



T.RowePrice

T. Rowe Price Retirement Plan Services, Inc.

2026 compliance deadlines



Introduction

Annual compliance and notice deadlines

Staying on top of the dozens of compliance dates and tasks for your plan can be challenging. This resource is designed to help you keep track of what you need to do by the applicable deadline.

Note: This document outlines significant deadlines for defined contribution plans with a December 31 plan year-end date. Some deadlines will vary for plans that follow a different year-end date.

If a due date falls on a holiday or weekend, the IRS may provide an extension for certain filing and reporting deadlines. Other mailing and check issuance deadlines are typically accelerated to the last business day prior to the weekend or holiday.

For additional fiduciary information and materials, visit

rps.troweprice.com/planview



First Quarter

January 31:

- ☐ Initial Nondiscrimination Testing Data and Annual Questionnaire due to T. Rowe Price for plans needing Actual Deferral Percentage (ADP)/Actual Contribution Percentage (ACP) testing, so that distributions of excess and excess aggregate contributions (excess amounts) to remedy any testing failure (if necessary) may be completed by plan year-end (PYE) + 2½ months. If your plan does not require ADP or ACP testing by March 15, please provide initial testing data between March 15 and May 5.¹
- ☐ Mail IRS Form 1099-R to participants who received a distribution in the prior year.

February 15:

- ☐ Final plan testing data due to T. Rowe Price for plans requiring ADP/ACP testing prior to March 15.

February 28:

- ☐ File Form 1099-R on paper with the IRS (or by March 31, if filing electronically).
- ☐ Submit refund requests for ADP and ACP nondiscrimination testing failures to T. Rowe Price in order to meet the March 15 deadline for calendar year plans.

March 13:

- ☐ IRS deadline for check issue date for refund checks for ADP and ACP nondiscrimination testing to avoid the 10% excise tax for calendar year plans. (Note: Plans that satisfy the requirements of an eligible automatic contribution arrangement (EACA) have a June 30 deadline.)

March 16:

- ☐ Some plan sponsors may need to file partnership and S-corp tax returns and deposit employer contributions for unincorporated entities, unless there is a filing extension.
- ☐ May begin submitting initial Nondiscrimination Testing Data and Annual Questionnaire to T. Rowe Price for plans that do not require ADP/ACP testing.

March 31:

- ☐ Electronic filing of Form 1099-R to report distributions made in the prior year.

¹In order to avoid the assessment of a 10% excise tax on the excess amounts, the ADP/ACP testing corrective distribution deadline is 2½ months following the close of the plan year (e.g., for a calendar year plan, the deadline is March 15). If that deadline is missed, corrective action to remedy a failed ADP/ACP test (i.e., distributions of excess amounts or corrective contributions) must be completed by the following plan year-end (e.g., December 31 for a calendar year plan) to avoid possible plan disqualification, although performing testing may need to be completed earlier for Form 5500 auditing purposes. Note: The plan sponsor must file a Form 5330 and pay the 10% excise tax on the excess amounts in the plan at PYE + 2½ months by PYE + 15 months. Also, under Section 7503 of the Internal Revenue Code, when a performance deadline (e.g., filing an IRS form) falls on a weekend/legal holiday, the performance of that act is considered timely if it is completed the next business day; however, corrective distributions should be processed by the business day before the weekend/legal holiday.

Second Quarter

April 1:

- ☐ Initial required minimum distributions (RMD) due to participants subject to begin RMDs in the prior calendar year.
- ☐ Provide excess deferral information to T. Rowe Price.

April 15:

- ☐ Distribute excess deferrals.
- ☐ File corporate tax returns and deposit employer contributions for incorporated entities, unless there is a filing extension.

April 30:

- ☐ Initial Nondiscrimination Testing Data and Annual Questionnaire due to T. Rowe Price in good order for safe harbor, 415, and 402(g) plans not requiring ADP/ACP testing prior to the March 15 deadline or for EACA plans looking to meet the June 30 deadline.
- ☐ Testing data and questionnaire are also due from sponsors of EACA plans needing corrective distributions (if necessary) by the deadline of plan year-end plus six months, which is required to avoid the 10% excise tax on the excess amounts not distributed by that date.

