Compliance Tracker

2026

JULY



A| Regular Deadline for Filing Form 5500 (Calendar-year Plans Only)

July 31, 2026

Employers with employee benefit plans covered under the Employee Retirement Income Security Act (ERISA) that operate on a calendar year must file Form 5500 for the 2025 plan year by July 31, 2026, unless an extension is requested or a reporting exemption applies.

B| Deadline for Paying PCORI Fees (Self-insured Plans Only)

July 31, 2026

Employers with self-insured health plans must report and pay fees to fund the Patient-Centered Outcomes Research Institute (PCORI) by July 31, 2026.

C| Deadline for Filing Form 941, Employer's Quarterly Federal Tax Return

July 31, 2026

Employers must file Form 941 with the IRS to report the federal taxes that were withheld from employees' pay during the second quarter of 2026. A deadline extension may apply.

A Form 5500 Filing Deadline (Calendar-year Plans Only)

The regular deadline for filing Form 5500 for ERISA-covered employee benefit plans that operate on a calendar year is July 31, 2026, unless a reporting exemption applies. 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.

B PCORI Fee Deadline (Self-insured Plans Only)

Employers with self-insured health plans must pay PCORI fees each year. Employers use IRS Form 720 to report and pay PCORI fees, which are based on the average number of lives covered under the plan. PCORI fees for plan years ending in 2025 are due by July 31, 2026.

C Form 941 Filing Deadline

Employers must file Form 941 with the IRS by July 31, 2026, to report the federal income taxes, Social Security taxes and Medicare taxes withheld from employees' pay during the second quarter of 2026 (April, May and June). If an employer was timely in depositing all taxes when they were due, the filing deadline is extended to Aug. 10, 2026.

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Upcoming Compliance Dates

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. The SAR must be provided within nine months of the close of the plan year unless the plan's Form 5500 deadline was extended. Plans exempt from the annual 5500 filing requirement are not required to provide an SAR. Unfunded welfare plans are also generally exempt from the SAR requirement.

Watch for MLR Rebates (Fully Insured Health Plans Only)
Sept. 30, 2026

Employers with insured health plans might receive rebates if their 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. Employers who receive rebates should consider their legal options for using the rebate. Any rebate amount that qualifies as a plan asset under ERISA must be used for the exclusive benefit of the plan's participants and beneficiaries.