

2020 Key Administrative Dates and Deadlines for Calendar-Year Defined Contribution Retirement Plans¹

Subject to ERISA and the Internal Revenue Code



JANUARY

- 1/31
 - Forms W-2, W-3, 8809
 - Form 1099-R
 - Form 945

FEBRUARY

- 2/10
 - Form 945 (Alternative Date)
- 2/14
 - Quarterly Benefit Statements
- 2/28
 - Form 1099-R and 1096 (paper) or 8809

MARCH

- 3/15
 - Corrective Distributions
- 3/16*
 - Forms 1042 and 1042-S
 - Form 1065 or 7004
- 3/31
 - Form 5330
 - Forms 1099-R (paper, with extension, or electronic)

APRIL

- 4/1
 - Required Minimum Distributions
- 4/15
 - Excess Deferrals and Allocable Income
 - Deductible Contributions (Form 1120 or 7004)
- 4/30
 - Form 1099-R (electronic, with extension)

MAY

- 5/15
 - Quarterly Benefit Statements
 - Form 990 or 8868

JUNE

- 6/30
 - EACA Corrective Distributions

JULY

- 7/28
 - Summary of Material Modifications
- 7/31
 - Plan Audit
 - Form 5500 or 5558
 - Form 8955-SSA or 5558
 - Notice to Terminated Vested Employees
 - Annual Benefit Statements
 - Form 5330

AUGUST

- 8/14
 - Quarterly Benefit Statements

SEPTEMBER

- 9/15
 - Money Purchase Plan Contributions
 - Annual Benefit Statements
 - Deductible Contributions
 - Form 5500 and Plan Audit
- 9/30
 - Summary Annual Report

OCTOBER

- 10/3
 - Safe Harbor Notices
 - Automatic Enrollment Notices
- 10/15
 - Corrective Plan Amendment
 - Deductible Contributions
 - Annual Benefit Statements
 - Form 5500 and Plan Audit
 - Form 8955-SSA
 - Notice to Terminated Vested Employees

NOVEMBER

- 11/14
 - Quarterly Benefit Statements
- 11/15
 - Summary Annual Report
- 11/16*
 - Employer Contributions, Form 990

DECEMBER

- 12/1
 - QDIA Notices
 - Automatic Enrollment Notices
 - Safe Harbor Notices
- 12/15
 - Summary Annual Report
- 12/31
 - Required Minimum Distributions
 - Corrective Distributions and QNECs
 - Safe Harbor, QACA, or EACA Elections
 - Participant Notices
 - Discretionary Plan Amendments
 - Remove Safe Harbor Feature

Note: Fee disclosures (under ERISA 404(a)(5)) must be provided on or before the participant can first direct investments and distributed at least annually thereafter. Additional disclosures are required between 30 and 90 days prior to certain plan changes.

¹ Click on any item for more information or refer to pp. 2-4.

*The date reflected is the next business day following a filing date of an IRS or Department of Labor form that otherwise would fall on a Saturday, Sunday, or a legal holiday.

The Milliman 2020 Defined Contribution Plan Calendar contains general information that is not intended to constitute the rendering of legal, tax, investment, or accounting advice. Application to specific circumstances should rely on further professional guidance.

