

2025 key administrative dates and deadlines for calendar-year defined contribution retirement plans

Subject to ERISA and the Internal Revenue Code



JANUARY

- 1/31
 - Form 1099-R or 8809
 - Forms W-2, W-3, 8809
 - Form 5330 (if extended)
 - Form 945

FEBRUARY

- 2/10
 - Form 945 (alternative date)
- 2/14
 - Quarterly benefit statements
- 2/28
 - Form 1099-R and 1096 (paper) or 8809

MARCH

- 3/15
 - Corrective distributions for failed ADP/ACP tests
 - Employer contribution due (S-corps, partnerships w/ FYE 12/31)
 - Money purchase plan minimum funding waiver
- 3/17
 - Form 1042, Form 1042-S *
 - Form 1065 or 7004 *
- 3/31
 - Form 1099-R and 1096 (paper, with extension) *
 - Form 1099-R (electronic) or 8809
 - Form 5330

APRIL

- 4/1
 - Required Minimum Distributions (RMD)
- 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 direction)
 - Form 5500 or 5558
 - Form 8955-SSA or 5558

JULY (CONTINUED)

- 7/31
 - Notice to Terminated Vested Employees
 - Form 5330 or 8868

AUGUST

- 8/14
 - Quarterly Benefit Statements

SEPTEMBER

- 9/15
 - Deductible Contributions for partnerships
 - Money Purchase Plan Contributions
 - Form 5500 for partnerships
- 9/30
 - Summary Annual Report for non-PBGC-covered plans

OCTOBER

- 10/3
 - Automatic Enrollment Notices
 - Safe Harbor Notices
- 10/15
 - Annual Benefit Statements (no participant direction)
 - Corrective Plan Amendment
 - Form 1120 (Deductible Contributions)
 - Form 5500 (if extended)
 - Form 8955-SSA (if extended)
 - Notice to Terminated Vested Employees (if Form 5500 extended)

NOVEMBER

- 11/14
 - Quarterly Benefit Statements
- 11/15
 - Summary Annual Report
- 11/17
 - Employer Contributions, Form 990 *

DECEMBER

- 12/1
 - Automatic Enrollment notices
- 12/2
 - QDIA Notices
 - Safe Harbor Notices
- 12/15
 - Summary Annual Report for non-PBGC covered plans
- 12/31
 - Corrective Distributions and QNECs
 - Discretionary Plan Amendments
 - Participant Notices
 - Remove Safe Harbor Amendments
 - Required Minimum Distributions (RMD)
 - Safe Harbor, QACA, or EACA Elections

* The date reflected is the next business day following a filing date of an IRS or U.S. Department of Labor (DOL) 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 2025 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.

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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
1/31	Form 1099-R or 8809	Provide IRS Form 1099-R to recipients of 2024 distributions unless a 30-day extension request on Form 8809 is filed.
1/31	Forms W-2, W-3, 8809	Send 2024 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.
1/31	Form 5330 (if extended)	File IRS Form 5330 to report and pay excise taxes on 2023 prohibited transactions and nondeductible contributions, if the due date was extended by IRS Form 8868.
1/31	Form 945	File IRS Form 945 to report income tax withheld from 2024 distributions.
2/10	Form 945 (alternative date)	File IRS Form 945, if the withholding taxes on 2024 distributions were paid in full.
2/14	Quarterly Benefit Statements	Distribute fourth quarter 2024 benefit statement to participants, if individual account plan gives participants the right to direct their investments.
2/28	Form 1099-R and 1096 (paper) or 8809	File Copy A of 2024 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, 2024, plan year-end ADP/ACP test to affected highly compensated employees (HCEs).
3/15	Employer contribution due (S-corps, partnerships w/ FYE 12/31)	Deadline to make a deductible contribution for S-corporations and partnerships with a December 31 fiscal year-end (FYE) with no corporate tax extension.
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 2024 plan year.
3/17 *	Form 1042, Form 1042-S	File IRS Form 1042 and 1042-S, respectively, for income tax withheld from 2024 distributions made to nonresident aliens and retirement plan distributions made to nonresident aliens.
3/17 *	Form 1065 or 7004	File IRS 2024 Form 1065 partnership tax return and make employer contributions, or file IRS Form 7004 to obtain a six-month extension.
3/31 *	Form 1099-R and 1096 (paper, with extension)	Transmit paper copies of 2024 Form 1099-R to IRS using Form 1096 if deadline was extended by Form 8809.
3/31	Form 1099-R (electronic) or 8809	File 2024 IRS Form 1099-R electronically, unless a 30-day extension on Form 8809 is filed.
3/31	Form 5330	File IRS Form 5330 and pay excise taxes for December 31, 2023, plan year-end ADP/ACP refunds returned after March 15, 2024.
4/1	Required Minimum Distributions (RMDs)	Deadline to make the first required minimum distribution (RMD) in 2025 to participants who continued to work past their RMD age and terminated or retired in 2024.
4/15	Excess Deferrals and Allocable Income	Send participant refunds of any 2024 excess §401(k), §403(b), and §457(b) plan deferrals and allocable income.
4/15	Form 1120 or 7004 (Deductible Contributions)	File IRS Form 1120 corporate tax return, or Form 7004, to obtain a six-month extension.
4/30	Form 1099-R (electronic, with extension)	Transmit 2024 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 2024 tax-exempt organization information return, or file IRS Form 8868 for extension to file 2024 IRS Form 990.

