



2025 Welfare Plan Compliance Calendar



Date	Description	Notes
January 31, 2025	Massachusetts 1099-HC form due to residents and to the Massachusetts Department of Revenue	Group health plan sponsors or insurers are required to provide the form to Massachusetts residents who received creditable coverage under the plan. There is no specific format for the 1099-HC, but a sample can be found at https://www.mass.gov/doc/draft-2024-form-ma-1099-hc-individual-mandate-massachusetts-health-care-coverage/download Additionally, group health plan sponsors or insurers must make an electronic reporting of the Forms MA 1099-HC to the state Department of Revenue. Information about electronic reporting is available at https://www.mass.gov/info-details/health-care-frequently-asked-questions-for-employers
January 31, 2025	Forms 1095-C or 1095-B due to California residents	Employers offering self-insured health plan coverage constituting minimum essential coverage ("MEC health plan") must distribute reporting forms to all California residents who were covered under the plan in 2024. Employers with fully-insured MEC health plans are not required to distribute duplicate forms if the insurance issuer distributes them. Employers can use the same 1095 forms used for ACA reporting purposes. Information can be found at https://www.ftb.ca.gov/file/business/report-mec-info/publications.html
January 31, 2025	Deadline for providing Form W-2 to employees and filing of W-2 forms (and W-3 transmittal) with the Social Security Administration.	Unless future guidance changes the applicability of this requirement, employers who filed at least 250 Forms W-2 for the 2023 year must report the aggregate value of applicable employer-sponsored health coverage on the 2024 Forms W-2. Information on reporting health coverage on the Form W-2 can be found at: https://www.irs.gov/affordable-care-act/form-w-2-reporting-of-employer-sponsored-health-coverage
February 28, 2025	Deadline for paper filers to provide Form 1094-C (or Forms 1094-B, if applicable) to the IRS [Extension available]	Applicable large employers and sponsors of self-insured MEC health plans must use Form 1094-C to file copies of Forms 1095-C with the IRS (or Form 1094-B to submit Forms 1095-B, if applicable). The filing deadline is the February 28 of the year following the calendar year to which the return relates for filers filing with paper. (Note: The deadline is the March 31 following the end of the reporting year for filers filing electronically.) An automatic 30-day extension is available if Form 8809 is filed by this due date. The extension applies only to IRS filings, not to the distribution of Forms 1095-C/1095-B to individuals. When the filing deadline falls on a weekend or legal holiday, the due date is the following business day. Form 1094-C instructions are available at https://www.irs.gov/uac/about-form-1094-c and Form 1094-B instructions are available at https://www.irs.gov/uac/about-form-1094-b
February 28, 2025	Form 8809, Application for Extension of Time to File Information Returns (for <u>paper filers</u>)	Used to apply for an automatic 30-day extension to file Form 1094-C (or Forms 1094-B, if applicable) with the IRS. The form and instructions are available at: https://www.irs.gov/pub/irs-pdf/f8809.pdf
February 28, 2025	2024 top-off payments due under the San Francisco Health Care Security Ordinance	An employer that is subject to the San Francisco Health Care Security Ordinance (HCSO) for a year, and that uses a self-funded health plan to satisfy part of the HCSO spending requirement for that year, must complete the remaining spending by the last day of February of the following year. Information on how to calculate the top-off payments can be found at: https://www.sf.gov/sites/default/files/2024-02/HCSO%20Self%20Funded%20of%20Instructions%20for%202023.pdf General information about the HCSO can be found at https://sf.gov/information/understanding-health-care-security-ordinance An employer is subject to the HCSO if the employer (i) employs one or more workers in San Francisco; (ii) is required to obtain a valid San Francisco business registration certificate; and (iii) is a for-profit business with 20 or more persons performing work (including outside of San Francisco) or a nonprofit organization with 50 or more persons performing work (including outside of San Francisco). For these purposes, San Francisco includes the city and county of San Francisco.
