

2026 Compliance Calendar for 401(k) Plans

Complimentary retirement plan compliance and notice requirements calendar



RETIREMENT
PARTNERS
HAWAII

LET US HELP YOU WRITE YOUR RETIREMENT STORY

The deadlines in this calendar are for plans with calendar-year plan years.

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New for 2026 and friendly reminders

With SECURE Act 1.0 and 2.0 provisions going into affect, there is much to discuss. Enclosed are some of the main retirement plan provisions to support you in your role. For more details on your plan's specifics, let's setup a time to discuss it together.

NEW

Roth Catch-Up Contributions

Catch-up contributions for employees **age 50+** who **earned over \$150,000** in 2025 FICA wages must be made as **Roth contributions**.

FRIENDLY REMINDERS

Long-Term, Part-Time Employees

Employees with **500+ hours** of service in **2 consecutive years** must be eligible to contribute to the plan.

Super Catch-Up Contributions

Employees between age **60 - 63** can contribute **the greater of \$11,250** or 150% of the regular catch-up limit.

Self-certify Hardship Withdrawals

If your plan allows, employees can confirm their eligibility for a hardship withdrawal on their own.

* This Compliance Calendar is provided for informational and educational purposes only. It is not intended to be an exhaustive list of all possible deadlines, filings, or compliance requirements that may apply to your retirement plan. Deadlines may vary based on your plan's specific features, effective dates, and other factors. Employers and plan sponsors are encouraged to consult with their recordkeeper, third-party administrator (TPA), ERISA attorney, or other qualified professional to confirm applicable due dates and compliance responsibilities. The deadlines in this calendar are for plans with calendar-year plan years. If the filing deadline falls on a Saturday, Sunday, or legal holiday, the DOL provides that filing dates are delayed until the next business day. This calendar is intended to provide plan sponsors with a list of notable deadlines and is not a substitute for consultation with ERISA counsel, and in no way represents legal advice.

First Quarter

Start the year strong with compliance success

Now is the time to lay a solid compliance foundation.

Complete critical filings, notices, and testing obligations early for a smooth quarter.

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Q1 | 2026

January	
15	Review prior year census data
31	Deadline: Sending IRS forms to participants 1099-R for participants who received distributions from the plan in the previous year as well as Forms W-2 , 945 , 1099-NEC , and 1099-MISC
February	
15	Review compliance testing results
28	Deadline: Filing Form 1099-R on paper with IRS to report distributions made in previous year. <i>Deadline for electronic filing is March 31</i>
March	
15	Deadline: ADP/ACP test corrective distributions to avoid 10% excise tax* <i>Note: A special deadline may apply to plans that satisfy the requirements of an eligible automatic contribution arrangement (EACA). See "June"</i>
	Deadline: Filing partnership tax returns and contribution deadline for deductibility (without extension) for companies operating on calendar-year fiscal year*
	Deadline: Requesting automatic extension to September 15 for partnership tax returns*
31	Deadline: Electronic filing of Form 1099-R to report distributions made in previous year (without extension)

Second Quarter

Stay on track with mid-year checkpoints

As we move into Q2, focus on processing corrective distributions and reviewing tax filings. Taking proactive steps now keeps you ahead of year-end compliance tasks.

Q2 | 2026

April

1	Deadline: The first required minimum distribution (RMD) is owed to participants who have reached age 73 or retired (whichever happened later) in the previous year
15	Deadline: Processing corrective distributions for participants whose 401(k) deferrals exceed the annual 401(k) deferral limit under IRC Section 402(g)
	Deadline: Filing individual and corporation tax returns
	Deadline: Contribution deadline for deductibility for self-employed individuals (without extension)
	Deadline: Requesting automatic extension to October 15 for individual and corporate tax returns

May

31	Deadline: Filing HSA contributions and participant statements if applicable, review instructions for Forms 1099-SA and 5498-SA *
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June

30	Deadline: Processing corrective distributions for failed ADP/ACP test from plan with EACA without 10% excise tax (if applicable)
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Third Quarter

Review progress and think about the year ahead

In Q3, prioritize Form 5500 filings and participant notices. Proactive preparation will help streamline your year-end compliance work.

Q3 | 2026

July

29	Deadline: Sending Summary of Material Modification (SMM) (210 days after end of plan year in which the amendment was adopted)
31	Deadline: Filing Form 5500 (without extension)
	Deadline: Filing Form 5558 to request automatic extension of time to file Form 5500 (to October 15)
	Deadline: Filing Form 5330 Return of Excise Taxes Related to Employee Benefit Plans, this is used to report and pay excise taxes on prohibited transactions and excess contributions that occurred in prior year

September

15	Extended deadline: Filing tax returns for partnerships
	Extended deadline: Contribution deadline for deductibility for calendar-year partnerships and S-corporations
30	Deadline: Distributing Summary Annual Report (SAR) to participants, unless deadline for Form 5500 was extended, then two months after due date for Form 5500 (December 15)

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Fourth Quarter

Wrap up the year with compliance confidence

End the year on a high note by finalizing RMDs, safe harbor amendments, and participant notices. Completing these tasks sets a strong foundation for the year to come.

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Q4 | 2026

October

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| 1 | Deadline: Establish a new safe harbor plan for the current year |
| 15 | Extended deadline: Filing Form 5500 |
| | Extended deadline: Individual and/or corporate tax returns and final contribution deadline for deductibility |
| | Deadline: Adopting a retroactive amendment to correct minimum coverage or nondiscrimination requirements (IRC Sections 410(b) & 401(a)(4)) |

December

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| 1 | Deadline: Sending annual 401(k) and safe harbor match notice |
| | Deadline: Establish a new safe harbor plan for the upcoming year |
| | Deadline: Sending annual QDIA, qualified default investment alternative notice |
| | Deadline: Sending annual automatic contribution arrangement notice (ACA) |
| 15 | Extended deadline: Distributing SAR to participants |
| 31 | Deadline: Processing corrective distributions for failed ADP/ACP test with 10% excise tax |
| | Deadline: Correcting a failed ADP/ACP test with qualified nonelective contributions (QNECs) |
| | Deadline: Converting existing 401(k) plan to safe harbor non-elective design for current plan year |
| | Deadline: Amending plan for discretionary changes implemented during plan year (certain exceptions apply) |
| | Deadline: RMDs due under IRC Section 401(a)(9) |



**Have questions?
Contact us for specifics about
your plan. We're here to help.**

2026 Compliance Calendar for 401(k) Plans

This information was developed as a general guide to educate plan sponsors and is not intended as authoritative guidance or tax/legal advice. Each plan has unique requirements, and you should consult your attorney or tax advisor for guidance on your specific situation.

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