

Mercer's Law & Policy Group | 2025 US defined benefit plan compliance calendar

Single-employer defined benefit plans for plan years beginning Jan. 1, 2025¹

Jan. 15 (Wednesday)

- Q4 contribution for 2024 plan year

Jan. 31 (Friday)

- Form 1099-R to recipients of 2024 distributions
- Form 945 for 2024 nonpayroll withholding if taxes were not paid in full and deposited on time²

Feb. 10 (Monday)

- Form 945 for 2024 nonpayroll withholding if taxes were paid in full and deposited on time²

Feb. 28 (Friday)

- Form 1099-R to IRS if filed on paper³

March 15 (Saturday)

- Minimum funding waiver request for 2024 plan year⁴

March 31 (Monday)

- Form 1099-R to IRS if filed electronically³

April 1 (Tuesday)

- First required minimum distributions to participants born in 1951 (unless still working and plan allows delay until retirement) and any older participants who retired in 2024 (if plan allows delay until retirement)
- Actuary's certification of 2025 adjusted funding target attainment percentage (AFTAP) to avoid presumption that 2025 AFTAP is 10% less than 2024 AFTAP

April 15 (Tuesday)

- Q1 contribution for 2025 plan year
- PBGC 4010 filing (Notice of Underfunding) for affected plans for 2024 plan year⁵

April 30 (Wednesday)

- Annual funding notice to participants, beneficiaries, unions and PBGC for 2024 plan year
- PBGC reconciliation filing without late-payment penalties for plans that filed an estimated variable-rate premium for 2024

May 1 (Thursday)

- Notice to participants from plans subject to benefit restrictions on April 1, 2025, based on presumed 2025 AFTAP⁶
- End of IRS, PBGC and DOL relief periods for Hurricanes Helene and Milton⁷

July 15 (Tuesday)

- Q2 contribution for 2025 plan year

July 29 (Tuesday)

- Summary of material modifications (or updated summary plan description) to participants for amendments adopted in 2024 plan year

July 31 (Thursday)

- Form 5500 for 2024 plan year, without extension⁸
- Form 8955-SSA and terminated vested participant statements for 2024 plan year, without extension⁸
- Form 5558 to extend Forms 5500 and 8955-SSA due date by 2½ months for 2024 plan year (use a single Form 5558 to extend both filings) unless automatically extended with corporate income tax return⁹

Sept. 15 (Monday)

- Balance of minimum contribution for 2024 plan year
- Election to use credit balances to offset 2024 minimum required contributions (or change standing election)
- Election to credit excess 2024 contributions to prefunding balance (or change standing election)
- Revocation of election to use credit balances in excess of 2024 minimum required contributions for small plans with year-end valuation dates
- PBGC comprehensive premium filing for 2025 plan year (if normal due date is not restored)⁹

Sept. 30 (Tuesday)

- Last day for actuary to certify 2024 AFTAP to avoid Oct. 1 presumption that 2025 AFTAP is less than 60%

Oct. 15 (Wednesday)

- Q3 contribution for 2025 plan year
- Form 5310-A qualified separate line-of-business election for 2024 testing year (or revocation of prior-year election)
- Correction of minimum coverage or nondiscrimination testing failures for 2024 plan year
- Notice to actuary to reinstate standing credit balance election for 2024 plan year if different actuary signed 2023 Schedule SB
- Form 5500 for 2024 plan year, if due date extended by Form 5558 or corporate income tax return extension⁸
- Form 8955-SSA and terminated vested participant statements for 2024 plan year, if due date extended by Form 5558 or corporate income tax return extension⁸
- PBGC comprehensive premium filing for 2025 plan year (if normal due date is restored)⁹

Oct. 31 (Friday)

- Notice to participants from plans subject to benefit restrictions on Oct. 1 based on presumption that 2025 AFTAP is less than 60%⁶

Dec. 31 (Wednesday)

