Compliance Tracker

2026

SEPTEMBER

		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30 A B			

A | Provide SAR to Plan Participants (Calendar-year Plans Only)

Sept. 30, 2026

Employers must provide a summary annual report (SAR) to plan participants by Sept. 30, 2026, for calendar-year plans if the employee benefit plan's Form 5500 deadline was not extended. Plans exempt from the annual Form 5500 filing requirement are not required to provide an SAR. Unfunded welfare plans are also generally exempt from the SAR requirement.

B | Watch for MLR Rebates (Fully Insured Health Plans Only)

Sept. 30, 2026

Employers with insured health plans might receive rebates if their health insurance issuers did not meet their medical loss ratio (MLR) percentage for 2025. Rebates must be provided by Sept. 30 following the end of the MLR reporting year.

A Deadline for Providing SAR (Calendar-year Plans Only)

Many employers who must file Form 5500 on behalf of their employee benefit plans must also provide plan participants with an SAR. The SAR is a summary of the information included in the Form 5500. The SAR must be provided within nine months of the close of the plan year. For calendar-year plans, this deadline is Sept. 30, 2026. If the Form 5500 deadline was extended, the employer must provide the SAR within two months of the close of the extension period. For calendar year plans, this extended deadline is Dec. 15, 2026.

The SAR requirement applies only to plans that must file Form 5500. Self-insured welfare plans, regardless of size, are not required to provide an SAR if they are unfunded.

B Deadline for Receiving MLR Rebates (Insured Health Plans Only)

Employers with insured group health plans may receive an MLR rebate from their health insurance issuers. Issuers who did not meet the applicable MLR percentage for 2025 must provide rebates to plan sponsors by Sept. 30, 2026.

Employers who receive MLR rebates should consider their options for using the rebate. Any rebate amount that qualifies as a plan asset under the Employee Retirement Income Security Act (ERISA) must be used for the exclusive benefit of the plan's participants and beneficiaries. Employers should use the plan asset portion of the rebate within three months of receiving it to avoid ERISA's trust requirement.

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Upcoming Compliance Dates

Provide ICHRA Notice for 2027 Plan Year (Calendar-year Plans Only)
Oct. 3, 2026

Employers who offer individual coverage health reimbursement arrangements (ICHRAs) must provide a notice to eligible employees 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, 2026, for the upcoming 2027 plan year.

Provide QSEHRA Notice for 2027 Plan Year (Calendar-year Plans Only)
Oct. 3, 2026

Employers who offer qualified small employer health reimbursement arrangements (QSEHRAs) must provide a notice to eligible employees 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, 2026, for the upcoming 2027 plan year.

Provide Medicare Part D Notices
Oct. 14, 2026

Employers must notify Medicare Part D eligible individuals by Oct. 14, 2026, whether the health plan's prescription drug coverage is creditable or noncreditable. Model notices are available for employers to use.

File Form 5500 (Extended Deadline for Calendar-year Plans Only)
Oct. 15, 2026

Employers with calendar-year employee benefit plans that applied for the automatic 2.5-month filing extension must file Form 5500 for the 2025 plan year by Oct. 15, 2026.