

# 2026 COMPLIANCE CALENDAR



## JANUARY

### Jan. 15

Deadline for final minimum funding quarterly installment payment for defined benefit plans that had a funding shortfall in 2024.

### Jan. 30

Deadline to provide participants and beneficiaries of a defined benefit plan with the notice of benefit restrictions if the DB plan is less than 60% funded.

### Jan. 31

Many recordkeepers require participant data for average deferral percentage (ADP)/average contribution percentage (ACP), top-heavy and 402(g) compliance testing to be returned by this date.

## FEBRUARY

### Feb. 2

Deadline for sending Form 1099-R to participants who received distributions from a qualified retirement plan during the previous year.

### Feb. 14

Deadline for participant-directed defined contribution plans to provide participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses charged to individual plan accounts during the last quarter of 2025.

## MARCH

### March 2

Deadline for filing Form 1099-R with the IRS, if not filed electronically, to report distributions made in the previous year.

### March 15

Employer contributions due to the retirement plan's trust for S corporations and partnerships with Dec. 31 fiscal year-end in order to take deductions with no corporate tax extension.

Forms 1042 and 1042-S due to the IRS to report, respectively, income tax withheld from distributions made to nonresident aliens and retirement plan distributions made to nonresident aliens.

Deadline for distributing ADP/ACP refunds without incurring a 10% excise tax on the employer.

Deadline for distributing ADP/ACP refunds without incurring a 10% excise tax on the employee.

Deadline to apply to the IRS for a waiver of the minimum funding standard for DB and money purchase pension plans.

## APRIL

### April 1

Electronic filings of Form 1099-R for 2024 distributions due to IRS.

DB Plan actuary's AFTAP certification for 2025 to avoid presumptive AFTAP

### April 15

Deadline for corrective distributions of excess deferral amounts under Internal Revenue Code Section 402(g) to participants.

Deadline for first 2026 minimum funding quarterly installment payment for DB plans that had a funding shortfall in 2025.

### April 30

DB Annual Funding Notice  
Deadline for sponsors of single and multiemployer DB pension plans to send annual funding notice to participants, beneficiaries and labor organizations representing participants. Also required for plans over 100 Participants.

Reconciliation filing and payment for the 2024 comprehensive Pension Benefit Guaranty Corporation premium due to PBGC for DB plans that filed an earlier estimated variable rate premium in the Oct. 15, 2024, comprehensive filing.

## MAY

### May 15

Deadline for participant-directed DC plans to supply participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses charged to individual plan accounts during first quarter of this year.

## JUNE

### June 30

Deadline for retirement plans with publicly traded employer securities to file their Form 11-K annual report—i.e., by 180 days after the end of the retirement plan year.

Deadline for corrective distributions for failed ADP/ACP tests to highly compensated employees (HCEs), to avoid a 10% excise tax on the employer for EACA plans.

Many deadlines are based on retirement plans that run a calendar year Plan Year. The deadline dates change for off-calendar year plans.

This chart is intended to provide plan sponsors with a list of notable deadlines and is not a substitute for consultation with ERISA counsel and in no way represents legal advice.

# 2026 COMPLIANCE CALENDAR cont.



JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
<p><b>July 15</b> Deadline for second 2025 minimum funding quarterly installment payment for DB plans that had a funding shortfall in 2024.</p> <p><b>July 29</b> Summary of material modifications is due to participants, unless it was included in a timely updated summary plan description (SPD).</p> <p><b>July 31</b> Form 5330, which reports excise taxes related to employee benefit plans, is due to the IRS.</p> <p>Form 5500 is due to the DOL for plans with a December 31 plan year-end. The Form 5500 filing can be delayed if the Form 5558 is filed with the IRS by this date; also called the Application for Extension of Time to File Certain Employee Plan Returns, it is used to apply for an extension to file forms 5500 and/or 5330.</p> <p>Deadline for annual benefit statements for individual account plans not offering participant-directed investments.</p>	<p><b>Aug. 14</b> Deadline for participant-directed DC plans to provide participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses that were charged to individual plan accounts during second quarter of the year.</p>	<p><b>Sept. 15</b> Deadline for money purchase pension, target benefit and DB plans to make required contributions to their plan trust and for S corporations and partnership plan sponsors that filed a corporate tax extension to make 2024 employer profit-sharing and matching contributions.</p> <p>DB Plan election to use or add to credit balances</p> <p><b>Sept. 16</b> Form 5500 due to the DOL's Employee Benefits Security Administration (EBSA) from plans eligible for an automatic extension linked to a corporate tax extension.</p> <p><b>Sept. 30</b> Summary annual reports are due to participants from plans with a December 31 year-end</p> <p>DB Plan actuary's final AFTAP certification for 2025</p>	<p><b>Oct. 3</b> Start of the period to disseminate annual notices to participants, including the 401(k) safe harbor, automatic contribution arrangement (ACA), qualified automatic contribution arrangement (QACA) safe harbor and qualified default investment alternative (QDIA).</p> <p><b>Oct. 15</b> Deadline for adopting a retroactive amendment to correct an Internal Revenue Code (IRC) Section 410(b) coverage or Section 401(a)(4) nondiscrimination failure for prior year</p> <p>A PBGC flat rate and variable rate annual premium filing and payment due to PBGC.</p> <p>Deadline for filing Form 5500 after a plan files Form 5558 to request an extension.</p> <p>Form 5310-A due to the IRS to give notice of the establishment of qualified separate lines of business.</p> <p>Deadline for third 2025 minimum funding quarterly installment payment for DB plans that had a funding shortfall in 2024.</p> <p>DB Plan Annual Funding Notice for plans with fewer than 100 participants.</p>	<p><b>Nov. 14</b> Deadline for participant-directed DC plans to provide participants with quarterly benefit/disclosure statement and statement of plan fees and expenses charged to individual plan accounts during third quarter of the year.</p> <p><b>Nov. 15</b> Summary annual reports due to participants if the Form 5500 deadline was extended because of a corporate tax filing extension.</p>	<p><b>Dec. 2</b> Deadline for sending annual safe harbor notice, qualified default investment alternative (QDIA) notice, &amp; Summary Annual Report (SAR.)</p> <p><b>Dec. 15</b> Deadline for providing summary annual reports to participants if Form 5500 deadline was extended because of filing Form 5558.</p> <p><b>Dec. 31</b> 2025 RMDs due to participants who were age 72 and older prior to Jan. 1, 2024.</p> <p>Deadline to adopt discretionary amendments to the plan, subject to certain exceptions.</p> <p>Deadline for a safe harbor plan to remove its safe harbor status for the following year or for an existing DC plan to convert to a safe harbor plan.</p> <p>Deadline to elect safe harbor status for the prior plan year with a nonelective contribution of 4% or more of compensation.</p> <p>DB Plan election to reduce 1/1/2025 credit balances.</p>

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