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DATE	ITEM	ACTION
5/15	Quarterly Benefit Statements	Distribute first-quarter 2025 benefit statements to participants, if individual account plan gives participants the right to direct their investments.
6/30	Corrective distribution for failed ADP/ACP tests (EACAs)	If the plan includes an EACA covering all participants, distribute corrective distributions for a failed December 31, 2024, 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 adopted by December 31, 2024, unless the information was included in an updated Summary Plan Description distributed on time.
7/31	Annual Benefit Statements (no participant direction)	Distribute 2024 annual benefit statements to individual account plan participants who do not have the right to direct their investments by the Form 5500 due date (not extended).
7/31	Form 5500 or 5558	File 2024 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 2024 IRS Form 8955-SSA showing their account balance.
7/31	Form 5330 or 8868	File IRS Form 5330 to report and pay excise taxes on 2024 prohibited transactions and nondeductible contributions, unless the due date was extended by IRS Form 8868.
8/14	Quarterly Benefit Statements	Distribute second-quarter 2025 benefit statement to participants, if individual account plan gives participants the right to direct their investments.
9/15	Deductible Contributions for partnerships	Deadline to file Form 1065 for partnership employers and make 2024 plan year contributions if IRS Form 7004 was filed.
9/15	Money Purchase Plan Contributions	Deadline to make required employer contributions to money purchase plans for the 2024 plan year.
9/15	Form 5500 for partnerships	For partnership employers, file 2024 Form 5500, if IRS Form 7004 was filed.
9/30	Summary Annual Report for non-PBGC covered plans	Distribute to participants the 2024 Summary Annual Report (SAR), unless the filing of 2024 Form 5500 is extended by IRS Form 5558.
10/3	Automatic Enrollment Notices	Earliest date to provide to participants §401(k) or §403(b) annual automatic enrollment notices for the 2025 plan year for plans with automatic contribution arrangements.
10/3	Safe Harbor Notices	Earliest date to provide to participants §401(k) or §403(b) plan safe harbor notices.
10/15	Annual Benefit Statements (no participant direction)	Distribute 2024 annual benefit statements to individual account plan participants who do not have the right to direct their investments by the Form 5500 due date (if extended).
10/15	Corrective Plan Amendment	Deadline to adopt a retroactive corrective plan amendment(s) for 2024 plan failures.
10/15	Form 1120 (Deductible Contributions)	Deadline for 2024 plan year deductible contributions if an extension request IRS Form 7004 was filed.
10/15	Form 5500 (if extended)	File 2024 Form 5500, if the due date was extended by IRS Form 5558.
10/15	Form 8955-SSA (if extended)	File 2024 IRS Form 8955-SSA, if the due date was extended by an IRS Form 5558.
10/15	Notice to Terminated Vested Employees (if Form 5500 extended)	Provide a notice to terminated vested employees who were reported on 2024 IRS Form 8955-SSA showing their account balance if the Form 5500 was extended.

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DATE	ITEM	ACTION
11/14	Quarterly Benefit Statements	Distribute third-quarter 2025 benefit statement to participants, if individual account plan gives participants the right to direct their investments.
11/15	Summary Annual Report	For partnerships, distribute 2024 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.
11/17 *	Employer Contributions, Form 990	File IRS 2024 tax-exempt organization information return if the Form 990 filing date was extended by Form 8868.
12/1	Automatic Enrollment Notices	Deadline to provide to participants §401(k) or §403(b) annual automatic enrollment notices for the 2025 plan year for plans with automatic contribution arrangements.
12/2	QDIA Notices	Deadline to send QDIA notices to participants for the 2025 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 2025 plan year.
12/15	Summary Annual Report for non-PBGC covered plans	Distribute to participants the 2024 SAR, if 2024 Form 5500 due date was extended by IRS Form 5558.
12/31	Corrective Distributions and QNECs	Deadline to process corrective distributions to correct a failed December 31, 2024, ADP/ACP test for excess 401(k)/(m) plan contributions. Deadline to make a qualified nonelective contribution (QNEC) to cure a failed December 31, 2024, "current year method" ADP/ACP test.
12/31	Discretionary Plan Amendments	Adopt discretionary changes implemented during 2025.
12/31	Participant Notices	Provide notices to participants, if applicable, about individual account plans that allow participant-directed investments
12/31	Remove Safe Harbor Amendments	Deadline to amend plan to remove an existing safe harbor plan feature for 2025.
12/31	Required Minimum Distributions (RMDs)	Deadline to make recurring RMDs to participants.
12/31	Safe Harbor, QACA, or EACA Elections	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.

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NAMES OF FORMS

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

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Milliman leverages deep expertise, actuarial rigor, and advanced technology to develop solutions for a world at risk. We help clients in the public and private sectors navigate urgent, complex challenges—from extreme weather and market volatility to financial insecurity and rising health costs—so they can meet their business, financial, and social objectives. Our solutions encompass insurance, financial services, healthcare, life sciences, and employee benefits. Founded in 1947, Milliman is an independent firm with offices in major cities around the globe.

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