

ACA FILING & PENALTIES GUIDE

2026 FILING YEAR

(2025 TAX YEAR)



Key ACA Filing Deadlines

Filing Requirement	Deadline
Form 1095-C Distribution to Employees	March 2, 2026
Form 1094-C/1095-C Electronic Filing	March 31, 2026
Form 1094-C Paper Filing with IRS	<i>Not permitted for ALEs</i>

ACA Penalties for Non-Compliance

Penalty Type	Description	Penalty Amount
A Penalty (IRC §4980H(a))	Failure to offer minimum essential coverage to at least 95% of full-time employees and dependents	\$2,970 per full-time employee (annual, 2025 tax year)
B Penalty (IRC §4980H(b))	Coverage offered is unaffordable or does not provide minimum value; penalty applies if employees receive subsidized coverage	\$4,460 per full-time employee receiving subsidies (annual, 2025 tax year)
Failure to File Penalty	Failure to file Forms 1094-C/1095-C accurately and timely	\$290 per return
Failure to Furnish Penalty	Failure to furnish Form 1095-C to employees	\$310 per return

Things to Remember

- Penalties are calculated monthly but shown as annual amounts.
- Employers must ensure compliance with all deadlines to avoid financial repercussions.
- The A Penalty applies if an Applicable Large Employer (ALE) fails to offer coverage to at least 95% of full-time employees and dependents.
- The B Penalty applies if coverage is unaffordable or does not provide minimum value, and employees receive subsidized coverage through the Marketplace.
- **Electronic filing is required for ALEs; paper filing is no longer permitted.**

Disclaimer:

Requirements may change. Please consult legal counsel for the latest guidance specific to your organization.