

2025 key administrative dates and deadlines for calendar-year multiemployer defined benefit plans

Subject to ERISA and the Internal Revenue Code

Important note for 2025: The Bipartisan Budget Act of 2015 accelerated the PBGC premium due date to September 15 for the 2025 plan year. The premium due date will return to October 15 in 2026.



JANUARY

- 1/1
 - Automatic employer surcharge
- 1/31
 - Form 1099-R or 8809
 - Forms W-2, W-3, 8809
 - Required Minimum Distributions (RMDs)
 - Form 5330 (if extended)
 - Form 945

FEBRUARY

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

MARCH

- 3/1
 - Notice of Request for Extension of Amortization Period
- 3/15
 - Request for an Extension of Amortization Period
- 3/31
 - Form 1099-R and 1096 (paper, with extension) *
 - Form 1099-R (electronic) or 8809
 - SFA annual statement of compliance
 - Form 15315 Zone Certification

APRIL

- 4/1
 - Required Minimum Distributions (RMDs)
- 4/30
 - Large plan annual funding notice
 - Notice of Endangered or Critical Status
 - Notice of Special Green Status
 - Notice of Projected Critical Status
 - Form 1099-R (electronic, with extension)

MAY

JUNE

JULY

- 7/29
 - Summary of Material Modifications
- 7/31
 - Form 5500 or 5558
 - Form 8955-SSA or 5558
 - Notice to Terminated Vested Employees
 - Small plan annual funding notice
 - Form 5330 or 8868

AUGUST

- 8/30
 - Summary Report of Multiemployer Plan

SEPTEMBER

- 9/15
 - PBGC Comprehensive Premium Filing**

OCTOBER

- 10/15
 - Form 5500 (if extended)
 - Form 8955-SSA (if extended)
 - Notice to Terminated Vested Employees (if Form 5500 extended)
 - Small plan annual funding notice alternative (if Form 5500 extended)

NOVEMBER

- 11/14
 - Summary Report of Multiemployer Plan (if Form 5500 extended)
- 11/26
 - Funding improvement plan (FIP) or rehabilitation plan (RP) adoption, initial year

DECEMBER

- 12/26
 - FIP or RP sent to bargaining parties (initial year)
- 12/31
 - Annual benefit statement availability notice

ANNUALLY

- Review and update if necessary FIP or RP (after initial year)

* The date reflected is the next business day following a filing date of an IRS, U.S. Department of Labor (DOL), or Pension Benefit Guaranty Corporation (PBGC) 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 Multiemployer 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.

2025 key administrative dates and deadlines for calendar-year multiemployer (ME) defined benefit plans

Subject to ERISA and the Internal Revenue Code

DATE	ITEM	ACTION
1/1	Automatic employer surcharge	10% contribution surcharges on employer contributions apply to plans first certified critical in 2024 if employer has not adopted the rehabilitation plan.
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	Required Minimum Distributions (RMDs)	For participants who previously commenced required minimum distributions (RMDs), payments are increased to reflect additional benefits that accrued in 2024.
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	Triennial benefit statement	For plans that last provided the triennial benefit statement for the 2019-2021 period, provide the Pension Protection Act (PPA) triennial benefit statements to participants for the 2022-2024 period. Statements are due 45 days after the end of the prior plan year in written, electronic, or any other appropriate form that is accessible to participants.
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.
3/1	Notice of Request for Extension of Amortization Period	Earliest date of the 14-day advance period to notify plan participants, beneficiaries, alternate payees, employee organizations, and the PBGC of a planned application for an extension of amortization charge bases.
3/15	Request for an Extension of Amortization Period	Deadline to request from the IRS an extension of amortization charge bases as of January 1, 2024.
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	SFA annual statement of compliance	Plans that received special financial assistance (SFA) must submit this annual statement through the last day of the plan year ending in 2051. No submission is required for 2025 if the plan received SFA after May 31, 2024.
3/31	Form 15315 Zone Certification	Deadline for the plan’s enrolled actuary to file Form 15315 to the IRS and provide plan trustees the actuarial certification of the plan’s 2025 zone status and, if applicable, the progress toward a previously adopted funding improvement plan or rehabilitation plan.
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.
4/30	Large plan annual funding notice	Provide the 2024 annual funding notice (AFN) to participants, beneficiaries, labor organizations representing participants and beneficiaries, participating employers, and the PBGC.
4/30	Notice of Endangered or Critical Status	If the plan’s 2025 zone certification is endangered or critical (or critical and declining), then participants, beneficiaries, participating unions, contributing employers, the PBGC, and the U.S. Department of Labor (DOL) must be notified not later than 30 days after the certification date.
4/30	Notice of Special Green Status	If the plan’s 2025 zone certification is “green” under IRC Section 432(b)(5), notify bargaining parties and the PBGC.

