401(k) Compliance Calendar 2027

Fisher\SMB®

Administering your company's 401(k) plan comes with important responsibilities.
Use this calendar and checklist to make sure you're on top of administering your company's plan.

JANUARY

- **15** Provide/Confirm prior year census data
- **31** Distribute Form 1099-R to participants who took a distribution in the prior year

FEBRUARY

- **16** Review/Approve compliance testing results

MARCH

- **15** Corrective Distributions if Nondiscrimination Testing failed (ADP/ACP Testing)
- **15** Fund Employer Contributions

APRIL

- **1** Engage auditor (for Form 5500 large plan filers)
- **15** Distribute Excess Deferrals for participants above the individual contribution limit
- **15** Fund Employer Contributions (for 1120 and Schedule C Filers)

MAY

- **31** Complete 5500 Questionnaire

JUNE

- **30** Eligible Automatic Contribution Arrangement Plans Only (EACA): Corrective Distributions if Nondiscrimination Testing failed (ADP/ACP Testing)

JULY

- **15** Mid-Year Testing
- **31** File IRS Form 5500
- **31** File IRS Form 5558 (if 5500 extension needed)

AUGUST

SEPTEMBER

- **15** Fund Employer Contributions if business tax extension filed
- **30** Distribute Summary Annual Report (SAR) (if Form 5500 filed by 7/31)

OCTOBER

- **1** Review Your 401(k) Plan Document (recommended)
- **15** File Form 5500 (if extension filed)
- **15** Fund Employer Contributions if business tax extension filed (for Form 1120 and Schedule C Filers)

NOVEMBER

DECEMBER

- **1** Distribute Annual Participant Notices
- **15** Distribute SAR if Form 5500 was filed with an extension
- **31** Correct Failing Nondiscrimination Testing (ADP/ACP Testing) by funding a Qualified-Non Elective Contributions (QNEC)
- **31** Issue Required Minimum Distributions (RMDs)

401(k) Compliance Calendar 2027

Fisher\SMB®

Date(s)	Responsible Party	Descriptions
☐ JAN 15	Plan Sponsor	Census data: Plan sponsor provides/confirms accurate prior year census data to the recordkeeper who will use the information to complete compliance testing and Form 5500
☐ JAN 31	Recordkeeper	Distribute Form 1099-R to participants who took a distribution in the prior year (recordkeeper typically sends the form)
☐ FEB 16	Plan Sponsor	Approve results from compliance testing provided by administrator
☐ MAR 15	Recordkeeper	Deadline to process corrective distributions to highly compensated employees (HCEs) for plans that failed the Actual Deferral Percentage (ADP) test and/or Actual Contribution Percentage (ACP) test in the previous plan year to avoid a 10% excise tax penalty
☐ MAR 15	Plan Sponsor	Deadline to fund employer contributions and receive a tax deduction for the prior plan year (for 1120-S and Form 1065 K-1 Filers), unless the business files a tax extension
☐ APR 1	Plan Sponsor	For plans that need an audit, it is recommended an auditor be engaged by this date
☐ APR 15	Plan Sponsor	Excess contribution refunds: Deadline to refund excess contributions for participants that contributed more than the individual contribution limits in the previous plan year
☐ APR 15	Plan Sponsor	Deadline to fund employer contributions and receive a tax deduction for the prior plan year (for 1120 and Schedule C Filers), unless the business files a tax extension
☐ MAY 31	Plan Sponsor	Plan sponsor provides a completed 5500 questionnaire to service provider (if applicable); the service provider prepares the plan Form 5500
☐ JUN 30	Recordkeeper	Deadline to process corrective distributions for EACA plans that failed the Actual Deferral Percentage (ADP) test and/or Actual Contribution Percentage (ACP) test in the previous plan year to avoid a 10% excise tax penalty
☐ JUL 15	Plan Sponsor	Mid-year testing: If the plan previously failed compliance testing, this is a good time to consider mid-year compliance testing to forecast next year's results
☐ JUL 31	Plan Sponsor	File IRS Form 5500: Deadline to electronically sign and file IRS Form 5500 (unless requesting an extension)
☐ JUL 31	Plan Sponsor	File Form 5558 to extend the filing of Form 5500. TPA or recordkeeper can provide a signature-ready form

