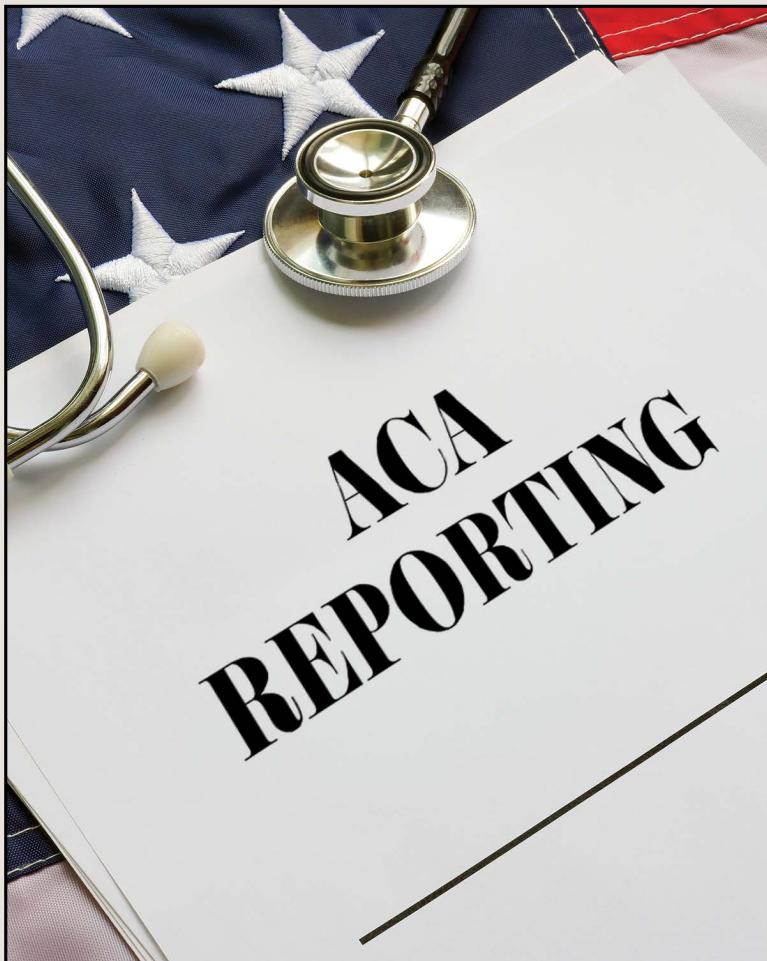


COMPLIANCE CHRONICLE

REGULATIONS | POLICIES | STANDARDS | REQUIREMENTS | LAWS

Navigating the ever-evolving landscape of compliance can be challenging and time-consuming. Warner Pacific is happy to share monthly updates to help your organization stay informed about new requirements and minimize compliance risks. Let us handle the complexities, so you can focus on what matters most – your business.

ACA Reporting Requirements for Forms 1094 and 1095



ACA reporting involves the submission of Forms 1095 and 1094 by employers to the IRS each year. These forms are crucial for ensuring compliance with the Affordable Care Act (ACA).

Form 1095 provides details about the health insurance coverage offered to employees, while Form 1094 serves as a summary transmittal form.

This reporting is important because it helps the IRS verify that employers are meeting their obligations under the ACA, such as providing affordable health coverage to their employees.

Accurate ACA reporting also helps employees understand their health insurance status and eligibility for premium tax credits.

Key Upcoming ACA Reporting

Requirements for paper filing, employee statements and electronic filing include:

1. Required Paper Filing: The IRS requires Applicable Large Employers (ALEs) to send ACA reports to ensure compliance with ACA regulations. ALEs are employers with 50 or more full-time or full-time equivalent employees. Employers with 50 or more full-time employees (including full-time equivalent employees) must file Forms 1094-C and 1095-C with the IRS. If they choose to file by paper, the deadline is February 28, 2026.

2. Required Employee Statements: Employers are required to furnish Form 1095-C to each full-time employee, detailing the health insurance coverage offered. In California, these statements must be provided by January 31. In Colorado, Florida, Minnesota, Oklahoma, and Texas, the deadline is March 3, 2026. The forms can be delivered by mail or electronically, with the employee's consent.

3. Required Electronic Filing: If a broker's client is filing 10 or more forms, they are required to file electronically through the ACA Information Returns (AIR) system. The deadline for electronic filing is March 31, 2026.

