

2025 Deadlines and Important Dates for Plan Sponsors

Sponsors of defined benefit and defined contribution retirement plans should keep the following deadlines and other important dates in mind as they work toward ensuring compliance for their plans in 2025. Dates assume a calendar year plan. Some deadlines may not apply, or dates may shift based on the plan sponsor's fiscal year.

JANUARY

- ▶ **15 / Fund:** Possible fourth quarter 2024 contribution due for defined benefit pension plans.
- ▶ **31 / Action:** File IRS Form 945, Annual Return of Withheld Federal Income Tax, by January 31 for non-payroll income taxes, such as taxes withheld by retirement plans, during 2024.
- ▶ **31 / Action:** Distribute IRS Form 1099-R to participants by January 31 for 2024 retirement plan distributions.

FEBRUARY

- ▶ **10 / Action:** File IRS Form 945 for 2024 non-payroll withholding if taxes were paid in full and deposited on time.
- ▶ **28 / Action:** File IRS Form 1096, Annual Summary and Transmittal of US Information Returns, with IRS if using paper transmittal by February 28 for 2024 tax year.
- ▶ **28 / Action:** File IRS Form 1099-R in paper format with the IRS by February 28 for 2024 retirement plan distributions.

Best Practice: Review and approve compliance testing results sent by plan administrator.

MARCH

- ▶ **15 / Action:** Highly compensated employees who fail ADP/ACP test for prior plan year must have refunds processed by March 15 (other than eligible automatic contribution arrangements).
- ▶ **15 / Fund:** Partnerships and S Corporations that are not getting an extension must fund employer contributions to receive tax deduction for the prior year.
- ▶ **31 / Action:** Electronic filing deadline for Form 1099-R
- ▶ **31 / Action:** File IRS Form 5330 excise tax return and payment for excess 2023 ADP/ACP contributions.

APRIL

- ▶ **1 / Action:** 401(k) plans with publicly traded employer stock that follow Article 6A of the Regulation S-X (SEC format) must file Form 11-K with the Securities and Exchange Commission by April 1.
- ▶ **1 / Action:** Recordkeeper (or other responsible party) completes and files Form 1099-R electronically with the IRS by April 1 for 2024 retirement plan distributions.
- ▶ **1 / Action:** April 1 deadline for 5% business owners and terminated participants who turned 73 in 2024 to receive their required minimum distribution (RMD).

Note: The IRS "weekend rule" does not roll the April 1 deadline to the next business day if April 1 falls on the weekend or holiday.

- ▶ **15 / Distribute:** Possible first quarter 2025 contribution due for defined benefit pension plans.
- ▶ **15 / Fund:** April 15 possible first quarter 2025 contribution due for defined benefit pension plans (i.e., contribute by April 15 before the weekend, as contribution deadlines are not extended to the next business day).
- ▶ **15 / Distribute:** Participants who contributed over 402(g) or 415 limits in the previous year must be refunded the excess amount by April 15.
- ▶ **15 / Action:** File PBGC Form 4010, Notice of Underfunding for single-employer defined benefit plans with more than \$15 million aggregate underfunding by Monday, April 15.
- ▶ **15 / Fund:** C-Corporations and Sole Proprietors that are not getting an extension must fund employer contributions by April 15 to receive tax deduction for the prior year.
- ▶ **15 / Fund:** IRA contributions for the prior tax year must be funded by April 15.
- ▶ **30 / Action:** Send annual funding notice to participants of single and multi-employer defined benefit plans over 100 participants by April 30.

MAY

- ▶ **15 / Action:** Start your mid-year compliance audit to ensure all records and documentation are up to date.

JUNE

- ▶ **29 / Action:** 401(k) plans with publicly traded employer stock must file SEC Form 11-K with the Securities and Exchange Commission by June 29 or file an extension on SEC Form 12b-25.
- ▶ **30 / Action:** Highly compensated employees who fail ADP/ACP test for prior plan year must have refunds processed by June 30, if an eligible automatic contribution arrangement (EACA).

JULY

- ▶ **14 / Action:** 401(k) plans with publicly traded employer stock that requested a 15 calendar day extension (SEC Form 12b-25) for the SEC Form 11-K must file the SEC Form 11-K with the Securities and Exchange Commission by July 15.
- ▶ **15 / Fund:** Possible second quarter 2025 contribution due for defined benefit pension plans by July 15.
- ▶ **31 / Action:** File IRS Form 5500, Annual Return/Report of Employee Benefit Plan, and IRS Form 8955-SSA, Annual Registration Statement Identifying Separated Participants With Deferred Vested Benefits, for the 2024 plan year by July 31.
- ▶ **31 / Action:** To request an extension of time to file IRS Form 5500, file IRS Form 5558 by July 31.

SEPTEMBER

- ▶ **15 / Fund:** If an extension was filed, September 15 is the deadline to fund employer contributions for Partnerships and S-Corporations.
- ▶ **15 / Fund:** September 15, last date to make 2024 contributions for single and multiemployer defined benefit pension plans.
- ▶ **30 / Action:** September 30, Distribute Summary Annual Report (SAR) to participants if the Form 5500 was filed on July 31.
- ▶ **30 / Action:** File Form 5330 excise tax return for excess 2023 ADP/ACP contributions, if due date was extended by Form 8868.