May 15:

- ☐ Tax-exempt organization must file Form 990, unless there is a filing extension.

May 31:

- ☐ Final plan testing data due to T. Rowe Price for EACA plans requiring testing prior to June 30.

June 15:

- ☐ Submit refund requests for ADP and ACP nondiscrimination testing failures for EACA plans to T. Rowe Price in order to meet the June 30 deadline for calendar year plans.

June 28:

- ☐ Final plan testing data due to T. Rowe Price for plans requesting testing for initial filing date of Form 5500.

June 30:

- ☐ Issue refund checks for ADP and ACP nondiscrimination testing failure for EACA plans looking to avoid the 10% excise tax for calendar year plans.¹

¹If the entire plan population is covered by the EACA with the permissive withdrawal feature, plan sponsors may not submit testing data until after the 90-day withdrawal period has ended. The excess distribution deadline for taking corrective action to avoid the 10% excise tax is automatically extended until 6 months following the close of the plan year. Please consult with your ERISA counsel to determine if this extension applies to your plan.

Third Quarter

July 29:

- ☐ Issue summary of material modifications (SMM) for calendar year plans that had amendments adopted in the prior plan year.

July 31:

- ☐ File the Form 5500 return (unless filing for an extension).
- ☐ File Form 5558 for automatic extension of time to file Form 5500.
- ☐ File Form 5330 (Return of Excise Taxes Related to Employee Benefit Plans).

August 31:

- ☐ Final plan testing data due to T. Rowe Price for plans requesting completed testing for filing Form 5500 with extension.

September 15:

- ☐ File partnership and S-corp tax returns and deposit employer contributions (extended deadline).

September 30:

- ☐ Distribute the summary annual report (SAR) (unless Form 5500 filing extension was requested).

Fourth Quarter

October 15:

- ☐ File Form 5500 return (for extended filers).
- ☐ File corporate tax returns and deposit employer contributions (extended deadline).

November 16:

- ☐ Finalized plan testing data due to T. Rowe Price in good order to complete testing by December 31.
- ☐ File Form 990 (extended deadline).

November 28:

- ☐ Distribute applicable annual participant notices: automatic contribution arrangement (ACA) notice, EACA notice, qualified automatic contribution arrangement (QACA) notice, qualified default investment alternative (QDIA) notice, and/or safe harbor notice.
- ☐ Distribute 404a-5 Plan and Investment Disclosure.¹
- ☐ Distribute contingent safe harbor notice for current year if making safe harbor contribution and amend plan document.

December 15:

- ☐ Deadline for T. Rowe Price to receive approval to process excesses prior to December 31.
- ☐ Distribute the SAR (for extended filers).

December 31:

- ☐ Issue checks for annual RMDs.
- ☐ IRS deadline for addressing prior plan year nondiscrimination testing failures in order to avoid the need to correct under EPCRS.
- ☐ Adopt discretionary amendments for the current plan year.
- ☐ 403(b) plans should distribute Universal Availability and (if using a preapproved volume submitter document) Annual Additions Notices (as applicable).

¹Plan fiduciaries are required to distribute their 404a-5 Plan and Investment Disclosures at least once in any 14-month period.

Filing and nondiscrimination due dates based on plan year-end date

Plan year-ends	NDT-HCE excess without tax	5500 due or 5558 for extension	SAR due if 5500 filed on original due date	5500 due if on extension	SAR due if 5500 is on extension
January 31	April 15	August 31	October 31	November 15	January 15
February 28	May 15	September 30	November 30	December 15	February 15
March 31	June 15	October 31	December 31	January 15	March 15
April 30	July 15	November 30	January 31	February 15	April 15
May 31	August 15	December 31	February 28	March 15	May 15
June 30	September 15	January 31	March 31	April 15	June 15
July 31	October 15	February 28	April 30	May 15	July 15
August 31	November 15	March 31	May 31	June 15	August 15
September 30	December 15	April 30	June 30	July 15	September 15
October 31	January 15	May 31	July 31	August 15	October 15
November 30	February 15	June 30	August 31	September 15	November 15
December 31	March 15	July 31	September 30	October 15	December 15

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