- Required minimum distributions to participants who already received first distribution
- Annual notice of benefit statements, if sponsor elects this option rather than providing individual triennial benefit statements¹⁰
- Actuary's certification of 2025 AFTAP to prevent presumed AFTAP of less than 60% from applying Jan. 1, 2026 (or retroactively to Oct. 1, 2025, if range certification issued prior to Oct. 1, 2025)
- Election to reduce Jan. 1, 2025, credit balances
- Revocation of election to use credit balances in excess of 2025 minimum required contributions (except for small plans using year-end valuation dates)

Notes

1. This list summarizes common reporting and disclosure obligations for single-employer, tax-qualified defined benefit plans covered by ERISA (including frozen plans, but excluding cooperative and small-employer charity plans and plans undergoing termination) that have more than 100 participants and are sponsored by for-profit corporations with calendar plan years. Your plan may have other compliance requirements, such as reporting certain events to the Pension Benefit Guaranty Corp. (PBGC), reporting and paying excise taxes (Form 5330), and notifying participants when any quarterly or other required contribution is not made within 60 days of the due date. For more information, see the plan reporting and disclosure guides from the [IRS](#) and the [Department of Labor](#). When the “weekend rule” applies, deadlines falling on a Saturday, Sunday or holiday move to the next business day; otherwise, actions should be taken by the day before a weekend/holiday deadline.
2. Deadline for Form 945 is extended 10 days if taxes paid in full for the year and deposited on time.
3. Deadline for filing Form 1099-R with IRS is extended one month for electronic filers.
4. Although this date is a Saturday, Sunday or legal holiday, no guidance clearly allows using the “weekend rule” to move the deadline to the next business day.
5. If required, employers with calendar fiscal years or controlled-group members with different fiscal years typically must file by April 15. For other employers with a 4010 filing requirement, the filing is due on the first business day coinciding with or following the 105th day after close of the fiscal year (or the 106th day after the close of the fiscal year if the 105-day period includes Feb. 29).
6. Benefit restriction notices must be distributed to participants and beneficiaries within 30 days after an underfunded plan becomes subject to certain benefit restrictions.
7. IRS has extended until May 1, 2025, certain filing and payment deadlines for individuals that live or have a business in areas declared by President Biden to be major disaster areas eligible for individual assistance from the Federal Emergency Management Agency (FEMA). PBGC automatically grants the same extension whenever IRS issues one. The Department of Labor separately announced an extension of deadlines for furnishing certain ERISA-mandated participant notices and disclosures due on or before May 1, 2025. (See [Retirement plan sponsors and participants get hurricane relief](#) (Oct. 11, 2024) and [DOL gives retirement plans and participants hurricane relief](#), Nov. 19, 2024.)
8. An automatic 2½-month extension to file Form 5500 and/or Form 8955-SSA is available by filing Form 5558. Without filing Form 5558, an employer that is granted an automatic extension for its corporate tax return and has the same tax year as the plan year receives an automatic extension to file Forms 5500 and 8955-SSA by the extended filing deadline for the corporate tax return (but no later than 9½ months after plan year-end). The Form 5558 deadline for a calendar-year plan and the extended corporate tax return deadline for a calendar-year C corporation fall on the same day: Oct. 15. However, S corporations must file Form 5558 to get the maximum extension. Employers that rely on the corporate tax return’s automatic extension to extend the deadline for Form 5500 and/or 8955-SSA can’t obtain an additional extension by filing Form 5558.
9. The Bipartisan Budget Act of 2015 accelerated the deadline for 2025 comprehensive premium filings by one month (from Oct. 15 to Sept. 15 for calendar-year plans). Unless that provision is repealed, premiums for 2025 plan years will be due one month earlier than normal.
10. The deadline to provide any individual triennial benefit statements for a plan year is unclear. Plans must provide a benefit statement every three years or an annual notice of availability of such a statement upon request.