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

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

The Milliman 2025 Multiemployer 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.

2025 key administrative dates and deadlines for calendar-year multiemployer (ME) defined benefit plans

Subject to ERISA and the Internal Revenue Code

DATE	ITEM	ACTION
4/30	Notice of Projected Critical Status	If the plan's 2025 zone certification is not critical for 2025 but is projected to be critical in any of the succeeding five plan years, then notify the bargaining parties, the PBGC, and the DOL of an election to be in critical in 2025 or notify the PBGC if the plan sponsor does not elect to be critical in 2025 not later than 30 days after the certification date.
4/30	Form 1099-R (electronic, with extension)	Transmit 2024 IRS Form 1099-R electronically if the deadline was extended by Form 8809.
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	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. If the Form 5500 is filed, then the Form 5500 and Schedule MB with attachments must also be posted electronically if the plan sponsor has an intranet site (or website maintained by the plan administrator on behalf of the plan sponsor).
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 vested accrued benefit.
7/31	Small plan annual funding notice	Provide 2024 annual funding notice (AFN) to participants, beneficiaries, labor organizations representing participants and beneficiaries, participating employers, and the PBGC.
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.
8/30	Summary Report of Multiemployer Plan	Provide an ERISA §104(d) notice summarizing certain information reported on the 2024 Form 5500 to participating unions and contributing employers if the Form 5500 was filed without applying for an extension.
9/15	PBGC Comprehensive Premium Filing	File 2025 PBGC Comprehensive Premium Filing and pay the flat-rate premium. The Bipartisan Budget Act of 2015 accelerated the premium due date by one month for the 2025 plan year. The premium due date will return to October 15 in 2026.
10/15	Form 5500 (if extended)	File 2024 Form 5500, if the due date was extended by IRS Form 5558. If the Form 5500 is filed, then the Form 5500 and Schedule MB with attachments must also be posted electronically if the plan sponsor has an intranet site (or website maintained by the plan administrator on behalf of the plan sponsor).
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 vested accrued benefit if the Form 5500 was extended.
10/15	Small plan annual funding notice alternative (if Form 5500 extended)	Provide 2024 annual funding notice (AFN) to participants, beneficiaries, labor organizations representing participants and beneficiaries, participating employers, and the PBGC if Form 5500 filing date was extended.
11/14	Summary Report of Multiemployer Plan (if Form 5500 extended)	Provide an ERISA §104(d) notice summarizing certain information reported on the 2024 Form 5500 to participating unions and contributing employers if the due date was extended by IRS Form 5558.
11/26	Funding improvement plan (FIP) or rehabilitation plan (RP) adoption, initial year	Deadline to adopt a funding improvement plan or rehabilitation plan if the 2025 zone certification first certified the plan's zone status as endangered, critical, or critical and declining.

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

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

The Milliman 2025 Multiemployer 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.

2025 key administrative dates and deadlines for calendar-year multiemployer (ME) defined benefit plans

Subject to ERISA and the Internal Revenue Code

DATE	ITEM	ACTION
12/26	FIP or RP sent to bargaining parties (initial year)	If the plan's 2025 zone certification first certified the plan's zone status as endangered, critical, or critical and declining, provide participating unions and contributing employers a schedule showing revised benefit and/or contribution structures under the funding improvement plan (FIP) or rehabilitation plan (RP) within 30 days of the trustees' adoption of the FIP or RP.
12/31	Annual benefit statement availability notice	Provide an annual notice to participants about the availability of and means to obtain a pension benefit statement, if alternative notification approach will be used.
Annual	Review and update if necessary FIP or RP (after initial year)	After the initial year, and while the plan remains in endangered or critical status, review and update (if necessary) the plan's funding improvement plan or rehabilitation plan.

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

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

The Milliman 2025 Multiemployer 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.

NAMES OF FORMS

IRS FORM NUMBER	FORM NAME
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 5330	Return of Excise Taxes Related to Employee Benefit Plans
Form 5500	Annual Return/Report of Employee Benefit Plan
Form 5500 Schedule MB	Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information
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 15315	Annual Certification for Multiemployer Defined Benefit Plans
Form W-2	Wage and Tax Statement
Form W-3	Transmittal of Wage and Tax Statement

Solutions for a world at risk™

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.

milliman.com

