

ACA Reporting Deadlines and Requirements:

A Complete Guide for Brokers and
Employers for *Tax Year 2025*



As the 2025 calendar year draws to a close, brokers and employer clients alike should be preparing now for the **ACA reporting season for tax year 2025**. Accurate and timely form distribution and e-filing with the IRS are essential, and evolving rules bring both new flexibility and new risks.

Fortunately, solutions like the **Mitratesh Mineral ACA Reporting Hub** help take the guesswork out of ACA compliance. From data validation to e-filing and year-round compliance tracking, brokers and employers can rely on technology and expertise to stay ahead.

In this guide, you will find:

- ✓ Firm deadlines for ACA reporting in 2026 (for tax year 2025)
- ✓ What is new or changed in ACA reporting rules
- ✓ Common ACA reporting mistakes and how to avoid them
- ✓ State-level ACA reporting requirements
- ✓ A year-round ACA compliance strategy
- ✓ A pre-January 1, 2026 checklist for brokers and employers
- ✓ Advice for brokers on how to guide clients through ACA compliance



Key ACA Reporting Deadlines for Tax Year 2025

Date	Action	Notes
February 28, 2026	Paper filing of IRS Forms 1094 / 1095 (if eligible)	Paper filing is allowed only for employers submitting fewer than 10 aggregated returns (e.g., 1095, W-2).
March 2, 2026	Furnish IRS Form 1095-C (or 1095-B as applicable) to employees	The permanent 30-day extension from January 31 is in effect.
March 2, 2026	Post "Notice of Availability" (for alternative furnishing approach)	Required if the employer is using the alternate furnishing method where individuals must request their statements. It must remain posted until October 15, 2026
March 31, 2026	Electronic filing of Forms 1094 / 1095 with IRS	All filers submitting 10 or more aggregated returns are required to file electronically through the IRS AIR system.
January 31, 2027 (or 30 days after a request, whichever is later)	Furnish requested 1095 statements under the alternative furnishing method	Applies when individuals request the 1095 forms.

Meeting these deadlines is non-negotiable.

Missing them can trigger per-form penalties and unnecessary compliance exposure.



Pro Tip: The **Mitratech Mineral ACA Reporting Hub** automatically tracks key deadlines and sends alerts before submission dates to help employers and brokers avoid last-minute filing stress.

New to ACA Reporting?

If you are new to ACA reporting or need a quick refresher, watch our on-demand webinar **ACA Compliance 101: Understanding the Law, Determining ALE Status, and Choosing the Right Forms**.

You'll learn the essentials of ACA compliance, how to identify Applicable Large Employers (ALEs), and which forms you need to file.

Watch Now >



Get Ready for ACA Season: What's New and What to Watch in 2025

Staying up to date with ACA requirements helps brokers and clients maintain compliance and confidence.

1. Alternative Furnishing (Only Upon Request)

Employers and insurers are no longer required to automatically furnish 1095-C or 1095-B forms. Instead, statements must be provided only if individuals request them, provided the employer posts a clear, specific, and accessible notice on their website explaining the form is available upon request and how to obtain it.

Pro Tip: Mitrates Mineral's built-in policy guidance helps employers create a compliant "Notice of Availability" template and store proof of posting, eliminating manual tracking and version control issues.

2. Electronic Filing Now Mandatory for Most Employers

Any organization filing **10 or more information returns in total** (including W-2s, 1099s, and ACA forms) must e-file via the IRS AIR system.

Pro Tip: With the Mitrates Mineral ACA Reporting Hub, employers can upload, validate, and file forms electronically in minutes, ensuring compliance with the IRS e-file threshold.

3. Use of Date of Birth When SSN or TIN Is Unavailable

Employers may now use a covered individual's date of birth if a Social Security Number or TIN cannot be obtained.

This reduces the need to document "reasonable cause" for missing numbers.

Pro Tip: The Mitrates Mineral platform flags missing or invalid SSNs early and provides real-time validation so data can be corrected before filing season begins.

4. Extended Time to Respond to IRS ACA Penalty Letters

Employers now have **90 days** to respond to an IRS Letter 226-J instead of 30. This rule applies to letters issued on or after January 1, 2025.

Pro Tip: Mitrates Mineral users can track compliance records and furnish documentation quickly, which is critical for defending against ACA penalty notices.

5. Six-Year Statute of Limitations for ACA Penalties

For employer shared responsibility failures after December 31, 2024, the IRS only has six years to assess penalties under Code § 4980H.

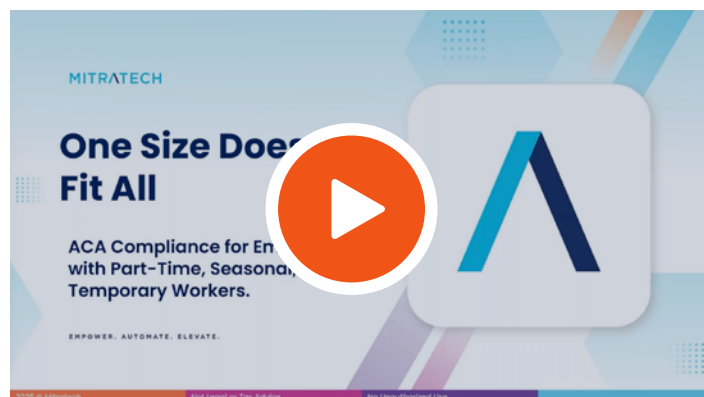
Pro Tip: The Mitrates Mineral ACA Reporting Hub keeps a secure digital archive of all filings and correspondence so employers can maintain the full six-year audit trail required by the IRS.

