

State Health Coverage Reporting Requirements for CY 2025

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Currently, five states (California, Massachusetts, New Jersey, Rhode Island, and Vermont) and the District of Columbia have enacted individual health insurance mandates with their own requirements for:

- Furnishing information regarding health insurance coverage to residents of the state, and
- Filing that information with certain state agencies.

These requirements and deadlines may (or may not) align with the federal requirements.

Reminder: under the Affordable Care Act (“ACA”), applicable large employers (“ALEs”) must furnish Form 1095-C to full-time employees and file Form 1094-C and all 1095-Cs with the IRS. An applicable large employer is defined as an employer that employed on average at least 50 full-time employees, including full-time equivalent employees, during the preceding calendar year.

ALEs offering a self-insured group health plan must also furnish Forms 1095-C to covered employees or other primary insured individuals in the self-funded health plan (e.g., covered part-time employees, COBRA qualified beneficiaries). Employers that are not ALEs and offer self-funded group health plan coverage (including level funded plans) must furnish and file forms regarding minimum essential coverage (Forms 1094-B and 1095-B).

Calendar year 2025 Forms 1095-C must be furnished by March 2, 2026, and filed electronically with the IRS by March 31, 2026.

Under the Paperwork Burden Reduction Act, employers (or carriers) may furnish the federal forms 1095-C (or 1095-B) upon request when:

- A timely, clear and accessible notice is provided to any individual (who would otherwise receive a Form 1095-C (or 1095-B)) informing them that they may request a copy of the applicable Form; and



- Upon request, the applicable Form is furnished by the later of January 31 or 30 days after the date of such request.

As described below, satisfying the federal requirements may not satisfy the applicable state obligations. It is important to ensure both federal and state requirements (as applicable) are met. The applicable states and District of Columbia have not adopted this federal relief. Employers (and carriers) should prepare to furnish Forms 1095-C (or 1095-B) to covered residents as they have in prior years (e.g., by mail).

The following chart summarizes important deadlines related to CY 2025 state individual mandate reporting.

State	Deadline to Furnish Statements to Employee Residents	Deadline to File Statements with State Agency
California	January 31, 2026. However, no penalty is imposed for failing to furnish by this deadline	March 31, 2026. No penalties will be assessed if filed by May 31, 2026
District of Columbia	March 2, 2026	April 30, 2026 (30 days after federal deadline)
Massachusetts	January 31, 2026	January 31, 2026
New Jersey	March 2, 2026	March 31, 2026
Rhode Island	March 2, 2026	March 31, 2026
Vermont	N/A	N/A

Note: The state reporting deadlines are subject to change if the states update their reporting information.

Important issues to consider regarding furnishing and filing state-level health coverage information are as follows:

- **State residents.** Employers with employees and other covered individuals residing in states with health coverage mandates should ensure the state-level health insurance distribution and state-level filing requirements are satisfied. Penalties may arise for late or incorrect filings with the state.
- **Forms.**
 - California, the District of Columbia, New Jersey, and Rhode Island use the federal Forms 1094/1095 (B, C) for the state’s individual mandate reporting requirements.
 - Massachusetts requires MA Form 1099-HC to be furnished to Massachusetts residents and filed with the state by January 31. In addition, Massachusetts requires employers with at least 6 employees residing in Massachusetts to file the Health Insurance Responsibility Disclosure (“HIRD”) form. The Massachusetts HIRD form is available starting November 15 of the filing year and must be completed by December 15 of the filing year.
- **Employers with fully insured plans.**
 - Carriers issuing policies in California, Massachusetts, New Jersey, and Rhode Island are generally obligated to issue health coverage statements to plan members residing in the respective state and to file the required health coverage information to that state agency.
 - The District of Columbia requires employers that sponsor a fully insured group health plan with at least 50 full-time employees, including at least one employee who is a resident of the District, to file information returns with the Office of Tax and Revenue (“OTR”).



Note: A carrier may not automatically furnish a member statement and file with a state agency for plan members residing outside of the policy issue/situs state.

- **Employers with fully insured plans issued out-of-state.** Employers should confirm that the carrier will adhere to the required state distribution and filing obligations for plan members that reside in a state with individual mandate reporting obligations.
 - For employers with fully insured plans that are written outside of a state with an individual mandate, if the carrier will not furnish the forms to state residents or file with the applicable state agency, the employer may be required to furnish and/or file the statements. This may require involvement with your payroll provider or other ACA reporting vendor to coordinate.
- **Employers with self-funded plans.** Employers should confirm with their third-party administrator (“TPA”) or ACA form preparation vendor that the required state distribution and filing obligations for plan members that reside in a state with an individual mandate will be satisfied and whether any additional fees will be assessed.
 - For self-funded health plans (including level funded and ICHRA), if the TPA will not furnish the forms to state residents or file with the applicable state agency, the employer may be required to furnish and/or file the statements. This may require involvement with your payroll provider or other ACA reporting vendor to coordinate.

■ Employer Action

Employers with employees and/or plan members residing in a state (and/or the District of Columbia) with individual mandate reporting requirements should confirm state reporting requirements with their carrier, TPA or ACA vendor to ensure federal as well as state-level reporting obligations will be met.