Our [ALE Affordability Calculator](#) is a user-friendly tool that simplifies the complex process of determining the affordability of employer-sponsored health coverage. It is designed to assist large employers in accurately calculating their minimum required employer contribution under the ACA.

For more information on ACA reporting requirements, penalties, employer shared responsibility payments (ESRP), and more resources, check out our [ACA Reporting resource here](#).

Employers and Paternity Leave

What can an employer do about paternity leave coverage? Outside of the Family and Medical Leave Act (FMLA), paternity leave coverage is available through state Paid Family and Medical Leave (PFML) programs and employer-sponsored paid parental leave policies.

States With Paid Family Leave Programs

As of 2025, 13 states and Washington, D.C., have mandatory PFML programs, and several others have voluntary or upcoming programs. These programs provide paid time off for bonding with a new child, which applies equally to fathers.



State/ Jurisdiction	Program Name	Benefit for Paternity Leave
California	Paid Family Leave (PFL)	Up to 8 weeks partial wage replacement
New York	Paid Family Leave (PFL)	Up to 12 weeks, % of wages
New Jersey	Family Leave Insurance	Up to 12 weeks partial pay
Rhode Island	Temporary Caregiver Insurance	Up to 6 weeks partial pay
Washington	Paid Family & Medical Leave	Up to 12 weeks paid leave
Massachusetts	Paid Family & Medical Leave	Up to 12 weeks paid leave
Connecticut	Paid Family & Medical Leave	Up to 12 weeks paid leave
Oregon	Paid Leave Oregon	Up to 12 weeks paid leave
Maine	Paid Family & Medical Leave (2026 start)	12 weeks planned
Minnesota	Paid Family & Medical Leave (2026 start)	12 weeks planned
Delaware	Paid Family & Medical Leave (2026 start)	12 weeks planned
Illinois	Paid Leave for All Workers Act (2025 start)	Paid leave, details vary
Washington, D.C.	Universal Paid Leave	Up to 12 weeks paid leave



Employer-Sponsored Paid Parental Leave

- Only 23% of U.S. workers have access to paid parental leave through their employer.
- Policies vary widely: Some employers offer 2 - 12 weeks fully paid, while others provide partial pay or flexible bonding time.
- Federal employees have a separate Paid Parental Leave program offering 12 weeks of paid leave.

Key Considerations for Employers

- Location is critical:** If the business operates in states with PFML, employees already have access to paid paternity leave.
- Employer discretion:** In states without PFML, the company can choose to add voluntary paid parental leave to its benefits package.
- Coordination with FMLA:** PFML usually runs concurrently with FMLA, meaning employees don't get double time but do get wage replacement.
- Competitive advantage:** Offering paid paternity leave can improve retention, morale and workplace equity.

What States Require Short-Term Disability Insurance?

Five states (plus Puerto Rico) require employers to provide state-mandated short-term disability insurance. They are California, Hawaii, New Jersey, New York, Rhode Island, and Puerto Rico.

State Disability Insurance Contacts & Resources

State	Program Name	Official Website/Contact Information
California	CA State Disability Insurance (SDI)	CA Employment Development Department (EDD) , or call (800) 480-3287
Hawaii	HI Temporary Disability Insurance (TDI)	HI Department of Labor and Industrial Relations , or call (808) 586-9188
New Jersey	NJ Temporary Disability Insurance (TDI)	NJ Division of Temporary Disability & Family Leave Insurance , or call (609) 292-7060
New York	NY Disability Benefits Law	NY Workers' Compensation Board , or call (877) 632-4996
Rhode Island	RI Temporary Disability Insurance (TDI)	RI Department of Labor and Training , or call (401) 462-8420
Puerto Rico	PR Disability Benefits Law	Puerto Rico Department of Labor , or call (787) 754-2119

These agencies provide:

- Employer compliance guides
- Forms for private plan approval
- Contribution rate updates



Key Notes for Employers

- Private STD/LTD plans (like those from Principal or Hartford) do not automatically satisfy state mandates, unless approved by the state as a substitute.
- New York requires employers to provide coverage for non-work-related disabilities for employees residing in the state, even if the company is headquartered elsewhere.
- California, where your group is located, also has a mandatory SDI program funded by employee payroll deductions.
- Multi-state employers must comply with each state's disability insurance laws for employees residing in those states.

Check out all of our compliance and legislative resources at warnerpacific.com.