Managing Part-Time, Seasonal, or Temporary Workers?

If your workforce includes part-time, seasonal, or temporary employees, ACA reporting can get complicated fast. Watch our on-demand webinar **One Size Doesn't Fit All: ACA Compliance for Employers with Part-Time, Seasonal, or Temporary Workers**.

Learn how to accurately track variable-hour employees, determine eligibility, and stay compliant across complex workforce models.

Watch Now >



Common ACA Reporting Mistakes and How to Avoid Them

Even seasoned HR and benefits teams can make costly errors when preparing ACA forms. Here are some of the most common mistakes and how to avoid them month by month.

Common Mistake	Why It Happens	How Mitratesch Mineral Helps
Missing or incorrect employee data	Manual entry or outdated HRIS records	Mitratesch Mineral's data validation automatically flags missing or inconsistent information before submission
Late filing	Poor deadline tracking or last-minute prep	Built-in calendar reminders and alerts keep every client on schedule
Incorrect ALE status calculation	Miscounting full-time equivalent or variable-hour employees	The Mitratesch Mineral ACA Reporting Hub automatically calculates ALE status based on hours of service
State filing gaps	Overlooking state-specific reporting rules	Mitratesch Mineral includes tools and updates for CA, NJ, MA, RI, and DC
Unfurnished or mis-mailed 1095 forms	Failing to meet form distribution requirements	The platform includes mail fulfillment and tracking for audit readiness



Pro Tip: Regularly review your ACA data throughout the year, not just during Q1. With Mitratesch Mineral's continuous compliance tools, employers can monitor ACA eligibility and coverage accuracy month by month.

Have ACA Reporting Questions?

Get answers straight from the experts in our on-demand session **Ask the Experts: The Mineral Experts™ Tackle Your Top ACA Reporting Challenges**.

Hear how Mitratesch Mineral's compliance specialists address real-world reporting issues, from tricky coverage codes to correcting filing errors and managing complex multi-entity submissions.

Watch Now >



State-Level ACA Reporting Requirements

In addition to federal ACA reporting, several states require their own submissions for individual mandates.

State	Requirement	Filing Due Date	Mitratesch Mineral Support
California	Form submission to the CA Franchise Tax Board	March 31	Integrated in the Mitratesch Mineral ACA Reporting Hub
New Jersey	Electronic form submission to NJ Division of Taxation	March 31	Integrated in the Mitratesch Mineral ACA Reporting Hub
Massachusetts	Electronic submission of form 1099-HC to the MA Department of Revenue	January 31	Mitratesch Mineral provides direction and Expert support for employers
Rhode Island	Electronic form submission to the RI Division of Taxation	March 31	Integrated in the Mitratesch Mineral ACA Reporting Hub
District of Columbia	Electronic form submission to DC Office of Tax and Revenue	April 30	Integrated in the Mitratesch Mineral ACA Reporting Hub



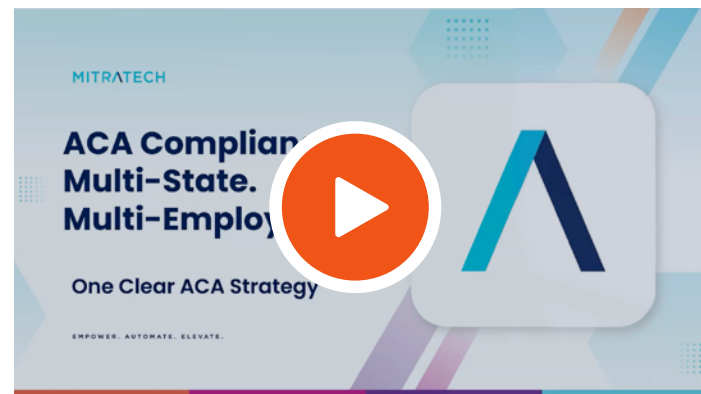
Pro Tip: State reporting requirements can change annually. Mitratesch Mineral automatically updates its filing templates and workflows to align with the latest state mandates.

Navigating Multi-State or Multi-Employer Reporting?

For a deeper dive into complex reporting scenarios, watch our on-demand webinar **Beyond the Basics: Mastering ACA Compliance for Multi-State or Multi-Employer Groups**.

Learn how to manage overlapping federal and state requirements, streamline reporting across multiple entities, and avoid common filing mistakes.

[Watch Now >](#)





Build a Year-Round ACA Compliance Strategy

In addition to federal ACA reporting, several states require their own submissions for individual mandates.



Quarterly data reviews:

Spot discrepancies in eligibility or coverage early.



