

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

Single-employer defined contribution plans for plan years beginning Jan. 1, 2025¹**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. 14 (Friday)

- Q4 2024 benefit statement for participant-directed plan and participant fee disclosure³

Feb. 28 (Friday)

- Form 1099-R to IRS if filed on paper⁴

March 15 (Saturday)

- If plan (other than eligible automatic contribution arrangement) failed 2024 ADP/ACP test, refund excess contributions and/or recharacterize pretax deferrals as after-tax or catch-up contributions to avoid 10% excise tax⁵

March 31 (Monday)

- Form 1099-R to IRS if filed electronically⁴
- Form 5330 excise tax return and payment for excess 2023 ADP/ACP contributions (or Form 8868 to request up to six-month extension to file return)

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)

April 15 (Tuesday)

- Refunds of 2024 elective deferrals over 402(g) limit

May 1 (Thursday)

- End of IRS and DOL relief periods for Hurricanes Helene and Milton⁶

May 15 (Thursday)

- Q1 2025 benefit statement for participant-directed plan and participant fee disclosure³

June 30 (Monday)

- If eligible automatic contribution arrangement failed 2024 ADP/ACP test, refunds of excess contributions and/or recharacterization of pretax deferrals as after-tax or catch-up contributions to avoid 10% excise tax

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 extension⁷
- Form 8955-SSA and terminated vested participant statements for 2024 plan year, without extension⁷
- 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 return⁷
- Annual benefit statement for plans not offering participant-directed investments (due by Form 5500 deadline or, if earlier, date 5500 filed)⁷

Aug. 14 (Thursday)

- Q2 2025 benefit statement for participant-directed plan and participant fee disclosure³

Sept. 15 (Monday)

- Minimum funding contribution due for money purchase pension plans for 2024 plan year

Sept. 30 (Tuesday)

- Summary annual report for 2024 plan year (unless Form 5500 deadline extended)⁸
- Form 5330 excise tax return for excess 2023 ADP/ACP contributions, if due date extended by Form 8868

Oct. 3 (Friday)

- First day to provide annual safe harbor plan and auto-enrollment notice(s) for 2026 plan year²

Oct. 15 (Wednesday)

- 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 the 2024 plan year
- Contributions correcting 2024 ADP/ACP test failures to count as 2024 annual additions
- Form 5500 for 2024 plan year, if due date extended by Form 5558 or corporate income tax return extension⁷
- Form 8955-SSA and terminated vested participant statements for 2024 plan year, if due date extended by Form 5558 or corporate income tax return extension⁷
- Annual benefit statement for plans not offering participant-directed investments (due by extended Form 5500 deadline or, if earlier, date 5500 filed)⁷

Nov. 14 (Friday)

- Q3 2025 benefit statement for participant-directed plan and participant fee disclosure³

Dec. 2 (Tuesday)

- Last day to provide annual safe harbor plan and auto-enrollment notice(s) for 2026 plan year²
- Annual qualified default investment alternative (QDIA) notice for 2026 plan year¹⁰
- Diversification notice to participants first eligible to divest employer securities on Jan. 1, 2026

Dec. 15 (Monday)

- Summary annual report for 2024 plan year, if 5500 due date extended by Form 5558 or corporate income tax return extension⁸

Dec. 31 (Wednesday)

- Required minimum distributions to participants who already received first distribution
- If plan failed 2024 ADP/ACP test, refunds and/or recharacterization of excess contributions (if not already done by earlier deadlines to avoid 10% excise tax or have count as 2024 annual additions)

Notes

1. This list summarizes common reporting, disclosure and other operational compliance obligations for single-employer, tax-qualified defined contribution plans covered by ERISA (excluding employee stock ownership plans) that have more than 100 participants and are sponsored by for-profit corporations with calendar plan years. This list is not exhaustive. Your plan may have other operational compliance requirements. 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 business 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. Plans must provide the quarterly fee disclosure at least once in a three-month period; many plans include the disclosure with the quarterly benefit statement. Plans also must provide an annual disclosure with investment performance and fee information at least once in a 14-month period.
4. Deadline for filing Form 1099-R with IRS is extended one month for electronic filers.
5. Although this date is a Saturday, Sunday or legal holiday, no guidance clearly allows using the weekend rule to move this due date to the next business day.
6. 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). 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.)
7. 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 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 automatic extension to extend the deadline for the Form 5500 and/or 8955-SSA can't obtain an additional extension by filing Form 5558.
8. The summary annual report must be distributed within two months after the due date of Form 5500 (including extensions).
9. The earliest the safe harbor and auto-enrollment notice(s) for the 2026 plan year can be furnished is Oct. 3, 2025, which is 90 days before the beginning of the 2026 plan year.
10. The annual QDIA notice must be provided within a reasonable period at least 30 days in advance of the plan year.