



WINTER

WARNER
Pacific

COMPLIANCE SPOTLIGHT



Winter is the season of preparation, and that makes it the perfect time to spotlight comprehensive health plan notices. These notices — covering areas such as COBRA, CHIPRA, Medicare Part D and HIPAA — are critical for employers and their employees, but the rules around timing and responsibility can be overwhelming. That's where Warner Pacific comes in.

We know as a trusted broker, your role is key in helping clients navigate these requirements with ease, ensuring they stay compliant while you strengthen your value as a partner. This Winter Spotlight gives you the essentials to guide your clients and their employees with confidence. And remember, we're here with the tools, resources and expertise you need to make it easier.

NOTICE	TIMING	RESPONSIBLE PARTY
Summary of Benefits and Coverage (SBC)	At enrollment, renewal and upon request	Employer (carrier may assist)
COBRA Initial Notice	Within 90 days of coverage start	Employer
COBRA Election Notice	Within 14 days of qualifying event	Employer or COBRA administrator
HIPAA Special Enrollment Rights	At initial eligibility and upon qualifying event	Employer
HIPAA Privacy Practices Notice	At enrollment and every three years	Employer (if self-insured or handling Protected Health Information)
Medicare Part D Creditable Coverage Notice	Annually by October 15	Employer
CHIPRA Notice	Annually	Employer
Women's Health and Cancer Rights Act (WHCRA)	At enrollment and annually	Employer
Newborns' and Mothers' Health Protection Act Notice	At enrollment	Employer
Mental Health Parity and Addiction Equity Act (MHPAEA)	Upon request	Employer
Grandfathered Plan Notice	In SPD and plan materials	Employer
Wellness Program Disclosure (EEOC)	Before medical inquiries	Employer
HIPAA Wellness Program Notice	Before medical inquiries	Employer





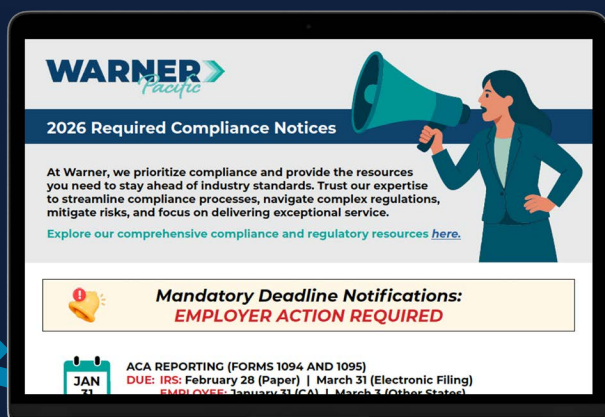
WINTER

WARNER
Pacific

COMPLIANCE SPOTLIGHT

NOTICE	TIMING	RESPONSIBLE PARTY
ADA Wellness Program Notice	Before medical inquiries	Employer
Notice of Exchange (Marketplace Notice)	Within 14 days of hire	Employer
FMLA General Notice	At hire (if applicable)	Employer
Internal Claims & Appeals/ External Review Notice	In SPD and denial notices	Employer
Transparency in Coverage (TiC) Disclosure	Ongoing via public website	Carrier (or employer if self-insured)
Summary Plan Description (SPD)	Within 90 days of coverage or upon request	Employer
Notices of Patient Protections	At enrollment	Employer
Special Rules for Fully Insured Plans	As applicable	Employer
Individual Coverage HRA (ICHRA) Notice	At least 90 days before plan year	Employer
Surprise Billing Notice	At time of service or enrollment	Provider or employer
Michelle's Law Notice	At enrollment or qualifying event	Employer

- Electronic delivery is allowed if employees have regular access to email or intranet.
- Model notices are available from the Department of Labor, Centers for Medicare and Medicaid Services, and Internal Revenue Service.
- Recordkeeping is essential — retain documentation for at least eight years for ERISA plans.



Check out all of our compliance and legislative resources, including our 2026 Compliance Calendar (under Compliance Tools), at warnerpacific.com.