



## 2026 Federal Compliance Calendar

Month	Requirement	Due Date	Description
January	W-2's	Jan 31	<p>Employers that filed at least 250 W-2s in the previous year must report the cost of coverage (employer and employee contributions) in Box 12 (Code DD).</p> <p>Employers must report all employer contributions to employees' HSAs in Box 12 (Code W).</p> <p>Employers must report dependent care benefits paid or incurred in Box 10. Amounts over \$5,000 (\$2,500 in the case of a separate return filed by a married individual) are also included in Box 1.</p>
March	Part D Creditable Coverage Report due to CMS (for calendar year plans*)	Mar 1	<p>Employers sponsoring prescription drug plans must report creditable status to CMS within 60 days after the beginning of the plan year.</p> <p><i>*Different for non-calendar year plans</i></p>
	HIPAA Breach Notifications due to OCR	Mar 1	Employers sponsoring group health plans must report any breach of Protected Health Information (PHI) affecting fewer than 500 individuals to OCR within 60 days of the end of the calendar year (regardless of when the plan year ends).
	1095-B and 1095-C Forms due to individuals	Mar 2	<p>Applicable Large Employers (50 or more FTEs) must provide offer of coverage information for the 2025 calendar year to employees (copies of 1095-Cs). Employers with self-funded plans must provide coverage information to covered individuals (copies of 1095-Bs or 1095-Cs).</p> <p>In addition, employers must comply with state-level requirements to provide Form 1095s to covered individuals residing in California, New Jersey, Rhode Island, and the District of Columbia and Form 1099-HCs to covered individuals residing in Massachusetts. The due dates vary by state.</p>
	1094-B, 1095-B, 1094-C, and 1095-C Forms due to IRS	Mar 31	Applicable Large Employers (50 or more FTEs) and employers with self-funded plans must report offer and coverage information for the 2025 calendar year on Forms 1094 and 1095.
April	Last day for 2025 HSA contributions or corrections	Apr 15	Employers and individuals have until the tax filing deadline to make HSA contributions and corrections for a given calendar year.
June	Prescription Drug Reporting	Jun 1	Due date for reporting data for the 2025 calendar year.



Month	Requirement	Due Date	Description
July	Last day to issue a Summary of Material Modification (SMM) for the prior plan year (for calendar year plans*)	Jul 28	<p>ERISA requires that an SMM be issued any time there is a change in a plan provision that is "material" or any time there is a change in a plan provision that is required to be in the Summary Plan Description (SPD). The due date is 210 days after the end of the plan year to which the change applies, 60 days following the adoption of a material reduction.</p> <p><i>*Different for non-calendar year plans</i></p>
	PCORI Fee	Jul 31	Patient-Centered Outcomes Research Institute (PCORI) fee is due for policy or plan years that ended in 2025.
	5500 Filing (for calendar year plans*)	Jul 31	<p>Employers must file 5500s for plans with at least 100 participants (i.e., employees) at the start of the plan year. In addition, employers with plans that have fewer than 100 participants must file a 5500 if the plan is "funded" (i.e., the assets of the plan are segregated from the general assets of the plan sponsor through a trust).</p> <p><i>*Different for non-calendar year plans</i></p>
September	Summary Annual Report (SAR) (for calendar year plans*)	Sept 30	<p>A SAR is a summary of the Form 5500 and is required for any plan subject to Form 5500 filing, but not for unfunded, self-funded plans (where claims are paid from the employer's general assets). It is due within 9 months of the close of the plan year.</p> <p><i>*Different for non-calendar year plans</i></p>
	MLR Rebates (Due date for carriers to issue rebates)	Sept 30	Carriers are required to report prior year MLR data to HHS by July 31 and to distribute rebates to employers by September 30 if the MLRs are not met.
October	Medicare Part D Creditable Coverage Notices due to Individuals	Oct 15	Employers offering prescription drug coverage must issue a creditable (or non-creditable) notice to individuals by October 14 (employers may provide the notice at any time during the 12 months preceding October 15 – e.g., during the previous open enrollment).
	5500 Filing Due Date with Extension (for calendar year plans*)	Oct 15	<p>Employers must file 5500s for plans with at least 100 participants (i.e., employees) at the start of the plan year. In addition, employers with plans that have fewer than 100 participants must file a 5500 if the plan is "funded" (i.e., the assets of the plan are segregated from the general assets of the plan sponsor through a trust).</p> <p><i>*Different for non-calendar year plans</i></p>



Month	Requirement	Due Date	Description
December	Last day for the employer to distribute the portion of MLR rebate that is considered plan assets	Dec 29	Employers sponsoring fully-insured group health plans must distribute the portion of an MLR Rebate that is considered plan assets to current plan participants (e.g., as cash or as a premium holiday) within 90 days of receipt. Otherwise, the employer may be subject to ERISA trust requirements.
	Gag Clause Attestations	Dec 31	Employers and carriers must submit an attestation of compliance with the gag clause prohibition contained in the Consolidated Appropriations Act (CAA).