



2017 Defined Contribution Compliance Calendar



JANUARY 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	First week of January	Participant statements	Send to participants	Begin sending fourth quarter 2016 quarterly participant statements.
<input type="checkbox"/>	First week of January	Discrimination testing	Not applicable	Commence discrimination testing data collection and evaluation.
<input type="checkbox"/>	January 31	File Form 5300: Plan Qualification for Cycle A individually designed plans	IRS	Applicable only for Cycle A filers (EIN ends in 1 or 6). Submission period opened February 1, 2016, and ends January 31, 2017.
<input type="checkbox"/>	January 31	Form 1099-R to participants	Participants, retirees, and beneficiaries receiving benefits	Report of single-sum total distributions as well as periodic annuities, pension payments, other non-total distributions, distribution of excess deferrals or excess contributions, for participants who received distributions in the previous year.
<input type="checkbox"/>	January 31	Second six-year remedial amendment cycle ends	N/A	Applicable for preapproved defined contribution plans.

JANUARY

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FEBRUARY

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FEBRUARY 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	February 28	Form 1099-R to IRS, if paper	IRS	Report of single-sum total distributions as well as periodic annuities, pension payments, other non-total distributions, distribution of excess deferrals or excess contributions from certain plans, for participants who received distributions in the previous year.

FEBRUARY							MARCH						
S	M	T	W	T	F	S	S	M	T	W	T	F	S
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MARCH 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	March 15	Return excess contributions or File Form 5330—Excise Taxes for failure to timely correct ADP/ACP failure	IRS	Unless QMACs or QNECs are used to satisfy ADP/ACP testing requirements, return any excess contributions for a failed ADP test and any excess aggregate contributions for a failed ACP test to avoid penalties. Plan sponsor will be subject to a 10 percent excise tax penalty for excess returns made after 2 1/2 months following the end of the plan year, unless your plan meets all the EACA requirements, including the annual notice requirement and the requirement that the EACA cover all eligible employees for the plan year.
<input type="checkbox"/>	March 15	Corporate tax returns	IRS	Deadline for filing corporate tax returns and contribution deadline for deductibility (without extension) for companies operating on a calendar year. Deadline for requesting automatic extension (to September 15) of corporate tax returns.
<input type="checkbox"/>	March 31	Form 1099-R to IRS, if electronic	IRS	Report of single-sum total distributions as well as periodic annuities, pension payments, other non-total distributions, distribution of excess deferrals or excess contributions from certain plans, for participants who received distributions in the previous year.
<input type="checkbox"/>	March 31	Commence required minimum distributions	Affected participants	Terminated vested participants or more than 5 percent owners who attained age 70 1/2 in prior year and have not commenced distributions.

MARCH							APRIL						
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12	13	14	15	16	17	18	9	10	11	12	13	14	15
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26	27	28	29	30	31		23	24	25	26	27	28	29
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APRIL 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	First week of April	Participant statements	Send to participants	Begin sending first quarter 2017 quarterly participant statements.
<input type="checkbox"/>	April 10	Fiduciary Rule (Conflicts of Interest)	N/A	Confirm third parties providing education, advice, and distribution recommendations are in compliance. (January 1, 2018: Full compliance with the Best Interest Contract Exception)
<input type="checkbox"/>	April 14	Distribute excess deferrals for 2016 plan year	Affected participants	The plan must distribute deferrals in excess of Section 402(g) limit. Participants entitled to make catch-up contributions may be able to reclassify some excess deferrals as catch-up contributions.
<input type="checkbox"/>	April 17	Individual/Partnership returns	IRS	Deadline for filing individual and/or partnership tax returns and contribution deadline for deductibility for unincorporated entities (without extension). Deadline for requesting automatic extension (to October 16) of individual and partnership returns.
<input type="checkbox"/>	April 30	New adopters of preapproved plans	IRS	Deadline for employers adopting a newly preapproved plan after January 1, 2016, and, if applicable, filing for a determination letter.

APRIL							MAY						
S	M	T	W	T	F	S	S	M	T	W	T	F	S
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2	3	4	5	6	7	8	7	8	9	10	11	12	13
9	10	11	12	13	14	15	14	15	16	17	18	19	20
16	17	18	19	20	21	22	21	22	23	24	25	26	27
23	24	25	26	27	28	29	28	29	30	31			
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MAY 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	May 15	Distribute 2017 plan year first quarter benefit statements	Participants and beneficiaries who may direct investments	Statement informing participants of their total accrued benefit and, if not fully vested, the nonforfeitable benefits that have accrued. For individual account plans, must also note value of each investment.

MAY							JUNE						
S	M	T	W	T	F	S	S	M	T	W	T	F	S
	1	2	3	4	5	6					1	2	3
7	8	9	10	11	12	13	4	5	6	7	8	9	10
14	15	16	17	18	19	20	11	12	13	14	15	16	17
21	22	23	24	25	26	27	18	19	20	21	22	23	24
28	29	30	31				25	26	27	28	29	30	

JUNE 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	June 30	Make ADP/ACP corrective distributions (for 2016 plan year) from plan with EACA	Affected participants	Unless QMACs or QNECs are used to satisfy the ADP/ACP testing requirements, plans that meet all of the EACA requirements (including the annual notice requirement and the requirement that all eligible employee are covered by the EACA for the plan year) have a six-month period to correct failed ADP/ACP tests before the corrective distributions are subject to an employer-paid 10 percent excise tax.

