

# 2026 key administrative dates and deadlines for calendar-year defined contribution retirement plans

Subject to ERISA and the Internal Revenue Code



## JANUARY

## FEBRUARY

- 2/2
  - Form 1099-R or 8809 \*
  - Forms W-2, W-3, 8809 \*
  - Determine required Roth catch-up higher earners
  - Form 5330 (if extended) \*
  - Form 945 \*

- 2/10
  - Form 945 (alternative date)

- 2/14
  - Quarterly benefit statements

## MARCH

- 3/2
  - Form 1099-R and 1096 (paper) or 8809 \*

- 3/15
  - Corrective distributions for failed ADP/ACP tests
  - Money purchase plan minimum funding waiver

- 3/16
  - Form 1042, Form 1042-S \*
  - Form 1065 or 7004 (deductible contributions) \*
  - Form 1120-S or 7004 (deductible contributions) \*

- 3/30
  - Form 1099-R and 1096 (paper, with extension)

- 3/31
  - Form 1099-R (electronic) or 8809
  - Form 5330 or 8868

## APRIL

- 4/1
  - Required minimum distributions (RMDs)

- 4/15
  - Excess deferrals and allocable income
  - Form 1120 or 7004 (deductible contributions)

- 4/30
  - Form 1099-R (electronic, with extension)

## MAY

- 5/15
  - Form 990 or 8868
  - Quarterly benefit statements

## JUNE

- 6/30
  - Corrective distribution for failed ADP/ACP tests (EACAs)

## JULY

- 7/29
  - Summary of material modifications

- 7/31
  - Annual benefit statements (no participant investment direction)
  - Form 5500 or 5558
  - Form 8955-SSA or 5558
  - Notice to terminated vested employees
  - Form 5330 or 8868

## AUGUST

- 8/14
  - Quarterly benefit statements

## SEPTEMBER

- 9/15
  - Form 1065 (deductible contributions)
  - Form 1120-S (deductible contributions)
  - Money purchase plan contributions
  - Form 5500 for partnerships and S-corporations

- 9/30
  - Summary annual report (SAR)
  - Form 5330 (if extended)

## OCTOBER

- 10/3
  - Automatic enrollment notices
  - Safe harbor notices

- 10/15
  - Annual benefit statements (no participant investment direction)
  - Corrective plan amendment
  - Form 1120 (deductible contributions)
  - Form 5500 (if extended)
  - Form 8955-SSA (if extended)
  - Notice to terminated vested employees (if Form 8955-SSA extended)
  - Form 5310-A (QSLOB election)

## NOVEMBER

- 11/14
  - Quarterly benefit statements

- 11/15
  - Summary annual report (SAR)

- 11/16
  - Employer contributions, Form 990 \*

## DECEMBER

- 12/2
  - Automatic enrollment notices
  - QDIA notices
  - Safe harbor notices
  - ESOP diversification notices

- 12/15
  - Summary annual report (SAR)

- 12/31
  - Corrective distributions and QNECs
  - Discretionary plan amendments
  - SECURE, SECURE 2.0 and CARES Acts Amendments**
  - Participant notices
  - Amendments to remove safe harbor
  - Required minimum distributions (RMDs)
  - Amendments to add safe harbor, QACA, or EACA

\* The date reflected is the next business day following a filing date of an IRS or U.S. Department of Labor form that otherwise would fall on a Saturday, Sunday, or legal holiday.

Plan sponsors affected by disasters declared by the Federal Emergency Management Agency (FEMA) may have an approved delayed filing date. See <https://www.irs.gov/newsroom/tax-relief-in-disaster-situations>.

The Milliman 2026 defined contribution plan calendar contains general information that is not intended to constitute the rendering of legal, tax, investment, or accounting advice. Application to specific circumstances should rely on further professional guidance.

# 2026 key administrative dates and deadlines for calendar-year defined contribution retirement plans

## Subject to ERISA and the Internal Revenue Code

Fee disclosures, under ERISA Regulation §2550.404a-5, must be provided on or before the participant can first direct investments and distributed at least annually thereafter. Additional disclosures are required between 30 and 90 days prior to certain plan changes.