March 1, 2025	Creditable Coverage Disclosure due to the Centers for Medicare and Medicaid Services (CMS)	Electronic disclosure to CMS must be made via the CMS web site: https://www.cms.gov/Medicare/Prescription-Drug-Coverage/CreditableCoverage/CCDisclosureForm.html The electronic disclosure to CMS must be provided within 60 days after the beginning date of the Plan Year for which the entity is providing the disclosure. The disclosure must also be provided within 30 days after the termination of a prescription drug plan and within 30 days after any change from creditable to non-creditable coverage (or vice versa). General information about the disclosure can be found at: http://www.cms.gov/Medicare/Prescription-Drug-Coverage/CreditableCoverage/index.html?redirect=/creditablecoverage

Date	Description	Notes
March 1, 2025	Reporting due to HHS for HIPAA breaches involving fewer than 500 individuals	Group health plans must report to U.S. Health and Human Services (HHS) any breaches of unsecured protected health information. If the breach involved fewer than 500 individuals, the reporting must be done on the HHS website within 60 days after the end of the calendar year in which the breach is discovered. Breaches must be reported online. Information about breach reporting can be found at: https://www.hhs.gov/hipaa/for-professionals/breach-notification/index.html
March 3, 2025	Deadline for providing 2024 Forms 1095-C to individuals	Applicable large employers must provide Forms 1095-C to full-time employees and plan sponsors must provide Forms 1095-C to persons enrolled in self-insured health plan coverage. Special rules apply for Forms 1095-B and for those Forms 1095-C provided to individuals who are enrolled in self-insured coverage but were not full-time employees at any time during 2024. When the filing deadline falls on a weekend or legal holiday, the due date is the following business day. Instructions are available at https://www.irs.gov/uac/about-form-1095-c and https://www.irs.gov/uac/about-form-1095-b
March 3, 2025	Deadline for providing 2024 Forms 1095-C to New Jersey residents	Employers offering MEC health plans must distribute reporting forms to all New Jersey residents who were covered under the plans in 2024 as a primary insured. Distributing the federal ACA reporting forms as required will satisfy this requirement. Information can be found at https://nj.gov/treasury/njhealthinsurancemandate/employers.shtml
March 3, 2025	Deadline for providing 2024 Forms 1095-C to Washington D.C. residents	Employers offering MEC health plans must distribute reporting forms to all Washington D.C. residents who were covered under the plan in 2024. Distributing the federal ACA reporting forms as required will satisfy this requirement. Information can be found at https://otr.cfo.dc.gov/sites/default/files/dc/sites/otr/publication/attachments/FAQ%20reporting%20SRP%20Update.3.31.20.pdf .
March 3, 2025	Deadline for providing 2024 Forms 1095-C to Rhode Island residents	Employers offering self-insured MEC health plans must distribute reporting forms to all Rhode Island residents who were covered under the plan in 2024 as the primary insured. Employers with fully-insured MEC health plans are not required to distribute duplicate forms if the insurance issuer distributes them. Distributing the ACA reporting forms as required will satisfy this requirement. Information can be found at https://tax.ri.gov/sites/g/files/xkgbur541/files/healthcoveragemandate/IndividualMandate_ReportingRequirements_FAQ.pdf (does not reflect subsequent extension of the reporting deadline); https://tax.ri.gov/sites/g/files/xkgbur541/files/2022-10/ADV_2022_29_individual_mandate_deadline.pdf (reflects subsequent extension of the reporting deadline)
March 31, 2025	Due date for <u>paper filers</u> to file Forms 1094-C/1094-B with the IRS (if previously extended)	Applicable large employers and sponsors of self-insured MEC health plans must use Form 1094-C to file copies of Forms 1095-C with the IRS (or Form 1094-B to submit Forms 1095-B if applicable). The filing deadline is the last day of February following the end of the reporting year for filers filing with paper. (Note: the deadline is March 31 following the end of the reporting year for filers filing electronically.) Under certain hardship conditions, an additional 30-day extension may be available if Form 8809 is filed by this due date. The extension applies only to IRS filings, not to the distribution of Forms 1095-C/1095-B to individuals. When the filing deadline falls on a weekend or legal holiday, the due date is the following business day. Instructions for Form 1094-C are available at https://www.irs.gov/uac/about-form-1094-c and instructions for Form 1094-B are at https://www.irs.gov/uac/about-form-1094-b
March 31, 2025	Deadline to report to the state of California regarding the California individual mandate [Grace period available]	Employers offering self-insured MEC health plans must submit information about California residents to the California Franchise Tax Board. Employers may use the same Forms 1094 and 1095 used for federal ACA reporting purposes. No penalties will be imposed by the California Franchise Tax Board if reporting is filed by May 31, 2025. Information about the reporting requirement can be found at https://www.ftb.ca.gov/file/business/report-mec-info/index.asp .
