Under the Affordable Care Act (ACA), Applicable Large Employers (ALEs) are required to report information about the minimum essential coverage they offer to full-time employees and their dependents. Certain data elements need to be collected for compliance; data collection should begin as soon as feasible. Information must be furnished as follows. Visit **www.IRS.gov** for the most current information about Employer Shared Responsibility and reporting requirements.

Which IRS forms does your organization need to file?

Provider of Minimum Essential Coverage under a Self-Insured Plan

Are you an Applicable Large Employer or an ALE Member[1]?

Yes → Comply with reporting under **§6056** and **§6055** by submitting:
- Form 1095-C to employees by March 2*
- Form 1094-C and copy of Forms 1095-C to IRS by February 28*

No → Comply with reporting under **§6055** by submitting:
- Form 1095-B to employees by March 2*
- Form 1094-B and copy of Forms 1095-B to IRS by February 28*

Provider of Minimum Essential Coverage under a Fully Insured Plan

Are you an Applicable Large Employer or an ALE Member[1]?

Yes → Comply with reporting under **§6056** by submitting:
- Form 1095-C to employees by March 2*
- Form 1094-C & copy of Forms 1095-C to IRS by February 28*

No → **No reporting by employer**

Reporting Requirements under IRS

Section 6055

WHO receives the Form?	**WHAT** information must be reported?	**WHEN** are the deadlines?	**WHY** must this information be reported?
Employees **Anyone who received minimum essential coverage (MEC) during the benefit year**	Required information on Form 1095-C (ALE) or Form 1095-B (non-ALE), such as: • Name and SSN of every person covered under the employee's program or policy • Months that the employee and dependents were enrolled and entitled to receive benefits.	**No later than March 2***	The information will be used by the IRS to enforce penalties under Employer Shared Responsibility and Individual Mandate.
Internal Revenue Service	Completed Forms 1095-C (ALE Members) or completed Forms 1095-B (non-ALE member) plus: • Aggregate number of full-time employees and equivalents per calendar month • Certification that MEC was offered per calendar month • Total head count, per calendar month, including full-time equivalents.	**No later than February 28*, or March 31* for electronic filings**	The information will be used by the IRS to enforce penalties under Employer Shared Responsibility and Individual Mandate.

Section 6056

WHO receives the Form?	**WHAT** information must be reported?	**WHEN** are the deadlines?	**WHY** must this information be reported?
Full-Time Employees[2] **Employed as full-time during the benefit year**	Required sections of Form 1095-C, including employee information, such as: • Offer of coverage per calendar month • Employee's share of lowest cost monthly premium for self-only minimum value coverage • Whether an applicable 4980H Safe Harbor was used per calendar month.	**No later than March 2***	The information will be used by the IRS to enforce penalties under Employer Shared Responsibility and Individual Mandate.
Internal Revenue Service	Completed Forms 1095-C in addition to required sections of Form 1094-C, including ALE member information such as: • Total number of full-time employees and equivalents • Total headcount per calendar month • Certification that MEC was offered per calendar month.	**No later than February 28*, or March 31* for electronic filings**	The information will be used by the IRS to enforce penalties under Employer Shared Responsibility and Individual Mandate.

This summary is based on 2026 coverage information to be reported in the first quarter of 2027. It reflects HMAA's interpretation of the regulations and does not represent legal, tax, or compliance advice.

[1]An Applicable Large Employer (ALE) is an employer that had an average of at least 50 full-time employees during a calendar year, including full-time equivalents. An ALE Member is an employer member of an aggregated group under Section 414 of the Internal Revenue Code and under one related company. For reporting purposes, each ALE member files its own return and provides forms to its respective employees.
[2]Full-time employees are those working at least 30 hours per week.
*If the due date falls on a holiday or weekend, the filing is due on the next business day.