

2025 ERISA Plan Compliance Calendar

The dates that plan sponsors cannot miss next year

Being a retirement plan sponsor involves juggling many tasks including, importantly, making sure your plan complies with all pertinent federal legislation and regulations. A compliance calendar keeps track of required filings, their due dates and related details so plan sponsors can avoid incurring any fines or other penalties for late filings or missing information.

What follows is intended to alert sponsors of retirement plans governed by the Employee Retirement Income Security Act to some of the significant regulatory dates for 2025. It does not identify all compliance obligations or due dates, and the calendar assumes that a plan is being administered on a calendar year basis by an employer using a calendar fiscal year.

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| January | 15 | Deadline for final 2024 minimum funding quarterly installment payment for defined benefit plans that had a funding shortfall in 2023. (Due 15 days after each quarter-end of the plan year.) |
| | 30 | Deadline to provide participants and beneficiaries of a DB plan with the notice of benefit restrictions if the DB plan is less than 60% funded. (Due January 30, or 30 days after the measurement date at which the plan has become subject to a benefit restriction.) |
| | 31 | Many recordkeepers require participant data for average deferral percentage/ average contribution percentage, top-heavy and 402(g) compliance testing to be returned by this date.

Deadline for sending Form 1099-R to participants who received distributions from a qualified retirement plan during the previous year. |
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| February | 14 | Deadline for participant-directed defined contribution plans to provide participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses charged to individual plan-accounts during the last quarter of 2024. (Due 45 days after the end of the quarter.) |
| | 28 | Deadline for filing Form 1099-R with the IRS, if not filed electronically, to report distributions made in the previous year. |

March

17 Deadline for distributing ADP/ACP refunds without incurring a 10% excise tax on the employer. (Due 2 1/2 months following the plan year-end. The deadline falls on the weekend in 2025; the IRS provides that when a date falls on a Saturday, Sunday or holiday, the deadline becomes the next business day.) Note: A special deadline applies to plans satisfying the requirements of an eligible automatic contribution arrangement. See June.

Employer contributions due to the retirement plan's trust for S corporations and partnerships with a December 31 fiscal year-end in order to take deductions with no corporate tax extension. (The deadline is March 15, which falls on the weekend in 2025; the IRS provides that when a date falls on a Saturday, Sunday or holiday, the deadline becomes the next business day.)

Forms 1042 and 1042-S due to the IRS to report, respectively, income tax withheld from distributions made to nonresident aliens and retirement plan distributions made to nonresident aliens. (The deadline is March 15, which falls on the weekend in 2025; the IRS provides that when a date falls on a Saturday, Sunday or holiday, the deadline becomes the next business day.)

Deadline to apply to the IRS for a waiver of the minimum funding standard for DB and money purchase pension plans—i.e., no later than the 15th day of the third month after the close of the plan year for which the waiver is requested. (The deadline is March 15, which falls on the weekend in 2025; the IRS provides that when a date falls on a Saturday, Sunday or holiday, the deadline becomes the next business day.)

31 Electronic filings of Form 1099-R for 2024 distributions are due to the IRS.

April

1 Initial required minimum distribution is due to participants who turned 72 or terminated employment, whichever was later, in 2023.

15 Deadline for corrective distributions to participants of excess deferral amounts under Internal Revenue Code Section 402(g).

Deadline for the first 2025 minimum funding quarterly installment payment for DB plans that had a funding shortfall in 2024. (Due 15 days after each quarter-end of the plan year.)

Employer contributions due to the plan's trust for C corporations with a December 31 fiscal year-end in order to take deductions with no corporate tax extension.

30 Deadline for sponsors of single-employer and multiemployer DB pension plans to send their annual funding notice to participants, beneficiaries and labor organizations representing participants. (The notice must be provided no later than 120 days after the close of the plan year.) Small plans—i.e., those covering fewer than 100 participants—must provide the notice by the IRS filing due date of the plan's Form 5500; the notice takes the place of the summary annual report for a DB plan.

Reconciliation filing and payment for the 2024 comprehensive Pension Benefit Guaranty Corporation premium due to the PBGC for DB plans that filed an earlier estimated variable rate premium in the October 15, 2024, comprehensive filing.

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| May | 15 | Deadline for participant-directed DC plans to supply participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses charged to individual plan-accounts during the first quarter. (Due 45 days after the end of the quarter.) |
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| June | 30 | Deadline for retirement plans with publicly traded employer securities to file their Form 11-K annual report—i.e., by 180 days after the end of the plan year. (The deadline is June 29, which falls on the weekend in 2025; the Securities and Exchange Commission provides that when a date falls on a Saturday, Sunday or holiday, the deadline becomes the next business day.)

Deadline for corrective distributions for failed ADP/ACP tests to highly compensated employees, to avoid a 10% excise tax on the employer for eligible automatic contribution arrangement plans. |
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| July | 15 | Deadline for the second 2025 minimum funding quarterly installment payment for DB plans with a funding shortfall in 2024. (Due 15 days after each quarter-end of the plan year.) |
| | 29 | Summary of material modifications is due to participants—i.e., 210 days after the end of the plan year in which the change was adopted—unless it was included in a timely updated summary plan description. |
| | 31 | Form 5330, which reports excise taxes related to employee benefit plans, is due to the IRS.

Form 5500 is due to the Department of Labor for plans with a December 31 plan year-end. (Due seven months after year-end.) The Form 5500 filing may be delayed if Form 5558 is filed with the IRS by this date; also called the Application for Extension of Time to File Certain Employee Plan Returns.

