December 19, 2025

Acrisure's Employer Compliance Reminders, 12/19/25

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And just like that, December is coming to a close. This month – and this year – seemed to fly by! While it's hard to believe where the time went, we're ready to turn the page and embrace all that 2026 has in store.

Just a few final compliance tasks remain, setting us up for a strong start to the new cycle in January.

From all of us at your Acrisure family, we wish you a joyful, healthy, and happy holiday season!

Compliance Reminders

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

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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.

For more information on the Gag Clause prohibition, refer to this **Acrisure Benefits Bulletin** (also attached below).

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)**(opens in a new tab) 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.

As with other government-required notices, a standardized form will be provided for use. Best practice is to use 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

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both clear and fully understood by the health plan administrator.

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

Current National Headlines in the News

With HR and Employee Benefits topics regularly in the news, staying current on what's really important can often be challenging. For the most current listing of those articles, see **this recent Weekly Digest**(opens in a new tab) (also attached below).

Upcoming Training in 2026

On January 15 from 2PM to 3PM, Acrisure will host **"2026 Group Health Plan Compliance: Insights for the Year Ahead"**. This webinar is free of charge and open to all VLCT members.

Join us to learn about the most recent developments affecting group health plans and to gain practical insights into the new year. During this webinar, we'll review how changes in federal policy objectives are shaping coverage considerations, including overage for gender-affirming and reproductive healthcare; assess the current environment of state regulation of Pharmacy Benefit Managers (PBMs); highlight impactful judicial decisions; and provide reminders for recurring compliance obligations in the first half of the year.

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

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Attachments

Benefits Bulletin: Gag Clause Prohibition Attestation

Weekly Digest: Human Resources Compliance in the News

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