

# 2025 Compliance Calendar for Retirement Plan Sponsors

As a retirement plan sponsor, you're responsible for meeting many critical deadlines to ensure the compliance and success of your plan. FuturePlan is here to support you throughout the year.

This calendar will help you keep track of required filings and important due dates.



#### **Connect with FuturePlan Experts**

Missing deadlines or delaying required filings can result in steep fines and can prevent participants from taking full advantage of eligible benefits.

If you have questions or would like a consultation surrounding the compliance needs for your retirement plan, call 866-929-2525 or connect with us at futureplan.com.



866-929-2525



futureplan.com

This calendar may not cover every requirement applicable to your specific employee benefit plan and focuses on key requirements affecting most defined contribution and defined benefit plans. It is subject to legislative or regulatory changes. This information is not intended to be a substitute for consultation with ERISA counsel and does not represent legal advice.

#### Compliance Reminders for the Calendar Plan Year 2025

The following list highlights important compliance dates for you to keep in mind based on the attributes of your plan. Please contact your FuturePlan consultant with questions about your plan.

Due Date	Action Items
	Action items
January	
	Year-end information requests for the plan year ends of 12/31/24 begin around this time. Clients should complete census and questionnaire.
1/1	Review your employment records to determine whether any part-time employees have completed 2 consecutive 12-month periods with 500 hours of service. Be ready to consider eligibility in your 401(k)/profit sharing plan, and ERISA covered 403(b) plans for Long Term Part Time Employees under the SECURE 2.0 Act. Consult with your FuturePlan consultant about this SECURE 1.0 and SECURE 2.0 provision and timing.
	Consult your FuturePlan consultant about the changes to the Required Minimum Distributions (RMD) and the various optional provisions of the SECURE 2.0 Act.
	Also, consult your FuturePlan consultant regarding the applicability of the Auto Enrollment/Auto Escalation provisions of the SECURE 2.0 Act, and the exceptions thereto.
	Operationally implement the 2025 cost of living/benefit limits in Qualified Retirement plans.
	Minimum funding requirements for defined benefit (DB), money purchase plan (MPP), and target benefit plan years ended April 30.
	Note: The weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.
1/15	<b>Quarterly contribution due</b> for calendar-year DB plans that have a funding shortfall for the preceding plan year. (For DB plans with a plan year beginning on any date other than January 1 (i.e. fiscal year plans) have separate quarterly funding deadlines that correspond to their plan year.)
	Form 5500 series extended filing due date for plan years ended March 31.
1/01	<b>DB Plan Funding Certification adjusted funding target attainment percentage</b> (AFTAP) is due for plan years ended April 30 to avoid certain plan level restrictions.
1/31	Form 5500 series filing deadline without an extension for plan years ended June 30, or deadline to file Form 5558 for an extended due date of April 15.
	Deadline for 1099-R distribution reporting, sent to participants receiving a distribution for the 2024 tax year.
February	
	Goal deadline for 12/31/24 clients to submit their completed census and questionnaire.
2/7	Year-end data collection tasks should be completed and submitted through my.futureplan.com. Contribution calculations take four to six weeks once census data is in good order and any questions about data are addressed.
	Minimum funding requirements for DB, MPP, and target benefit plans for plan years ended May 31.
	Note: The weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.
2/15	<b>Deadline for 401(k)</b> and other participant investment directed retirement plan accounts to provide <b>fee disclosure and benefit statements to participants</b> (45 days after end of the quarter). Lifetime income disclosures are required to be included on benefit statements at least annually, and could be included by this deadline for participant-directed plans.
2/18	Form 5500 series extended filing due date for plan years ended April 30.
2/28	DB Plan Funding Certification AFTAP is due for plan years ended May 31 to avoid certain plan level restrictions.
	Form 5500 series filing deadline without an extension for plan years ended July 31, or deadline to file Form 5558 for an extended due date of May 15.
	Form 1099-R reporting due to the IRS for distributions to participants during 2024, if filing 1099-R on paper.

