

COMPLIANCE OVERVIEW



Key Year-end Disclosure Deadlines for Group Health Plans

As the end of the calendar year approaches, employers that sponsor group health plans must ensure timely compliance with several federal reporting and disclosure requirements. These obligations, mandated under various federal laws, including the Employee Retirement Income Security Act (ERISA), the Affordable Care Act (ACA) and the Consolidated Appropriations Act (CAA), must be fulfilled in a timely manner to avoid potential penalties.

The table below focuses on **key dates relevant to plans that operate on a calendar year basis** to assist plan sponsors in meeting their year-end obligations.

Requirement	Description	Deadline
Summary Annual Reports (SARs)	Employers who must file Form 5500 on behalf of their employee benefit plans (including group health plans) must also provide plan participants with an SAR, which summarizes information from the Form 5500. The plan administrator generally must provide the SAR within nine months of the close of the plan year, unless an extension of time to file the Form 5500 is obtained.	Sept. 30, 2025
Medicare Part D Notices	Employers with group health plans that provide prescription drug coverage must notify Medicare Part D eligible individuals each year about whether the drug coverage is at least as good as the Medicare Part D coverage (in other words, whether their prescription drug coverage is “creditable”).	Oct. 14, 2025
Form 5500s (Extended Deadline)	Each year, employers that are subject to ERISA must electronically file an annual report (Form 5500) for each employee benefit plan they maintain unless a filing exemption applies. Employers with employee benefit plans that operate on a calendar-year basis had to file their annual reports for 2024 by July 31, 2025. However, employers that filed IRS Form 5558 by this date were granted an automatic, one-time extension of time to file by 2.5 months.	Oct. 15, 2025
SARs (Extended Deadline)	If an extension of time to file Form 5500 was obtained, the plan administrator must furnish the SAR within two months after the close of the extension period.	Dec. 15, 2025

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Gag Clause Attestation	Health plans and health insurance issuers must annually submit an attestation of compliance with the CAA's gag clause prohibition. Employers with fully insured plans do not need to submit an attestation if their issuer does. Self-insured plans can contractually delegate this to their TPA, but the legal requirement remains with the health plan.	Dec. 31, 2025
HRA-specific Deadlines		
Individual Coverage HRA (ICHRA) Notice	Employers with ICHRAs must provide a notice to eligible participants regarding the ICHRA and its interaction with the ACA's premium tax credit no later than 90 days before the beginning of the ICHRA plan year.	Oct. 3, 2025
Qualified Small Employer HRA (QSEHRA) Notice	Employers that fund a QSEHRA for any year (i.e., those that do not qualify as applicable large employers under the ACA's employer shared responsibility rules and do not maintain a group health plan for any of its employees) must provide a notice to each eligible employee no later than 90 days before the beginning of the year.	Oct. 3, 2025

In addition to the deadlines above, the end of the plan year is a good time to ensure that all applicable annual notice requirements (e.g., the Children's Health Insurance Program notice) have been satisfied.

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