SPOTLIGHT



Defined Contribution Retirement Plan | 2025 Compliance Calendar

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 2025. 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.

Month	Requirement	Due Date	Status
JANUARY	Review 2025 Plan Limits: Adhere to IRS dollar limitations on benefits and contributions.	January 1 - December 31	□ Complete □ N/A
	Form 1099-R: Last day to furnish Form 1099-R to recipients of distributions and/or deemed distributions in 2024.	January 31	□ Complete □ N/A
FEBRUARY	Form 945: Last day to file Form 945 to report federal income tax withheld from distributions in 2024 (Form 945 is due January 31 if 2024 tax deposits were not made on time in full).	February 10	□ Complete □ N/A
	Fourth quarter 2024 benefit statement and fee disclosure: Last day to furnish fourth quarter 2024 benefit statement and fee disclosure to a participant or beneficiary in an individual account plan that permits participant investment direction.	February 14	□ Complete □ N/A
	Form 1096 with Form 1099-R: Last day to file Form 1096 and Form 1099-R on paper with the IRS for prior year distributions and/or deemed distributions.	February 28	□ Complete □ N/A
MARCH	Excess contributions: Last day to refund excess contributions (for failed ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (for failed ACP test) for 2024 to avoid 10% excise tax (unless plan is an EACA).	March 15	□ Complete □ N/A
	Application for Waiver for Minimum Funding Standard: 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).	March 15	□ Complete □ N/A
	Employer contributions: Last day for S-corporation and partnership employer plan sponsors to make deductible contributions for 2024 (For plan sponsor's with a tax year ending December 31, without tax extension).	March 15	☐ Complete☐ N/A
	Form 1096 with Form 1099-R: Last day to file Form 1099-R on paper with extension, or electronically with the IRS for prior year distributions and/or deemed distributions.	March 31	□ Complete □ N/A
APRIL	Required Beginning Date: 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	□ Complete □ N/A
	Form 5330: Last day without extension (unextended deadline) to file Form 5330 and pay excise tax on 2023 plan year excess contributions or excess aggregate contributions where excess amounts not distributed (or forfeited) on time.	April 1	☐ Complete☐ N/A

Month	Requirement	Due Date	Status
APRIL	Excess contributions: Last day to distribute excess deferrals in excess of 402(g) dollar limits for 2024 (in excess of \$23,000 or \$30,500 if catch-up eligible) to applicable participants.	April 15	□ Complete □ N/A
	Form 1120: Last day for C-corporation employer plan sponsors to make deductible contributions for 2024 and file Form 1120 (For plan sponsors with a tax year ending December 31, without a corporate tax return extension).	April 15	□ Complete □ N/A
	Form 1099-R: Last day to file form 1099-R with the IRS electronically with extension.	April 30	☐ Complete☐ N/A
MAY	First quarter 2025 benefit statement and fee disclosure: Last day to furnish first quarter 2025 benefit statement and fee disclosure to a participant or beneficiary in an individual account plan that permits participant investment direction.	May 15	☐ Complete☐ N/A
JUNE	Excess contributions: 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 2024 to avoid 10% excise tax.	June 30	☐ Complete☐ N/A
JULY	Summary of Material Modifications: 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	☐ Complete☐ N/A
	Form 5500: Last day to file Form 5500 for 2024 without extension (due seven months after plan year ending December 31, unless extension applies).	July 31	☐ Complete☐ N/A
	Form 8955-SSA: Last day to file Form 8955-SSA without extension (report certain information relating to each participant with a deferred vested benefit).	July 31	☐ Complete☐ N/A
	Notice to terminated vested participants: Last day to provide a notice to terminated vested participants describing deferred vested retirement benefits (in conjunction with Form 8955-SSA).	July 31	☐ Complete☐ N/A
	Form 5558: 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	☐ Complete☐ N/A
	Annual Benefit Statement: 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)	☐ Complete ☐ N/A
	Form 5330: 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	☐ Complete☐ N/A
AUGUST	Second quarter 2025 benefit statement and fee disclosure: Last day to furnish second quarter 2025 benefit statement and fee disclosure to a participant or beneficiary in an individual account plan that permits participant investment direction.	August 14	☐ Complete☐ N/A
SEPTEMBER	Minimum Funding Requirement: Last day to pay balance of remaining required contributions for 2024 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 ½ months after end of Plan Year) .	September 15	☐ Complete☐ N/A
	Employer Contributions: Extended deadline for employer's taxed as S corporations and partnerships to make deductible contributions.	September 15	☐ Complete☐ N/A