JUNE							JULY						
S	M	T	W	T	F	S	S	M	T	W	T	F	S
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11	12	13	14	15	16	17	9	10	11	12	13	14	15
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25	26	27	28	29	30		23	24	25	26	27	28	29
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JULY 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	First week of July	Participant statements	Send to participants	Begin sending second quarter 2017 quarterly participant statements.
<input type="checkbox"/>	July 28	Distribute SMM	Affected participants	Distribute SMM for amendments made in 2016 plan year; distribution of an updated SPD satisfies this requirement.
<input type="checkbox"/>	July 31	Distribute annual benefit statements for 2016 plan year (non-participant-directed plans)	Participants and beneficiaries with accounts	Statement informing participants of their total accrued benefit and, if not fully vested, the nonforfeitable benefits that have accrued. For individual account plans, must also note value of each investment.
<input type="checkbox"/>	July 31	Form 5500	Filed electronically with DOL	Annual report filed by employee benefit plans subject to ERISA and IRS for purposes of providing plan information to DOL and IRS. Filing requirements vary with type and size of plan. A short form is available for plans with fewer than 100 participants as of the first day of the plan year, that are exempt from financial audit requirements, are fully invested in certain secure investments and hold no employer stock. Only certain schedules are required to be filed with Form 5500-SF.
<input type="checkbox"/>	July 31	Form 8955-SSA	IRS	Annual registration statement identifying separated participants with deferred vested benefits.
<input type="checkbox"/>	July 31	Form 5558 (5500 extension)	IRS	To request extension of time in which to file Form 5500 or Form 8955-SSA or both (maximum 2 1/2 months).
<input type="checkbox"/>	July 31	File Form 5330: Return of excise taxes related to employee benefit plans	IRS	Used to report and pay excise taxes on prohibited transactions and excess 401(k) plan contributions that occurred in prior year.

JULY							AUGUST						
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9	10	11	12	13	14	15	13	14	15	16	17	18	19
16	17	18	19	20	21	22	20	21	22	23	24	25	26
23	24	25	26	27	28	29	27	28	29	30	31		
30	31												

AUGUST 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	August 1	Preapproved defined contribution plans	N/A	Beginning of the 12-month on-cycle submission period for master and prototype plan sponsors and volume submitter practitioners to submit preapproved defined contribution plans for opinion or advisory letters during the third six-year remedial amendment cycle.
<input type="checkbox"/>	August 14	Distribute second quarter 2017 plan year benefit statements	Participants and beneficiaries who may direct investments	Statement informing participants of their total accrued benefit and, if not fully vested, the nonforfeitable benefits that have accrued. For individual account plans, must also note value of each investment.

AUGUST							SEPTEMBER						
S	M	T	W	T	F	S	S	M	T	W	T	F	S
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13	14	15	16	17	18	19	10	11	12	13	14	15	16
20	21	22	23	24	25	26	17	18	19	20	21	22	23
27	28	29	30	31			24	25	26	27	28	29	30

SEPTEMBER 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	September 15	Corporate tax returns	IRS	Extended deadline for filing corporate tax returns and contribution deadline for deductibility.
<input type="checkbox"/>	September 15	Top-heavy minimum contribution due	Affected participants	Top-heavy minimum contribution due if your fiscal year and plan year coincide, and a federal tax extension has been filed; top-heavy contributions due.
<input type="checkbox"/>	September 29	SARs	Sent to participants and beneficiaries	Deadline for distributing Summary Annual Report (SAR) to participants, provided deadline for Form 5500 was not extended (later of nine months after close of plan year or two months after due date for Form 5500).

SEPTEMBER							OCTOBER						
S	M	T	W	T	F	S	S	M	T	W	T	F	S
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3	4	5	6	7	8	9	8	9	10	11	12	13	14
10	11	12	13	14	15	16	15	16	17	18	19	20	21
17	18	19	20	21	22	23	22	23	24	25	26	27	28
24	25	26	27	28	29	30	29	30	31				

OCTOBER 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	First week of October	Participant statements	Send to participants	Begin sending third quarter 2017 quarterly participant statements.
<input type="checkbox"/>	October 13	Coverage/Nondiscrimination Failure Amendment	No filing requirement	Deadline for adopting a retroactive amendment to correct an internal revenue code (IRC) Section 410(b) coverage or Section 401(a)(4) nondiscrimination failure for 2016.
<input type="checkbox"/>	October 16	File Form 5500, if extension obtained	IRS	Form 5500 extensions are available by filing a Form 5558 on or before the filing's initial due date. Also available to employers under certain circumstances when tax and plan years are the same.
<input type="checkbox"/>	October 16	Form 8955-SSA, if extension filed	IRS	Annual registration statement identifying separated participants with deferred vested benefits.

