

**Cheat Sheet**

Even if you’ve submitted your ACA forms to the IRS, five states and Washington, D.C. require their own employer reporting. If you have employees in California, Massachusetts, New Jersey, Rhode Island, or D.C., you must file additional state reports. Vermont also has an individual mandate but does not require employer reporting.

**2026 ACA Affordability Cheat Sheet**

Quick reference for setting employee contributions

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These filings are not typically handled by basic payroll or HR reporting vendors. The responsibility often falls on the employer — and missing them can mean penalties and employees left without the forms they need at tax time.

**State by State Requirements**

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| **State**  | **State Mandate**  | **Typical Deadlines**  | **Off-the-Shelf Vendor Coverage**  | **Risk if Missed**  |
| **California (CA)** | Federal 1094/1095s filed with the Franchise Tax Board (FTB).  | Forms to residents by Jan 31. To FTB: Mar 31; FTB grants an automatic extension to May 31 for state filing.  | Varies – Many vendors file federally but not to CA FTB unless contracted  | $50 per covered individual per year  |
| **Massachusetts (MA)** | Form MA 1099-HC to the Department of Revenue (DOR).  Annual HIRD filing (separate requirement).  | To residents: Jan 31. To DOR (electronic): March 31.  HIRD filing due Dec 15.  | Rare – Most vendors do not generate or file 1099-HC unless specifically requested  | $50 per covered individual, cap $50k  |
| **New Jersey (NJ)** | Employer/coverage provider submission of 1095 data to DORES (state Treasury).  | To residents (primary enrollees): generally early March (e.g., Mar 3, 2025). To DORES (electronic): Mar 31.  | Varies – Some vendors can transmit to DORES, others require employer upload  | State can assess penalties for failure to file; widely cited guidance describes $50 per individual (up to $50,000).  |
| **Rhode Island (RI)** | Employer MEC reporting to the Division of Taxation.  | To residents: Mar 2 each year. To RI (electronic via MyTax RI): Mar 31 (mirrors federal e-file timing).  | Varies – May not handle state-specific file format; often requires employer action  | Division notes compliance is reviewed case-by-case; no published per-employee schedule for employer filing failures (individual mandate penalties exist for residents).  |
| **Washington, D.C.** | Employer MEC information return to OTR.  | To DC OTR: 30 days after the federal deadline (i.e., Apr 30 when the federal e-file due date is Mar 31).  | Varies – Often missed unless vendor supports MyTax.DC.gov submissions  | No penalties are imposed by OTR for failure to file these informational returns (individual mandate penalties apply to residents, not to employer filing).  |

**Are you sure your state filings are handled?**
If you have employees in CA, MA, NJ, RI, or DC, you cannot rely solely on federal ACA reporting. Confirm now whether your carrier or vendor is submitting these state filings — otherwise the responsibility (and penalties) fall directly on you.

**ACA rules don’t have to be overwhelming.**
We help employers stay compliant, avoid penalties, and keep benefit plans running smoothly. Reach out today to see how we can support your team.

**[Broker Name]**
[Broker Firm/Agency Name]
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