March 31, 2025	Deadline to report to the state of Rhode Island regarding the Rhode Island individual mandate	Employers offering self-funded plans must submit information about Rhode Island residents to the Rhode Island Division of Taxation. Employers may use the same Forms 1094 and 1095 used for ACA reporting purposes. Information about the reporting requirement can be found at https://tax.ri.gov/guidance/health-insurance-mandate
March 31, 2025	Retiree Drug Subsidy Reconciliation due for 2023 plan year	Plan sponsors who apply for the Medicare Part D retiree drug subsidy must submit a reconciliation to confirm the list of covered retirees and cost data. The reconciliation must be filed by the last day of the fifteenth month following the last day of the RDS plan year specified in the application. Additional information and a User Guide are available at: https://www.rds.cms.hhs.gov/

Date	Description	Notes
March 31, 2025	<p>Deadline for electronic filers to provide Form 1094-C (or Forms 1094-B, if applicable) to the IRS</p> <p>[Extension Available]</p>	<p>Applicable large employers and sponsors of self-insured MEC health plans must use Form 1094-C to file copies of Forms 1095-C with the IRS (or Form 1094-B to submit Forms 1095-B, if applicable). The filing deadline is the March 31 following the end of the reporting year for filers filing electronically. (Note: the deadline is the last day of February following the end of the reporting year for filers filing with paper).</p> <p>An automatic 30-day extension is available if Form 8809 is filed by this due date. The extension applies only to IRS filings, not to the distribution of Forms 1095-C/1095-B to individuals. When the filing deadline falls on a weekend or legal holiday, the due date is the following business day.</p> <p>Instructions for Form 1094-C are available at https://www.irs.gov/uac/about-form-1094-c and instructions for Form 1094-B are at https://www.irs.gov/uac/about-form-1094-b</p>
March 31, 2025	Form 8809, Application for Extension of Time to File Information Returns (for electronic filers)	<p>Used to apply for an extension of time to electronically file Form 1094-C (or Form 1094-B, if applicable) with the IRS.</p> <p>The form and instructions are available at https://www.irs.gov/pub/irs-pdf/f8809.pdf</p>
March 31, 2025	Deadline to report to the state of New Jersey regarding the New Jersey individual mandate	<p>Employers that provide health coverage must report to the New Jersey Division of Taxation with respect to residents enrolled in the employer's medical coverage. Employers may use the same Forms 1094 and 1095 used for ACA reporting purposes so long as Part III of Form 1095 is completed.</p> <p>Information is available at https://nj.gov/treasury/njhealthinsurancemandate/employers.shtml</p>
April 15, 2025	<p>Due date for Form 8928 and payment of excise tax.</p> <p>[Extension Available]</p>	<p>Form 8928 must be filed (and any excise tax paid) by the due date for the corporate tax return (without regard to any extension) for any year in which there is a "noncompliance period." There will generally be a noncompliance period when there is a violation of COBRA, HIPAA, the Newborns and Mothers Health Protection Act, the Women's Health and Cancer Rights Act, the Mental Health Parity and Addiction Equity Act, the Genetic Information Nondiscrimination Act or the ACA market reform requirements.</p> <p>In addition, a Form 8928 must be filed (and any excise tax paid) by the fifteenth day of the fourth month after the end of the calendar year in which noncomparable contributions were made to an HSA or an Archer MSA.</p> <p>The Form 8928 is at http://www.irs.gov/pub/irs-pdf/f8928.pdf and the instructions are available at http://www.irs.gov/pub/irs-pdf/i8928.pdf</p> <p>An automatic 6-month extension is available if Form 7004 is filed and estimated tax is paid prior to this due date. The extension applies only to the filing, not to the obligation to pay the required tax.</p>