OCTOBER

- ▶ **3 / Action:** Distribute annual notices to participants no earlier than October 3 and no later than Dec 2, including notices for: 2026 401(k) Plan Safe Harbor Match, Automatic Contribution Arrangement Safe Harbor, Automatic Enrollment and Qualified Default Investment Alternatives (QDIA).
- ▶ **15 / Fund:** Possible third quarter 2025 contribution due for defined benefit pension plans by October 15.
- ▶ **15 / Action:** October 15 is the extended deadline for filing IRS Form 5500 and IRS Form 8955-SSA.
- ▶ **15 / Action:** October 15 is the extended deadline for filing individual and C-Corp tax returns.
- ▶ **15 / Action:** If an extension was filed, October 15 is the deadline to fund defined contribution employer contributions for C-Corporations and Sole Proprietors.
- ▶ **15 / Action:** October 15 to open a Simplified Employee Pension (SEP) plan for extended tax filers.
- ▶ **15 / Action:** Send annual funding notice to participants of single- and multi-employer defined benefit plans with 100 or fewer participants by October 15.
- ▶ **15 / Action:** October 15 defined benefit plan PBGC Premium filings and payments due.
- ▶ **31 / Action:** Single-employer defined benefit plans that are less than 60% funded or are 80% funded and have benefit restrictions triggered must inform participants by October 31 or 30 days after the benefit restriction applies.

DECEMBER

- ▶ **1 / Action:** Distribute annual participant notices no later than December 2 for the 2026 upcoming calendar year plan year. These include notices for: 401(k) Plan Safe Harbor Match, Automatic Contribution Arrangement Safe Harbor, Automatic Enrollment and Qualified Default Investment Alternatives (QDIA).
- ▶ **15 / Action:** December 15 is the extended deadline to distribute Summary Annual Report (SAR) when the Form 5500 was filed on October 15.
- ▶ **31 / Action:** December 31 is the final deadline to process corrective distributions for failed ADP/ACP testing; a 10% excise tax may apply.
- ▶ **31 / Action:** Ongoing required minimum distributions (RMDs) for 5% business owners and terminated participants must be completed by December 31.
- ▶ **31 / Action:** Amendments to change traditional 401(k) to safe harbor design, remove safe harbor feature or change certain discretionary modifications must be completed by December 31. Amendments to change to safe harbor nonelective design must be completed by Dec 1 of given plan year for 3% or by Dec 31 of the following year for 4% contribution level.
- ▶ **31 / Action:** Plan sponsors must amend plan documents by December 31 for any discretionary changes made during the year.



In addition to those important deadlines and dates, plan sponsors should be aware of the contribution plan limits and other rolling notices for 2025:

- ▶ Traditional and Roth Individual Retirement Account contribution limit is \$7,000. Catch-up contributions for participants age 50 and over is \$1,000, which is fixed by law and not adjusted each year.
- ▶ Employee salary deferral limit for 401(k), 403(b) and 457 plans is \$23,500. The catch-up contribution limit for participants who are age 50 or older in 2025 is \$7,500.
- ▶ Maximum annual additions (i.e., employee deferrals, employer contributions and forfeitures) that can be allocated to a participant's defined contribution plan account for 2025 is \$70,000.
- ▶ Limitation for the annual benefit under a defined benefit plan under Section 415(b)(1)(A) is \$285,000.
- ▶ The dollar amount used to define "highly compensated employee" under Section 414(q)(1)(B) is \$160,000.
- ▶ Newly eligible employees must receive a Summary Plan Description (SPD) within 90 days after becoming covered by the plan.
- ▶ Provide quarterly statements and fee information to defined contribution plan participants.
- ▶ Provide annual lifetime income illustrations to defined contribution plan participants.

BEST PRACTICES

- ▶ Contact your service provider or BDO's ERISA team to discuss any required and/or discretionary SECURE 2.0 provisions effective in 2025 to ensure compliance
- ▶ Make sure discretionary amendments that impact plan design and administration are executed and implemented timely per IRS regulations
- ▶ Make sure administrative procedures align with language in plan document.
- ▶ Plans may consider doing mid-year compliance testing to avoid failing applicable annual tests.
- ▶ Review and approve compliance testing results sent by plan administrator.
- ▶ Plan sponsor should confirm the accuracy of the prior year's census data to the recordkeeper. This information is used for ADP/ACP testing, among other things.

Our purpose is helping people thrive, every day. Together, we are focused on delivering exceptional and sustainable outcomes and value for our people, our clients and our communities. BDO is proud to be an ESOP company, reflecting a culture that puts people first. BDO professionals provide assurance, tax and advisory services for a diverse range of clients across the U.S. and in over 160 countries through our global organization.

BDO is the brand name for the BDO network and for each of the BDO Member Firms. BDO USA, P.C., a Virginia professional corporation, is the U.S. member of BDO International Limited, a UK company limited by guarantee, and forms part of the international BDO network of independent member firms. For more information, please visit: www.bdo.com.