EMPLOYEE FIDUCIARY



FOR CALENDAR-YEAR 401(K) PLANS

401(k) Annual Administration Checklist

2027

First-payroll steps, deadlines by quarter, ongoing responsibilities and the records to keep

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Introduction

Getting plan administration tasks done on time is one of your most important 401(k) fiduciary responsibilities. This checklist makes it easy.

Annual tasks fall into four categories: nondiscrimination testing, Form 5500 reporting, participant disclosure and plan document maintenance. A good provider handles the hard parts and guides you through the rest, but it's up to you to make sure each task gets done. A checklist also helps you meet your duty to monitor your provider's work.

How to use this checklist

Enter the date completed and your initials next to each task, or "N/A" if it doesn't apply. Tags like Non-safe harbor show who a task applies to. All dates assume a calendar-year plan.

2027 at a Glance
Every deadline on one page. Print it and pin it up.

First Payroll of 2027
What must be in place before your first 2027 paycheck.

Deadline Tasks
Tasks due by a specific date, quarter by quarter.

Ongoing Responsibilities and Plan Records
Year-round tasks, and the records to keep.

What's new for 2027

Limit	2026	2027
Contribution limits		
Elective deferrals (402(g))	$24,500	**$25,500**
Catch-up, age 50+	$8,000	**$8,500**
Super catch-up, ages 60-63	$11,250	**$11,750**
Annual additions (415(c))	$72,000	**$75,000**
Compensation limits		
Comp limit (401(a)(17))	$360,000	**$375,000**
HCE threshold	$160,000	**$170,000**
Roth catch-up wage threshold	$150,000	**$155,000**

Source: IRS Notice 2026-66.

- **Roth catch-ups for high earners.** Catch-ups must be Roth for employees whose 2026 FICA wages from your company topped $155,000. No Roth in your plan means no catch-ups for them.
- **HCE status uses last year's pay.** Employees paid more than $160,000 in 2026 (plus 5% owners) are HCEs for 2027 testing. The $170,000 threshold applies to 2027 pay.
- **Your SECURE 2.0 amendment.** It's now part of your plan document. Make sure your forms and procedures match it.

2027 at a Glance

Every deadline in this checklist on one page. Assign an owner to each item and add it to your calendar.

Jan — Q1

- ☐ New limits in payroll
- ☐ Review first payrolls
- ☐ Send 2026 census

Feb — Q1

- ☐ **2/14** Q4 statements

Mar — Q1

- ☐ **3/15** ADP/ACP refunds
- ☐ **3/15** Partnership / S-Corp funding

Apr — Q2

- ☐ **4/1** First-year RMDs
- ☐ **4/15** 402(g) refunds
- ☐ **4/15** Sole prop / C-Corp funding

May — Q2

- ☐ **5/15** Q1 statements

Jun — Q2

- ☐ **6/30** ADP/ACP refunds (EACA plans)
- ☐ Investment review

Jul — Q3

- ☐ **7/29** SMM if amended

Aug — Q3

- ☐ **8/2** Form 5500 / 8955-SSA or extension
- ☐ **8/14** Q2 statements

Sep — Q3

- ☐ **9/15** Extended partnership / S-Corp funding
- ☐ **9/30** SAR (not extended)
- ☐ Mid-year plan check

Oct — Q4

- ☐ **10/15** Extended Form 5500
- ☐ **10/15** Extended sole prop / C-Corp funding

Nov — Q4

- ☐ **11/14** Q3 statements
- ☐ Fee review

Dec — Q4

- ☐ **12/2** 2028 notices
- ☐ **12/15** SAR (extended)
- ☐ **12/31** Year-end deadlines

Some items apply only to certain plans or businesses. See the Deadline Tasks pages for details.

First Payroll of 2027

Confirming payroll has the correct 2027 limits at the start of the year helps you avoid corrections down the line, like refunding excess deferrals or fixing catch-ups that should have been Roth. Work through these items before your first 2027 payroll:

Task	Date completed	Initials
Confirm payroll reflects 2027 limits 402(g) $25,500, catch-up $8,500, ages 60-63 $11,750		
Flag high earners for Roth catch-ups 2026 FICA wages from your company over $155,000		
Offer deferrals to LTPT employees Hours requirement over 500 Age 21+ with 500+ hours in both 2025 and 2026		
Review first 2027 payroll results Check limits, Roth catch-ups and new enrollees after your first payroll		

Deadline Tasks

Dates in **amber** fall on a weekend. We recommend delivering by the prior business day.