April 15, 2025	Form 7004 Application for Automatic Extension of Time to File Certain Business Income Tax, Information, and Other Returns	<p>Used to apply for a 6-month automatic extension to file Form 8928.</p> <p>Instructions are available at https://www.irs.gov/uac/about-form-7004</p>
April 30, 2025	Deadline to provide Washington D.C. state individual mandate reporting	<p>Reporting is required for employers that provide (i) fully-insured group medical coverage to at least 50 employees, at least one of whom is a DC resident, or (ii) self-insured group medical coverage that covers at least one DC resident. Such employers must report to the Office of Tax and Revenue via the mytax.dc.gov portal with respect to residents enrolled in the employer's medical coverage. Employers may file the ACA Forms 1095-C and 1094-C. Reporting is due 30 days after ACA reporting is due to the IRS.</p> <p>Information can be found at https://otr.cfo.dc.gov/sites/default/files/dc/sites/otr/publication/attachments/FAQ%20reporting%20SRP%20Update.3.31.20.pdf</p>
April 30, 2025	Annual Reporting Form due to the San Francisco Office of Labor Standards Enforcement	<p>An employer that is subject to the San Francisco HCSO for a year must electronically file the annual reporting form by April 30 of the following year. The form will be made available at the website listed above by April 1 each year, and it must be submitted electronically. The form, instructions, and general information about the HCSO can be found at: https://www.sf.gov/information/health-care-security-ordinance</p> <p>An employer is subject to the San Francisco HCSO if the employer (i) employs one or more workers in San Francisco; (ii) is required to obtain a valid San Francisco business registration certificate; and (iii) is a for-profit business with 20 or more persons performing work (including outside of San Francisco) or a nonprofit organization with 50 or more persons performing work (including outside of San Francisco).</p>
May 1, 2025	Due date for electronic filers to file Forms 1094-C/1094-B with the IRS (if extended)	<p>Applicable large employers and sponsors of self-insured health plans must use Form 1094-C to file copies of Forms 1095-C with the IRS (or Form 1094-B to submit Forms 1095-B if applicable). The filing deadline is the March 31 following the end of the reporting year for filers filing electronically. (Note: The filing deadline is the last day of February following the end of the reporting year for paper filers).</p> <p>Under certain hardship conditions, an additional 30-day extension may be available if Form 8809 is filed by this due date. The extension applies only to IRS filings, not to the distribution of Forms 1095-C/1095-B to individuals.</p> <p>When the filing deadline falls on a weekend or legal holiday, the due date is the following business day.</p> <p>Instructions are available at https://www.irs.gov/uac/about-form-1094-c and https://www.irs.gov/uac/about-form-1094-b</p>

Date	Description	Notes
May 15, 2025	Due date for Form 990 for VEBA and other tax-exempt organizations [Extension available]	VEBAs and other tax-exempt organizations are required to file Form 990 on the 15th day of the 5th month following the end of the organization's taxable year. For organizations on a calendar year, the Form 990 is due on May 15th of the following year. VEBAs and other tax-exempt organizations should use Form 8868 to request an automatic 6-month extension of time. Form 990 instructions are available at https://www.irs.gov/pub/irs-pdf/i990.pdf
May 31, 2025	Deadline to report to the state of California regarding the California individual mandate (last day before penalties issued)	Employers offering self-funded plans must submit information about California residents to the California Franchise Tax Board. Employers may use the same Forms 1094 and 1095 used for ACA reporting purposes. Although the deadline is technically March 31, no penalties will be imposed by the California Franchise Tax Board if the reporting is filed by this deadline. Information about the reporting requirement can be found at https://www.ftb.ca.gov/file/business/report-mec-info/index.asp .
