

ERISA Compliance Calendar for July Defined Contribution Plan Years

July 2025

- 31 Mutual of America suggested deadline for plan sponsors to provide or confirm plan census testing data for Actual Deferral Percentage (ADP) and/or Actual Contribution Percentage (ACP) Nondiscrimination Testing (NDT). For plans that are required to remit a “True Up” of employer match or profit-sharing contribution, the “True Up” must be calculated and remitted before ADP/ACP testing can be completed.

September 2025

- 15 Deadline for processing corrective distributions for Non-Safe Harbor plans to avoid the 10% excise tax to remedy a failed ADP and/or ACP test for the prior plan year. Please note: Plans that satisfy the requirements of an Eligible Automatic Contribution Arrangement (EACA) have a December 31, 2025, deadline.

October 2025

- 30 Deadline for plan sponsors to provide or confirm with Mutual of America plan census testing data for ADP and/or ACP NDT for EACA plans.

December 2025

- 15 Submit refund requests for ADP and ACP NDT failures for EACA plans to Mutual of America to meet the December 31, 2025, deadline.
- 31 Issue refund checks for ADP and ACP NDT failure for EACA plans looking to avoid the 10% excise tax.

January 2026

- 31 File Form 5500 and 8955-SSA returns (unless you are filing for an extension). File Form 5558 for automatic extension of time to file Form 5500. File Form 5330 (Return of Excise Taxes Related to Employee Benefit Plans).
- 31 Deadline for Mutual of America to issue Form 1099-R to participants who received distributions during the previous calendar year.

March 2026

- 31 Deadline for plan sponsors to provide participants with the Summary Annual Report (SAR) if Form 5500 filing was filed by the original filing deadline (January 31).
- 31 Mutual of America suggested deadline to decide which optional plan amendments or plan provision changes need to be adopted for the upcoming plan year.

April 2026

- 1 Initial Required Minimum Distribution (RMD) due for participants who reached the required beginning date in prior year (age 73 in 2024) or terminated employment in prior year after reaching that age.
- 1 Deadline for plan sponsors to provide to Mutual of America excess deferral information for plan participants who exceeded the 402(g) excess deferrals limits in the prior calendar year.
- 3 The 90-day window opens for plan sponsors to distribute the following annual notices to plan participants: (1) Safe Harbor; (2) EACA; (3) Qualified Automatic Contribution Arrangement (QACA); (4) Automatic Contribution Arrangement (ACA); (5) Qualified Default Investment Alternative (QDIA). Note: These notices are not needed if your plan does not provide for one or more of these arrangements.
- 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).
- 15 Extended deadline for plan sponsors to file IRS Form 5500 and 8955-SSA.
- 15 IRS deadline for plan sponsors to file retroactive amendment to correct an IRC Section 410(b) coverage or Section 401(a)(4) nondiscrimination failure.

June 2026

- 1 Deadline to provide annual participant notices as applicable to the Plan for Safe Harbor contributions or those plans using a nonelective contribution but that also have an additional match contribution; QDIA and Automatic Enrollment (ACA, QACA, EACA).
- 15 Extended deadline for plan sponsors to distribute to plan participants the SAR if Form 5500 filing originally filed with an extension.
- 16 Deadline for Mutual of America to receive instructions and approval from plan sponsors to process ADP/ACP excess refunds prior to June 30, 2026.
- 30 Deadline for a plan sponsor to: (1) Correct a failed ADP/ACP test by issuing refunds or recharacterization of excess contributions (if not already done by earlier deadline to avoid 10% excise tax or have count as 2024 annual additions) or utilizing Qualified Nonelective Contributions (QNECs); (2) Elect Safe Harbor status for the prior plan year with a nonelective contribution of 4% or more of compensation; (3) Convert to a Safe Harbor plan or remove the Safe Harbor plan status for the following year; (4) Adopt discretionary amendments to the plan subject to certain exceptions (i.e., anti-cutbacks); (5) Deadline for RMDs to participants who already received first RMD previously.
- 30 Deadline for 403(b) plans that have adopted an IRS pre-approved plan document to provide annually the "Universal Availability and Annual Additions Contributions Limit Notice."

This list summarizes common reporting, disclosure and other operational compliance obligations for single-employed, tax-qualified defined contribution plans covered by ERISA (excluding employee stock ownership plans) with July 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. Participant Benefit Statements must be provided at least annually for participants without the right to direct their investments and at least quarterly for participants who do have the right to direct their investments. Participant Fee Disclosure 404(a)(5) notices must be provided to participants with investment performance and fee information at least once in a 14-month period. Notice to participants of qualified ACA, QACA or EACA and the ability to opt out must be provided at least 30 days prior to eligibility and annually; for plans with immediate eligibility, notice can be given on or as soon as feasible after eligibility. Notice to participants for plans that choose to use the QDIA must be provided at least 30 days prior to initial investment and then annually thereafter.

Employer contributions to plan, including Employer Match, Safe Harbor Employer Match, Safe Harbor Nonelective, and Profit-Sharing, are generally due to be remitted and applied to participant accounts no later than the Tax Filing Deadline including Extensions of the entity. The plan document may call for employer contributions to be calculated and remitted more frequently, and Safe Harbor contributions allocated more frequently than the plan year must be contributed to the plan by the last day of the immediately following plan year quarter.

For 401(k) plans that have a discretionary match contribution, the plan sponsor must provide the employee with notice within 60 days after the matching contribution has been made to the plan. If the plan sponsor funds matching contributions are less than annually (such as with every payroll, monthly or quarterly), then the employer must provide the employee with notice within 60 days after the last matching contribution has been deposited for the plan year.



Questions?

Please contact your Client Relationship Manager.



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

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