2020 Key Administrative Dates and Deadlines for Calendar-Year Defined Contribution Retirement Plans

Subject to ERISA and the Internal Revenue Code

DATE	ITEM	ACTION
1/31	Forms W-2, W-3, 8809	Provide 2019 IRS Form W-2 (<i>Wage and Tax Statement</i>) to employees, reporting wages and coverage in Box 13 as a participant in a defined contribution "retirement plan" (qualified profit sharing/401(k), 403(b), governmental 457(b), SEP or, SIMPLE), and reporting elective deferrals and designated Roth contributions for 2019 in Box 12, and file the form with the Social Security Administration (SSA) using Form W-3 (<i>Transmittal of Wage and Tax Statements</i>) unless a 30-day extension has been granted upon a filing of a timely request using Form 8809 (<i>Application for Extension of Time to File Information Returns</i>).
1/31	Form 1099-R	Provide 2019 IRS Form 1099-R (<i>Distributions from Pensions, Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance Contracts, etc.</i>) to recipients of 2019 distributions.
1/31	Form 945	File IRS Form 945 (<i>Annual Return of Withheld Federal Income Tax</i>) to report income tax withheld from 2019 distributions. (If deposits were made on time in full payment of the withholding taxes for the year, an alternative return filing date optionally applies.)
2/10	Form 945 (Alternative Date)	File IRS Form 945, if the withholding taxes on 2019 distributions were timely paid in full.
2/14	Quarterly Benefit Statements	Distribute fourth quarter 2019 benefit statement to participants, if individual account plan gives participants the right to direct their investments.
2/28	Forms 1099-R and 1096 (paper) or 8809	Transmit paper copies of IRS Form 1099-R to IRS using Form 1096 (<i>Annual Summary and Transmittal of U.S. Information Returns</i>), if not filing electronically or unless a 30-day extension request on Form 8809 is timely filed.
3/15	Corrective Distributions	Distribute to highly compensated employees corrective distributions for a failed 12/31/19 plan year end ADP/ACP test for excess 401(k)/(m) plan contributions and allocable income to avoid 10% excise tax assessment on plan sponsor.
3/16*	Forms 1042 and 1042-S	File IRS Form 1042 (<i>Annual Withholding Tax Return for U.S. Source Income of Foreign Persons</i>) to report income taxes withheld from distributions made in 2019 to certain nonresident aliens. File Copy A of IRS Form 1042-S (<i>Foreign Persons' U.S. Source Income Subject to Withholding</i>) to report distributions made in 2019 to certain nonresident aliens, and provide Copies B, C, and D to recipients.
3/16*	Form 1065 or 7004	File IRS Form 7004 (<i>Application for Automatic Extension of Time to File Certain Business Income Tax, Information, and Other Returns</i>) to obtain a six-month extension to file 2018 IRS Form 1065 (<i>U.S. Return of Partnership Income</i>) and the deadline for making and deducting 2018 employer contributions; otherwise, file IRS 2019 partnership tax return and deposit employer contributions for amounts to be considered deductible for 2019.
3/31	Form 5330	File IRS Form 5330 (<i>Return of Excise Taxes Related to Employee Benefit Plans</i>) to report and pay excise taxes for 12/31/18 plan year end ADP/ACP refunds returned after 3/15/19 (or after 6/30/19 if the plan includes an eligible automatic contribution arrangement (EACA) that covers all participants).
3/31	Forms 1099-R (paper, with extension, or electronic)	File copies of 2019 IRS Form 1099-R electronically, unless a 30-day extension request using Form 8809 is timely filed.
4/1	Required Minimum Distributions	Deadline to make the first required minimum distributions (RMDs) to terminated vested participants who attained age 70-1/2 in 2019 and to participants older than age 70-1/2 who retired in 2019.
4/15	Excess Deferrals and Allocable Income	Refund to participants any 2019 excess 401(k), 403(b), and nongovernmental 457(b) plan deferrals and allocable income. (Note: Excess deferrals for governmental 457(b) plans do not require correction by the following April 15, but rather "as soon as administratively practicable.")
4/15	Deductible Contributions (Form 1120 or 7004)	File IRS Form 7004 to obtain a six-month extension of both IRS Form 1120 (<i>U.S. Corporation Income Tax Return</i>) and the deadline for making and deducting plan year 2019 employer contributions; otherwise, file the corporate tax return and deposit employer contributions for amounts to be considered deductible for plan year 2019.
4/30	Form 1099-R (electronic, with extension)	Transmit 2019 Form 1099-R electronically to the IRS if the deadline was extended by a timely filed Form 8809.
5/15	Quarterly Benefit Statements	Distribute first quarter 2020 benefit statements to participants, if individual account plan gives participants the right to direct their investments.
5/15	Form 990 or 8868	For tax-exempt employers with calendar fiscal years, file IRS Form 8868 (<i>Application for Extension of Time to File an Exempt Organization Return</i>) to obtain a six-month extension to file 2018 IRS Form 990 (<i>Return of Organization Exempt from Income Tax</i>); otherwise, file IRS 2018 tax-exempt organization information return and deposit 2019 employer contributions being reported on Form 990.

* The date reflected is the next business day following a filing date of an IRS or Department of Labor form that otherwise would fall on a Saturday, Sunday, or a legal holiday.

The Milliman 2020 Defined Contribution Plan Calendar contains general information that is not intended to constitute the rendering of legal, tax, investment, or accounting advice. Application to specific circumstances should rely on further professional guidance.