June 1, 2025	Deadline for RxDC prescription drug reporting for 2024	Group health plans must annually submit pharmacy benefit and drug cost information to the DOL, IRS, and HHS. Reporting for a calendar year is due by June 1 of the following year. Instructions and templates are available at: www.cms.gov/CCIIO/Programs-and-Initiatives/Other-Insurance-Protections/Prescription-Drug-Data-Collection
July 29, 2025	Summary of Material Modifications due to participants	If there has been a material amendment, due no later than 210 days after the end of the plan year in which the plan change is adopted. New participants must receive within 90 days of becoming a plan participant. Note: If a modification or change to a group health plan produces a material reduction in covered services or benefits under the plan, different deadlines apply. See the section below on deadlines that are not calendar-specific for more information.
July 31, 2025	Patient Centered Outcomes Research Institute ("PCORI") fee due date	A health plan sponsor (or health insurer for insured plans) must pay the fee with Form 720, which is due by the July 31 following the calendar year in which the applicable plan year ends. Form 720 can be found at: https://www.irs.gov/pub/irs-pdf/f720.pdf and instructions can be found at: http://www.irs.gov/pub/irs-pdf/i720.pdf Note: The PCORI fee will cease to apply starting with plan years beginning on or after October 1, 2029.
July 31, 2025	Form 5500 is due [Extension available]	Due the last day of the seventh month after the plan year-end, unless an extension is requested or automatically provided based on extension of the corporate tax return. For an automatic extension, the new Form 5500 due date the same as the extended due date for the corporate tax return. For a requested extension, the new due date is the 15th day of the third month after the normal due date of the Form 5500. When the filing deadline falls on a weekend or legal holiday, the due date is the following business day. The Form 5500 and instructions can be found at https://www.dol.gov/agencies/ebsa/employers-and-advisers/plan-administration-and-compliance/reporting-and-filing/form-5500
July 31, 2025	Form 5558 Application for Extension of Time to File Certain Employee Plan Returns is due	Used to request an extension of time to file Form 5500. Form 5558 and the instructions can be found at https://www.irs.gov/uac/form-5558-application-for-extension-of-time-to-file-certain-employee-plan-returns
September 15, 2025	Form 5500 due (if relying on automatic extension based on the extension of federal corporate income tax return due date)	Due the last day of the seventh month after the plan year-end, unless an extension is requested or automatically provided based on extension of the federal corporate income tax return. An automatic extension applies until the extended due date for the federal corporate income tax return if (i) the plan year and the employer's tax year are the same; (ii) the employer has been granted an extension of time to file its federal income tax return to a date later than the normal due date for filing the Form 5500; and (iii) a copy of the application for extension of time to file the federal income tax return is maintained with the filer's records. When the filing deadline falls on a weekend or legal holiday, the due date is the following business day.
September 30, 2025	Summary Annual Report due to participants (if 5500 deadline not extended) [Extension available if extend Form 5500 deadline]	The SAR is due to participants nine months after the plan year-end. This deadline can be extended by filing for an extension of the Form 5500 to which the SAR will relate. If the Form 5500 deadline is extended, the new deadline for the SAR is two months after the extended due date for filing the Form 5500.

Date	Description	Notes
October 3, 2025	QSEHRA notice due to eligible employees	Employers that offer a qualified small employer health reimbursement arrangement in lieu of health coverage for a year must provide a notice to eligible employees at least 90 days before the beginning of the year. Sample notice language is included in IRS Notice 2017-67, available at https://www.irs.gov/pub/irs-drop/n-17-67.pdf
October 3, 2025	ICHRA notice due to eligible employees for upcoming year	Employers that offer an individual coverage health reimbursement arrangement (ICHRA) must provide a notice to eligible employees at least 90 days before the beginning of the year. For employees who are not eligible to participate in the ICHRA on the first day of the year or the date the notice is provided to other employees, the notice must be provided no later than the date the employee is first eligible to participate. More information and a model notice can be found at https://www.irs.gov/newsroom/health-reimbursement-arrangements-hras .
