April 23, 2026

Acrisure's Employer Compliance Reminders, 4/23/26

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May is a relatively quiet month for compliance, making it an excellent opportunity to catch up and ensure everything is in order before deadlines approach again. Once we enter June, it will be non-stop until the end of the year.

Upcoming Key Compliance Deadlines

RxDC Reporting

This should be well underway. As a reminder, this transparency provision is a part of the Consolidated Appropriations Act (CAA) that was enacted in December 2020. Employer-sponsored health plans and insurance issuers are required to report prescription drug spending annually to the federal government. If you're unsure about the progress, consider reaching out to your broker agent or TPA (Third Party Administrator) for confirmation.

The CMS deadline to submit 2025 RxDC data is **June 1, 2026**.

Non-Discrimination Testing

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Although this is not due until the end of the year, conducting midyear Non-Discrimination Testing (NDT) is critical in identifying and correcting any disparities in benefit distributions among different employee groups. This proactive step helps mitigate legal risks and ensures that your health benefits program remains fair and compliant.

In Case You Missed It

There are several outstanding legislative proposals currently under discussion that could impact health insurance in Vermont. While the final outcomes remain uncertain, we will continue to monitor each development closely.

- **Reference-Based Pricing:** **S.190**(opens in a new tab), a bill continuing momentum toward health care cost containment efforts by increasing price transparency and moving the Green Mountain Care Board closer to implementation of reference-based pricing, has advanced to the House Health Care Committee.

- **Primary Care:** The House Health Care Committee reviewed **S.197**(opens in a new tab), a bill aimed at increasing the use of primary care to reduce strain on hospital systems. Discussions included spending targets, opportunities for regional collaboration to improve efficiency, and potential payment reform through alternative models to support long-term affordability.

- **Health Care Affordability:** The House Health Care Committee reviewed **H.433** (opens in a new tab), a bill that would move the state closer to a universal primary care system at the expense of an additional payroll or income tax,

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shifting, rather than reducing the cost of health care in Vermont.

- **Association Health Plans:** The Senate Finance Committee began testimony on **H.585**(opens in a new tab), which would allow Association Health Plans in 2028 contingent on federal changes and initiate a study on impacts to Qualified Health Plans. These plans could expand options for businesses facing high costs, with further evaluation underway.

Upcoming Training Opportunity

Acrisure will be hosting **Preventing Leadership Gaps That Undermine Your Bottom Line**(opens in a new tab) on May 21 at 2 PM ET. This session is designed for HR teams of any size and for anyone who has taken on HR responsibilities. It focuses on practical tools you can start using immediately. You'll learn how to recognize early warning signs of leadership gaps, identify their root causes, and apply a simple 10-minute diagnostic. We'll also explore the real operational, financial, and cultural impact of leaving these gaps unaddressed. By the end, you'll have a clear, actionable 90-day plan to strengthen leadership stability without needing a large team or a significant budget.

This event is a part of Acrisure's continued education series and free of charge. Registration(opens in a new tab) is required, so be sure to sign up in advance.

Compliance Disclaimer:

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