## Compliance Tracker



No key compliance deadlines for May 2025.

## **Compliance Reminders**

Employers should regularly review their compliance with federal, state and local employment laws. During 2025, this review may include:

- Preparing to file an annual report (Form 5500) for employee benefit plans unless a filing exemption applies.
  For calendar-year plans, the Form 5500 deadline (without extensions) is July 31, 2025;
- Ensuring that employee performance reviews are being conducted on schedule and in accordance with established procedures;
- Monitoring any changes to state and local leave laws and confirming employee leave policies are consistent with current requirements;
- Scheduling any required workplace training, such as sexual harassment training;
- Reviewing new <u>guidance</u> from the U.S. Equal Employment Opportunity Commission and the U.S. Department of Justice on illegal and discriminatory diversity, equity and inclusion (DEI) practices. The guidance provides some clarity as to the agencies' position on what may constitute illegal DEI practices; and

 Monitoring the status of the U.S. Department of Labor's (DOL) <u>new overtime rule</u>, which significantly increased the salary threshold for an overtime exemption under the federal Fair Labor Standards Act but was vacated nationwide by a federal court in November 2024. Although the DOL has appealed this ruling, it is uncertain whether the agency will change direction under the new presidential administration.

## **Upcoming Compliance Dates**

## **Submit RxDC Report**

June 1, 2025

Group health plans must annually submit detailed information on prescription drug and health care spending to the federal government. This reporting is referred to as the <u>prescription drug data</u> <u>collection</u> (or RxDC report). The next RxDC report is due by June 1, 2025, covering data for 2024.

Most employers rely on third parties, such as issuers, third-party administrators (TPAs) or pharmacy benefit managers (PBMs), to prepare and submit RxDC files for their health plans. Employers should reach out to their issuers, TPAs or PBMs, as applicable, to confirm that they will submit the RxDC files for their health plans by the deadline. Also, employers will likely need to provide their third-party vendors with plan-specific information, such as enrollment and premium data, to complete their RxDC submissions.