October 3, 2025	Application for Retiree Drug Subsidy & Attestation of Actuarial Equivalence for plan year beginning January 1, 2025 due to CMS [Extension available]	The Application must be submitted no later than 90 days before the beginning of the plan year. A 30-day extension may be requested. Information regarding the drug subsidy can be found at https://www.rds.cms.hhs.gov/
October 14, 2025	Annual Medicare Part D Notice of Creditable Coverage due to participants on or before this date	Notice must be provided (1) before October 15 of each year, (2) prior to an individual's initial enrollment period for Part D, (3) prior to the effective date of coverage for any Part D eligible individual who enrolls in the plan's prescription drug coverage, (4) when the plan no longer provides any drug coverage or when the coverage is no longer creditable, and (5) upon request. Information regarding creditable coverage and Model Notices can be found at: http://www.cms.hhs.gov/CreditableCoverage/01_Overview.asp
October 15, 2025	Form 5500 due (if extended by filing a Form 5558)	Due the last day of the seventh month after the plan year-end, unless an extension is requested or automatically provided based on extension of the corporate tax return. An extension requested by filing a Form 5558 can extend the due date until the 15th day of the third month after the normal due date of the Form 5500. When the filing deadline falls on a weekend or legal holiday, the due date is the following business day. The Form 5500 and instructions can be found at: https://www.dol.gov/agencies/ebsa/employers-and-advisers/plan-administration-and-compliance/reporting-and-filing/form-5500
October 15, 2025	Form 8928 due (if extended)	Form 8928 must be filed (and any excise tax paid) by the due date for the corporate tax return (without regard to any extension) for any year in which there is a "noncompliance period." There will generally be a noncompliance period when there is a violation of COBRA, HIPAA, the Newborns and Mothers Health Protection Act, the Women's Health and Cancer Rights Act, the Mental Health Parity and Addiction Equity Act, the Genetic Information Nondiscrimination Act or the PPACA market reform requirements. In addition, a Form 8928 must be filed (and any excise tax paid) by the fifteenth day of the fourth month after the end of the calendar year in which noncomparable contributions were made to an HSA or an Archer MSA. The Form 8928 is available at http://www.irs.gov/pub/irs-pdf/f8928.pdf and instructions are available at http://www.irs.gov/pub/irs-pdf/i8928.pdf An automatic 6-month extension is available if Form 7004 is filed and estimated tax is paid prior to the April 15 due date. The extension applies only to the filing, not to the obligation to pay the required tax.
November 2, 2025	Application for Retiree Drug Subsidy & Attestation of Actuarial Equivalence due to CMS (if previously extended)	The Application must be submitted no later than 90 days before the beginning of the plan year. A 30-day extension may be requested. Information regarding the drug subsidy can be found at: https://www.rds.cms.hhs.gov
November 15, 2025	Summary Annual Report due to participants (if Form 5500 deadline extended via automatic extension)	The SAR is due to participants two months after the extended due date for filing the Form 5500. If the deadline for the corresponding Form 5500 was not extended, the deadline to provide the SAR is nine months after the plan year-end.
December 15, 2025	Massachusetts HIRD filing due	Each employer that reported six or more employees in any Massachusetts Department of Unemployment Assistance wage report during the previous 12 months must electronically submit the Health Insurance Responsibility Disclosure (HIRD) filing by December 15 of each year. More information is available at https://www.mass.gov/info-details/health-insurance-responsibility-disclosure-hird-faqs
December 15, 2025	Summary Annual Report due to participants (if 5500 deadline extended via submission of Form 5558)	Due to participants nine months after the plan year-end or two months after the extended due date for filing the Form 5500. When the distribution deadline falls on a weekend, the due date is the next business day.

