November 24, 2025

# Acrisure's Employer Compliance Updates, 11/24/25

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*Current as of: 11/18/2026*

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As we approach the close of November, it's hard to believe how quickly the year has passed. With 2026 on the horizon, the U.S. government is releasing its final updates as we transition into a new calendar year.

From all of us at your Acrisure family, we wish you a happy and healthy Thanksgiving.

# In Case You Missed It

## 2025 ACA Reporting Forms & Instructions Finalized

The Internal Revenue Service (IRS) has issued final instructions for Affordable Care Act (ACA) reporting under Internal Revenue Code Sections 6055 and 6056. The release follows the IRS's earlier publication of the final reporting forms and draft instructions for the 2025 calendar year.

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- **Forms 1094-B(opens in a new tab) and 1095-B(opens in a new tab) (and related instructions(opens in a new tab))** will be used by providers of minimum essential coverage – including self-insured plan sponsors that are not applicable large employers (ALEs) – to report under Section 6055.

- **Forms 1094-C(opens in a new tab) and 1095-C(opens in a new tab) (and related instructions(opens in a new tab))** will be used by ALEs to report under Section 6056 as well as for combined Section 6055 and 6056 reporting by ALEs that sponsor a self-insured plan.

**No major changes were made** to the final forms or instructions for 2025 reporting.

### IRS Announces 2026 Retirement Plan Limits

The IRS has released **Notice 2025-67**,(opens in a new tab) containing cost-of-living adjustments for 2026 that affect the maximum amounts employees can contribute to 401(k) plans and individual retirement accounts (IRAs). Our **handy reference sheet** (opens in a new tab) shows the 2026 limits compared to the 2025 limits.

## Compliance Reminders

In the coming months, these compliance reminders will continue to be included to help ensure they are not missed, particularly given the time of year, and to provide adequate time to meet all compliance deadlines.

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## Gag Clause Attestations(opens in a new tab) are Due December 31, 2025

As a reminder, the **Gag Clause Attestation**(opens in a new tab) is designed to **promote transparency between health plans and insurance carriers**. This annual compliance requirement confirms that provider contracts do not contain clauses that restrict the disclosure of pricing or quality information, thereby supporting informed decision-making for plan participants.

Employers and plan sponsors are required to submit this attestation annually to ensure  compliance with the transparency standards. If you are uncertain about the attestation process or whether your carrier will submit on your behalf, please contact your account manager for guidance.

## Upcoming HIPAA Privacy Notice Changes are Due February 16, 2026

Upcoming changes to HIPAA regulations require covered entities and health plan sponsors to update their Notice of Privacy Practices (NPP) to reflect new protections for substance use disorder (SUD) records. Although the reproductive health care provisions were vacated by a federal court decision in June 2025, the specific requirements related to SUD remain in effect.

These updates must clearly describe how SUD information may be used and disclosed, reinforcing privacy safeguards for individuals.

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As with other government-required notices, a standardized form will be provided for use. Best practice is to utilize the supplied form to ensure all compliance elements are met. It is also recommended that the form be carefully reviewed to confirm that it is both clear and fully understood by the health plan administrator.

All required updates must be implemented no later than February 16, 2026.

# Upcoming Training

On December 18 from 2 PM to 3 PM, Acrisure will host "**Next Level Leadership: Managing a Multigenerational Team**(opens in a new tab)". This **webinar is free of charge and open to all VLCT members**.

The webinar will explore how generational differences influence communication, motivation, and work styles in the workplace. **HR professionals and people leaders will learn practical strategies** to **lead effectively across generations, strengthen collaboration, and build trust** among diverse team members.

Registration(opens in a new tab) is required, so be sure to sign up in advance.

Attachments

Qualified Retirement Plan Limits for 2025 and 2026

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