



Forms 1094 & 1095: forms, instructions & deadlines

The Affordable Care Act requires applicable large employers (ALEs)—generally those with **50 or more full-time employees**—to report information to the IRS and to their full-time employees about their compliance with the employer shared responsibility (pay or play) provisions and the health care coverage they have offered (or did not offer). **Self-insured employers (regardless of size)** have additional reporting responsibilities that apply to health coverage providers.

Forms & instruction

The following Internal Revenue Service (IRS) forms and instructions are available for 2023 calendar year reporting:

- **Minimum Essential Coverage (MEC) Reporting (Section 6055)**
 - Form 1094-B and Form 1095-B (and instructions)
- **Large Employer Reporting (Section 6056)**
 - Form 1094-C and Form 1095-C (and instructions)

Deadlines

The following chart provides the information reporting due dates for 2023 calendar year reporting for ALEs (both fully-insured and self-insured), as well as for small self-insured employers that are not considered ALEs.

Due dates

Action: Provide Form 1095-C to Full-Time Employees

Fully insured ALEs: March 1, 2024

Self-insured ALEs: March 1, 2024

Self-insured employers that are not ALEs (fewer than 50 full-time employees): Not applicable

Action: Provide Form 1095-B to responsible individuals (may be the primary insured, employee, former employee, or other related person named on the application)

Fully insured ALEs: Not applicable

Self-insured ALEs: ALEs providing selfinsured coverage to non-employees may use either Form 1095-B or Form 1095-C to report coverage for those individuals and other family members covered under the plan, by March 1, 2024

Self-insured employers that are not ALEs (fewer than 50 full-time employees): March 1, 2024, if not using the alternative method of furnishing. Under this method, a reporting entity must post a clear and conspicuous notice on its website stating that responsible individuals may receive a copy of their statement upon request



Action: File Forms 1094-C & 1095-C with the IRS

Fully insured ALEs: April 1, 2024*

Self-insured ALEs: April 1, 2024* ALEs providing selfinsured coverage to non-employees may use either the B series Forms or the C series

Self-insured employers that are not ALEs (fewer than 50 full-time employees): Not applicable

Action: File Forms 1094-B & 1095-B with the IRS

Fully insured ALEs: Not applicable

Self-insured ALEs: Forms or the C series Forms to report coverage for those individuals and other family members covered under the plan, by April 1, 2024*

Self-insured employers that are not ALEs (fewer than 50 full-time employees): April 1, 2024*

**Beginning in 2024, reporting entities that file at least 10 returns during the calendar year must file electronically. Reporting entities must aggregate most information returns, such as Forms W-2 and 1099, to determine if they meet the 10-return threshold for mandatory electronic filing.*