Date(s)	Responsible Party	Descriptions
☐ SEP 15	Plan Sponsor	Deadline to fund employer contributions and receive a tax deduction for the prior plan year (for 1120-S and Form 1065 K-1 Filers)
☐ SEP 30	Plan Sponsor	Deadline for plans that filed Form 5500 by July 31 to distribute the Summary Annual Report (SAR) to all plan participants and beneficiaries
☐ OCT 1	Plan Sponsor	Review your plan document to make sure it is in compliance. Amendments to the plan can be made in the Fall to be effective in the new year
☐ OCT 15	Plan Sponsor	Final deadline to electronically sign and file IRS Form 5500 (if extension was filed via IRS Form 5558)
☐ OCT 15	Plan Sponsor	Deadline to fund employer contributions and receive a tax deduction for the prior plan year (for 1120-S and Form 1065 K-1 Filers)
☐ DEC 1	Plan Sponsor	Distribute applicable annual participant notices; service providers can assist plan sponsors with creation and distribution
☐ DEC 15	Plan Sponsor	Deadline for plans who filed Form 5500 by October 15 to distribute the Summary Annual Report (SAR) to all plan participants and beneficiaries
☐ DEC 31	Plan Sponsor	Correct a failing nondiscrimination test (ADP/ACP) by: 1) Funding a qualified-non-elective contributions (QNEC) to non-highly compensated employees (NHCEs), or 2) Distribute refunds to highly compensated employees (HCEs), but a 10% excise tax may apply on the amount
☐ DEC 31	Plan Sponsor	Distribute required minimum distributions (RMDs). Newly eligible RMD participants can postpone their first RMD until April 1 of the next year
☐ ONGOING	Plan Sponsor	Plan sponsor's responsibility to make sure the plan is operated in accordance with the plan document
☐ ONGOING	Plan Sponsor	Employers must deposit 401(k) deferrals into the plan's trust as soon as administratively feasible, but no more than 7 business days for plans with fewer than 100 participants. The deposit must not be later than the 15th business day of the following month
☐ ONGOING	Plan Sponsor	Plan sponsor provides the summary plan description to all newly eligible participants within 90 days of their participation in the plan
☐ ONGOING	Recordkeeper	Recordkeeper provides quarterly benefit statements to plan participants

Administering Your Company's 401(k) Plan

Fisher SMB®

Your 401(k) plan document identifies how your plan works and what special features it offers to help you customize it to your business needs. As an administrator, you'll want to ensure these documents reflect your business's current 401(k) needs and goals.



ProTip: The Adoption Agreement is the part of the Plan Document that contains the specific features and options of your plan.

If you are overwhelmed by the Plan Document, try checking the Adoption Agreement.

Step 1 – Review Your 401(k) Plan Documents

Company Information

- ☐ Is your basic company contact information accurate and up to date?
- ☐ Does your plan reflect your current company ownership?

Eligibility – The Internal Revenue Service (IRS) dictates that employees who are over 21 years of age and have at least one year of service are eligible to participate in their employer-sponsored retirement plan. However, you might have slightly different rules of eligibility in place for your plan.

- ☐ Does your plan clearly state when employees are eligible to participate?
- ☐ Are there any exceptions or special rules in place concerning eligibility? If so, list details:

_____

_____

Enrollment Period – Most plans have a set period of time when newly eligible employees can be added to the plan and current participants can make changes to their retirement benefits.

- ☐ Does the plan state if you have an annual, semi-annual, quarterly, or monthly enrollment period for eligible employees?

  _____ Annual _____ Semi-annual _____ Quarterly _____ Monthly

- ☐ Are there specifications for exceptions or unique enrollment situations? If so, list:

_____

_____

Employee Contributions – Your plan should outline how employees add money to their 401(k). Elective deferrals are the most common type of employee contribution, but make sure other contribution types (e.g., Roth, After Tax) are clearly defined.

- [ ] List ways employees can add money to their accounts below:



ProTip: The employer contribution formula for your plan can be changed or updated to reflect the growing needs of your company.

This can be done through the third party administrator with a simple plan amendment.

Employer Contributions – With a Traditional 401(k) plan, employers have the option to include an employer match.

- [ ] Does the plan specify how much the employer will match? List details:
- [ ] Does the plan document explain when the match will occur? List timeframes:
- [ ] Does it detail any requirements or exceptions for employer matches? List details:
- [ ] Does the formula meet your business goals with the retirement plan?

