

COMPLIANCE TIMELINE

Below is a sample compliance timeline for a plan year beginning January 1 and ending December 31. This timeline is intended as a general summary and may not apply to all group types or plan structures. For full regulatory guidance and the most up-to-date requirements, please refer to the [U.S. Department of Labor](#).

Q1

JANUARY

Distribute Summary Plan Description (SPD), HIPAA Privacy Notice, & Required Notices to ALL Covered Participants

All Group Sizes

Must be distributed via paper or electronically according to the DOL electronic disclosure rules.

MARCH 1

Online Medicare Disclosure to CMS

All Group Sizes with Rx

MARCH 3

ACA Form 1095 to Employees

ALE (50+FTEs) or groups offering self-funded plans

MARCH 31

ACA IRS Electronic Filing Deadline

ALE (50+FTEs) or groups offering self-funded plans

Q3

JULY 1

PCORI Fee (Form 720)

Groups offering self-funded plans or HRAs

JULY 31

Form 5500 Filing*

Groups with 100+ participants. *Form 5500 is due 7 months after plan year end.

SEPTEMBER 30

Summary Annual Report (SAR)

Groups with 100+ participants who filed 5500

Must be distributed via paper or electronically according to the DOL electronic disclosure rules.

Q4

OCTOBER 15

Distribute Medicare Part D Notice

All Group Sizes with Rx

NOVEMBER

Open Enrollment Notices

All Group Sizes

See below for specific notices and their distribution requirements.

NOVEMBER

Distribute Summary of Benefits & Coverage (SBC)

All Group Sizes

Must be distributed via paper or electronically according to the DOL electronic disclosure rules.

DECEMBER

Review POP Document, SPD, and Plan Documents

All Group Sizes

DECEMBER

Non-Discrimination Testing

Plans with pre-tax, FSA, or HRA

ADDITIONAL AS-NEEDED COMPLIANCE OBLIGATIONS

Summary of Material Modifications (SMM) – Due within **210 days** after plan year end

Summary of Material Reduction (SMR) – Due within **60 Days** of change

FMLA Poster (WH1420) – Posted in visible **workplace location**

FMLA General Notice – Due **Upon Hire**

Required ERISA/HIPAA/EEOC Notices that can be included in SPD or distributed separately:

- **COBRA General Notice** – Due within **90 days** of enrollment
- **HIPAA Special Enrollment Rights** – **At or before enrollment** (and at least every 3 years)
- **NMHPA** (Newborns' & Mothers' Health Protection) – **At enrollment & Annually**
- **CHIPRA** (Children's Health Insurance Program) – **At enrollment & Annually**
- **WHCRA** (Women's Health and Cancer Rights Act) – **At enrollment & Annually**
- **MHPAEA** (Mental Health Parity and Addiction Equity Act) **At enrollment**
- **Michelle's Law** – **At enrollment & any triggering event**
- **Wellness Program Notice** – **At enrollment**
- **EEOC Wellness Program Notice** – **Before collection of health information, i.e. biometrics**



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