

Calendar of Significant Defined Contribution Plan Compliance Tasks¹

Action Item	Due Date
January	
Form 945 to IRS (to report income withheld on distributions)	January 31, 2019
Form 1099-R, 1099-DIV to participants (or write letter for 30-day extension)	January 31, 2019
February	
Form 945 (alternative date if withholding deposits timely made)	February 11, 2019
Fourth quarter benefit statements	February 14, 2019
Form 1099-R to IRS (if paper; or file Form 8809 for 30-day extension)	February 28, 2019
March	
Notice of intent to request prior year funding waiver (money purchase pension plans)	March 1, 2019
ADP/ACP test corrective distributions to avoid excise taxes, unless EACA for full year 2018	March 15, 2019
Request for prior year minimum funding waiver (money purchase pension plans)	March 15, 2019
Report U.S. source income of foreign persons: Form 1042-S to participants and IRS (or file Form 8809 for 30-day extension for 1042-S filing with IRS; write letter to request 30-day extension for providing 1042-S to participants); Form 1042 to IRS (or file Form 7004 for 6-month extension)	March 15, 2019
April	
Required minimum distributions for first time qualifying participants including 5% owners	April 1, 2019
Form 1099-R to IRS (if electronic; or file Form 8809 for 30-day extension)	April 1, 2019
Form 5330 excise tax on prior year (2017 testing year) excess contributions and excess aggregate contributions	April 1, 2019
Distribution of all excess 2018 deferrals (over \$18,500 plus \$6,000 catch-up)	April 15, 2019
File IRS Form 990-T to report and pay any unrelated business income tax owed by the Trust (or file for 6-month filing extension on Form 8868). This tax is sometimes triggered if the plan's trust earns income from certain plan investments (for example, limited partnership interests).	April 15, 2019
May	
First quarter benefit statements	May 15, 2019

¹ Assumes calendar plan and sponsor tax year. Does not account for short plan years or new plans. Weekend rule generally applies to filing deadlines and certain other acts under tax rules, but not contributions, distributions and other Title I ERISA obligations. If a deadline is not extended to the next business day, be sure to take appropriate action in advance of the deadline.

Action Item	Due Date
June	
EACA corrective distributions (to avoid 10% excise tax on ADP/ACP refunds)	June 30, 2019
July	
Summary of material modifications if amendments adopted in 2018	July 29, 2019
2018 Form 5500 and 8955-SSA (or file Form 5558 to request an extension if not relying on corporate tax return extension)	July 31, 2019
Form 5330 excise tax on funding deficiency for money purchase pension plans, nondeductible contribution, prohibited transaction, etc. (or file Form 5558 to request 6-month extension)	July 31, 2019
Statement of deferred vested benefits (SSA information) to terminated participants (unless on Form 8955-SSA extension)	July 31, 2019
Annual participant statement (if no right to direct investments and not on extension for Form 5500)	July 31, 2019
August	
Second quarter benefit statements	August 14, 2019
Participant fee disclosures in plans with participant directed investments	August 30, 2019 (up to 14 months from last mailing, if later)
September	
Minimum funding contribution due (money purchase pension plans)	September 15, 2019
Summary annual report, if no 5500 extension	September 30, 2019
October	
Earliest day to send out safe harbor notices for 401(k)/401(m) nondiscrimination safe harbor plans (including notice of qualified automatic contribution arrangement) and plans with eligible automatic contribution arrangements.	October 3, 2019
Retroactive amendment to correct prior year coverage/nondiscrimination failures	October 15, 2019
Annual participant statement (if no right to direct investments and either using Form 5558 extension for Form 5500 or corporate return extension for 5500)	October 15, 2019
2018 Form 5500, 8955-SSA, and SSA information to participants, if on Form 5558 extension or corporate return extension for 5500	October 15, 2019
QSLOB Form 5310-A modification or revocation election (if changing QSLOB for the 2018 plan year.)	October 15, 2019

Action Item	Due Date
November	
Third quarter benefit statements	November 14, 2019
December	
Deadline for participant notices including: auto-enrollment, QDIA, safe harbor	December 2, 2019
Summary annual report if Form 5500 extension using either Form 5558 or corporate return extension	December 15, 2019
Required minimum distributions	December 31, 2019
Corrective distributions for 2018 plan year	December 31, 2019
Last day to adopt discretionary plan amendments for 2019	December 31, 2019

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