

2026 ERISA Plan Compliance Calendar

A schedule to help plan sponsors track important due dates for their plan

The dates below are an overview of important regulatory dates for 2026. This document does not identify all compliance obligations or due dates. The dates in the examples below are based on a January plan year. If you operate your plan using a different plan year, the same rules apply, but the deadline dates vary accordingly based on the start of your plan year.

January

- 31*** Deadline for recordkeepers and TPAs to issue Form 1099-R to participants who received distributions during the previous calendar year.

February

- 14*** Deadline to provide participant-directed defined contribution (DC) plan participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses actually charged to the individual plan accounts during the last quarter of 2025. Note: This is due 45 days after quarter-end. Plans must provide the quarterly fee disclosure at least once in a 3-month period; many plans already 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. Mutual of America typically generates statements within several days after the end of each calendar quarter.

March

- 1*** Deadline for recordkeepers and TPAs to file Form 1099-R (if filed on paper) with the Internal Revenue Service (IRS) to report distributions that were made to plan participants in the previous calendar year.
- 15†** Deadline for a plan that failed the 2025 ADP and/or ACP test to refund excess contributions and/or recharacterize pre-tax deferrals as after-tax or catch-up contributions to avoid a 10% excise tax, unless the plan has an Eligible Automatic Contribution Arrangement (EACA) covering all eligible employees.
- Contribution deadline for deductibility (without extension) for S Corporations, LLC, or partnerships and companies operating on a calendar-fiscal-year basis.
- Waiver of the minimum funding standard for money purchase pension plans application is due to the IRS.
- 31** Deadline for electronic filings of Form 1099-R for 2025 distributions to the IRS.
- Deadline to file Form 5330 excise tax return and payment for excess 2024 ADP/ACP contributions that were not otherwise corrected by 3/15/25 (or Form 8868 to request up to 6-month extension to file return). The deadline is the last day of the 15th month after the close of the plan year to which the excess contributions or excess aggregate contributions relate.

* When the deadline falls on a Saturday, Sunday or legal holiday, the IRS "weekend rule" generally extends the deadline to the next business day.

† Although this date is a Saturday, Sunday or legal holiday, no current guidance allows using the IRS "weekend rule" to extend this deadline to the next business day.

April

- 1 First Required Minimum Distribution (RMD) to participants born in 1952 (unless still working and plan allows delay until retirement) and to any older participants who retired in 2025 (if plan allows delay until retirement).
- 15 Deadline for processing corrective distributions to participants whose contributions in the prior calendar year exceeded the applicable limit under Section 402(g) of the Internal Revenue Code (IRC).
Deadline for C Corporation, sole proprietor and IRA contribution deadlines for deductibility (without extension).

May

- 15 Deadline to provide participant-directed DC plan participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses actually charged to the individual plan accounts during the first quarter of this year. Note: This is due 45 days after quarter-end. Mutual of America typically generates statements within several days after the end of each calendar quarter.

June

- 30 Deadline for a plan with an Eligible Automatic Contribution Arrangement (EACA) covering all eligible employees that failed the 2025 ADP and/or ACP test to refund excess contributions and/or recharacterize pre-tax deferrals as after-tax or catch-up contributions to avoid a 10% excise tax

July

- 29 Deadline to send Summary of Material Modifications (SMM) or updated Summary Plan Description (SPD) to participants for amendments adopted in 2025 plan year.
- 31 Deadline to file Form 5500 for 2025 plan year (without extension) and form 8955-SSA and terminated vested participants statements for 2025 plan year (without extension).
Deadline to file Form 5558 to extend Forms 5500 and 8955-SSA due date by 2½ months for 2025 plan year.

August

- 14 Deadline to provide participant-directed DC plan participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses actually charged to the individual plan accounts during the second quarter of this year. Note: This is due 45 days after quarter-end. Mutual of America typically generates statements within several days after the end of each calendar quarter.

