

Michigan Employer Compliance Calendar 2027

Benefits and HR deadlines for Michigan employers, with the numbers that change on January 1.

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BEFORE YEAR-END 2026

Three things to finish by December 31.

Gag Clause Attestation

December 31. Every group health plan, fully insured or self-funded, attests that its contracts do not block access to cost and quality data. If your carrier files for you, confirm it in writing rather than assuming it.

Open Enrollment Notices

With your enrollment materials. The Summary of Benefits and Coverage for each plan, the annual CHIP premium assistance notice and the Women's Health and Cancer Rights Act notice. Our open enrollment checklist (cfhic.com/templates-checklists) lists the rest.

Payroll for \$15.00

Before January 1. Michigan's minimum wage rises to \$15.00 an hour and the tipped wage to \$6.30. Update payroll, and re-check any affordability test that uses the rate-of-pay safe harbor.

ALL YEAR IN MICHIGAN

The rules with no date on them.

New Hire Reporting

All employers, within 20 days of hire. Report each new employee to the Michigan New Hire Operations Center. It feeds child support enforcement, so it applies to every hire, part-time and seasonal included.

Earned Sick Time

All Michigan employers. One hour of paid sick time for every 30 worked, up to 72 hours a year, or 40 for employers with ten or fewer employees. Keep the poster up in English, Spanish and any language spoken first by 10% of your staff, and keep records for three years.

COBRA Notices

Employers with 20 or more employees. A general notice within 90 days of a new enrollee's coverage starting, and an election notice after every qualifying event. Michigan adds no state continuation law for smaller employers, so the federal rule is the one that counts.

2027 MONTH BY MONTH

The dated deadlines, in order.

Dates assume a calendar-year plan. When a deadline lands on a weekend, it moves to the next business day, and 2027 has several that do.

January

January 1. Michigan minimum wage \$15.00, tipped wage \$6.30. New ACA numbers take effect for 2027 plan years.

February 1. Forms W-2 to employees and the Social Security Administration (January 31 is a Sunday).

March

March 1. Paper Forms 1094-C and 1095-C to the IRS (February 28 is a Sunday), and the Medicare Part D disclosure to CMS, due within 60 days of the plan year start.

March 2. Furnish 1095-C forms, or post the notice that employees can request one and keep it up through October 15.

March 31. Electronic 1094-C and 1095-C filing, required once you file ten or more returns of any kind.

Summer

August 2. Form 5500 for plans with 100 or more participants, and the PCORI fee on IRS Form 720 for self-funded and HRA plans (July 31 is a Saturday). A Form 5558 extends the 5500 to October 15.

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September

September 30. Summary Annual Report to participants for plans that filed a 5500, or December 15 if the 5500 was extended.

October

October 14. Medicare Part D creditable coverage notice to every Medicare-eligible participant, due before October 15.

October 15. Extended Form 5500 deadline. Last day the 1095-C request notice has to stay posted.

November and December

Open enrollment. SBCs, the CHIP notice and the WHCRA notice go out with enrollment materials.

December 31. Gag clause attestation for 2027.

THE 2027 NUMBERS

The figures that change on January 1.

ACA Affordability: 10.22%

An employee's share of the cheapest self-only plan that meets minimum value must stay at or under 10.22% of household income, measured through a safe harbor. It was 9.96% in 2026.

Poverty-Line Safe Harbor: \$135.92

The simplest test: keep the employee's monthly cost for that plan at or under \$135.92, based on the 2026 federal poverty line of \$15,960, and the offer is affordable for everyone.

Employer Mandate Penalties

\$3,780 per full-time employee (minus the first 30) for not offering coverage, or \$5,670 per subsidized employee for an offer that is unaffordable or below minimum value. Applies to employers with 50 or more full-time-equivalent employees.

Michigan Minimum Wage: \$15.00

The tipped cash wage rises to \$6.30, 42% of the minimum. From 2028 the rate follows inflation each year and the tipped share keeps climbing toward 50% by 2031.

QUESTIONS WE GET

What Michigan employers ask about the calendar.

Which of these apply to a small employer?

Under 20 employees, most of the calendar is the Michigan items, W-2s, the open enrollment notices, the Part D notices and the gag clause attestation. COBRA starts at 20, the ACA mandate and reporting at 50 full-time equivalents, and the Form 5500 at 100 participants.

My plan year is not January to December.

Then the plan-year items shift with it: the Part D disclosure to CMS, the Form 5500, the PCORI fee and the Summary Annual Report all key off your plan year end or start. The Michigan wage, W-2 and ACA reporting dates do not move.

Does my carrier handle these for me?

Some of them. Carriers usually supply the SBC and often file the gag clause attestation for insured plans, but the employer stays responsible for most notices and every ACA filing. Ask which ones in writing.

Where are the Michigan-only rules explained?

Our Michigan benefits compliance guide (cfhic.com/michigan-benefits-compliance) covers the state rules that reach a benefits program and the ones employers often assume apply but do not.

Want us to walk your own plan year through this? Send us your renewal at cfhic.com/send-us-your-renewal or call 248.370.8853.

Sources: IRS Rev. Proc. 2026-22 and 2026-26; HHS 2026 poverty guidelines; Michigan Earned Sick Time Act as amended; Michigan minimum wage schedule; DOL and CMS notice rules.