

Compliance Considerations for 2025 Renewals

- Plan documents and SPDs.** Ensure you have written plan documents and summary plan descriptions (SPDs), and utilize a wrap document if filing a single Form 5500 for multiple benefits offerings (e.g., medical, dental, vision, and life insurance).
- Out-of-pocket limits.** For group health plans, ensure compliance with the out-of-pocket (OOP) limits on essential health benefits (\$9,200 for self-only coverage; \$18,400 for coverage other than self-only).
- Compensation disclosures.** For group health plans, collect compensation disclosures from covered service providers reasonably in advance of each contract and renewal date.
- Affordability.** The 2025 affordability percentage is 9.02%. This percentage is relevant to large employers when using an affordability safe harbor to avoid penalties under the ACA’s employer mandate. For a 2025 calendar year plan, the federal poverty line (“FPL”) safe harbor is \$113.20/month (based on the 2024 [poverty guidelines](#)).¹ For plan years beginning after January 1, 2025, the FPL safe harbor may change once the 2025 guidelines are issued.
- Medicare Part D creditable coverage.** Confirm whether prescription drug coverage offered for the 2025 plan year is considered creditable or non-creditable for purposes of Medicare Part D and timely notify participants and the Centers for Medicare and Medicaid Services (CMS).
- HDHPs/HSAs.** Ensure any health savings accounts (HSA) and HSA-compatible high-deductible health plans (HDHPs) meet the applicable IRS requirements for 2025:
 - Minimum deductible: **\$1,650** self-only coverage and **\$3,300** coverage other than self-only (an individual embedded deductible in family coverage cannot be less than \$3,300).
 - Maximum out-of-pocket: **\$8,300** self-only coverage and **\$16,600** family coverage.
 - Maximum HSA contributions: **\$4,300** for self-only and **\$8,550** for coverage other than self-only.
 - If free or reduced-cost telehealth or other remote care services were provided during a period of temporary relief, make adjustments to ensure the minimum deductible is satisfied before non-preventive services are covered.
- Transparency reporting.** Ensure various transparency reporting requirements are satisfied, including:
 - For calendar year 2024, complete RxDC reporting by June 1, 2025.
 - Submit gag clause attestations by December 31 each year.
 - Ensure that machine-readable files for in-network rates and out-of-network allowed amounts are made public and updated monthly.
 - Await guidance on a new file that will be required for negotiated rates and historical net prices for covered prescription drugs.

¹ The FPL safe harbor is higher for Alaska (\$141.38) and Hawaii (\$130.11) due to different poverty guidelines.



- Health FSA and transportation account limits.** At the time of publication, the health flexible spending account (FSA) and transportation account limits for 2025 have not been announced. Be on the lookout for their release from the IRS and be ready to implement them.
- Life insurance and evidence of insurability.** To prevent participants from paying for supplemental life insurance that they do not qualify for, ensure procedures are in place for collecting evidence of insurability and premiums.

The above is a snapshot of some key compliance requirements. For a more comprehensive checklist or questions, contact your USI benefits consultant or email ebolutions@usi.com.