

# RETIREMENT PLAN SPOTLIGHT

## Defined Contribution Retirement Plan | 2026 Compliance Calendar

### Calendar Plan Year and Calendar Employer Tax Year

Retirement plan sponsors are responsible for compliance with many ongoing reporting, disclosure and notice requirements. This Retirement Plan Compliance Calendar summarizes the major requirements that apply to Defined Contribution ("DC") plans for 2026. Due dates are based on a calendar plan year and are applicable to plans subject to the Employee Retirement Income Security Act of 1974 ("ERISA"). If you have questions regarding these requirements and their application to your plan(s), please contact your USI Consulting Group representative, visit our [Contact Us](#) page or reach out to us at [information@usicg.com](mailto:information@usicg.com).

Month	Requirement	Due Date	Status
<b>JANUARY</b>	<b>Review 2026 Plan limits:</b> Adhere to IRS dollar limitations on benefits and contributions.	<b>January 1 - December 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 1099-R:</b> Last day to furnish Form 1099-R to recipients of distributions and/or deemed distributions in 2025.	<b>January 31*</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
<b>FEBRUARY</b>	<b>Form 945:</b> Last day to file Form 945 to report federal income tax withheld from distributions in 2025 (Form 945 is due January 31 if 2025 tax deposits were not made on time in full).	<b>February 10</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Fourth quarter 2025 benefit statement and fee disclosure:</b> Last day to furnish fourth quarter 2025 benefit statement and fee disclosure to a participant or beneficiary in an individual account plan that permits participant investment direction.	<b>February 14</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 1096 with Form 1099-R:</b> Last day to file Form 1096 and Form 1099-R on paper with the IRS for prior year distributions and/or deemed distributions.	<b>February 28*</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
<b>MARCH</b>	<b>Excess contributions:</b> Last day to refund excess contributions (for failed ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (for failed ACP test) for 2025 to avoid 10% excise tax (unless plan is an EACA).	<b>March 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Application for Waiver for Minimum Funding Standard:</b> Application for Waiver for Minimum Funding Standard due for Money Purchase plans, where applicable (due no later than the 15th day of the 3rd month after the close of the plan year for which the waiver is requested).	<b>March 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Employer contributions:</b> Last day for S-corporation and partnership employer plan sponsors to make deductible contributions for 2025 (For plan sponsor's with a tax year ending December 31, without tax extension).	<b>March 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 1096 with Form 1099-R:</b> Last day to file Form 1099-R on paper with extension, or electronically with the IRS for prior year distributions and/or deemed distributions.	<b>March 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 5330:</b> Last day without extension (unextended deadline) to file Form 5330 and pay excise tax on 2024 plan year excess contributions or excess aggregate contributions where excess amounts not distributed (or forfeited) on time.	<b>March 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A

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APRIL	<b>Required Beginning Date:</b> Required Beginning Date (RBD) for taking first Required Minimum Distribution (RMD) under IRC Section 401(a) (9) for participants who attained age 73 or who retired after age 73 in prior year.**	April 1	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Excess contributions:</b> Last day to distribute excess deferrals in excess of 402(g) dollar limits for 2025 (in excess of \$23,500 or \$31,000 if catch-up eligible) to applicable participants.	April 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 1120:</b> Last day for C-corporation employer plan sponsors to make deductible contributions for 2025 and file Form 1120 (For plan sponsors with a tax year ending December 31, without a corporate tax return extension).	April 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 1099-R:</b> Last day to file form 1099-R with the IRS electronically with extension.	April 30	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
MAY	<b>First quarter 2026 benefit statement and fee disclosure:</b> Last day to furnish first quarter 2026 benefit statement and fee disclosure to a participant or beneficiary in an individual account plan that permits participant investment direction.	May 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
JUNE	<b>Excess contributions:</b> Last day for EACA plans to refund excess contributions (failed ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (failed ACP test) for 2025 to avoid 10% excise tax.	June 30	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
JULY	<b>Summary of Material Modifications:</b> Last day to furnish Summary of Material Modifications (SMM), or an updated SPD to participants and beneficiaries receiving benefits (due no later than 210 days after the end of the plan year in which the plan change is adopted).	July 29	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 5500:</b> Last day to file Form 5500 for 2025 without extension (due seven months after plan year ending December 31, unless extension applies).	July 31	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 8955-SSA:</b> Last day to file Form 8955-SSA without extension (report certain information relating to each participant with a deferred vested benefit).	July 31	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Notice to terminated vested participants:</b> Last day to provide a notice to terminated vested participants describing deferred vested retirement benefits (in conjunction with Form 8955-SSA).	July 31	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 5558:</b> Last day to file Form 5558 - Application for Extension of Time to File Certain Employee Plan Returns (Form 5500) (due on or before normal due date for filing Form 5500).	July 31	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Annual benefit statement:</b> Last day without 5500 extension to furnish annual benefit statement to a participant or beneficiary in an individual account plan that does not provide for participant investment direction.	July 31 (or the day Form 5500 is filed, if earlier)	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 5330:</b> Last day without extension to file Form 5330 and pay excise tax on nondeductible contributions. For example, late deposits of employee deferrals, prohibited transactions, certain employee stock ownership plan dispositions, and certain prohibited allocations of qualified securities by and ESOP (if applicable).	July 31	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
AUGUST	<b>Second quarter 2026 benefit statement and fee disclosure:</b> Last day to furnish second quarter 2026 benefit statement and fee disclosure to a participant or beneficiary in an individual account plan that permits participant investment direction.	August 14	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
SEPTEMBER	<b>Minimum funding requirement:</b> Last day to pay balance of remaining required contributions for 2025 plan year to satisfy minimum funding requirements for plans subject to minimum funding requirements such as money purchase pension and target benefit plans (due 8 1/2 months after end of Plan Year).	September 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A

