Compliance Tracker
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A | Provide ICHRA Notice for 2026 Plan Year (Calendar-year Plans Only)
Oct. 3, 2025

Employers that offer individual coverage health reimbursement arrangements (ICHRAs) that operate on a calendar-year basis must provide notice to eligible employees by Oct. 3, 2025.

B | Provide QSEHRA Notice for 2026 Plan Year (Calendar-year Plans Only)
Oct. 3, 2025

Employers that offer qualified small employer health reimbursement arrangements (QSEHRAs) that operate on a calendar-year basis must provide notice to eligible employees by Oct. 3, 2025.

C | Provide Medicare Part D Notices
Oct. 14, 2025

Employers must notify Medicare Part D eligible individuals by Oct. 14, 2025, whether the health plan's prescription drug coverage is creditable or noncreditable.

D | File Form 5500 (Extended Deadline for Calendar-year Plans Only)
Oct. 15, 2025

Employers with calendar-year employee benefit plans that applied for the automatic 2.5-month filing extension must file Form 5500 for the 2024 plan year by Oct. 15, 2025.

E | File Form 941, Employer's Quarterly Federal Tax Return
Oct. 31, 2025

Employers must file Form 941 with the IRS to report the federal taxes that were withheld from employees' pay during the third quarter of 2025. A deadline extension may apply.

A Deadline for Providing ICHRA Notice (Calendar-year Plans Only)

Employers that offer ICHRAs must provide a notice to eligible employees regarding the ICHRA's coverage and its interaction with the Affordable Care Act's (ACA) premium tax credit. This notice must be provided at least 90 days before the beginning of each plan year. For ICHRAs that operate on a calendar-year basis, this notice must be provided by Oct. 3, 2025, for the upcoming 2026 plan year.

B Deadline for Providing QSEHRA Notice (Calendar-year Plans Only)

Employers that offer QSEHRAs must provide a notice to eligible employees regarding the QSEHRA's coverage and its interaction with the ACA's premium tax credit. This notice must be provided at least 90 days before the beginning of each plan year. For QSEHRAs that operate on a calendar-year basis, this notice must be provided by Oct. 3, 2025, for the upcoming 2026 plan year.

C Deadline for Providing Medicare Part D Notices

Employers must disclose to individuals whether their health plan's prescription drug coverage is creditable or noncreditable by Oct. 14, 2025. This notice must be provided to Medicare Part D-eligible individuals who are covered by the plan's prescription drug coverage. Model notices are available for employers to use.

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D Extended Filing Deadline for Form 5500 (Calendar-year Plans Only)

The extended deadline for filing Form 5500 for ERISA-covered employee benefit plans that operate on a calendar-year basis is Oct. 15, 2025. Form 5500 must be filed by the last day of the seventh month following the end of the plan year. An automatic extension of 2.5 months may be requested by filing IRS Form 5558 by the due date. Small welfare benefit plans (fewer than 100 participants) that are fully insured, unfunded, or a combination of insured and unfunded are generally exempt from the Form 5500 filing requirement.

E Form 941 Filing Deadline

Employers must file Form 941 with the IRS by Oct. 31, 2025, to report the federal income tax, Social Security tax and Medicare tax withheld from employees' pay during the third quarter of 2025 (July, August and September). If an employer was timely in depositing all taxes when they were due, the filing deadline is extended to Nov. 10, 2025.