

Annual compliance calendar

The following calendar reflects compliance dates for select plan document and administrative items based on a defined contribution plan using a calendar plan year/fiscal year.

January

31 Deadline for sending Form 1099-R to participants who received distributions during the prior calendar year.¹

31 Deadline to file Form 5330 pay excise tax on failed ADP/ACP tests from two years prior (e.g., March 31, 2025, for the plan year that ended December 31, 2023).¹
Non-Safe Harbor Plans Only

31 Last day to file Form 5500 and Form 8955-SSA, or file Form 5558 for automatic extension to October 15.^c

February

28 Deadline to file Form 1099-R with the IRS in order to report distributions made in the prior calendar year (paper).

March

1 Last day to provide the Flexible Match notice for prior year if using the Flexible Match provision in an IRS 401(a/k) prototype plan document.¹

15 Last day to process corrective distributions for failed actual deferral percentage (ADP)/ actual contribution percentage (ACP) tests from the prior year to avoid 10% excise tax.^{a,2}
Non-Safe Harbor Plans Only

15 For plan sponsors filing a calendar year income tax return as either a Subchapter S Corporation or a Sole Proprietorship, last day to deposit contributions in a plan to potentially deduct them from income in the prior tax year, (unless the plan sponsor has obtained an extension to their tax-filing deadline, in which case the deadline is that extended date).¹

31 Deadline to file Form 1099-R with the IRS in order to report distributions made in the prior calendar year (electronic).¹

April

1 Extended deadline to take initial payment for participants newly subject to required minimum distributions (RMD) rules in the prior calendar year.

15 Last day to issue corrective distributions for excess deferrals contributed in the prior calendar year.

31 Last day to provide Statement of Deferred Benefit to participant (no later than filing of Form 8955-SSA).

31 Last day to file Form 5330 to report and pay excise taxes on prohibited transactions and non-deductible contributions to a 401(k) plan that occurred in the prior year.

(Note: This timing differs from filing Form 5330 to address ADP/ACP test failures.)

June

30 Last day to process corrective distributions for failed ADP/ACP tests from the prior year for a plan with an eligible automatic contribution arrangement (EACA) to avoid 10% excise tax.^b
Non-Safe Harbor Plans Only

September

30 Last day to provide the Summary Annual Report (SAR) unless the deadline for Form 5500 was extended.^{d,3}

July

29 Last day to distribute a Summary of Material Modification (SMM) or revised Summary Plan Description (SPD) reflecting changes made in the prior plan year to existing participants and beneficiaries.
(Note: Other timelines apply to newly eligible participants.)

October

- 15 Form 5500 and 8955-SSA extended deadline due date.^e
- 15 Last day to adopt a amendment to correct an IRC Section 410(b) coverage or a Section 401(a)(4) non-discrimination failure for the prior plan year.

December

- 1 Annual safe harbor/ supplemental safe harbor notice delivery deadline.^{f,1}
Safe Harbor Plans Only
- 1 Annual qualified default investment alternative (QDIA) notice deadline.^{f,1}
- 1 Annual automatic contribution arrangement notice deadline.^{f,1}
- 15 Last day to distribute the SAR to plan participants if Form 5500 is on extension.^g

31 Last day for a calendar year plan to process corrective distributions for failed ADP/ACP tests from the prior year. Unless correction is made by March 15, the employer is required to file a Form 5330 and pay a 10% excise tax on the excess contributions.^h *Non-Safe Harbor Plans Only*

31 Last day to correct failed ADP/ACP tests from the prior year using qualified non-elective contributions (QNECs). The 10% excise tax does not apply if the QNEC contributions are sufficient for the plan to pass the failed tests.^h
Non-Safe Harbor Plans Only

31 Last day to execute an amendment to convert an existing 401(k) plan to a safe harbor design for the next plan year; remove safe harbor status from an existing 401(k) plan for the next plan year; or make discretionary changes implemented during the plan year.^h Note that, in addition,

the plan sponsor must provide an annual safe harbor notice, if applicable, to each employee eligible to participate at least 30 days before the beginning of the plan year.

31 Last day to process RMDs for the current tax year from participant and beneficiary accounts, unless eligible to defer first-time RMD.

Note: 404(a)-5 fee disclosure to plan participants must be provided within 12 months of the last notice provided.

Note: Plans can add a Safe Harbor Non-Elective contribution after year end as long as the contribution is 4% or greater.

Notes if your plan uses an off-calendar plan year:

- ^a For off-calendar plan years, the deadline is 2½ months following the plan year-end; for plans with eligible automatic contribution arrangement (EACAs), the deadline is six months following year-end.
- ^b For off-calendar plan years, the deadline is six months following plan year-end.
- ^c For off-calendar plan years, the deadline is seven months following plan year-end.
- ^d For off-calendar plan years, the deadline is nine months following plan year-end.
- ^e For off-calendar plan years, the extended deadline is 9½ months following plan year-end.
- ^f For administrative ease, a combined notice may be sent.
- ^g For off-calendar plan years, the extended deadline is 11½ months following plan year-end.
- ^h For off-calendar plan years, the deadline is 12 months following plan year-end.

¹Typically, when the due date falls on a weekend or holiday, the deadline is extended to the next business day.

²Typically, when this date falls on a weekend or holiday, the correction deadline is the Friday beforehand.

³This can be provided as late as two months after the date the related Form 5500 is filed.