Month	Requirement	Due Date	Status
SEPTEMBER	<b>Employer contributions:</b> Extended deadline for employer's taxed as S corporations and partnerships to make deductible contributions.	September 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Summary Annual Report:</b> Last day to furnish Summary Annual Report for 2025 plan year to participants and beneficiaries if an extension to file Form 5500 was not obtained (9 months after year-end or 2 months after filing Form 5500).	September 30	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
OCTOBER	<b>Safe Harbor Notice:</b> Distribute Annual 401(k) Plan Safe Harbor Notice (No more than 90 days and at least 30 days prior to the beginning of the 2027 plan year). Provide notice to eligible employees.	October 2 (through December 1)	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Qualified Default Investment Alternative Notice:</b> Distribute Qualified Default Investment Alternative (QDIA) Notice (No more than 90 days and at least 30 days prior to the beginning of the 2027 plan year). Provide annual notice to all participants (including alternate payees and beneficiaries) to inform of their rights to direct investments and how their accounts will be invested if they do not direct investments.	October 2 (through December 1)	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Annual Automatic Enrollment Notice:</b> Distribute Annual Automatic Enrollment Notice (No more than 90 days and at least 30 days prior to the beginning of the 2027 plan year). Provide annual notice to all eligible employees (can be combined with QDIA notice).	October 2 (through December 1)	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>403(b) Annual Contribution Notice:</b> 403(b) Annual Contribution Notice (No more than 90 days and at least 30 days prior to the beginning of the 2027 plan year). Provide annual notice to all eligible employees.	October 2 (through December 1)	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 5500 with Form 5558:</b> Last day to file Form 5500 with Form 5558 filing extension. This is a 2 1/2 month extension if Form 5558 was filed timely.	October 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 8955-SSA with Form 5558:</b> Last day to file Form 8955-SSA with Form 5558 filing extension. This is a 2 1/2 month extension if Form 5558 was filed timely.	October 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Notice to terminated vested participants:</b> Last day to provide a notice to terminated vested participants describing deferred vested retirement benefits in conjunction with Form 8955-SSA.	October 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Form 5310-A:</b> Last day to give notice to IRS of Qualified Separate Lines of Business (QSLOB), where applicable (Form 5310-A).	October 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Annual benefit statement:</b> Last day with 5500 extension to furnish annual benefit statement to a participant or beneficiary in an individual account plan that does not provide for participant investment direction.	October 15 (or the day Form 5500 is filed, if earlier)	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Retroactive corrective plan amendment:</b> Last day to adopt and implement retroactive corrective plan amendment to correct 2025 410(b) coverage or 401(a)(4) nondiscrimination failures (9 1/2 months after close of Plan Year).	October 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Employer contributions:</b> Extended deadline for employers taxed as C corporations to make deductible contributions.	October 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Lifetime Income Disclosure notice:</b> Last day to provide Lifetime Income Disclosure for individual account plans that do not provide for participant directed investments for calendar year plans. (no later than the second quarterly statement sent to participants).	October 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A

Month	Requirement	Due Date	Status
NOVEMBER	<b>Third quarter 2026 benefit statement and fee disclosure:</b> Last day to furnish third quarter 2026 benefit statement and fee disclosure to a participant or beneficiary in an individual account plan that permits participant investment direction.	November 14	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
DECEMBER	<b>Annual participant notices:</b> Last day to provide annual participant notices [safe harbor, automatic enrollment, QDIA, 403(b)] (see above notice requirements in October).	December 1	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Summary Annual Report:</b> Last day with 5500 extension to furnish Summary Annual Report for 2025 plan year.	December 15	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Excess contributions:</b> Last day to refund excess contributions (failed ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (failed ACP test) for the 2025 plan year with 10% excise tax.	December 31	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Required Minimum Distributions:</b> Last day to make Required Minimum Distributions (RMD) to applicable participants for distribution calendar years other than for the first distribution calendar year.	December 31	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Discretionary plan amendments:</b> Last day for plan sponsors to adopt discretionary plan amendments that became effective during the current plan year.	December 31	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	<b>Last day of the Plan Year:</b> Review the Plan Forfeiture Account. Allocate Forfeiture accounts. Review the plan document regarding the allocation of Forfeiture monies.	December 31	<input type="checkbox"/> Complete <input type="checkbox"/> N/A

## Participant Disclosures

**Initial Participant Fee Disclosure.** Provide initial fee disclosure to newly eligible participants must be provided on or before the date the participant can first direct their investments.

**Annual Participant Fee Disclosure.** Provide annual fee disclosure to active participants. Annual notice is required to be provided to participants within 14 months of the prior year notice.

**Quarterly Participant Fee Disclosure.** Provide fee disclosure to active participants at least quarterly (every calendar quarter).

**Disclosure of any change in fees.** Provide disclosure of any change in fees to participants (as required) at least 30 days, but no more than 90 days prior to the effective date of the change.

**Lifetime Income Disclosure.** To comply with the SECURE Act, lifetime income illustrations must be provided to participants in one benefit statement annually.

\* IRS deadline extended to the next business day if due date falls on weekend or legal holiday (Internal Revenue Code Section 7503).

\*\* Under the SECURE 2.0 Act, the RMD age has changed from 72 to 73 for anyone who did not attain age 72 by December 31, 2022. For these individuals, their RBD is April 1 of the calendar year following the later of the year in which the individual attains age 73 or retires. Like before, 5% owners must begin their RMDs once they attain age 73, even if they continue working.

Connect with us today | [information@usicg.com](mailto:information@usicg.com) | 860.633.5283 | [usicg.com](http://usicg.com) | 

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