Electronic Filing of ACA Returns

All Atlantic Benefits

Employers that file **at least 10 returns** during the calendar year must file their ACA returns electronically. Employers that have not requested an extension or an electronic filing waiver, and that are subject to the ACA reporting rules should be exploring options for filing electronically to ensure filing is completed by the **March 31, 2026, deadline.**

Currently, electronic filing is done using the AIR Program. The IRS has provided a lot of guidance and information on electronic reporting under Internal Revenue Code Sections 6055 and 6056 through its AIR Program main page. The following provides an overview of the electronic reporting process.

AIR Program Overview

In general, the AIR Program is used by:

Software developers who develop software for creating electronic files for ACA information returns;

Transmitters who will transmit information returns to the IRS on behalf of reporting entities; and

Issuers who have the capability to transmit information returns directly to the IRS on their own behalf.

Typically, issuers, employers and other reporting entities will use a third-party vendor to file electronically with the IRS on their behalf, rather than directly using the AIR Program themselves. The deadline for filing returns electronically with the IRS is **March 31, 2026.**

Electronic Reporting Process

The following steps must be completed by entities that submit electronic returns through the AIR Program:

Step One: Register to use IRS e-Services tools and apply for the ACA Application for Transmitter Control Code (TCC). Reporting entities that are using third-party vendors—and are not transmitting information returns directly to the IRS—should not apply for a TCC.

Step Two: Pass all applicable test scenarios. **Software developers** are required to annually pass ACA Assurance Testing System (AATS) testing to transmit information returns to the IRS, and those who passed testing for any tax year ending after Dec. 31, 2014, do not need to test for the current tax year. **Transmitters and issuers** must use approved software to perform the communications test, which is only required to be successfully completed once.

Additional details and IRS resources are available on the IRS' AIR Program main page.

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