2020 Key Administrative Dates and Deadlines for Calendar-Year Defined Contribution Retirement Plans

Subject to ERISA and the Internal Revenue Code

DATE	ITEM	ACTION
6/30	EACA Corrective Distributions	If the plan includes an EACA that covers all participants, distribute to highly compensated employees corrective distribution for 2019 excess ADP/ACP amounts to avoid 10% excise tax assessment on plan sponsor.
7/28	Summary of Material Modifications	Provide a Summary of Material Modifications (SMM) to participants if the plan adopted amendments for the plan year ending 12/31/19, unless the information was included in an updated and timely distributed Summary Plan Description (SPD).
7/31	Plan Audit	Deadline to obtain an independent qualified public accountant's audit report or limited scope audit to include in Schedule H (<i>Financial Information</i>) as an attachment to 2019 Form 5500, if there are more than 100 eligible participants, unless IRS Form 5558 is filed to obtain a 2-1/2 month extension to file Form 5500.
7/31	Form 5500 or 5558	File 2019 Form 5500 (Annual Return/Report of Employee Benefit Plan) or file IRS Form 5558 (<i>Application for Extension of Time to File Certain Employee Plan Returns</i>) to extend Form 5500 filing due date by 2-1/2 months.
7/31	Form 8955-SSA or 5558	Deadline to file 2019 IRS Form 8955-SSA (<i>Annual Registration Statement Identifying Separated Participants with Deferred Vested Benefits</i>) or file IRS Form 5558 to extend the filing deadline by 2-1/2 months.
7/31	Notice to Terminated Vested Employees	Provide a notice describing the amount of the account balance as of the date of termination to terminated vested employees who were reported on 2019 Form 8955-SSA, unless IRS Form 5558 is filed to obtain a 2-1/2 month extension to file Form 8955-SSA.
7/31	Annual Benefit Statements	Distribute 2019 annual benefit statements to individual account plan participants who do not have the right to direct their investments, unless IRS Form 5558 is filed to obtain a 2-1/2 month extension to file Form 5500 or if an extension (Form 7004 or 8868) to file corporate (Form 1120), partnership (Form 1065), or tax-exempt (Form 990) returns was timely filed.
7/31	Form 5330	File IRS Form 5330 to report and pay excise taxes on 2019 plan year prohibited transactions and nondeductible contributions. Form 5558 may be filed to request an extension of time of up to six months to file Form 5330, but does not extend the time to pay the excise taxes. The amount of estimated excise tax due must be paid with Form 5558. Interest is charged on taxes not paid by the due date even if an extension of time to file is granted.
8/14	Quarterly Benefit Statements	Distribute second quarter 2020 benefit statements to participants, if individual account plan gives participants the right to direct their investments.
9/15	Money Purchase Plan Contributions	Deadline to make required employer contributions to money purchase plans for the 2019 plan year.
9/15	Annual Benefit Statements	For partnership employers, distribute 2019 annual benefit statements to individual account plan participants who do not have the right to direct their investments, if no IRS Form 5558 was filed to extend the filing of 2019 Form 5500 but an extension request (IRS Form 7004) was timely filed for the employer's 2019 income tax return (IRS Form 1065).
9/15	Deductible Contributions	Deadline for partnership employers to make 2019 plan year deductible contributions if an extension request (IRS Form 7004) was timely filed for the employer's income tax return (IRS Form 1065).
9/15	Form 5500 and Plan Audit	For partnership employers, file 2019 Form 5500, if no IRS Form 5558 was filed but an extension request (IRS Form 7004) was timely filed for the employer's income tax return (IRS Form 1065).
9/30	Summary Annual Report	Distribute to participants 2019 Summary Annual Report (SAR), unless the filing of 2019 Form 5500 is extended by a timely filed IRS Form 5558, or if an extension (Form 7004 or 8868) to file corporate (Form 1120), partnership (Form 1065), or tax-exempt (Form 990) returns was timely filed.
10/3	Safe Harbor Notices	Earliest date to provide to participants 401(k) or 403(b) plan safe harbor notices, if applicable for 2021.
10/3	Automatic Enrollment Notices	Earliest date to provide to participants 401(k) or 403(b) annual automatic enrollment notices for the 2021 plan year for plans with automatic contribution arrangements. (Note: The notice may be combined with the qualified default investment alternative (QDIA) notice.)
10/15	Corrective Plan Amendment	Deadline to adopt a retroactive corrective plan amendment, if the plan fails minimum coverage, nondiscrimination, and/or compensation requirements for 2019.
10/15	Deductible Contributions	Deadline for corporate employers to make 2019 plan year deductible contributions if an extension request (IRS Form 7004) was timely filed for the company's income tax return (IRS Form 1120).

The Milliman 2020 Defined Contribution Plan Calendar contains general information that is not intended to constitute the rendering of legal, tax, investment, or accounting advice. Application to specific circumstances should rely on further professional guidance.