4th Quarter 2026

Deadline	Task	Date completed	Initials
12/2/26 WED	**Distribute 2027 participant notices** Safe harbor (match plans), QDIA, automatic enrollment and fee disclosure		
12/31/26 THU	**Confirm your SECURE 2.0 amendment is adopted** Keep a copy with your plan records		

1st Quarter 2027

Deadline	Task	Date completed	Initials
January	**Send 2026 census and payroll data** Your provider needs it to run nondiscrimination testing		
2/14/27 SUN	**Provide Q4 2026 benefit statements** Due 45 days after quarter-end		
3/15/27 MON	**Refund a failed 2026 ADP/ACP test** Non-safe harbor Avoids the 10% excise tax. EACA plans: by 6/30/27		
3/15/27 MON	**Fund 2026 employer contribution** Partnership / S-Corp, no extension Deadline to take the 2026 deduction		

2nd Quarter 2027

Deadline	Task	Date completed	Initials
4/1/27 THU	Distribute first-year RMDs Participants who became RMD-eligible during 2026		
4/15/27 THU	Fund 2026 employer contribution Sole prop / C-Corp, no extension Deadline to take the 2026 deduction		
4/15/27 THU	Refund 2026 deferrals over the 402(g) limit $24,500 for 2026. Avoids double taxation		
5/15/27 SAT	Provide Q1 2027 benefit statements Due 45 days after quarter-end		

3rd Quarter 2027

Deadline	Task	Date completed	Initials
7/29/27 THU	Distribute SMM or updated SPD If amended in 2026 Includes a SECURE 2.0 amendment that changed SPD information		
8/2/27 MON	File 2026 Form 5500 and Form 8955-SSA Or file Form 5558 for a 2½-month extension (July 31 is a Saturday)		
8/14/27 SAT	Provide Q2 2027 benefit statements Due 45 days after quarter-end		
9/15/27 WED	Fund 2026 employer contribution Partnership / S-Corp, extended Deadline to take the 2026 deduction		
9/30/27 THU	Distribute 2026 Summary Annual Report 5500 not extended		

4th Quarter 2027

Deadline	Task	Date completed	Initials
10/15/27 FRI	File 2026 Form 5500 and Form 8955-SSA If extended		
10/15/27 FRI	Fund 2026 employer contribution Sole prop / C-Corp, extended Deadline to take the 2026 deduction		
11/14/27 SUN	Provide Q3 2027 benefit statements Due 45 days after quarter-end		
12/2/27 THU	Distribute 2028 participant notices Safe harbor (match plans), QDIA, automatic enrollment and fee disclosure		
12/15/27 WED	Distribute 2026 Summary Annual Report If 5500 extended		

4th Quarter 2027

Deadline	Task	Date completed	Initials
12/31/27 FRI	**Year-end deadlines**		
	Refund a failed 2026 ADP/ACP test Non-safe harbor Employer owes a 10% excise tax on late refunds		
	Make 2026 safe harbor or QNEC contributions Nonelective or annually calculated match		
	Sign 2027 discretionary amendments		
	Distribute 2027 RMDs Participants who became RMD-eligible before 2027		

Ongoing Responsibilities

Most plan errors come from day-to-day operation. Initial each item you've reviewed, or enter "N/A".

Task	What to do	Initials
Follow the plan document	Operate the plan as written, including your SECURE 2.0 amendment	
Enroll every eligible employee	Send your provider data on all W-2 employees	
Onboard new eligibles	Enrollment kit, beneficiary form, SPD and notices before entry	
Use the plan's compensation definition	For both deferrals and employer contributions	
Deposit on time	Deferrals and loan payments, as soon as they can reasonably be segregated	
Monitor limits	Cap deferrals at $25,500; high earners' catch-ups above it must be Roth	
Keep loans on schedule	Repayments follow the loan policy and promissory note	
Track part-time hours Hours requirement over 500	2027 hours decide who enters as an LTPT employee in 2028	
Do quarterly housekeeping	Force out small balances, process defaulted loans, use forfeitures	

Plan Records

Keep these 2027 plan year records for at least 6 years after the Form 5500 is filed, and plan documents as long as they may be relevant. Then securely destroy them under a written retention schedule.

Record	What's included	Initials
Annual valuation	Participant-level contributions, distributions and fees	_____
Trustee/custodian report	Trust-level purchases and sales	_____
Nondiscrimination testing	Coverage, ADP/ACP, 402(g), 415(c), top-heavy and rate group results	_____
Participant notices	Fee disclosure, safe harbor, QDIA and automatic enrollment	_____
Form 5500	As filed, with schedules and any required audit report	_____
Summary Annual Report	As distributed to participants	_____
Plan documents	Plan, amendments (including SECURE 2.0), SPD and SMMs	_____

Feel confident, not overwhelmed!

Annual administration is easy to manage with a checklist and a qualified provider. Don't feel that way? Replace your 401(k) provider. Talk to a real person at Employee Fiduciary about simple, affordable 401(k) plans with some of the lowest fees in the country.

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