

2017 Compliance Calendar

January

January 1

Deadline for employers to distribute Form W-2, must include ACA required aggregate value of employer-provided health coverage. Employers are required to report the cost of group health plan coverage on an employee's Form W-2, Wage and Tax Statement, in Box 12, using Code DD.

*Until further notice the aggregate value is only required if employers issue 250 or more W-2's annually.
Payroll provider responsibility.*

February – March

February 28 or March 31 **Deadline to file Form 1094-C and Form 1095-C with the IRS.**

February 28, 2017 (if paper filing) and March 31, 2017 (if filing electronically). Employers filing 250 or more Forms 1095-C are required to file electronically.

These forms help the IRS determine whether an ALE owes penalties under the employer shared responsibility rules, as well as whether an employee is eligible for premium tax credits.

March

March 1

Deadline for calendar year plans to distribute SPD, SMM, or SMR to employees.

The Summary Plan Description (SPD), Summary of Material Modifications (SMM), and Summary of Material Reductions (SMR) are part of the employer's Welfare Benefit Plan (WBP) and are maintained by Bond's sister company, EBC, on a fee for service basis. All employers that offer benefits to their employees are required to have and maintain a welfare benefit plan.

March 1

Deadline for employers with calendar year plans to submit online disclosure to the Centers for Medicare & Medicaid Services (CMS) regarding the creditable coverage status of the drug benefit.

No penalty for non-disclosure.

March 2

Deadline for Applicable Large Employer (ALE) to provide Form 1095-C to employees.

There is an extension in place for 2017. For 2018, the deadline will be January 31

July 2016

July 31

Deadline to pay Patient Centered Outcomes Research Institute (PCORI) fee for the preceding plan year.

The PCORI fee is due the July 31 following the end of the plan year for which the fee is collected. For 2016, the fee is due July 31, 2017. Plan sponsors of self-insured health plans pay the fee by filing Internal Revenue Service (IRS) Form 720.

For fully insured plans, the insurance issuer is responsible for reporting and paying the PCORI fee. If a fully insured plan also offers a Health Reimbursement Arrangement (HRA) or a Non-excepted Flexible Spending Account (FSA), the employer is responsible for reporting and paying the PCORI fee for the HRA and non-excepted FSA.

July 31

Deadline to File Form 5500 for 2016 calendar year plans

Form 5500 filing is only required for Welfare Benefit Plans with 100 or more participants.

Bond will work together with clients to assist in Form 5500 compliance. If plan sponsors have not filed their Form 5500, then Form 5558 should be filed by July 31st for an automatic extension until October 15, 2017.

The Form 5500 filing deadline is the last day of the seventh month following the close of the plan year. For example, if the plan year is February 1 – January 31, then Form 5500 must be filed by August 30.

September

September 30 **Deadline for calendar year plans to distribute Summary Annual Report (SAR) to participants (if no Form 5500 extension granted)** Health & Welfare plans filing an Annual Form 5500 by July 31, 2017, must distribute the SAR to all plan participants by September 30, 2017.

October

October 14 **Deadline to provide Medicare Part D Notice of Creditable Coverage.***

Employers must provide notice to all Part D eligible individuals, or those about to become eligible, prior to October 15 of each year who is covered by an employer health plan with prescription drug coverage, regardless of whether the employer coverage is primary or secondary to Medicare. The notice must be provided to all Part D eligible individuals, whether covered as active employees, retirees, COBRA recipients, disabled individuals, or as dependents. Plan participants are Part D eligible if they are 65 or more years old, three months before turning age 65, and/or if they are disabled.

In addition, an online disclosure to the Centers for Medicare & Medicaid Services (CMS) about the creditable coverage status of the drug benefit must be made no later than 90 days after the following plan year end.

October 15 **Deadline for plan administrators to file Form 5500 with the DOL, if deadline was extended by filing Form 5558**

November

November 1 **Deadline for non-auto renewing calendar year plans to distribute SBC.***

Non-auto renewing group health plans must distribute a Summary of Benefits and Coverage (SBC) that accurately describes benefits and coverage under the plan to all plan participants and beneficiaries beginning on the first day of the first open enrollment period. For those participants and beneficiaries who do not enroll in coverage through an open enrollment period, including individuals who are newly eligible for coverage or who are eligible for special enrollment, the SBC must be distributed upon eligibility for plan coverage. If a group health plan makes any material modification to the terms of the plan or coverage and the modification is not reflected in the most recently provided SBC, the plan must provide notice of the modification not later than 60 days prior to the date the modification becomes effective.

This is a target date for calendar year plans. For all non-auto renewing plans, the SBC must be provided on or before the date the participant is eligible to enroll in coverage

December

December 1 **Deadline for auto-renewing calendar year plans to distribute SBC.*** Auto renewing calendar year group health plans must distribute a Summary of Benefits and Coverage (SBC) that accurately describes benefits and coverage under the plan to all plan participants and beneficiaries beginning on the first day of the first open enrollment period and no later than 30 days prior to the new plan year.

December 15 **Deadline for calendar year plans to distribute Summary Annual Report to participants (if Form 5500 extension granted by filing Form 5558 extension)**

December 31 **Deadline for group health plans to distribute the Special Enrollment Rights and Women's Health and Cancer Rights Act (WHCRA) Notice for the new plan year to all participants and beneficiaries.***

December 31 **Deadline for employers to notify employees of potential opportunities for premium assistance from the state in which the employee resides by distributing the Children's Health Insurance Program (CHIP) Notice.***

** Bond provides this notice as part of each client's customized Open Enrollment Kit. For groups that do not have a full kit from Bond, a Compliance Packet containing this notice is provided annually at renewal.*