Date	Description	Notes
December 31, 2025	Deadline for submitting the Gag Clause Prohibition Compliance Attestation	<p>A group health plan must attest that the plan will not enter into, and has not since the date of the most recent attestation, entered into, an agreement that includes a gag clause. The attestation is due by December 31, regardless of the plan's plan year.</p> <p>The attestation must be made online at https://hios.cms.gov/HIOS-GCPCA-UI.</p> <p>Instructions for submitting the attestation are available at https://regtap.cms.gov/reg_librarye.php?i=5481. Instructions for using the online submission portal are available at https://regtap.cms.gov/reg_librarye.php?i=5479.</p>
December 31, 2025	Deadline for correcting any DCAP discrimination test failures	Code Section 129 subjects dependent care assistance program benefits to a number of nondiscrimination tests to ensure that they are not provided disproportionately to members of a prohibited group. If a test is failed, any dependent care benefits received by members of the prohibited group during the calendar must be included in their income. Any corrective action must be taken before the close of the calendar year.
December 31, 2025	Amendment deadline for any 2026 plan changes	Welfare plan amendments generally must be prospective.
December 31, 2025	Deadline to adopt certain retroactive amendments to Section 125 Cafeteria Plan	As permitted under IRS Notice 2022-41 , a cafeteria plan may adopt a retroactive amendment to add a right for participants to change medical coverage elections mid-year in connection with family members; enrollment in a Marketplace policy. The amendment must be adopted by the end of the plan year in which that right is added.
The Following Dates Are Not Calendar-Specific		
Monthly	Group health plan transparency – machine-readable files	<p>Machine-readable files must be updated on a monthly basis.</p> <p>Background: Effective for plan years beginning on or after January 1, 2022, group health plans must make publicly available certain machine-readable files (i.e., digital files that can be used for further processing of data). Either the files themselves, or links to publicly available files posted elsewhere (e.g., a TPA's website), must be posted to a public website of the plan. The entity posting the files (generally the insurer or third party administrator) must update the files every month.</p> <p>For more information, see https://www.dol.gov/agencies/ebsa/laws-and-regulations/laws/affordable-care-act/for-employers-and-advisers/transparency-in-coverage.</p>
Annually	Women's Health and Cancer Rights Act notices	<p>Notice must be given annually and upon enrollment. Model notices can be found at: https://www.dol.gov/sites/default/files/ebsa/about-ebsa/our-activities/resource-center/publications/compliance-assistance-guide-appendix-c.pdf</p>
Annually	CHIP premium assistance notices	<p>Employers who have employees residing in any of the states that offer premium assistance must provide annual notices to those employees.</p> <p>The model notice (which includes a list of the states offering premium assistance) can be found at: https://www.dol.gov/sites/default/files/ebsa/laws-and-regulations/laws/chipra/model-notice.pdf</p>
See Notes	HIPAA notice of privacy practices for protected health information	<p>Every three years, a plan must either provide its Notice of Privacy Practices to participants or notify participants that a Notice of Privacy Practices is available.</p> <p>In addition, the notice must be given upon enrollment and upon request. When there is a material change to the notice, an updated notice must be posted to the benefits website by the effective date of the change and distributed with the next annual mailing to participants. If the employer does not maintain a benefits website, the updated notice must be distributed within 60 days of the effective date of the change.</p> <p>A model notice can be found at: https://www.hhs.gov/hipaa/for-professionals/privacy/guidance/model-notices-privacy-practices/index.html</p>
See Notes	ADA wellness program notice	<p>A notice must be provided to employees who are eligible to participate in a wellness program that involves a medical examination or a disability-related inquiry (such as a health risk assessment or biometric screening). The notice must be provided before the employee provides medical information and sufficiently in advance to allow the employee to make an informed decision about whether to participate.</p> <p>A sample notice can be found at: https://www.eeoc.gov/laws/regulations/ada-wellness-notice.cfm</p> <p>Additional information about the notice can be found at: https://www.eeoc.gov/laws/regulations/qanda-ada-wellness-notice.cfm</p>
See Notes	GINA wellness program authorization	An employee must provide a prior knowing, voluntary and written authorization before voluntarily providing genetic information as part of a wellness program. Similarly, an employee's spouse must provide a prior knowing, voluntary and written authorization before voluntarily providing medical or genetic information as part of a health risk assessment. The authorization must describe the type of genetic information that will be obtained, the general purposes for which it will be used, and the restrictions on disclosure of the information.

