insurers and Employers That Self-Insure)"), and XXXVI.D ("Information Reporting of Employer-Sponsored Coverage (Applicable Large Employers)"). Also watch for the upcoming update to EBIA's Form 1094/1095 Workbook, including Sections VI ("Getting Started: What Information Is Needed to Complete the C Forms"), VII ("Form 1094-C: Transmittal of Employer-Provided Health Insurance Offer and Coverage Information Returns"), VIII ("Form 1095-C Report/Employee Statement: Employer-Provided Health Insurance Offer and Coverage"), IX ("Furnishing Employee Statements"), and X ("Filing With the IRS").

Contributing Editors: EBIA Staff.