Midyear training:

Schedule HR refreshers on ACA tracking and employee classification.



Technology alignment:

Ensure HRIS, payroll, and benefits systems sync properly with ACA tools.



Vendor collaboration:

Work with vendors such as Mitratesh Mineral to align ACA reporting with broader HR compliance goals.



Pro Tip: The Mitratesh Mineral ACA Reporting Hub integrates with leading HR and payroll systems, making continuous data validation easy and automatic all year long.

Avoid the Crunch: Build Your ACA Game Plan Now

The best way to simplify ACA reporting is to start early. Read our blog **Avoid the Crunch: Build Your ACA Game Plan Now** to learn how to prepare your data, plan your filing strategy, and set key milestones before year-end.

You'll get practical tips for avoiding last-minute errors, improving data accuracy, and using the **Mitratesh Mineral ACA Reporting Hub** to stay ahead of every deadline.

[Read Now >](#)



Pre-January 1, 2026 Checklist for Brokers and Employers

Brokers and employers should use this checklist to prepare early and avoid filing errors.

Task	Description	Broker Role
Review past filings and error reports	Identify rejected returns, missing SSNs, or recurring mistakes	Help clients prepare for possible rejections and guide data clean-up
Verify and clean employee data	Check all names, addresses, SSNs, dates of birth, and coverage months	Encourage clients to use Mitrtech Mineral's data validation tools and resources
Confirm vendor or software readiness	Ensure systems are ready for e-filing and schema updates	Recommend the Mitrtech Mineral ACA Reporting Hub for integrated filing
Decide on furnishing method	Choose whether to adopt alternative furnishing or continue automatic distribution	Discuss compliance and efficiency benefits using Mitrtech Mineral
Update or draft the Notice of Availability	Create and post a compliant notice if using the alternative furnishing method	Provide templates and share compliance updates from Mitrtech Mineral
Support training and education	Advise teams on new rules, requests, and reporting steps	Provide access to Mitrtech Mineral training resources and webinars
Create a 2026 reporting calendar	Schedule deadlines for validation, corrections, and filing	Share Mitrtech Mineral's automated calendar reminders and checklists
Review state-level healthcare reporting mandates	States such as CA, NJ, MA, RI, and DC have separate reporting requirements	Help clients leverage Mitrtech Mineral's state-specific compliance tools
Maintain documentation and records	Retain ACA records for at least six years	Share Mitrtech Mineral's resources and remind clients they have access to the HR Experts
Monitor IRS guidance	Watch for tax-year forms and updates; IRS AIR system downtime	Share Mitrtech Mineral Experts insights and alerts with clients

Don't Wait Until January

Open enrollment is the perfect time to clean and verify your ACA data. Read our blog [Don't Wait Until January: Why Open Enrollment Is the Best Time to Clean Your ACA Data](#) to learn how early preparation sets the stage for accurate reporting.

Discover how aligning benefits enrollment with data validation helps employers correct errors, confirm eligibility, and avoid last-minute filing stress.

[Read Now >](#)



Advice for Brokers: How to Support Clients During ACA Reporting Season

1. **Position ACA compliance as a value-add service.**

Brokers can stand out as trusted advisors by helping clients simplify ACA reporting through tools such as the Mitrates Mineral ACA Reporting Hub.

2. **Recommend the right compliance technology.**

Direct clients toward integrated solutions that simplify form creation, data validation, and electronic filing.

3. **Communicate early.**

Share Mitrates Mineral's reporting timelines and resources with clients well before the filing season begins.

4. **Educate HR and payroll teams.**

Use Mitrates Mineral training modules or webinars to help clients avoid reporting errors.

5. **Audit client data proactively.**

Encourage clients to use Mitrates Mineral's validation tools to identify missing or mismatched data early.

6. **Stay informed.**

Subscribe to Mitrates Mineral updates so you can alert clients to new IRS guidance or deadline changes.



Getting Clients ACA-Ready

Want to help your clients prepare early for the 2026 reporting season? Read our blog **What Brokers Should Be Doing Now to Get Clients ACA-Ready**.

Discover practical steps brokers can take today to help employers organize data, stay ahead of ACA changes, and strengthen client relationships.

Read Now >





Why It Matters for Brokers and Employers

1. **Avoid penalties:** Timely, accurate filing prevents costly fines.
2. **Reduce errors and rejections:** Clean data ensures smoother submissions and fewer corrections.
3. **Build stronger relationships:** Brokers who simplify ACA compliance become trusted advisors.
4. **Differentiate your offering:** Partnering with Mineral allows brokers to bring modern compliance technology and expertise to every client.



Pro Tip: The **Mitratesch Mineral ACA Reporting Hub** provides brokers and employers with a single, secure platform to manage ACA compliance from start to finish, including data accuracy, form generation, electronic submission, and expert-backed support.

Compliance is complex. Your solution doesn't have to be.

Whether you are a broker guiding clients or an employer managing filings, the **Mitratesch Mineral ACA Reporting Hub** gives you everything you need for a confident, penalty-free reporting season.

Explore the Mitratesch Mineral ACA Reporting Hub

