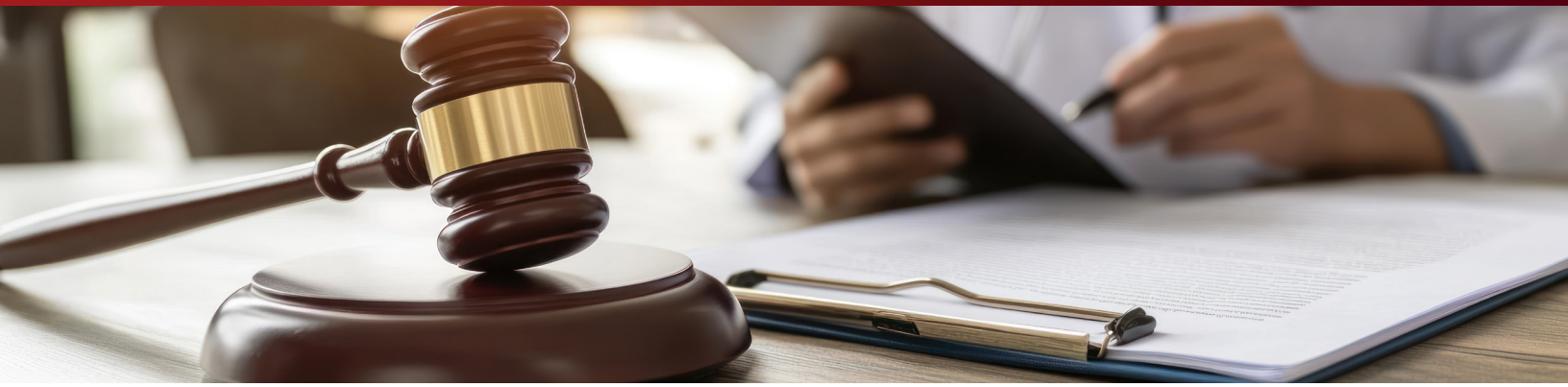




BACK IN SESSION: What the Government Reopening Means for Healthcare Compliance

After 43 days, the longest government shutdown in U.S. history is finally over. Federal agencies are turning the lights back on, picking up delayed work, and reopening systems that had been sitting still for weeks. The deal restored funding through January 2026 but left one major question unresolved: what happens next with the enhanced Affordable Care Act subsidies.

For those in the benefits world, this moment is about practical steps more than it is about politics. What matters now is understanding what changed, what didn't, and how to move forward.

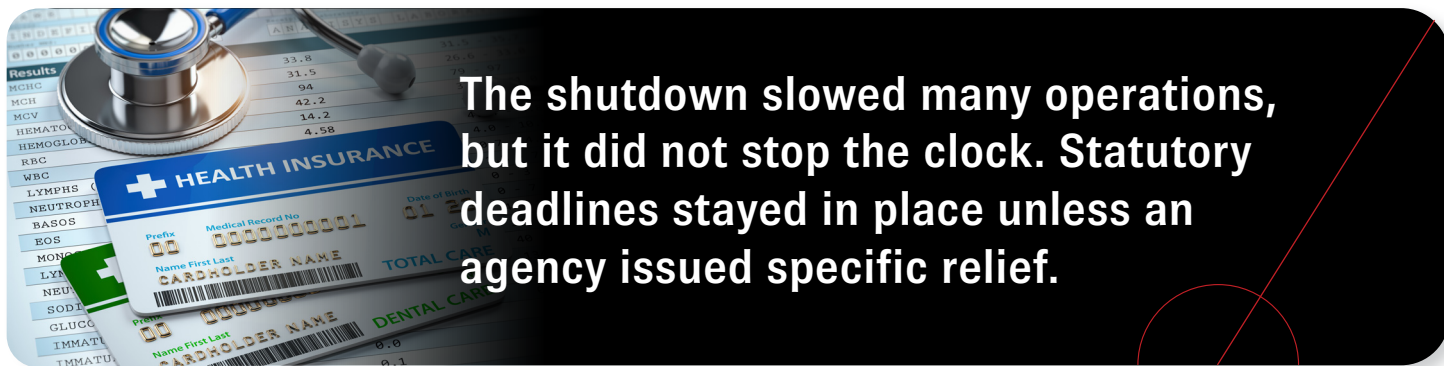
The deal restored funding through January 2026 but left one major question unresolved: what happens to the enhanced Affordable Care Act subsidies that expire at year's end?



WHAT ACTUALLY HAPPENED TO COMPLIANCE CALENDARS

The shutdown slowed many operations, but it didn't stop the clock. Statutory deadlines stayed in effect unless an agency issued official relief. Most did not.

The DOL's shutdown contingency plan confirmed that filing deadlines remain in effect, even with limited staffing. That means employers, TPAs, and brokers are expected to stay on track with filings and documentation. The Department of Labor's contingency plan clearly stated that while staff would be reduced, deadlines would remain. The IRS also kept filing systems in limited service. If you filed extensions or had trouble accessing portals, keep proof of your efforts. Those details will matter if timing questions arise later.



