# 2026 Fiduciary Calendar: Key Dates for Calendar-Year Plan Sponsors

*A prudent process is a documented one. This calendar tracks the recurring compliance and governance deadlines that matter most for calendar-year 401(k) plans in 2026.*

## Q1 — JANUARY – MARCH

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| **Jan 1** | Mandatory Roth catch-up in effect for participants with prior-year FICA wages over $150,000. Enhanced catch-up limits (up to $11,250) apply for participants ages 60–63. |
| **Jan 1** | Long-term part-time employees who met the two-year, 500-hour threshold in 2024–2025 become plan-eligible. |
| **Jan 31** | Deadline to correct a failed ADP/ACP test from the prior plan year without QNEC. |
| **Mar 15** | Deadline for distributing ADP/ACP excess refunds without a 10% excise tax on the employer (2.5 months after plan year-end). |
| **Mar 31** | Deadline to elect safe harbor status for the prior plan year using a 4%+ nonelective contribution. |

## Q2 — APRIL – JUNE

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| **Apr 1** | Initial RMD deadline for participants who reached RMD age in the prior year. |
| **Apr 15** | Deadline for corrective refunds of excess deferrals above the annual 402(g) limit. |
| **May 15** | Q1 participant benefit statement and fee disclosure deadline (45 days after quarter-end). |
| **Jun 30** | Deadline for EACA plans to process corrective ADP/ACP distributions without the 10% excise tax. |

### HOW TO USE THIS CALENDAR

- These dates assume a calendar-year plan (Jan 1 – Dec 31). If your plan year runs on a different schedule, each deadline shifts accordingly — your recordkeeper or TPA can confirm your plan-specific dates.
- Deadlines that fall on a weekend or federal holiday generally move to the next business day.
- This calendar covers the most common recurring deadlines. Plans with a defined benefit component, ESOP, or other special features carry additional dates not shown here.



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## Q3 — JULY – SEPTEMBER

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| **Jul 29** | Deadline to distribute a Summary of Material Modification (SMM) for amendments adopted in the prior plan year (210 days after year-end). |
| **Jul 31** | Form 5500 filing deadline without extension. Form 5558 deadline to request an extension to Oct 15. Form 5330 excise tax deadline, if applicable. |
| **Aug 14** | Q2 participant benefit statement and fee disclosure deadline. |
| **Sep 15** | Minimum funding deadline for defined benefit and money purchase plans (if applicable). |
| **Sep 30** | Summary Annual Report (SAR) deadline for plans that filed Form 5500 by Jul 31 without extension. |

## Q4 — OCTOBER – DECEMBER

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|---|---|
| **Oct 2** | Annual notice window opens for Safe Harbor, QACA, EACA, and QDIA notices for the upcoming plan year. |
| **Oct 15** | Extended Form 5500 filing deadline for plans that filed Form 5558. |
| **Nov 14** | Q3 participant benefit statement and fee disclosure deadline. |
| **Nov 15** | SAR deadline for plans that filed Form 5500 on extension. |
| **Dec 1** | Deadline to distribute annual Safe Harbor, QDIA, and Automatic Contribution Arrangement notices for the 2027 plan year. |
| **Dec 31** | SECURE 2.0 plan document amendment deadline for most calendar-year plans. Deadline to adopt or remove safe harbor status for 2026. Deadline for corrective distributions for failed ADP/ACP tests with the 10% excise tax. |

### CWM'S TAKE

A calendar tells you when something is due — it doesn't tell you whether your plan is set up to meet it. Most compliance gaps we find aren't missed deadlines; they're notices sent from outdated templates or amendments that were never actually adopted. Treat this calendar as the checklist for confirming your recordkeeper and TPA are handling each date correctly, not just that a date passed.

*Want a plan-specific version of this calendar? A complimentary CWM Fiduciary Benchmarking Study will map these dates to your actual plan year.*



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