

2025 Benefits Open Enrollment Compliance Checklist



Employers sponsoring group health plans may use this sample checklist as a guide to ensure their 2025 calendar year plans comply with plan limits and certain plan design requirements.



Compliance Requirement

Action Item

2025 Affordable Care Act (ACA) Affordability Standard: 9.02%

- Confirm employee contributions for self-only coverage under the lowest plan cost option available do not exceed 9.02% of the employee’s household income* for the 2025 tax year.

Click [here](#) for a Risk Strategies | eBen | eBen | eBen | eBen article with more information.

2025 Cost Sharing Maximum Limits (ACA Compliant Plans**)

- \$9,200 for self-only coverage
- \$18,400 for family coverage

2025 Cost Sharing Maximum Limits (High-Deductible Health Plans***)

- \$8,300 for self-only coverage
- \$16,600 for family coverage

Click [here](#) for a Risk Strategies | eBen | eBen | eBen | eBen article with more information.

2025 High-Deductible Health Plans Minimum Cost Sharing Deductibles

- \$1,650 for self-only coverage
- \$3,300 for family coverage

Click [here](#) for a Risk Strategies | eBen | eBen | eBen | eBen article with more information.

**Employers can also measure the affordability of their coverage using three different ACA affordability safe harbor methods: 1) Federal Poverty Line (FPL); 2) Rate of Pay; 3) Form W-2 (Box 1).*

***The ACA requires health plans to place annual limits on participants’ cost sharing for essential health benefits (EHBs).*

**** Also known as HDHPs compatible with Health Savings Accounts (HSAs)*

Compliance Requirement

Action Item

2025 Health Savings Account (HSA) Annual Contribution Limits*

- \$4,300 for self-only coverage
- \$8,550 for family coverage
- \$1,000 for catch-up contributions (age 55 or older)

Click [here](#) for a Risk Strategies | eBen with more information.

2025 Health Care Flexible Spending Account (FSA) Annual Contribution Limit

- \$3,300
- \$660 maximum carryover amount

Click [here](#) for a Risk Strategies | eBen with more information.

2025 Excepted Benefit Health Reimbursement Arrangement (EBHRA)** Limit

- \$2,150

Click [here](#) for a Risk Strategies | eBen with more information.

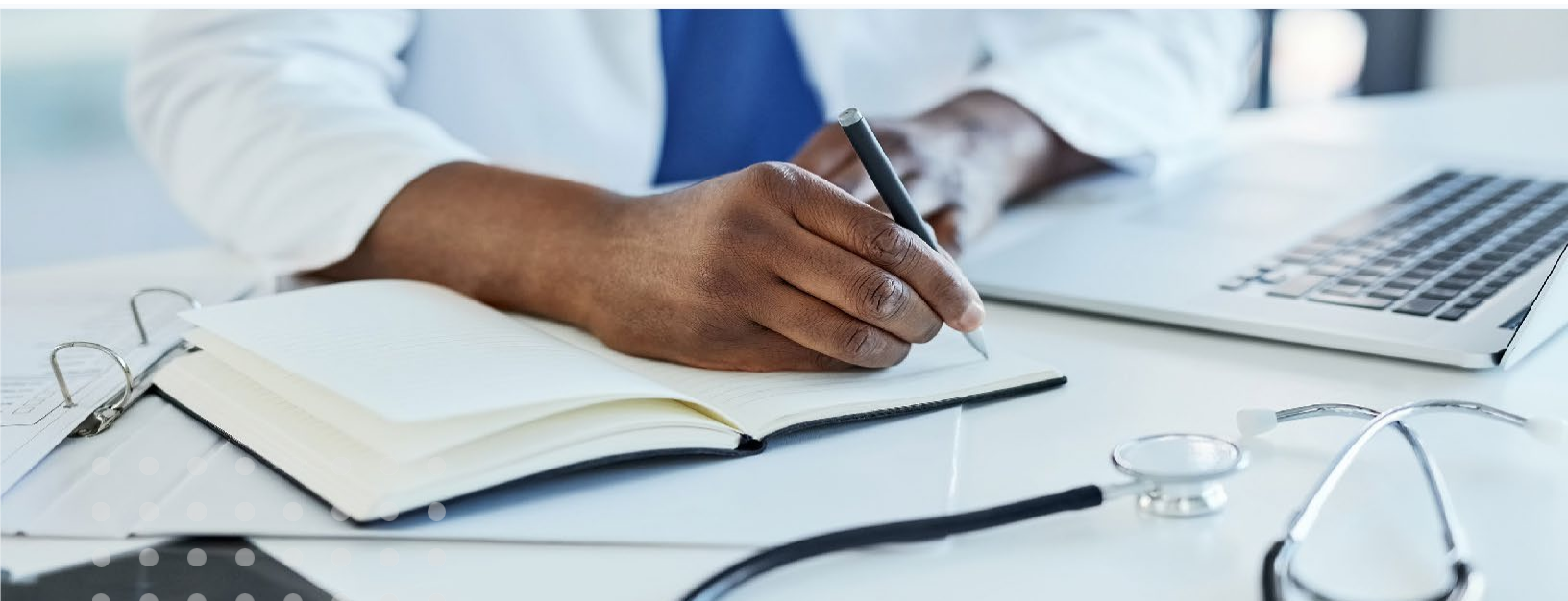
2025 Qualified Transit and Parking maximum monthly contribution limit