Due Date	Action Items
March	
3/15	Calendar year 401(k) plans must process corrective distributions for failed ADP/ACP tests to avoid a 10% penalty tax. Certain automatic enrollment plans have until June 30.
	Deadline to request waiver of minimum funding standard for DB and MPP plans' preceding calendar plan year.
	Minimum funding requirements for defined benefit (DB), money purchase plan (MPP), and target benefit plan years ended June 30. Note, the weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.
	<b>Deadline for retroactive DB plan amendment</b> under IRC section 412(d)(2) to increase pension benefits and related employer contributions for the preceding calendar plan year.
	Federal Income Tax return deadline for S Corporations and Partnerships without extension.
3/17	Deadline for S Corporations and Partnerships to retroactively establish a qualified retirement plan, for the prior tax year, by the due date of the plan sponsor's federal income tax return. However, 401(k) deferrals must generally be made on a prospective basis after the qualified plan is established.
	Form 5500 series extended filing due date for plan years ended May 31.
	DB Plan Funding Certification AFTAP is due for plan years ended June 30 to avoid certain plan level restrictions.
3/31	Form 5500 series filing deadline without an extension for plan years ended August 31, or deadline to file Form 5558 for an extended due date of June 16.
	Electronic filing deadline of the Form 1099-R reporting with the IRS.
April	
4/1	Actuary's Certification of 2025 adjusted funding target attainment percentage (AFTAP) to avoid presumption that 2025 AFTAP is 10% less than 2024 AFTAP.
	Deadline for processing corrective distributions for elective deferrals that exceed IRC section 402(g) limit.
	Quarterly contribution due for calendar-year DB plans that have a funding shortfall for the preceding plan year. (For DB plans with a plan year beginning on any date other than January 1 (i.e. fiscal year plans) have separate quarterly funding deadlines that correspond to their plan year.)
	Minimum funding requirement for DB, MPP and target benefit plans for plan years ended July 31.
4/15	Note: The weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.
.,	Form 5500 series extended filing due date for plan years ended June 30.
	Federal Income Tax return deadline for Sole Proprietors and C Corporations without extension.
	<b>Deadline for C-Corporations and Sole Proprietorships</b> to <i>retroactively</i> establish a qualified retirement plan, for the <i>prior</i> tax year, by the due date of the plan sponsor's income tax return. However, 401(k) deferrals must generally be made on a prospective basis after the qualified plan is established. See your FuturePlan consultant for details and exceptions.
4/29	<b>Deadline for DB plan sponsors</b> with calendar plan years to provide participants with the <i>modified</i> annual notice of the plan's funding status. (Plans with fewer than 100 participants on each day of the preceding plan year need not provide the funding notice until the Form 5500 is due for the plan year.)
	DB Plan Funding Certification AFTAP is due for plan years ended July 31.
4/30	Form 5500 series filing deadline without an extension for plan years ended September 30, or deadline to file Form 5558 for an extended due date of July 15.