Date	Description	Notes
See Notes	HIPAA wellness program notice	<p>A health-contingent wellness program must disclose the availability of a reasonable alternative in any materials describing the program. For outcome-based wellness programs, this notice must also be included in any disclosure that an individual did not satisfy an initial outcome-based standard.</p> <p>A model notice is available at: https://www.dol.gov/sites/default/files/ebsa/about-ebsa/our-activities/resource-center/publications/compliance-assistance-guide-appendix-c.pdf</p>
See Notes	Medicare Secondary Payer data reporting	<p>Insurers of fully-insured plans, administrators of self-insured self-administered plans and TPAs of all other self-insured plans must comply with the reporting requirements. The quarterly deadlines vary by reporting entity and will be communicated following the initial registration.</p> <p>The Group Health Plan User Guide is available at: https://www.cms.gov/Medicare/Coordination-of-Benefits-and-Recovery/Mandatory-Insurer-Reporting-For-Group-Health-Plans/GHP-User-Guide/GHP-User-Guide.html</p> <p>Additional information regarding the reporting requirements is available at: http://www.cms.gov/Medicare/Coordination-of-Benefits-and-Recovery/Mandatory-Insurer-Reporting-For-Group-Health-Plans/Overview.htm</p>
See Notes	Summary plan descriptions (SPDs)	<p>Required to be updated and distributed to participants every five years to incorporate changes made during the preceding five years. If no changes are made during a ten year period, the SPD needs to be distributed to participants every ten years. The SPD is also required to be provided to plan participants within 90 days of becoming plan participants and to plan beneficiaries within 90 days of receiving plan benefits.</p>
See Notes	Summaries of Benefits and Coverage (SBC) and the Uniform Glossary	<p>SBCs must be provided (i) with initial enrollment materials, (ii) by the first day of coverage (if there are any changes to the SBC since initially provided), (iii) at the same time that open enrollment materials are provided, (iv) within 90 days of a special enrollment (special enrollees only), and (v) within 7 business days of a request. Different rules apply if the plan does not provide written enrollment materials.</p> <p>The SBC must include an internet address where an individual can review the Uniform Glossary as well as contact information for obtaining a paper copy. The Uniform Glossary must be provided within 7 business days of a request.</p> <p>Information about the SBC (including templates and the Uniform Glossary) can be found at https://www.dol.gov/sites/dolgov/files/EBSA/about-ebsa/our-activities/resource-center/publications/reporting-and-disclosure-guide-for-employee-benefit-plans.pdf</p>
See Notes	Advance notice of plan modification affecting the content of the SBC	<p>Notice must be provided to participants and beneficiaries at least 60 days before the effective date of a material modification in the terms of the plan or coverage that would affect the content of the SBC (other than in connection with open enrollment).</p>
See Notes	Notice of material reduction in welfare plan benefits	<p>If advance notice is not required in connection with a change to the SBC, this notice is required to be given to participants no later than 60 days after the effective date of the reduction unless information concerning the affected plan, including modifications and changes thereto, is distributed to participants at regular intervals of not more than 90 days and such communication otherwise meets the applicable SMM disclosure requirements.</p>
See Notes	Notice of ACA grandfathered plan status	<p>A grandfathered plan must include a notice about grandfathered plan status in any materials describing the plan's benefits.</p> <p>More information and the model notice can be found at https://www.dol.gov/agencies/ebsa/laws-and-regulations/laws/affordable-care-act/for-employers-and-advisers/grandfathered-healthplans</p>

**This calendar is designed for single-employer plans that are maintained on a calendar year basis by a sponsor with a calendar year fiscal year. Deadlines that depend upon an individual's specific situation (such as the general deadlines for providing COBRA notices) are generally not covered here. This calendar contains certain deadlines applicable under Massachusetts and San Francisco law as well as under the various state individual mandates, but other non-federal deadlines are not included. This publication is intended to inform about legal matters of current interest. It is not intended as legal advice. Readers should not act upon the information contained in it without professional counsel.*



Contact Us With Any Questions. We are Here to Help.

Sue Ellen Martino • JMG Insurance Corp • 203-721-8515 • smartino@jmg.com • www.jmg.com