September

- 15 Due date for money purchase pension plans to make required contributions to their plan trust, i.e., by 8½ months after the plan year-end.
If an S corporation or partnership plan sponsor filed a corporate tax extension, this is the deadline to make employer profit-sharing and matching contributions for the 2025 tax year.
For ERISA Employers, deadline for distributing the Summary Annual Report (SAR) to participants if Form 5500 was filed by the July 31 deadline.
- 30 Deadline to provide participants with the SARs from plans with a December 31 year-end, i.e., due 9 months after the plan year-end or 2 months after filing the Form 5500 (unless the Form 5500 filing deadline is extended).

October

- 15** Deadline for adopting a retroactive amendment to correct an IRC Section 410(b) coverage or Section 401(a)(4) non-discrimination failure for the prior calendar year.
- Deadline to provide the IRS with Form 5310-A to give notice of the establishment of qualified separate lines of business.
- Deadline to file Form 5500 for 2025 plan year, if due date extended by form 5558 or corporate tax return extension.
- Deadline to file Form 8955-SSA and terminated vested participant statements for 2025 plan year, if due date extended by Form 5558 or corporate income tax return.

November

- 14*** Deadline to provide participant-directed DC plan participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses actually charged to the individual plan accounts during the third quarter of this year. Note: This is due 45 days after quarter-end. Mutual of America typically generates statements within several days after the end of each calendar quarter.
- 15*** If the Form 5500 deadline was extended due to a corporate tax filing extension, the SARs are due to the plan participants.

December

- 2** Deadline for sending annual automatic contribution arrangement notice to participants who are being automatically enrolled or have previously been automatically enrolled and have not yet made an affirmative contribution and/or allocation election. Note: Currently, Mutual of America generates and sends these notices directly to plan sponsors of Net Asset Value (NAV) plans, and Mutual of America provides the template notices to plan sponsors of Group Annuity (GA) plans so that they may distribute the notices to eligible plan participants.
- Deadline for sending annual 403(b) and 401(k) Safe Harbor notices to participants, if applicable to the plan. The Safe Harbor notices generally must be provided at least 30 days but no more than 90 days before the beginning of the plan year.
- For ERISA Employers, deadline for sending annual Qualified Default Investment Alternative notice to participants who are being enrolled with a default investment allocation election or have been previously enrolled with a default investment allocation and have not yet made an affirmative allocation election.
- 15** Deadline to provide participants with SARs if the Form 5500 deadline was extended as a result of filing Form 5558.
- 31** Deadline for an existing DC plan to convert to a safe harbor plan and also the deadline for a safe harbor plan to remove its safe harbor status for the following year.
- Final date to elect safe harbor status for the prior plan year with a non-elective contribution of 4% or more of compensation.
- Due date to adopt discretionary amendments to the plan, subject to certain exceptions, i.e., anti-cutbacks.
- Deadline for Cycle 2 Restatement of 403(b) plans. Employers must adopt the updated plan documents by this date to maintain their plan's tax-qualified status.
- Deadline for taking Required Minimum Distributions (RMDs) in 2026 for subsequent distributions.
- Deadline to correct a failed ADP/ACP test.
- Deadline for plan sponsors to amend plan documents for SECURE Act of 2019 (SECURE 1.0 Act), SECURE Act of 2022 (SECURE 2.0 Act), the CARES Act and other recent laws. Additionally, this is the deadline for the 2024 Required Amendment List (see <https://www.irs.gov/pub/irs-drop/n-24-82.pdf>).

* When the deadline falls on a Saturday, Sunday or legal holiday, the IRS "weekend rule" generally extends the deadline to the next business day.

Note: IRS Notice 2024-2 extended until December 31, 2026, the plan amendment deadline for SECURE Act of 2019, the SECURE Act of 2022, the Bipartisan American Miners Act of 2019 provision lowering the age for in-service distributions to 59½, and the retirement plan relief provisions of the CARES and Taxpayer Certainty and Disaster Act of 2020. Collectively Bargained Plans maintained pursuant to a collective bargaining agreement and ratified before December 29, 2022, have until December 31, 2028. These deadlines apply regardless of plan year.



320 Park Avenue, New York, NY 10022-6839
mutualofamerica.com • 800.468.3785 • [in](#) [f](#) [▶](#)

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