



IRS Guidance Clarifies ACA Reporting Deadlines: Alternative Method for 2024 Individual Forms is Available Until March 3, 2025

As we discussed in our [previous blog](#), new legislation modified the Affordable Care Act (ACA) reporting requirements for individual Forms 1095-B and/or 1095-C. The new rules add an alternative method of compliance which allows a reporting entity to post a notice on its website informing individuals that the forms are available upon request, instead of mailing individual forms. The statutory language did not, however, include information about how to comply with the new requirements in practice.

The IRS recently issued guidance ([Notice 2025-15](#)) which explains how employers can comply with the new rules, including more information about required content. The notice clarifies that this alternative method of compliance is available if the notice is posted by the regular deadline for providing the forms. If the notice meets the timing and content requirements set forth in the guidance, then individual forms must only be provided upon request.

Alternative Notice Content

The notice must be clear and conspicuous and posted on the reporting entity's website in a location that is reasonably accessible to all individuals who would otherwise receive the forms. The notice must include an email address, a physical address to which individuals can send a request for the form, and a telephone number where individuals may direct questions. The IRS has provided that certain existing notice rules, modified for these purposes as further explained in the guidance, will satisfy the alternative method requirements.

Notice Posting Deadline

The guidance clarifies that the notice must be posted by the regular deadline for providing the forms. Thus, going forward, the notice must be posted no later than 30 days after January 31 of the year following the year to be reported and must remain on the website through October 15. **If using this method for 2024 reporting, the notice must be posted no later than March 3, 2025, and must be maintained on the website through October 15, 2025.**

Deadline for Providing Individual Forms

If an individual makes a request for a copy of the form(s), it must be provided no later than the later of the following dates:

- January 31 of the year following the year for which the reporting is due; or
- 30 days after the date of the request.

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