- \$325

Click [here](#) for a Risk Strategies | eBen with more information.

* Includes both employee and employer contribution amount limits.

** Employers offer EBHRAs to reimburse the cost of excepted benefits (such as limited-scope dental or vision coverage) as well as short-term, limited-duration insurance plan premiums.



Compliance Requirement

Action Item

2025 No-Cost Preventive Care Benefits

- ACA requires non-grandfathered health plans to cover a range of recommended preventive services without participant cost-sharing (i.e., no deductibles, copayments, or coinsurance), often referred to as “first-dollar coverage”.
- Confirm plan provides coverage for the latest [recommended preventive care services](#) at first-dollar coverage.

2025 COVID-19 Vaccines, Testing, and Treatment Coverage

- COVID-19 vaccines, including booster shots, must be covered without participant cost-sharing, but coverage can be limited to in-network providers only.
- Click [here](#) for a Risk Strategies | eBen with more information.
- HSA-compatible HDHPs are not permitted to pay for COVID-19 testing and treatment services before HDHP annual plan deductibles are satisfied for plan years beginning on or after January 1, 2025.
 - Plan sponsors who adopted this optional measure should prepare to implement cost-sharing for COVID testing and treatment services starting 1/1/2025 for HDHP enrollees.

Click [here](#) for a Risk Strategies | eBen with more information.

Telehealth & HDHPs

- HSA-compatible HDHPs are not permitted to cover telehealth and remote care services on a first-dollar basis, or prior to members satisfying their HDHP deductible for plan years beginning on or after January 1, 2025.
- Plan sponsors who adopted this optional measure should prepare to implement cost-sharing for telehealth starting 1/1/2025 for HDHP enrollees.

Click [here](#) for a Risk Strategies | eBen with more details.

Compliance Requirement

Action Item

Mental Health Parity – NQTL Comparative Analysis

- The Mental Health Parity and Addiction Equity Act (MHPAEA) requires group health plans to conduct comparative analyses of the nonquantitative treatment limitations (NQTLs) used for medical/surgical benefits compared to mental health/substance use disorder benefits.
- Confirm with plan carrier or third-party administrator that NQTL comparative analyses will be updated for the 2025 calendar plan year, as necessary. Click [here](#) for more information.

Wellness Programs

- Compliance with ADA, ACA, and GINA for health-contingent wellness programs:
 - Frequency: provides eligible individuals the opportunity to qualify at least once per year.
 - Amount: limits the maximum total reward to 30% or 50% (for tobacco reduction/prevention programs) of the total cost of coverage under the plan, based on total cost of self-only or family coverage, as applicable to each participant.
 - Purpose: must be reasonably designed to promote health and prevent disease.
 - Full Reward: must be available to all similarly situated individuals.
 - Reasonable Alternative Standard: must provide a reasonable alternative standard (or waiver of the otherwise applicable standard) for the full reward for all individuals who do not meet the initial standard (e.g., those who smoke or use tobacco products).

Click [here](#) for a Risk Strategies | eBen with more information.

Life Insurance EOI Practices

- Shore up life insurance evidence of insurability (EOI) practices with the carrier.

Click [here](#) for a Risk Strategies | eBen with more information.

Cybersecurity Practices

- Ensure your health & welfare plans' data, personal information, and plan assets are safeguarded by thoroughly reviewing the Department of Labor's recent cybersecurity compliance guidance [here](#).

