2026 EDITIONS

COFFEE & COMPLIANCE

with Christina & Jennie

DID YOU KNOW?

2026 FAQ DIRECTORY

Each month's Coffee & Compliance tackles one timely benefits topic. Find the edition you need below.

JAN	**IRS Notice 2026-5 and the Expansion of Health Savings Accounts** Bronze and Catastrophic Exchange plans now qualify as HDHPs, so enrollees can open and contribute to an HSA as of 1/1/26; first-dollar telehealth relief is made permanent.
FEB	**Consolidated Appropriations Act of 2026 & PBM Reform** PBMs are now "service providers" subject to CAA fee-disclosure rules, with pharmacy rebates disclosed and passed through to health plans quarterly.
MAR	**High Stakes for Benefit Plan Fiduciaries** Who counts as an ERISA fiduciary, why fee reviews and documentation matter, and how the DOL's prudent person rule guides plan decisions.
APR	**HIB Benefits Compliance Inbox Highlights** Real employer questions on SPD and wrap document distribution, COBRA for integrated HRAs, and the "gross misconduct" exception.
MAY	**House Bill Would Create 'OPTIONS'** The bipartisan OPTIONS Act would let employees direct employer contributions among tax-favored benefits such as retirement, HSAs/HRAs, and §127 educational assistance.
JUN	**Summer Vacation Season: How to Prepare** Dos and don'ts for PTO requests: state PTO mandates and payout rules, uniform policies, and when FMLA notice obligations kick in.
JUL	**Medicaid Impacts Under the One Big Beautiful Bill** New Medicaid work requirements take effect by 1/1/27; employees who lose Medicaid get a 60-day HIPAA special enrollment window in employer plans.
AUG	**DOL Proposed Rule Will [Finally] Expand E-Delivery** A proposed rule would let health plans deliver many plan documents by email and online posting, moving beyond the 2002 "wired at work" safe harbor.
SEP	**ACA Affordability Breaks Double Digits for 2027** The affordability percentage rises to 10.22% for 2027 plan years (up from 9.96%); confirm contributions pass your chosen safe harbor before finalizing rates.
OCT	**DOL Attempts to Clarify Mental Health Parity for Employers** FAB 2026-03 confirms plans must maintain current NQTL comparative analyses, with enforcement focused on medical necessity, exclusions, and network adequacy.
NOV	**PBM Transparency Is Served** The DOL's final rule requires PBMs serving large self-insured plans to disclose direct and indirect compensation, with fiduciary audit rights at least annually.

Questions about any of these topics? Your Heffernan account team is always available to help.