2020 Key Administrative Dates and Deadlines for Calendar-Year Defined Contribution Retirement Plans

Subject to ERISA and the Internal Revenue Code

DATE	ITEM	ACTION
10/15	Annual Benefit Statements	Distribute 2019 annual benefit statements to individual account plan participants who do not have the right to direct their investments, if 2019 Form 5500 due date was extended by a timely filed IRS Form 5558; for corporate employers, distribute the statements if no IRS Form 5558 was filed to extend the filing of 2019 Form 5500 but an extension request (IRS Form 7004) was timely filed for the employer's 2019 income tax return (IRS Form 1120); for tax-exempt employers, distribute the statements, if no IRS Form 5558 was filed to extend the filing of 2019 Form 5500 but an extension request (IRS Form 8868) was timely filed for the employer's 2019 information return (IRS Form 990).
10/15	Form 5500 and Plan Audit	File 2019 Form 5500, if the due date was extended by a timely filed IRS Form 5558; for corporate employers, file 2019 Form 5500, if no IRS Form 5558 was filed but an extension request (IRS Form 7004) was timely filed for the employer's income tax return (IRS Form 1120); for tax-exempt employers, file 2019 Form 5500, if no IRS Form 5558 was filed but an extension request (IRS Form 8868) was timely filed for the employer's information return (IRS Form 990). (Note: No Form 5500 filing extension is permitted beyond 9-1/2 months after the plan year ends.)
10/15	Form 8955-SSA	File 2020 IRS Form 8955-SSA, if the due date was extended by a timely filed IRS Form 5558.
10/15	Notice to Terminated Vested Employees	Provide a notice describing the amount of the account balance as of the date of termination to terminated vested employees who were reported on 2020 IRS Form 8955-SSA, if the due date to file Form 8955-SSA was extended by a timely filed IRS Form 8955-SSA.
11/14	Quarterly Benefit Statements	Distribute third quarter 2020 benefit statement to participants, if individual account plan gives participants the right to direct their investments.
11/15	Summary Annual Report	For partnerships, distribute 2019 SAR to participants and beneficiaries, if the Form 5500 filing date was extended by a timely filed Form 7004 for the Form 1065 partnership income.
11/16*	Employer Contributions, Form 990	For tax-exempt employers with calendar fiscal years, file IRS 2019 tax-exempt organization information return and deposit 2019 employer contributions being reported on Form 990, if the Form 990 filing date was extended by a timely filed Form 8868.
12/1	QDIA Notices	Deadline to send QDIA notices to participants for the 2021 plan year.
12/1	Automatic Enrollment Notices	Deadline to provide to participants 401(k) or 403(b) annual automatic enrollment notices for the 2021 plan year for plans with automatic contribution arrangements. (Note: The notice may be combined with the QDIA notice.)
12/1	Safe Harbor Notices	Deadline to provide to participants 401(k) or 403(b) plan safe harbor notices, if applicable for the 2021 plan year.
12/15	Summary Annual Report	Distribute to participants 2019 SAR, if 2018 Form 5500 due date was extended by a timely filed IRS Form 5558; for corporate employers, distribute 2019 SAR, if no IRS Form 5558 was filed but an extension request (IRS Form 7004) was timely filed for the employer's income tax return (IRS Form 1120); for tax-exempt employers, distribute 2019 SAR, if no IRS Form 5558 was filed but an extension request (IRS Form 8868) was timely filed for the employer's information return (IRS Form 990).
12/31	Required Minimum Distributions	Deadline to make recurring age 70-1/2 RMDs to participants.
12/31	Corrective Distributions and QNECs	Deadline to process corrective distributions to correct a failed 12/31/19 ADP/ACP test for excess 401(k)/(m) plan contributions and allocable income to maintain qualified status (10% excise tax applies); also, deadline to make a qualified nonelective contribution (QNEC) to cure a failed 12/31/19 "current year method" ADP/ACP test.
12/31	Safe Harbor, QACA, or EACA Elections	If desired for the 2021 plan year, deadline to amend an existing 401(k) or 403(b) plan to be a safe harbor plan or to add a QACA or EACA. (Note: This is the deadline for the amendment to the plan; however, notices to participants should be made prior to the beginning of the 2021 plan year, as indicated in "Safe Harbor Notices" and "Automatic Enrollment Notices," above.)
12/31	Participant Notices	If not included in an SPD, provide notices to participants, if applicable, about individual account plans that allow participant-directed investments that plan sponsor is relieved of liability for certain losses resulting from the participant's exercise of his/her rights, and about the availability of any investment advice services.
12/31	Discretionary Plan Amendments	Deadline to amend plan for discretionary changes implemented during 2020.
12/31	Remove Safe Harbor Feature	Deadline to amend plan to remove an existing safe harbor plan feature for 2021.

* The date reflected is the next business day following a filing date of an IRS or Department of Labor form that otherwise would fall on a Saturday, Sunday, or a legal holiday.

The Milliman 2020 Defined Contribution Plan Calendar contains general information that is not intended to constitute the rendering of legal, tax, investment, or accounting advice. Application to specific circumstances should rely on further professional guidance.