Compliance Requirement

Action Item

Required Notices*

- Summary of Benefits and Coverage (SBC)
- Annual Children's Health Insurance Program (CHIP) Notice
- Medicare Part D Creditable Coverage Notice
- Women's Health and Cancer Rights Act (WHCRA) Notice
- Wellness Program Notices, as applicable
- [Fixed Indemnity Excepted Benefits Consumer Notice, as applicable \(new for 2025\)](#)

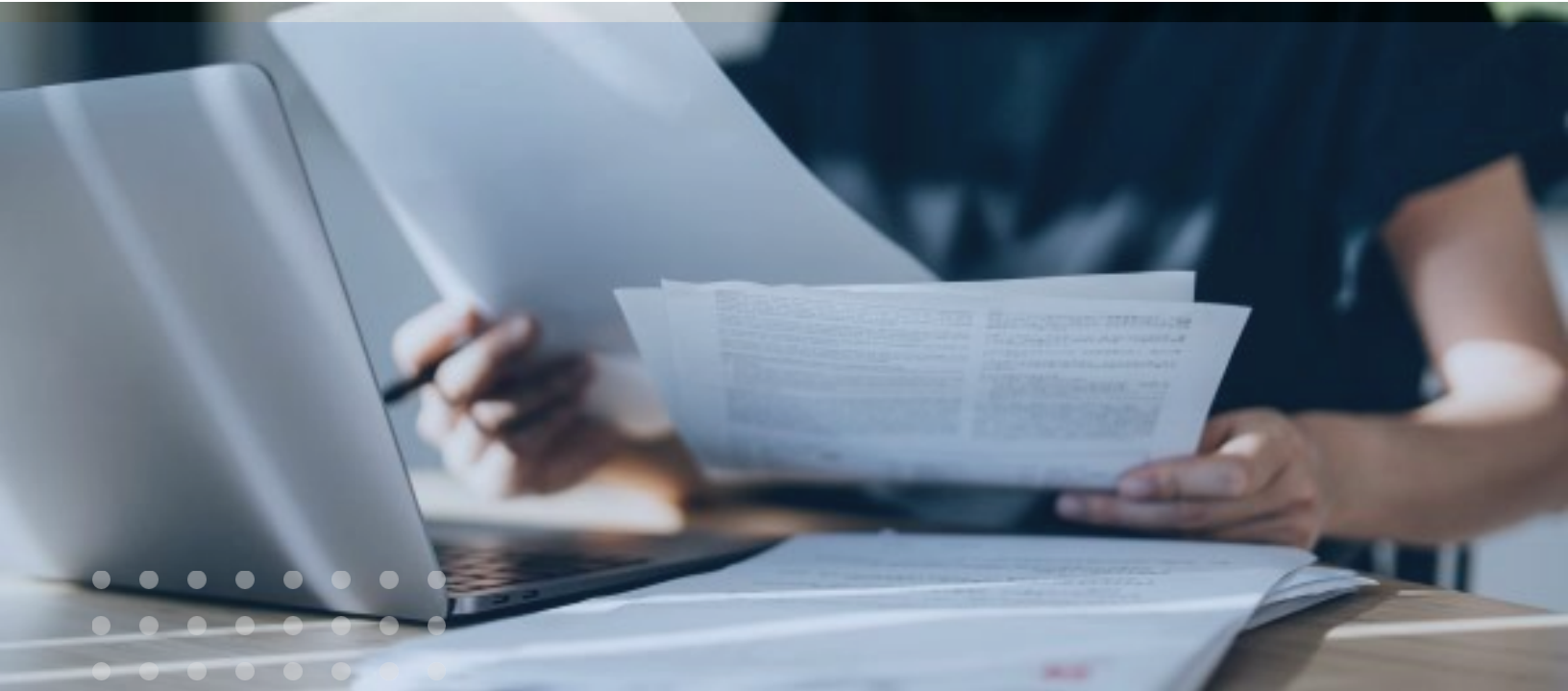
Reach out to your Risk Strategies | eBen team members for templates of these required notices.

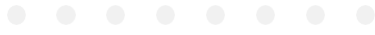
2025 Plan Changes

- Communicate any plan changes to plan participants through an updated summary plan description (SPD) or a summary of material modifications (SMM).**

**Non-exhaustive, sample of list of required notices that can be included in open enrollment materials.*

***Language detailing plan changes may be included in open enrollment materials with a statement that materials constitute SMM.*





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