

2025 key administrative dates and deadlines for calendar-year single-employer 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

- 1/15 ▪ Final quarterly contribution for prior plan year
- 1/27 ▪ PBGC Form 200 *
- 1/31 ▪ Form 1099-R or 8809 ▪ Form 5330 (if extended)
 - Forms W-2, W-3, 8809 ▪ Form 945
 - Required Minimum Distributions (RMDs)

FEBRUARY

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

MARCH

- 3/1 ▪ Notice of Minimum Funding Standard Waiver Application
- 3/15 ▪ Minimum Funding Standard Waiver
- 3/17 ▪ Form 1042, Form 1042-S *
- 3/31 ▪ Form 1099-R and 1096 (paper, with extension) *
 - Form 1099-R (electronic) or 8809
 - AFTAP Certification

APRIL

- 4/1 ▪ Summary Plan Description
 - Benefit restrictions commence
 - Required Minimum Distributions (RMDs)
- 4/15 ▪ Quarterly contribution
 - PBGC Form 4010
- 4/25 ▪ PBGC Form 200
- 4/30 ▪ Large plan annual funding notice
 - Form 1099-R (electronic, with extension)

MAY

- 5/1 ▪ Notice of funding-based limitation
- 5/15 ▪ PBGC Form 10

JUNE

- 6/1 ▪ Request to use substitute mortality tables

JULY

- 7/15 ▪ Quarterly contribution
- 7/25 ▪ PBGC Form 200
- 7/29 ▪ Summary of Material Modifications
- 7/31 ▪ Form 5500 or 5558 ▪ Small plan annual funding notice
 - Form 8955-SSA or 5558 ▪ Form 5330 or 8868
 - Notice to Terminated Vested Employees

AUGUST

- 8/14 ▪ PBGC Form 10

SEPTEMBER

- 9/15 ▪ Credit balance election
 - Minimum funding contribution
 - **PBGC Comprehensive Premium Filing**
- 9/25 ▪ PBGC Form 200
- 9/30 ▪ AFTAP certification
 - Summary Annual Report for non-PBGC covered plans

OCTOBER

- 10/1 ▪ AFTAP-triggered benefit restrictions
- 10/15 ▪ Quarterly contribution ▪ Notice to Terminated Vested Employees (if Form 5500 extended)
 - Corrective Plan Amendment
 - Form 5500 (if extended) ▪ Small plan annual funding notice alternative (if Form 5500 extended)
 - Form 8955-SSA (if extended) ▪ PBGC Form 10
- 10/27 ▪ PBGC Form 200 *
- 10/31 ▪ Notice of funding-based limitation

NOVEMBER

- 11/14 ▪ PBGC Form 10

DECEMBER

- 12/15 ▪ Summary Annual Report for non-PBGC covered plans
- 12/31 ▪ AFTAP "range" certification expiration
 - Annual benefit statement availability notice
 - Election to reduce credit balance
 - Revocation of credit balance election

* The date reflected is either the business day prior to or 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 single-employer defined benefit 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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DATE	ITEM	ACTION
1/15	Final quarterly contribution for prior plan year	Due date for fourth required quarterly contribution for plan year 2024; cash contributions or a signed election to use available carryover and/or prefunding balances.
1/27 *	PBGC Form 200	File Pension Benefit Guaranty Corporation (PBGC) Form 200 if plan sponsor failed to make the January 15, 2025, required contribution that resulted in more than \$1 million in cumulative unpaid contributions.
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	PBGC Form 10	File PBGC Form 10 if the January 15, 2025, required quarterly contribution was missed, unless PBGC Form 200 was already filed or a waiver applies.
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 Minimum Funding Standard Waiver Application	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 a waiver of the 2024 minimum funding requirement.
3/15	Minimum Funding Standard Waiver	Deadline to apply for a waiver of 2024 minimum funding standard, if sponsor will be unable to make the 2024 required contribution and will meet the conditions to qualify for a funding waiver.
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.
3/31 *	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	AFTAP Certification	If the 2025 adjusted funding target attainment percentage (AFTAP) is not certified by March 31, 2025, then the 2024 AFTAP minus 10 percentage points is deemed to apply for purposes of triggering Internal Revenue Code (IRC) section 436 benefit restrictions beginning April 1, 2025 (assuming such a reduction results in the imposition of benefit restrictions), and until a subsequent certification determines that the plan’s funded ratio is sufficient to remove the benefit restrictions.
4/1	Summary Plan Description	Deadline to provide an SPD to an individual who became a plan participant on January 1, 2025; otherwise within 90 days of a participant becoming covered by the plan.
4/1	Benefit restrictions commence	Benefit restrictions commence (if the March 31, 2025, AFTAP trigger is less than 80%).
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.

