



ACA Reporting Requirements Update for Large Employers (January 6, 2026)

Under the Affordable Care Act, [Applicable Large Employers](#) (those employers with 50 or more full-time plus full-time equivalent employees) must provide all of their full-time employees (defined as employees who worked at least 30 hours per week/130 hours per month during the previous calendar year) with a Form 1095-C each year. Form 1095-C requires these large employers to report on whether or not they *offered* health insurance coverage to each and every one of their full-time employees, regardless of whether or not the employee actually enrolled in the coverage.

The Paperwork Burden Reduction Act ([HR 3797](#)), which was passed in December 2024, allows employers to furnish Form 1095-C (employee statements) *only upon request*.

When the covered individual requests forms 1095-C, the employer must furnish the form by either January 31 *or* 30 days after the date of the request, whichever is later. Employers must give individuals timely notice of this request option, by providing a “clear, conspicuous, and accessible notice” that any covered individual may request a copy of such statement.

ALEs must still file with the IRS month by month reporting on whether or not the coverage offered met the ACA’s definition of affordable, by sending to the IRS copies of all the Forms 1095-C, along with a Form 1094-C.

For 2025 reporting, the Forms 1095-C and 1094-C remain largely unchanged from prior years. The 2025 Form 1095-C is on the IRS website at <https://www.irs.gov/pub/irs-pdf/f1095c.pdf>. The 2025 Form 1094-C is at <https://www.irs.gov/pub/irs-pdf/f1094c.pdf>. Instructions for both forms are also on the IRS website, at <https://www.irs.gov/pub/irs-pdf/i109495c.pdf>.

March 2, 2026: Deadline for providing [1095-C](#) forms to ACA full-time employees, if you are sending them to all employees.

March 31, 2026: Deadline to file the [1094-C](#) and 1095-C information electronically to the IRS.

Form 1095-B: Plan Sponsors and Insurers (including the Health Trust)

As plan sponsor of the MMEHT health plans, the Health Trust will create a Form 1095-B for each policyholder who was covered under a Health Trust health plan anytime during 2025, and will also provide that information to the IRS.

The Paperwork Burden Reduction Act also pertains to health plan sponsors, such as the Health Trust. **The Health Trust will mail Forms 1095-B to covered employees only upon request**

from the employee. Employees who wish to receive a 1095-B statement of coverage for 2025 should email HTbilling@memun.org or mail a request to MMEHT, 60 Community Drive, Augusta, ME 04330.

Employer Spreadsheet Tool

As in prior years, if a Health Trust participating employer would like to receive a listing of those employees who were covered under a Health Trust plan in 2025, we are happy to provide you with that information to assist you in preparing your mandated employer reporting. We will provide one spreadsheet to each employer who requests it, showing information related to their employees.

If you wish to receive a copy of this spreadsheet for your employer group, or if you wish to designate someone new to receive the spreadsheet, please send an email to Health Trust Director Kristy Gould at kgould@memun.org. If you requested it in prior years, we have you on our distribution list. Spreadsheets will be sent via encrypted emails in mid-January.

Best wishes for a happy new year 2026!

Please note that the Maine Municipal Association and the Maine Municipal Employees Health Trust are sharing this information to assist you with your compliance planning. We recommend that you contact your legal counsel with specific questions relating to this law.