



National Compliance Update

USI EMPLOYEE BENEFITS

November 6, 2025

New PCOR Fee Announced

On November 3, 2025, the IRS released Notice 2025-61, announcing that the adjusted applicable dollar amount used to determine the PCOR fee for plan years ending on or after October 1, 2025, and before October 1, 2026, is **\$3.84**.

The PCOR filing deadline is **July 31, 2026**, for all self-funded medical plans (including level-funded) and some HRAs (including ICHRAs) for plan years (including short plan years) ending in 2025. Carriers are responsible for paying the fee for insured policies.

PCOR fee due July 31, 2026:

Plan Years Ending on	Amount of PCOR Fee
January 31, 2025	\$3.47/covered life/year
February 28, 2025	\$3.47/covered life/year
March 31, 2025	\$3.47/covered life/year
April 30, 2025	\$3.47/covered life/year
May 31, 2025	\$3.47/covered life/year
June 30, 2025	\$3.47/covered life/year
July 31, 2025	\$3.47/covered life/year
August 31, 2025	\$3.47/covered life/year
September 30, 2025	\$3.47/covered life/year
October 31, 2025	\$3.84/covered life/year
November 30, 2025	\$3.84/covered life/year
December 31, 2025	\$3.84/covered life/year

This summary is intended to convey general information and is not an exhaustive analysis. This information is subject to change as guidance develops. USI does not provide legal or tax advice. For advice specific to your situation, please consult an attorney or other professional.

EMPLOYER NEXT STEPS

For now, no action by employers with self-funded health plans (or an HRA) is required. USI will send a reminder in mid-2026 of the fee and additional information for filing and paying the PCOR fee with the IRS.

USI Note. USI has seen increased enforcement activity from the IRS around missing PCOR fees. Specifically, the IRS is issuing [CP161 notices](#) to employers who appear to have missed a prior year PCOR fee filing, requesting payment (including interest and penalties).

RESOURCES

For a copy of Notice 2025-61, visit https://www.irs.gov/irb/2025-45_IRB#NOT-2025-61.

For the Form 720 and Instructions, visit <https://www.irs.gov/forms-pubs/about-form-720>. The Q2 Form 720 for 2025 which is used to file and pay this fee is typically not available until April of the filing year.

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