Due Date	Action Items
	Action rems
May	
5/15	<b>Deadline for 401(k)</b> and other participant investment directed retirement plan accounts to provide fee disclosure and benefit statements to participants (45 days after end of the quarter). Lifetime income disclosures are required to be included on benefit statements at least annually, and could be included by this deadline for participant-directed plans.
	Minimum funding requirement for DB, MPP and target benefit plans with plan years ended August 31.
	Note: The weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.
	Form 5500 series extended filing due date for plan years ended July 31.
5/31	DB Plan Funding Certification AFTAP is due for plan years ended August 31 to avoid certain plan level restrictions.
June	
6/2	Form 5500 series filing deadline without an extension for plan years ended October 31, or deadline to file Form 5558 for an extended due date of August 15.
	March 31 plan year end 401(k) plans must process corrective distributions for failed ADP/ACP tests to avoid a 10% penalty tax.
6/15	Minimum funding requirements for defined benefit (DB), money purchase plan (MPP), and target benefit plan years ended September 30.
	Note: The weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.
6/16	Form 5500 series extended filing due date for plan years ended August 31.
0/00	DB Plan Funding Certification AFTAP is due for plan years ended September 30 to avoid certain plan level restrictions.
6/30	Form 5500 series filing deadline without an extension for plan years ended November 30, or deadline to file Form 5558 for an extended due date of September 15.
July	
	Quarterly contribution due for calendar-year DB plans that have a funding shortfall for the preceding plan year. (For DB plans with a plan year beginning on any date other than January 1 (i.e. fiscal year plans) have separate quarterly funding deadlines that correspond to their plan year.)
7/15	Minimum funding requirement for DB, MPP and target benefit plans for plan years ended October 31.
	Note: The weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.
	Form 5500 series extended filing due date for plan years ended September 30.
7/21	DB Plan Funding Certification AFTAP is due for plan years ended October 31 to avoid certain plan level restrictions.
7/31	Form 5500 series filing deadline without an extension for plan years ended December 31, or deadline to file Form 5558 for an extended due date of October 15.
August	
	<b>Deadline for 401(k)</b> and other participant investment directed retirement plan accounts to provide fee disclosure and benefit statements to participants (45 days after end of the quarter). Lifetime income disclosures are required to be included on benefit statements at least annually, and could be included by this deadline for participant-directed plans.
8/15	Minimum funding requirement and target benefit plans for plan years ended November 30.
	Note: The weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.
	Form 5500 series extended filing due date for plan years ended October 31.
8/31	DB Plan Funding Certification AFTAP is due for plan years ended November 30 to avoid certain plan level restrictions.

Due Date	Action Items
September	
9/1	Form 5500 series filing deadline without an extension for plan years ended January 31, or deadline to file Form 5558 for an extended due date of November 17.
9/15	Final prior year contribution is due for S corporation and Partnership clients sponsoring qualified retirement plans who have filed income tax return extensions.
	Minimum funding contribution due for DB, MPP and target benefit plans with calendar plan years.
	Note: The weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.
-,	Form 5500 series extended filing due date for plan years ended November 30.
	Note: Accelerated premium payment date in 2025. Pension Benefit Guaranty Corporation (PBGC) premium payment deadline for defined benefit plans with calendar plan years.
	Summary Annual Report due for applicable plans with plan years ended December 31, unless Form 5500 series is on extension.
9/30	DB Pension Plan Funding Certification AFTAP is due for plan years ended December 31 to avoid certain plan level restrictions.
	Form 5500 series filing deadline without an extension for plan years ended February 28, or deadline to file Form 5558 for an extended due date of December 15.
October	
10/1	Imposition of DB plan benefit restrictions if the AFTAP hasn't been certified for the current calendar plan year.
10/1	Contribution verifications for calendar-year DB pension plans should be submitted to FuturePlan to ensure timely filing of the Form 5500 series.
10/3	First day to provide safe harbor and auto enrollment notices for 2026 calendar plan year.
	Quarterly contribution due for calendar-year DB plans that have a funding shortfall for the preceding plan year. (For DB plans with a plan year beginning on any date other than January 1 (i.e. fiscal year plans) have separate quarterly funding deadlines that correspond to their plan year.)
	<b>Deadline for a corrective (11-g) amendment</b> to the plan document to cure certain coverage, minimum participation, and non-discrimination testing failures for the preceding calendar plan year.
10/15	Final prior year contribution is due for Sole Proprietor and C Corporation clients sponsoring qualified retirement plans who have filed income tax return extensions.
	Form 5500 series extended filing due date for plan years ended December 31.
	Minimum funding requirements for defined benefit (DB), money purchase plan (MPP), and target benefit plan years ended January 31.
	Note: The weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.
	DB Plan Funding Certification AFTAP is due for plan years ended January 31 to avoid certain plan level restrictions.
10/31	<b>DB Notification Deadline</b> for single-employer DB plans that are less than 60% funding or are 80% funded and have benefit restrictions to notify participants (by 10/31 or 30 days after the benefit restriction applies).
	Form 5500 series filing deadline without an extension for plan years ended March 31, or deadline to file form 5558 for an extended due date of January 15.
November	
11/15	Minimum funding requirements for defined benefit (DB), money purchase plan (MPP), and target benefit plan years ended February 28.
	Note: The weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.