DATE	ITEM	ACTION
2/2 *	Form 1099-R or 8809	Provide IRS Form 1099-R to recipients of 2025 distributions unless a 30-day extension request on Form 8809 is filed.
2/2 *	Forms W-2, W-3, 8809	Send 2025 IRS Form W-2 to employees who are "active participants" in a qualified plan unless the IRS approved an extension. File the same Form W-2 with the Social Security Administration (SSA) using Form W-3 unless granted a 30-day extension using Form 8809.
2/2	Determine required Roth catch-up higher earners	Identify higher-income participants who in 2026 will be subject to the requirement for any catch-up contributions to be made on a Roth after-tax basis based on their prior calendar year 2025 Form W-2 box 3 Federal Insurance Contributions Act (FICA) wages from the employer sponsoring the plan exceeding \$150,000 (adjusted for cost-of-living increases).
2/2 *	Form 5330 (if extended)	File IRS Form 5330 to report 2024 prohibited transactions and nondeductible contributions if the due date was extended by IRS Form 8868 (payment of the excise taxes having been due and paid with the Form 8868 filing).  <i>Filing IRS Form 8868 for an extension of time to file Form 5330 only extends the filing due date and does not extend the time to pay the excise taxes due, which must be paid by the unextended due date with the Form 8868 application. Interest is charged on excise taxes not paid by the due date, even if the Form 8868 filing extension of time to file Form 5330 is granted.</i>
2/2 *	Form 945	File IRS Form 945 to report income tax withheld from 2025 distributions.
2/10	Form 945 (alternative date)	File IRS Form 945 if the withholding taxes on 2025 distributions were paid on time in full.
2/14	Quarterly benefit statements	Distribute fourth-quarter 2025 benefit statement to participants if individual account plan gives participants the right to direct their investments.
3/2 *	Form 1099-R and 1096 (paper) or 8809	File Copy A of 2025 IRS Form 1099-R using Form 1096 unless a 30-day extension request on Form 8809 is filed.
3/15	Corrective distributions for failed ADP/ACP tests	Distribute corrective distributions for a failed December 31, 2025, plan year-end ADP/ACP test to affected highly compensated employees (HCEs).
3/15	Money purchase plan minimum funding waiver	Deadline to file for an IRS waiver of minimum funding requirements for money purchase plans for the 2025 plan year.
3/16 *	Form 1042, Form 1042-S	File IRS Form 1042 and 1042-S, respectively, for income tax withheld from 2025 distributions made to nonresident aliens and retirement plan distributions made to nonresident aliens.
3/16 *	Form 1065 or 7004 (deductible contributions)	File IRS 2025 Form 1065 partnership tax return and make deductible employer contributions, or file IRS Form 7004 to obtain a six-month extension.
3/16 *	Form 1120-S or 7004 (deductible contributions)	File IRS 2025 Form 1120-S S-corporation tax return and make deductible employer contributions, or file IRS Form 7004 to obtain a six-month extension.
3/30	Form 1099-R and 1096 (paper, with extension)	Transmit paper copies of 2025 Form 1099-R to IRS using Form 1096 if deadline was extended by Form 8809.
3/31	Form 1099-R (electronic) or 8809	File 2025 IRS Form 1099-R electronically unless a 30-day extension on Form 8809 is filed.
3/31	Form 5330 or 8868	File IRS Form 5330 and pay excise taxes for December 31, 2024, plan year-end ADP/ACP refunds returned after March 15, 2025, unless the due date was extended by IRS Form 8868 (payment of the excise taxes being due and paid with the Form 8868 filing).  <i>Filing IRS Form 8868 for an extension of time to file Form 5330 only extends the filing due date, and does not extend the time to pay the excise taxes due, which must be paid by the unextended due date with the Form 8868 application. Interest is charged on excise taxes not paid by the due date, even if the Form 8868 filing extension of time to file Form 5330 is granted.</i>
4/1	Required minimum distributions (RMDs)	Deadline to make the first RMD in 2026 to participants who continued to work past their RMD age and terminated or retired in 2025.