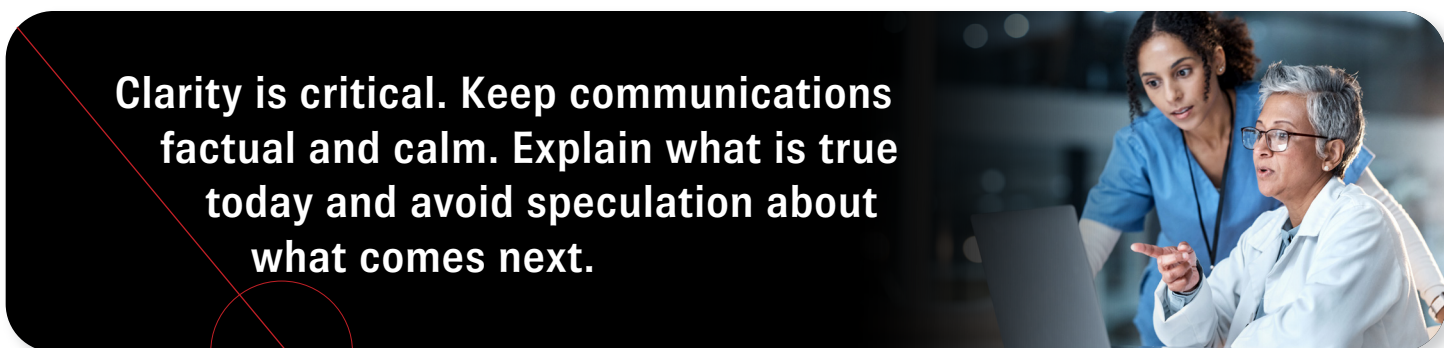
SUBSIDIES: THE WAITING GAME CONTINUES

The government reopening didn't include a decision on the enhanced Affordable Care Act premium tax credits. These expanded subsidies were first introduced in 2021 under the American Rescue Plan and later extended through 2025 by the Inflation Reduction Act. Without new legislation, they expire on December 31, 2025.

Lawmakers are expected to revisit the issue in December, and reports suggest it will be a close vote. Several Democrats joined Republicans to move the funding bill forward, agreeing to take up the subsidy discussion separately.

For now, nothing changes. The enhanced subsidies remain active through the end of 2025, and the standard ACA premium tax credits continue beyond that. Marketplace coverage for 2025 stays under the same rules already in place. If Congress does not act, the higher subsidy amounts and expanded eligibility will sunset, and consumers will return to pre-2021 formulas beginning with 2026 coverage.

Clarity is key. Keep communications factual and steady. Explain what is true today and avoid speculation about what comes next. Employees and clients will see a lot of noise around subsidies and affordability in the weeks ahead. Calm, accurate updates help people focus on what matters and strengthen trust when the headlines do not.



WHAT THE REOPENING MEANS IN REAL LIFE

Agencies are easing back into full operations, and the close of plan year 2025 adds urgency. The next few weeks are about wrapping up filings and confirming compliance tasks before year-end.

- **ACA Reporting:** Prepare 1094/1095 forms for the 2025 coverage year on the standard early-2026 timeline. IRS systems are coming back online, and deadlines remain unchanged. Per IRS reporting procedures, employers should maintain 1094/1095 documentation until the 2026 audit cycle is complete.

- **RxDC Reporting:** The June 1, 2025 submission period for 2024 data has closed. Keep records, data sets, and carrier attestations from that filing in case of follow-up requests.
- **MHPAEA Comparative Analysis:** Documentation is still required. The DOL has indicated that backlogged audits will resume early next year.
- **Form 5500:** Calendar-year plans that filed extensions should confirm receipt and save e-filing confirmation.
- **Telehealth:** Current allowances are extended through January 2026. As outlined in CMS guidance earlier this year, telehealth coverage for Medicare and employer plans remains protected through early 2026, with final rulemaking expected next year. Review plan materials and ensure they match the latest guidance.

Compliance responsibilities never paused; they just became harder to manage. Now that agencies are catching up, this is the time to clean files, verify submissions, and align internal teams.

POLITICS WITHOUT THE SPIN

The reopening deal required bipartisan votes. A handful of Democrats sided with Republicans to end the shutdown while agreeing to address subsidies later. The political debate will continue, but for those managing benefits, the real work is to stay focused on what is currently on the books. Stability comes from consistency—following established rules until they officially change.



As 2025 closes out, compliance work shifts from recovery to readiness. The rules still apply, and the next few months will set the tone for 2026.

WHAT TO FOCUS ON RIGHT NOW

1. **Reset the Calendar.** Verify every key compliance date through the first quarter of 2026. Align internal reminders and vendor schedules.
2. **Document Everything.** Keep evidence of filings, extension requests, and portal issues from the shutdown period. It is your best protection in audit scenarios.
3. **Simplify Messaging.** Communicate clearly that enhanced subsidies end December 31 unless extended. Avoid predicting outcomes.
4. **Prepare for 2026.** Expect enforcement to ramp up as agencies work through backlogs. Early readiness will prevent surprises when notices start arriving.

BOTTOM LINE

Federal agencies have reiterated that compliance obligations remain active throughout shutdown recovery periods. As 2025 closes out, compliance work shifts from recovery to readiness. Agencies are rebuilding momentum, and employers must keep pace. The rules still apply, and the next few months will set the tone for 2026.

CRC Benefits is here to help translate policy shifts into practical next steps. Our team monitors agency updates and upcoming legislation in real time, turning complex changes into simple actions you can take today. From ACA reporting and RxDc data management to MHPAEA documentation, we help you stay aligned and confident.

If you need a client-ready summary of the reopening and subsidy outlook, or a quick checklist to guide your year-end compliance reset, CRC Benefits can deliver it. Reach out to your CRC Benefits team to get started and start the new year on solid ground.

CONTRIBUTORS



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