Deadline for annual benefit statements for individual account plans not offering participant-directed investments. |
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| August | 14 | Deadline for participant-directed DC plans to provide participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses that were charged to individual plan-accounts during Q2. (Due 45 days after the end of the quarter.) |
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- September 15** Deadline for money purchase pension, target-benefit and DB plans to make required contributions to their plan trust—i.e., by 8 1/2 months after the plan year-end—and for S corporations and partnership plan sponsors that filed a corporate tax extension to make 2024 employer profit-sharing and matching contributions.
- Minimum funding deadline for the 2023 plan year for pension plans that do not have a funding shortfall for 2024.
- Form 5500 due to the DOL's Employee Benefits Security Administration from plans eligible for an automatic extension linked to a corporate tax extension.
- 30** Summary annual reports are due to participants from plans with a December 31 year-end—i.e., nine months after the plan year-end or two months after filing Form 5500, unless Form 5500 filing is extended.
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- October 2** Start of the period to disseminate annual notices to participants, including notices re the 401(k) safe harbor, automatic contribution arrangements, the qualified automatic contribution arrangement safe harbor and qualified default investment alternatives—i.e., from 90 to 30 days before the end of the current plan year.*
- 15** IRS deadline for adopting the retroactive amendment to correct an IRC Section 410(b) coverage failure or a Section 401(a)(4) nondiscrimination failure.
- Deadline for the third 2025 minimum funding quarterly installment payment for DB plans that had a funding shortfall in 2024. (Due 15 days after each quarter-end of the plan year.)
- A PBGC flat rate and variable rate annual premium filing and payment are due to the PBGC—i.e., by the 15th day of the 10th full month after the month the plan year began.
- Deadline for filing Form 5500 after a plan files Form 5558 to request an extension.
- Form 5310-A due to the IRS to give notice of the establishment of qualified separate lines of business.
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**If a traditional safe harbor 401(k) plan provides a nonelective contribution but also non-safe-harbor matching contributions structured so the plan need not satisfy the ACP test, then the plan still must satisfy the safe harbor notice requirements. If a 401(k) plan that satisfies the safe harbor nonelective contribution requirements also provides non-safe harbor matching contributions and must satisfy the ACP test, then the plan need not satisfy the safe harbor notice requirements.*

- November**
- 14** Deadline for participant-directed DC plans to provide participants with a quarterly benefit/disclosure statement and statement of plan fees and expenses charged to individual plan-accounts during Q3. (Due 45 days after the end of the quarter.)
- 15** Summary annual reports due to participants if the Form 5500 deadline was extended due to a corporate tax filing extension.
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- December**
- 1** Final deadline to disseminate the 401(k) safe harbor annual notice to plan participants.
- Final deadline for supplying the QDIA annual required notice to all participants who were defaulted into a QDIA no more than 30 days prior to the beginning of the plan year.
- Final deadline to provide participants with the annual automatic enrollment and default investment notices; these may be combined with the QDIA notice.
- Deadline to elect safe harbor status for the current plan year with nonelective contributions if the nonelective contribution is less than 4% of compensation.
- 15** Extended deadline for providing summary annual reports to participants if the Form 5500 deadline was extended because of filing Form 5558.
- 31** 2025 RMDs are due to participants who were age 73 or older on or after January 1, 2023.
- Deadline for correcting a failed ADP/ACP test.
- Deadline to adopt discretionary amendments to the plan, subject to certain exceptions—e.g., anti-cutbacks.
- Deadline for a safe harbor plan to remove its safe harbor status for the following year or for an existing DC plan to convert to a safe harbor plan.
- Deadline to elect safe harbor status for the prior plan year with a nonelective contribution of 4% or more of compensation.

Plan Sponsor Duties Without Dates

Defined contribution plan statements must be provided at least annually for participants who do not have the right to direct their investments, and at least quarterly for those who do have the right.

A qualified default investment alternative notice for plans that choose to use a QDIA must be provided to participants 30 days prior to their first investment. Note: If the plan has immediate eligibility, participants must be given the notice as soon as administratively feasible.

Notice to participants of a qualified automatic enrollment arrangement or an eligible automatic enrollment arrangement, and of a participant's ability to opt out, must be provided 30 days prior to eligibility and then annually. For plans with immediate eligibility, notice may be given on or as soon as feasible after eligibility.

Defined benefit or money purchase pension plans must provide the Pension Benefit Guaranty Corporation with a notice of failure to meet minimum funding standards within 60 days of a missed payment or denial of payment waiver.

An explanation of a plan's pre-retirement survivor annuity must be provided to a participant between the first day of the plan year in which she reaches age 32 and the last day of the plan year in which she reaches 35. If a participant is over 35 when hired, she should be given the explanation within one year of hire. An explanation of a joint and survivor annuity must be made to affected plan participants between 90 and 30 days before the annuity's starting date.

Participant Fee Disclosures

Plan sponsors must furnish fee disclosures to participants on or before the date on which they or their beneficiary may first direct their investments in the plan and at least annually thereafter—now defined as “at least once in any 14-month period, without regard to whether the plan operates on a calendar year or fiscal year basis.”

Sponsors must, at least quarterly, supply participants with a statement of account expenses and the services for which they apply. If any change is made to fee information, the sponsor must inform participants 30 to 90 days beforehand.

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