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DATE	ITEM	ACTION
4/15	Excess deferrals and allocable income	Send participant refunds of any 2025 excess §401(k), §403(b), and §457(b) plan deferrals and allocable income.
4/15	Form 1120 or 7004 (deductible contributions)	File IRS 2025 Form 1120 corporate tax return and make deductible employer contributions, or file IRS Form 7004 to obtain a six-month extension.
4/30	Form 1099-R (electronic, with extension)	Transmit 2025 IRS Form 1099-R electronically if the deadline was extended by Form 8809.
5/15	Form 990 or 8868	For tax-exempt employers with calendar fiscal years, file IRS 2025 tax-exempt organization information return, or file IRS Form 8868 for extension to file 2025 IRS Form 990.
5/15	Quarterly benefit statements	<p>Distribute first-quarter 2026 benefit statements to participants if individual account plan gives participants the right to direct their investments.</p> <p><i>Under SECURE 2.0, beginning with the 2026 plan year, DC plans must provide a paper statement to each participant at least once each year unless the participant affirmatively elects electronic delivery (or the plan satisfies the “wired at work” electronic disclosure delivery method). For example, awaiting formal Department of Labor (DOL) guidance, it is anticipated that DC plans may satisfy the 2026 plan year’s once-per-year paper statement requirement with the fourth-quarter 2026 statement due February 14, 2027.</i></p>
6/30	Corrective distribution for failed ADP/ACP tests (EACAs)	If the plan includes an EACA covering all participants, make corrective distributions for a failed December 31, 2025, plan year-end ADP/ACP test to affected HCEs.
7/29	Summary of material modifications	Provide a summary of material modifications to participants for plan amendments for the 2025 calendar plan year adopted by December 31, 2025, unless the information was included in an updated summary plan description distributed by this date.
7/31	Annual benefit statements (no participant investment direction)	Distribute 2025 annual benefit statements to individual account plan participants who do not have the right to direct their investments (Form 5500 due date [if not extended]).
7/31	Form 5500 or 5558	File 2025 Form 5500 or Form 5558 to extend the Form 5500 filing due date by two and a half months.
7/31	Form 8955-SSA or 5558	File IRS Form 8955-SSA or Form 5558 to extend the Form 8955-SSA filing due date by two and a half months.
7/31	Notice to terminated vested employees	Provide a notice to terminated vested employees who were reported on 2025 IRS Form 8955-SSA showing their account balance.
7/31	Form 5330 or 8868	<p>File IRS Form 5330 to report and pay excise taxes on 2025 prohibited transactions and nondeductible contributions unless the due date was extended by IRS Form 8868 (payment of the excise taxes being due and paid with the Form 8868 filing).</p> <p><i>Filing IRS Form 8868 for an extension of time to file Form 5330 only extends the filing due date, and does not extend the time to pay the excise taxes due, which must be paid by the unextended due date with the Form 8868 application. Interest is charged on excise taxes not paid by the due date, even if the Form 8868 filing extension of time to file Form 5330 is granted.</i></p>
8/14	Quarterly benefit statements	<p>Distribute second-quarter 2026 benefit statement to participants if individual account plan gives participants the right to direct their investments.</p> <p><i>Under SECURE 2.0, beginning with the 2026 plan year, DC plans must provide a paper statement to each participant at least once each year unless the participant affirmatively elects electronic delivery (or the plan satisfies the “wired at work” electronic disclosure delivery method). For example, awaiting formal DOL guidance, it is anticipated that DC plans may satisfy the 2026 plan year’s once-per-year paper statement requirement with the fourth-quarter 2026 statement due February 14, 2027.</i></p>
9/15	Form 1065 (deductible contributions)	Deadline to file IRS 2025 Form 1065 tax return for partnership employers and make 2025 plan year deductible employer contributions if an extension request IRS Form 7004 was filed.

