2026 Employer Health Plan Compliance Calendar

Plan Year: January 1 – December 31, 2026

Month	Compliance Action / Filing	Details / Notes
January 31, 2026	W-2 Reporting	Report aggregate cost of employer-sponsored coverage in Box 12 (code DD).
February 28, 2026	ACA 1094-B/1095-B or C (paper filing)[1]	Due to IRS for employers filing < 10 returns. (Electronic required for ≥ 10).
March 1, 2026	CMS Online Disclosure of Creditable Coverage	File within 60 days after plan renewal or change in creditability status.
March 2, 2026	ACA 1095-B/1095-C Statements to Employees[2]	Furnish individual coverage statements to all employees or post/distribute notice in lieu of distributing.
March 31, 2026	ACA 1094/1095 Electronic Filing	Due electronically through IRS AIR system.
March 31, 2026	SPD Delivery Deadline	Provide Summary Plan Description (SPD) to new enrollees within 90 days of coverage.
April 15, 2026	2025 HSA Contribution Deadline	Last date employees may contribute for 2025 tax year.
June 1, 2026	RxDC Prescription Drug Data Collection Report to CMS[3]	Submit prior-year (2025) plan data. Include rebate and cost transparency data per CAA.
July 31, 2026	Form 5500 Filing (for plan year ending 12/31/2025)	File electronically via EFAST2 (small, unfunded plans are exempt).
July 31, 2026	PCORI Fee Payment (Form 720)[4]	For plan years ending in 2025; file IRS Form 720 + remit payment.
September 30, 2026	Summary Annual Report (SAR)	Deliver to participants within 9 months after plan year end.
October 15, 2026	Medicare Part D Creditable/Non-Creditable Notice	Must be provided annually to all Medicare-eligible employees/retirees before Oct 15.
December 1, 2026	SBC Distribution for Open Enrollment	Provide updated Summary of Benefits and Coverage at open enrollment or ≥ 30 days before renewal if coverage renews automatically.
December 31, 2026	CAA Gag Clause Attestation to CMS[5]	Confirm plan/vendor contracts contain no prohibited gag clauses and submit information through CMS HIOS system.
This compliance calendar outlines key deadlines for employer-sponsored group health plans. Employers should confirm specific requirements with their broker, compliance consultant or legal counsel.		

[1] Effective 2023, employers can now post/distribute a notice in lieu of automatically mailing the individual Forms 1095-B to employees. For fully insured plans, the insurance carrier will prepare the Forms 1094/1095-B. Applicable Large Employers (ALEs) are responsible for completing the Forms 1094/1095-C. For self-funded and partially self-funded non-ALEs, the employer is responsible for completing the Forms 1094/1095-B.

[2] For fully insured plans, the insurance carrier will prepare and file the Forms 1094/1095-B. Applicable Large Employers (ALEs) are responsible for completing and filing the Forms 1094/1095-C. For self-funded and partially self-funded non-ALEs, the employer is responsible for completing and filing the Forms 1094/1095-B. Electronic filing is now required for employers submitting 10 or more IRS forms (includes W-2s, 1099s, 1094/1095s).

[3] For fully insured plans, the insurance carrier will prepare and submit the RxDC filing. The carrier may request certain information and an authorization from the employer before completing the filing. Self-funded plans should work with their TPA and PBM to ensure completion of the annual filing.

[4] For fully insured plans, the PCORI fee is built into the premium amount paid to the carrier each month and the carrier completes the Form 720 and remits the fees on behalf of the employer. Self-funded plans, including HRAs, are responsible for completing the form and remitting the fees each year.

[5] For fully insured plans, the Gag Clause Attestation is submitted by the insurance carrier. The carrier typically does not require any action from the employer. Self-funded plans should work with their TPA, BPM and/or Behavior Health provider to ensure completion of this requirement.