Due Date	Action Items
November	
11/17	Kickoff for required minimum distribution (RMD) cases. Communications sent to plan sponsors regarding plan participants who will need an RMD.
	Deadline for 401(k) and other participant investment directed retirement plan accounts to provide fee disclosure and benefit statements to participants (45 days after end of the quarter). Lifetime income disclosures are required to be included on benefit statements at least annually, and could be included by this deadline for participant-directed plans.
	Form 5500 series extended filing due date for plan years ended January 31.
11/30	DB Plan Funding Certification AFTAP is due for plan years ended February 28 to avoid certain plan level restrictions.
December	
	3(16) fiduciaries confirm all notices have been mailed out. Please see your FuturePlan Consultant for additional information.
12/1	Form 5500 series filing deadline without an extension for plan years ended April 30, or deadline to file Form 5558 for an extended due date of February 16.
	Safe harbor contribution notices, automatic enrollment, and QDIA notices due for Safe Harbor Section 401(k)/403(b) safe harbor plans.
12/2	Last day to provide safe harbor and auto enrollment notices for the 2026 calendar plan year.
	Summary Annual Report due for qualified retirement plans if Form 5500 series is on extension.
12/15	September 30 plan year end 401(k) plans must process corrective distributions for failed ADP/ACP tests to avoid a 10% penalty tax.
	Minimum funding requirements for defined benefit (DB), money purchase plan (MPP), and target benefit plan years ended March 31.
	Note: The weekend/holiday rule permits additional time for filing, but it does not extend the time for making required minimum funding contributions.
	Form 5500 series extended filing due date for plan years ended February 28.
12/31	<b>Deadline for 401(k) plans to make corrective distributions</b> relating to the prior calendar plan year's failed ADP/ACP tests to avoid operational failures. Please note, a 10% excise tax may apply to such corrective distributions.
	Deadline for 401(k) plans correcting prior years' ADP/ACP test failures with Employer Qualified Non-Elective Contributions (QNEC).
	Deadline for electing to be a safe harbor 401(k) plan for the prior calendar plan year, assuming the plan sponsor agrees to at least a 4% non-elective safe harbor contribution.
	<b>Deadline for RMD processing.</b> There are no pre-death RMDs due from Roth accounts in DC qualified retirement plans. See your FuturePlan consultant for details and exceptions.
	Deadline for pension plan's enrolled actuary to calculate a specific funding adequacy calculation AFTAP, if a range AFTAP was previously issued.
	DB Plan Funding Certification AFTAP is due for plan years ended March 31 to avoid certain plan level restrictions.
	Finalize plan amendments for discretionary plan provisions that are generally changes applicable for the current calendar plan year.
	Form 5500 series filing deadline without an extension for plan years ended May 31, or deadline to file Form 5558 for an extended due date of March 16. DB pension plans must provide benefit statements every three years or an annual notice explaining how participants may obtain statements.
	Deadline to elect to reduce plan's carryover and/or prefunding balance as of January 1, 2025, by providing an irrevocable written notification to the plan's enrolled actuary and the plan administrator.

Due Date	Action Items
December	
	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.
<b>12/31</b> (cont.)	The deadline for adopting plan amendments made pursuant to SECURE 2.0 as well as the SECURE Act and CARES Act has generally been extended to <u>no later than</u> <u>December 31, 2026</u> (the deadline is further extended to December 31, 2028, for collectively bargained plans and to December 31, 2029, for governmental qualified plans and public school 403(b) plans).

#### **Important DB Plan Reminders:**

- Qualified plan freeze amendments must be completed prior to participants satisfying the conditions to accrue benefits for a plan year. Please work with your FuturePlan consultant to discuss requirements for your plan.
- DB plans subject to the Annual Funding Notice requirements are exempt from providing Summary Annual Reports. Note: The AFN has a different due date to distribute to participants than the SAR.

This material is for informational purposes only and is not intended to provide legal, tax, accounting, or investment advice. Consult with your own independent advisor for guidance on your specific issues or questions. This content reflects known information as of January 2025, but may be subject to change, and is not represented to be error-free.

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