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DATE	ITEM	ACTION
9/15	<b>Form 1120-S (deductible contributions)</b>	Deadline to file IRS 2025 Form 1120-S tax return for S-corporation employers and make 2025 plan year deductible employer contributions if an extension request IRS Form 7004 was filed.
9/15	<b>Money purchase plan contributions</b>	Deadline to make required employer contributions to money purchase plans for the 2025 plan year.
9/15	<b>Form 5500 for partnerships and S-corporations</b>	For partnership and S-corporation employers, extended date to file 2025 Form 5500 if IRS Form 7004 was filed to extend the business tax return (if IRS Form 5558 was not filed to extend the Form 5500 due date).
9/30	<b>SAR</b>	Distribute to participants the 2025 SAR unless the filing of 2025 Form 5500 is extended by IRS Form 5558.
9/30	<b>Form 5330 (if extended)</b>	File IRS Form 5330 to report December 31, 2024, plan year-end ADP/ACP refunds returned after March 15, 2025, if the due date was extended by IRS Form 8868 (payment of the excise taxes having been due and paid with the Form 8868 filing).  <i>Filing IRS Form 8868 for an extension of time to file Form 5330 only extends the filing due date, and does not extend the time to pay the excise taxes due, which must be paid by the unextended due date with the Form 8868 application. Interest is charged on excise taxes not paid by the due date, even if the Form 8868 filing extension of time to file Form 5330 is granted.</i>
10/3	<b>Automatic enrollment notices</b>	Earliest date to provide to participants §401(k) or §403(b) annual automatic enrollment notices for the 2026 plan year for plans with automatic contribution arrangements.
10/3	<b>Safe harbor notices</b>	Earliest date to provide to participants §401(k) or §403(b) plan safe harbor notices.
10/15	<b>Annual benefit statements (no participant investment direction)</b>	Distribute 2025 annual benefit statements to individual account plan participants who do not have the right to direct their investments (Form 5500 due date [if extended]).
10/15	<b>Corrective plan amendment</b>	Deadline to adopt retroactive corrective plan amendment(s) for certain 2025 coverage and/or nondiscrimination plan failures.
10/15	<b>Form 1120 (deductible contributions)</b>	Deadline for 2025 plan year deductible contributions if an extension request IRS Form 7004 was filed.
10/15	<b>Form 5500 (if extended)</b>	File 2025 Form 5500 if the due date was extended by IRS Form 5558 (or for corporate employers if IRS Form 7004 was filed to extend the Form 1120 corporate tax return, if IRS Form 5558 was not filed to extend the Form 5500 due date).
10/15	<b>Form 8955-SSA (if extended)</b>	File 2025 IRS Form 8955-SSA if the due date was extended by an IRS Form 5558.
10/15	<b>Notice to terminated vested employees (if Form 8955-SSA extended)</b>	Provide a notice to terminated vested employees who were reported on 2025 IRS Form 8955-SSA showing their account balance if the Form 8955-SSA was extended.
10/15	<b>Form 5310-A (QSLOB election)</b>	File Form 5310-A for a notice of qualified separate line of business (QSLOB) election for the 2025 testing year (applies to an initial QSLOB election notice, or a modification or revocation of a previously filed QSLOB election notice).
11/14	<b>Quarterly benefit statements</b>	Distribute third-quarter 2026 benefit statement to participants if individual account plan gives participants the right to direct their investments.  <i>Under SECURE 2.0, beginning with the 2026 plan year, DC plans must provide a paper statement to each participant at least once each year unless the participant affirmatively elects electronic delivery (or the plan satisfies the “wired at work” electronic disclosure delivery method). For example, awaiting formal DOL guidance, it is anticipated that DC plans may satisfy the 2026 plan year’s once-per-year paper statement requirement with the fourth-quarter 2026 statement due February 14, 2027.</i>

