

THE LOCAL CHOICE E-NEWS

*Department of Human Resource
Management
Office of Health Benefits*

December 3, 2025

Affordable Care Act (ACA) Reporting Update and Deadlines for Calendar Year 2025

DHRM relies on the information provided by you and stored in the Cardinal HCM system to file required reports that comply with the ACA employer mandate to report health care coverage offered to eligible participants and dependents. Important deadlines are approaching for the 2025 ACA Reporting.

Deadline 1: ACA Reconciliation Due By December 12, 2025

It is important that the ACA Reconciliation Report is reviewed and reconciled by December 12, 2025. The Cardinal ACA Reconciliation Report can be run at any point.

Navigation Path: Navigator > Benefits > ACA Annual Processing > ACA Preparation > ACA Reconciliation Report

The Cardinal job aid [NAV225 Generating an HCM Report](#) provides instructions to generate a report.

Review the ACA Reconciliation Report to make sure it reflects an accurate FEIN, SSN, Class Code and Offer Code for each participant associated with your group during the calendar year 2025. Remember all participants for 2025 must have a record on the report showing they were waived or enrolled in non-Medicare coverage offered by your group. ACA reporting does not include months in which a participant is enrolled in a Medicare plan.

- The new format of the ACA Reconciliation Report will now show the actual values displayed on the ACA 1095 form.
- The IRS website: [Indicator Codes for Employee Offer of Coverage](#) provides explanations of the values used on the ACA 1095 form.
- The [Cardinal ACA Reconciliation Report Codes and Samples](#) document is helpful in understanding the codes used on the report. The reconciliation report will include transactions keyed as of the report date.
- If a participant record is missing or incorrect on the report, submit the [TLC ACA Reconciliation Form](#) marked ADDITION for a missing record or CHANGE for an incorrect record to TLC@dhrm.virginia.gov so that Cardinal can be updated.

Deadline 2: On-line ACA Certification Due by December 29, 2025

The ACA Certification in Cardinal is available to agencies at any time. This certification requires that you verify employer information and enter the number of employees by FEIN for each month of 2025 using the ACA definitions published by IRS. You may use this link for IRS guidance:

<https://www.irs.gov/affordable-care-act/employers/determining-if-an-employer-is-an-applicable-large-employer>

Things you can do to manage ACA information throughout the year:

Be sure to collect an enrollment form from all new hires that are eligible for coverage – those that choose to waive coverage and those that choose to enroll. Be sure it includes the hire date and classification.

Be sure to term records for employees that waived coverage when they are no longer eligible for coverage.

Review reports to be sure enrollment information is accurate. Reports can be run at any point. The Cardinal job aid [NAV225 Generating an HCM Report](#) provides instructions to generate a report.

- Cardinal Enrollment Report (RBN350): lists all participants enrolled in Healthcare on a specific date. Terminated employees remain on the report for 90 days from date of termination.
- Benefit Enrollment Changes Report (RBN287): lists benefit changes that were made between two date parameters.
- Benefit Event Status Report (RBN300): lists all participants in a particular process status or set of status levels.
- ACA Reconciliation Report (RBN218): lists individual health benefit information for agencies to validate prior to Affordable Care Act (ACA) reporting, containing a line for each participant and dependent with coverage in the calendar year.
- Base Benefit Audit Consistency Report (RBN304): lists data that has been entered into the benefit plan, employee data, dependent data, or enrollment data pages which does not appear to follow policy or regulations. For example, records with missing or invalid social security numbers (SSNs) that require follow-up are on this report.

For questions regarding the ACA reporting requirement please contact TLC at TLC@dhrm.virginia.gov.

For technical or functional questions about reports in Cardinal, please submit a help desk ticket to vccc@vita.virginia.gov and include Cardinal in the subject line with a brief summary for routing. In the email, provide detailed information about your issue (i.e., functional area, page, actions, error). Be sure to include your name, email address, and a phone number where you can be reached.

Please do not reply to this e-mail. You may send inquiries to The Local Choice mailbox at TLC@dhrm.virginia.gov.