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4/15	Quarterly contribution	Due date for first required quarterly contribution for plan year 2025; cash contributions or a signed election to use available carryover and/or prefunding balances.
4/15	PBGC Form 4010	For employers with calendar-year fiscal years, file PBGC Form 4010 if plan or member of its controlled group meets the “gateway” test for 2024, unless an exception applies.
4/25	PBGC Form 200	File PBGC Form 200, if plan sponsor failed to make an April 15, 2025, required contribution on time that resulted in more than \$1 million in cumulative unpaid contributions.
4/30	Large plan annual funding notice	Provide the 2024 annual funding notice (AFN) to participants, beneficiaries, labor organizations representing participants and beneficiaries, and the PBGC. A notice to the PBGC is not required if plan has less than \$50 million in underfunding.
4/30	Form 1099-R (electronic, with extension)	Transmit 2024 IRS Form 1099-R electronically if the deadline was extended by Form 8809.
5/1	Notice of funding-based limitation	Provide a notice of IRC section 436 benefit restrictions to plan participants if the 2025-certified AFTAP or deemed AFTAP is less than 80% as of April 1, 2025, and notice was not previously provided.
5/15	PBGC Form 10	File PBGC Form 10 if the April 15, 2025, required quarterly contribution was missed, unless PBGC Form 200 was already filed or a waiver applies.
6/1	Request to use substitute mortality tables	Deadline for plan sponsors to submit IRS request to begin using substitute mortality tables for plan year 2026.
7/15	Quarterly Contribution	Due date for second required quarterly contribution for plan year 2025; cash contributions or a signed election to use available carryover and/or prefunding balances.
7/25	PBGC Form 200	File PBGC Form 200, if plan sponsor failed to make a July 15, 2025, required contribution on time, which resulted in more than \$1 million in cumulative unpaid contributions.
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 SB with attachments must also be posted electronically if the plan sponsor has an intranet site.
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, and the PBGC. A notice to the PBGC is not required if the plan has less than \$50 million in underfunding.
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	PBGC Form 10	File PBGC Form 10 if the July 15, 2025, required quarterly contribution was missed, unless PBGC Form 200 was already filed or a waiver applies.
9/15	Credit balance election	Deadline to elect to add to the 2025 prefunding balance or to use the plan’s carryover and/or prefunding balance to offset the minimum required contribution for 2024 by providing an irrevocable written notification to the plan’s enrolled actuary and plan administrator.
9/15	Minimum funding contribution	Due date to make a final contribution to satisfy the plan year 2024 minimum funding requirement or to make any contribution to be included on the 2024 Schedule SB.
9/15	PBGC Comprehensive Premium Filing	File 2025 PBGC Comprehensive Premium Filing and pay the flat-rate and variable-rate premiums. 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.

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9/25	PBGC Form 200	File PBGC Form 200, if plan sponsor failed to make a September 15, 2025, required contribution that resulted in more than \$1 million in cumulative unpaid contributions.
9/30	AFTAP certification	Deadline for completion of the actuarial valuation and certification of the final plan year 2025 AFTAP, unless the 2025 AFTAP was “range”-certified. If the AFTAP is not certified by this date, the AFTAP is deemed to be less than 60% for the remainder of plan year 2025, and until a subsequent certification determines that the plan’s funded ratio is sufficient to remove the benefit restrictions.
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.
10/1	AFTAP-triggered benefit restrictions	Commence IRC section 436 benefit restrictions if plan’s certified or deemed 2025 AFTAP as of September 30, 2025, is less than 80%.
10/15	Quarterly contribution	Due date for third required quarterly contribution for plan year 2025; cash contributions or a signed election to use available carryover and/or prefunding balances.
10/15	Corrective Plan Amendment	Deadline to adopt a retroactive corrective plan amendment(s) for 2024 plan failures.
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 SB with attachments must also be posted electronically if the plan sponsor has an intranet site.
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, and the PBGC if Form 5500 filing date was extended. A notice to the PBGC is not required if the plan has less than \$50 million in underfunding.
10/15	PBGC Form 10	File PBGC Form 10 if the September 15, 2025, final contribution for plan year 2024 was missed, unless PBGC Form 200 was already filed or a waiver applies.
10/27 *	PBGC Form 200	File PBGC Form 200, if plan sponsor failed to make an October 15, 2025, required contribution on time that resulted in more than \$1 million in cumulative unpaid contributions.
10/31	Notice of funding-based limitation	Provide a notice of IRC section 436 benefit restrictions to plan participants, if the September 30, 2025, certified or deemed AFTAP is less than 80% and notice was not previously provided.
11/14	PBGC Form 10	File PBGC Form 10 if October 15, 2025, required quarterly contribution was missed, unless PBGC Form 200 was already filed or a waiver applies.
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	AFTAP “range” certification expiration	Deadline to certify 2025 AFTAP if plan used a “range” certification. Failure to certify AFTAP by December 31, 2025, will result in AFTAP for plan year 2025 being deemed under 60% retroactively to October 1, 2025.
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.
12/31	Election to reduce credit balance	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.
12/31	Revocation of credit balance election	Deadline to revoke a prior election to use a carryover and/or prefunding balance to meet minimum funding requirements for 2025, by providing written notification to the plan’s enrolled actuary and the plan administrator.

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NAMES OF FORMS

IRS OR PBGC FORM NUMBER	FORM NAME
Form 1042 and 1042-S	Annual Withholding Tax Return for U.S. Source Income of Foreign Person
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 SB	Single-Employer Defined Benefit 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 W-2	Wage and Tax Statement
Form W-3	Transmittal of Wage and Tax Statement
PBGC Form 10	Post-Event Notice of Reportable Event
PBGC Form 200	Notice of Failure to Make Required Contributions
PBGC Form 4010	Annual Financial and Actuarial Information

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