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DATE	ITEM	ACTION
11/15	Summary annual report (SAR)	For partnerships and S-corporations, distribute 2025 SAR to participants and beneficiaries if the Form 5500 filing date was extended by a Form 7004 filed on time for the Form 1065 partnership income tax return or the Form 1120-S S-corporation income tax return (if IRS Form 5558 was not filed to extend the 2025 Form 5500).
11/16 *	Employer contributions, Form 990	File IRS 2025 Form 990 tax-exempt organization information return if the filing date was extended by an IRS Form 8868.
12/2	Automatic enrollment notices	Deadline to provide to participants §401(k) or §403(b) annual automatic enrollment notices for the 2026 plan year for plans with automatic contribution arrangements.
12/2	QDIA notices	Deadline to send QDIA notices to participants for the 2026 plan year.
12/2	Safe harbor notices	Deadline to provide to participants §401(k) or §403(b) plan safe harbor notices if applicable for the 2026 plan year.
12/2	ESOP diversification notices	Employee stock ownership plans (ESOPs) must provide a diversification notice to participants first eligible to divest publicly traded employer securities on January 1, 2027.
12/15	Summary annual report (SAR)	Distribute to participants the 2025 SAR if 2025 Form 5500 due date was extended by IRS Form 5558 (or for corporate employers if IRS Form 7004 was filed to extend the Form 1120 corporate tax return, if IRS Form 5558 was not filed to extend the Form 5500 due date).
12/31	Corrective distributions and QNECs	Deadline to process corrective distributions to correct a failed December 31, 2025, ADP/ACP test for excess 401(k)/(m) plan contributions. Deadline to make a qualified nonelective contribution (QNEC) to cure a failed December 31, 2025, "current year method" ADP/ACP test.
12/31	Discretionary plan amendments	Adopt plan amendments for discretionary changes implemented during 2026.
12/31	SECURE, SECURE 2.0 and CARES Act Amendments	<p>Deadline to adopt required and discretionary plan amendments related to the SECURE Act, the SECURE 2.0 Act, and the CARES Act for qualified plans that are not governmental or collectively bargained, and for 403(b) plans not maintained by a public school.</p> <p><i>Later deadlines apply for collectively bargained plans (December 31, 2028) and for all governmental plan types—governmental qualified plans, public school 403(b) plans, and governmental 457(b) plans (December 31, 2029). However, if a plan is terminating and the plan termination date precedes these deadlines, any required amendments must be adopted by the time of the plan termination.</i></p>
12/31	Participant notices	Provide notices to participants, if applicable, about individual account plans that allow participant-directed investments.
12/31	Amendments to remove safe harbor	Deadline to amend plan to remove an existing safe harbor plan feature for 2026.
12/31	Required minimum distributions (RMDs)	Deadline to make recurring RMDs to participants.
12/31	Amendments to add safe harbor, QACA, or EACA	Deadline to electively amend an existing §401(k) or §403(b) plan to be a safe harbor plan, or to add a QACA or EACA.

## NAMES OF FORMS

IRS FORM NUMBER	FORM NAME
<b>Form 1042 and 1042-S</b>	Annual Withholding Tax Return for U.S. Source Income of Foreign Persons
<b>Form 1065</b>	U.S. Return of Partnership Income
<b>Form 1096</b>	Annual Summary and Transmittal of U.S. Information Returns
<b>Form 1099-R</b>	Distributions From Pensions, Annuities, Retirement and Profit-Sharing Plans, IRAs, Insurance Contracts, etc.
<b>Form 1120 and 1120-S</b>	U.S. Corporation Income Tax Return
<b>Form 5330</b>	Return of Excise Taxes Related to Employee Benefit Plans
<b>Form 5500</b>	Annual Return/Report of Employee Benefit Plan
<b>Form 7004</b>	Application for Automatic Extension of Time to File Certain Business Income Tax, Information, and Other Returns
<b>Form 5310-A</b>	Notice of Plan Merger or Consolidation, Spinoff, or Transfer of Plan Assets or Liabilities; Notice of Qualified Separate Lines of Business
<b>Form 5558</b>	Application for Extension of Time to File Certain Employee Plan Returns
<b>Form 8809</b>	Application for Extension of Time to File Information Returns
<b>Form 8868</b>	Application for Extension of Time to File an Exempt Organization Return
<b>Form 8955-SSA</b>	Annual Registration Statement Identifying Separated Participants With Deferred Vested Benefits
<b>Form 945</b>	Annual Return of Withheld Federal Income Tax
<b>Form 990</b>	Return of Organization Exempt From Income Tax
<b>Form W-2</b>	Wage and Tax Statement
<b>Form W-3</b>	Transmittal of Wage and Tax Statements

## Solutions for a world at risk™

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