

## Mercer's Law &amp; Policy Group | 2026 US defined benefit plan compliance calendar

 Single-employer defined benefit plans for plan years beginning Jan. 1, 2026<sup>1</sup>
**Jan. 15 (Thursday)**

- Q4 contribution for 2025 plan year

**Feb. 2 (Monday)**

- Form 1099-R to recipients of 2025 distributions <sup>2</sup>
- Form 945 for 2025 nonpayroll withholding if taxes were not paid in full and deposited on time <sup>2,3</sup>

**Feb. 10 (Tuesday)**

- Form 945 for 2025 nonpayroll withholding if taxes were paid in full and deposited on time <sup>3</sup>

**March 2 (Monday)**

- Form 1099-R to IRS if filed on paper <sup>2,4</sup>

**March 15 (Sunday)**

- Minimum funding waiver request for 2025 plan year <sup>5</sup>

**March 31 (Tuesday)**

- Form 1099-R to IRS if filed electronically <sup>4</sup>

**April 1 (Wednesday)**

- First required minimum distributions to participants born in 1952 (unless still working and plan allows delay until retirement) and any older participants who retired in 2025 (if plan allows delay until retirement)
- Actuary's certification of 2026 adjusted funding target attainment percentage (AFTAP) to avoid presumption that 2026 AFTAP is 10% less than 2025 AFTAP

**April 15 (Wednesday)**

- Q1 contribution for 2026 plan year
- PBGC 4010 filing (Notice of Underfunding) for affected plans for 2025 plan year <sup>6</sup>

**April 30 (Thursday)**

- Annual funding notice to participants, beneficiaries, unions and PBGC for 2025 plan year
- PBGC reconciliation filing without late-payment penalties for plans that filed an estimated variable-rate premium for 2025

**May 1 (Friday)**

- Notice to participants from plans subject to benefit restrictions on April 1, 2026, based on presumed 2026 AFTAP <sup>7</sup>

**July 15 (Wednesday)**

- Q2 contribution for 2026 plan year

**July 29 (Wednesday)**

- Summary of material modifications (or updated summary plan description) to participants for amendments adopted in 2025 plan year

**July 31 (Friday)**

- Form 5500 for 2025 plan year, without extension <sup>8</sup>
- Form 8955-SSA and terminated vested participant statements for 2025 plan year, without extension <sup>8</sup>
- Form 5558 to extend Forms 5500 and 8955-SSA due date by 2½ months for 2025 plan year (use a single Form 5558 to extend both filings) unless automatically extended with corporate income tax return <sup>8</sup>

**Sept. 15 (Tuesday)**

- Balance of minimum contribution for 2025 plan year
- Election to use credit balances to offset 2025 minimum required contributions (or change standing election)
- Election to credit excess 2025 contributions to prefunding balance (or change standing election)
- Revocation of election to use credit balances in excess of 2025 minimum required contributions for small plans with year-end valuation dates

**Sept. 30 (Wednesday)**

- Last day for actuary to certify 2026 AFTAP to avoid Oct. 1 presumption that 2026 AFTAP is less than 60%

**Oct. 15 (Thursday)**

- Q3 contribution for 2026 plan year
- Form 5310-A qualified separate line-of-business election for 2025 testing year (or revocation of prior-year election)
- Correction of minimum coverage or nondiscrimination testing failures for 2025 plan year
- Notice to actuary to reinstate standing credit balance election for 2025 plan year if different actuary signed 2024 Schedule SB

**Oct. 15 (Thursday) (continued)**

- Form 5500 for 2025 plan year, if due date extended by Form 5558 or corporate income tax return extension <sup>8</sup>
- Form 8955-SSA and terminated vested participant statements for 2025 plan year, if due date extended by Form 5558 or corporate income tax return extension <sup>8</sup>
- PBGC comprehensive premium filing for 2026 plan year

**Oct. 31 (Saturday)**

- Notice to participants from plans subject to benefit restrictions on Oct. 1 based on presumption that 2026 AFTAP is less than 60% <sup>8,7</sup>

**Dec. 31 (Thursday)**

- 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 statements <sup>9</sup>
- Actuary's certification of 2026 AFTAP to prevent presumed AFTAP of less than 60% from applying Jan. 1, 2027 (or retroactively to Oct. 1, 2026, if range certification issued prior to Oct. 1, 2026)
- Election to reduce Jan. 1, 2026, credit balances
- Revocation of election to use credit balances in excess of 2026 minimum required contributions (except for small plans using year-end valuation dates)
- Deadline to amend plan documents for SECURE 1.0 and 2.0, CARES Act and other recent laws, and for changes on 2024 Requirement Amendments List <sup>10</sup>

**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](#).
2. Because this deadline falls on a Saturday, Sunday or holiday, IRS's "weekend rule" moves the deadline to the next business day.
3. Deadline for Form 945 is extended 10 days if taxes paid in full for the year and deposited on time.
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 the deadline to the next business day.
6. 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).
7. Benefit restriction notices must be distributed to participants and beneficiaries within 30 days after an underfunded plan becomes subject to certain benefit restrictions.
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 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.
10. IRS [Notice 2024-2](#) extended until Dec. 31, 2026, the plan amendment deadline for the Setting Every Community Up for Retirement Enhancement (SECURE) Act of 2019, the SECURE 2.0 Act of 2022 and the retirement plan relief provisions under the Coronavirus Aid, Relief and Economic Security (CARES) Act and Taxpayer Certainty and Disaster Tax Relief Act of 2020. Collectively bargained plans maintained pursuant to a collective bargaining agreement ratified before Dec. 29, 2022, have until Dec. 31, 2028. These deadlines apply regardless of plan year.