Vesting Schedules – If you've chosen a Traditional 401(k) plan, your plan document will include the vesting schedule you've decided upon.

- [ ] Does your plan state the amount of time an employee must wait before they completely own any employer contributions you've made to their account? How long:
- [ ] Are you vesting employees too soon or too late to maximize your chances of retaining the best talent?

Named Fiduciaries – A 401(k) "named fiduciary" is an individual or entity who manages an employer-sponsored retirement plan.

- [ ] List the person or group acting as the fiduciary for your plan here:

Step 2 – Update your Employee Census

An employee census contains information about participants in your business's 401(k) plan that is shared with your 401(k) service provider (Recordkeeper or Third-Party Administrator (TPA)).

This information lets your 401(k) service provider give your participants access to a secure online experience for contributions, account management, and other 401(k) features. The census is also critical for accuracy when completing required annual compliance tests and the annual Form 5500.

This information can change frequently, so you'll need to update your census records regularly or rely on a TPA or payroll provider to do it for you.



CENSUS DATA

Your census should contain the following details for each participant.

Personal

- ☐ Name
- ☐ Date of birth
- ☐ Social security number
- ☐ Home address
- ☐ Email address

Employment

- ☐ Start date
- ☐ Employment status
- ☐ Termination date
- ☐ Eligibility date
- ☐ Base salary (gross compensation)
- ☐ Eligible salary (see plan document)
- ☐ Hours worked
- ☐ Designation of ownership percentage

Contribution

- ☐ Employee deferral amounts
- ☐ Employer contribution amounts

Step 3 – Manage Employee Contributions and Loan Repayments

Your service provider can help you with managing employee contributions and setting up 401(k) loans as an optional benefit. But there are a few things to keep in mind:

- [ ] Are contributions being collected in a timely manner and in accurate amounts?
- [ ] Are those contributions being forwarded to your service provider and being invested?
- [ ] If you offer 401(k) loans, are repayments being collected, forwarded, and invested? Collect employee contributions and loan repayments
- [ ] Are you aware of the funding deadlines that kick in when you withhold any amount from a participant's check?
- [ ] Do plan provisions and payroll processes support Roth catch-up contributions for participants whose prior-year FICA wages exceed the applicable IRS threshold?



Step 4 – File Form 5500

Form 5500 is an informational report you're required to file with the Department of Labor that contains details about your retirement plans.

Keep in mind that there are different versions of this form you can use depending on the size of your company and plan type. Many 401(k) service providers will prepare, sign, and even file a Form 5500 for you. Check with your service provider prior to beginning the filing process. To get started on Form 5500, you'll need to provide or verify the following information:

- [ ] Name of plan
- [ ] Company name, address, phone number, and EIN
- [ ] Plan administrator name (this is the signer)
- [ ] Participant census information
- [ ] Information about any plan pension or welfare benefits

ProTip: Check out our website for a step-by-step guide on how to file Form 5500.

Get it here.

Step 5 – Complete Annual 401(k) Compliance Tests

Many (but not all) 401(k) retirement plans must go through compliance testing each year to make sure they're in line with rules and regulations from the U.S. Department of Labor and the IRS.

These rules make sure employers contribute the right amount of money needed for all eligible employees. It also ensures that no one is contributing more than they're allowed, and that plans aren't discriminating against certain classes of employees.

BEST PRACTICES FOR COMPLIANCE TESTING

- [ ] Maintain accurate census data throughout the year
- [ ] Ensure you follow any required compliance dates or milestones throughout the year
- [ ] Review test results in detail with your 401(k) service provider
- [ ] Make a plan for the upcoming year to address any corrective action and prepare for successful tests in the future
- [ ] Perform a mid-year test to forecast future test results



Schedule your consultation

Looking for more resources to help you administer your company's retirement plan? One of our 401(k) business specialists would love to talk to you about your company's retirement plan needs.

Schedule a consultation

Investing in securities involves the risk of loss. Intended for use by employers considering or sponsoring retirement plans; not for personal use by plan participants. Fisher Retirement Solutions®, Fisher\SMB™, FisherSMB™, and all related logos and designs are trademarks of FisherSMB Enterprises, LLC.

© 2027 FisherSMB Enterprises, LLC. K122115MC October 2026