2026 Defined Benefit Plan Compliance Calendar

This 2026 Defined Benefit Plan Compliance Calendar addresses important deadlines for calendar-year qualified pension plans.

TruePlan℠
Benefit and Retirement Advisors

DATE	COMPLIANCE ITEM	FORMS, LINKS AND COMMENTS

JANUARY

15	Q4 2025 funding contributions due.	

FEBRUARY

2	Send 1099-R to recipients (April 1 if electronically).	Form 1099-R
	File Form 945 for non-payroll withholding (Feb. 10 if paid and submitted timely).	Form 945

MARCH

2	File 1099-R to IRS if paper (March 31 if electronically) or file Form 8809 for an extension.	Form 1099-R Form 8809
15	File Minimum Waiver Request if experiencing hardship.	

APRIL

1	Required Minimum Distribution required to be paid to term vested participants that turned age 73 in 2025.	Pension packages should be sent out in December for participant elections. If no election is made, participants default.
	Actuarial certification of 2026 Adjusted Funding Target Attainment Percentage to avoid penalties.	
15	Q1 2026 funding contributions due.	
	If underfunded (less than 80%) file Form 4010 with the Pension Benefit Guaranty Corporation.	Form 4010

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APRIL (CONT.)

30	**Annual Funding Notices due to participants of plans with more than 100 participants.** **PBGC reconciliation for plans that made estimated variable rate payments in 2025.** **Notice to participants if plan has not met the funding requirements for AFTAP certification.** **Notice to participants if plan's AFTAP is deemed less than 80%.**	Plans with less than 100 participants have an extension to their 5500 filing date.

MAY

	N/A	

JUNE

	N/A	

JULY

15	**Q2 2026 funding contributions due.**	
29	**If changes have been made to your plans for 2025, Summary of Material Modifications to participants unless an updated Summary Plan Description is provided.**	
31	**Form 5500 + Schedule SB or file Form 5558 for an extension.**	Form 5500 Form 5558
	Form 8955-SSA filed to identify participants from deferred vested.	Form 8955-SSA
	Form 5330 to report and pay excise tax.	Form 5330

DATE	COMPLIANCE ITEM	FORMS, LINKS AND COMMENTS

AUGUST

	N/A	

SEPTEMBER

15	**Balance of minimum funding contribution for the 2025 plan year.**	
	Credit balance election due – offset 2025 minimum contributions and credit excess to prefund a balance to plan actuary to administer.	
30	**Last day to AFTAP certify (Oct. 1 presumption of <60% if uncertified).**	Avoids assumption that the plan is funded less than 60% and ramifications associated with underfunding.

OCTOBER

15	**File 5500s if extended through Form 5558 in July.**	Form 5500 Form 5558
	PBGC comprehensive plan filing for the current year.	
	Plan audits due.	Filed with Form 5500.
31	**Notice to employees of plan restrictions if AFTAP certification not met.**	Eliminates benefit accruals, accelerated payments (hardship, lump sums) and event triggered benefits (layoffs, shutdowns).

NOVEMBER

	N/A	

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DECEMBER

31	**Plan document deadline for SECURE 2.0 plan updates.**	
	Required Minimum Distributions mandated for participants who have already received first distribution.	
	Pension Benefit Statements required to be sent to term vested active participants (required every three years).	ERISA 105, SECURE 2.0 Section 338 (new requirement which mandates paper statements to be sent to participants unless they opt out of receiving them).
	AFTAP certification expiration.	Actuary's certification of 2026 AFTAP to prevent presumed AFTAP of less than 60% from applying Jan. 1, 2027 (or retroactively to Oct. 1, 2026, if range certification issued prior to Oct. 1, 2026).

ADDITIONAL TIMELINES TO CONSIDER

- **Summary Plan Descriptions** must be updated every five years if material changes have been made or every 10 years if no changes have occurred. SPDs must be provided to employees that request them within 30 days.
- **Plan Document Restatements** must be updated every six years.
- **Summary of Material Modifications** must be filed 210 days after the plan year has ended.
- **Pension Benefit Statements** – SECURE 2.0 requires that employees receive a Pension Benefit Statement on paper every three years unless they opt out and request to receive it electronically. Regardless of future elections, SECURE 2.0 mandates that participants must receive a one-time paper notice allowing them to opt out.