Month	Requirement	Due Date	Status
	Summary Annual Report: Last day to furnish Summary Annual Report for 2024 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	□ Complete □ N/A
OCTOBER	Safe Harbor Notice: Distribute Annual 401(k) Plan Safe Harbor Notice (No more than 90 days and at least 30 days prior to the beginning of the 2025 plan year). Provide notice to eligible employees.	October 2 (through December 1)	☐ Complete☐ N/A
	Qualified Default Investment Alternative Notice: Distribute Qualified Default Investment Alternative (QDIA) Notice (No more than 90 days and at least 30 days prior to the beginning of the 2026 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)	□ Complete □ N/A
	Annual Automatic Enrollment Notice: Distribute Annual Automatic Enrollment Notice (No more than 90 days and at least 30 days prior to the beginning of the 2026 plan year). Provide annual notice to all eligible employees (can be combined with QDIA notice).	October 2 (through December 1)	☐ Complete☐ N/A
	403(b) Annual Contribution Notice: 403(b) Annual Contribution Notice (No more than 90 days and at least 30 days prior to the beginning of the 2025 plan year). Provide annual notice to all eligible employees	October 2 (through December 1)	□ Complete □ N/A
	Form 5500 with Form 5558: Last day to file Form 5500 with Form 5558 filing extension. This is a 2 $\frac{1}{2}$ month extension if Form 5558 was filed timely.	October 15	☐ Complete☐ N/A
	Form 8955-SSA with Form 5558: Last day to file Form 8955-SSA with Form 5558 filing extension. This is a 2 ½ month extension if Form 5558 was filed timely.	October 15	☐ Complete☐ N/A
	Notice to terminated vested participants: Last day to provide a notice to terminated vested participants describing deferred vested retirement benefits in conjunction with Form 8955-SSA.	October 15	☐ Complete☐ N/A
	Form 5310-A: Last day to give notice to IRS of Qualified Separate Lines of Business (QSLOB), where applicable (Form 5310-A).	October 15	☐ Complete☐ N/A
	Annual benefit statement: 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)	☐ Complete ☐ N/A
	Retroactive corrective plan amendment: Last day to adopt and implement retroactive corrective plan amendment to correct 2024 410(b) coverage or 401(a)(4) nondiscrimination failures (9 ½ months after close of Plan Year).	October 15	☐ Complete ☐ N/A
	Employer contributions: Extended deadline for employers taxed as C corporations to make deductible contributions.	October 15	□ Complete □ N/A
	Lifetime Income Disclosure notice: 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	☐ Complete☐ N/A
NOVEMBER	Third quarter 2025 benefit statement and fee disclosure: Last day to furnish third quarter 2025 benefit statement and fee disclosure to a participant or beneficiary in an individual account plan that permits participant investment direction.	November 14	☐ Complete☐ N/A

Month	Requirement	Due Date	Status
DECEMBER	Annual participant notices: Last day to provide annual participant notices [safe harbor, automatic enrollment, QDIA, 403(b)] (see above notice requirements in October).	December 1	☐ Complete☐ N/A
	Summary Annual Report: Last day with 5500 extension to furnish Summary Annual Report for 2024 plan year.	December 15	□ Complete □ N/A
	Excess contributions: Last day to refund excess contributions (failed ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (failed ACP test) for the 2024 plan year with 10% excise tax.	December 31	☐ Complete☐ N/A
	Required Minimum Distributions: 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	☐ Complete☐ N/A
	Discretionary plan amendments: Last day for plan sponsors to adopt discretionary plan amendments that became effective during the current plan year.	December 31	□ Complete □ N/A
	Last day of the Plan Year: Review the Plan Forfeiture Account. Allocate Forfeiture accounts. Review the plan document regarding the allocation of Forfeiture monies.	December 31	☐ Complete☐ 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 | 860.633.5283 | usicg.com | in

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