OCTOBER							NOVEMBER						
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NOVEMBER 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	November 14	Distribute 2017 plan year third quarter benefit statements	Participants and beneficiaries who may direct investments	Statement informing participants of their total accrued benefit and, if not fully vested, the nonforfeitable benefits that have accrued. For individual account plans, must also note value of each investment.

NOVEMBER							DECEMBER						
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DECEMBER 2017

<input checked="" type="checkbox"/>	When Due	Description	Sent to/Filed With	Action
<input type="checkbox"/>	December 1	Annual Notice of Intent to Use Safe-Harbor Formula (for safe harbor 401(k) plans)	Sent to all employees eligible to participate in plan	Notice to participants describing their rights and obligations under a 401(k) plan, including a description of safe harbor matching or safe harbor nonelective employer contribution formula, how and when to make deferral elections and other required information. Plan sponsor may supply "contingent" notice of a possible 3 percent QNEC for the year, preserving the right to adopt such a safe harbor design during the ensuing plan year.
<input type="checkbox"/>	December 1	Supplemental notice for safe harbor plan	Sent to all employees eligible to participate in plan	Supplemental Notice for safe harbor plan that issued Contingent Notice at beginning of year as to whether 3 percent safe harbor will be made for the current year.
<input type="checkbox"/>	December 1	EACA/QACA notice (for DC plans using automatic enrollment)	Sent to all employees eligible to participate in plan	Notice describes rights and obligations under a 401(k) plan with automatic enrollment arrangement, including right to elect not to have salary deferrals made on employee's behalf, right to elect a different percentage, and how contributions will be invested in absence of an investment election.
<input type="checkbox"/>	December 1	Annual QDIA notice (for DC plans with participant-directed investments)	Sent to participants and beneficiaries	Notice describes right to direct investments, how accounts will be invested in the absence of participant direction, and opportunity to invest outside QDIA in a broad range of investment alternatives. Notice may be combined with QACA, EACA, or other ERISA §404(c) notices.
<input type="checkbox"/>	December 15	Extended SAR deadline	Sent to participants and beneficiaries	Narrative summary of financial information reported on Form 5500 and statement of right to receive annual report. Model notice language is provided by the DOL.
<input type="checkbox"/>	December 29	Required minimum distributions for 2017	Affected participants	Applies to participants and beneficiaries whose minimum required distributions have already commenced.
<input type="checkbox"/>	December 31	Discretionary amendments	N/A	Deadline for amending plan for discretionary changes implemented during plan year (certain exceptions apply, e.g., adding salary deferrals, cutback accrued benefits).
<input type="checkbox"/>	December 29	ADP/ACP corrective distributions	Affected participants	ADP/ACP corrective distributions (for 2016 plan year). A 10 percent excise tax applies to the plan sponsor if the corrective distributions are not made by March 15.
<input type="checkbox"/>	December 31	Formal Safe Harbor conversion amendment for 2018 plan year	N/A	A sponsor who desires to amend a 401(k) plan to provide for a safe harbor design for its 2018 plan year should amend the plan by the last day of the 2017 plan year to reflect the safe harbor provisions. Similarly, a sponsor of a safe harbor plan who desires to remove the plan from safe harbor status for its 2017 plan year should amend the plan to remove such provisions.

NOVEMBER

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DECEMBER

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RECURRING OBLIGATIONS

Description	When Due	Sent to/Filed With	Action
Automatic Enrollment/ Escalation	Due upon eligibility	Newly eligible employees	The notice describes the rights and duties of employees under the EACA or QACA, including notice of the QDIA to which the plan will deposit automatic contributions. The IRS has supplied a model notice, combining the EACA/QACA notice with the QDIA notice.
Initial QDIA Notice	Due 30 days prior to eligibility or first investment in the default fund; for auto enrollment plans, on or before the employee becomes eligible to participated	All eligible employees, and to new hires with immediate eligibility	This notice is required only if the plan's fiduciaries desire ERISA § 404(c) protection with respect to the default investment, or intend an automatic contribution arrangement to satisfy the EACA/QACA rules. The notice must include specific information and disclosures. There is no model notice per se. However, the IRS included QDIA language in its model EACA/QACA notice.
Blackout Notice (for plans with participant-directed investments)	Due at least 30 days, but not more than 60 days, before the beginning of a blackout period	Sent to participants and to beneficiaries affected by blackout period	Advance notice of a period of more than three consecutive business days during which normal rights to direct investment of assets in accounts or obtain plan loans or distributions are restricted.
QJSA Notice	Due 30 to 180 days before the annuity starting date or based on specified plan rules	Sent to participants and beneficiaries	When an employee retires or is otherwise eligible for a distribution, provide a QJSA notice that explains QJSA and QOSA terms and conditions, right to waive, spousal consent rule, explanation of optional forms of benefits, and their relative values.
5310-A Notice	Due 30 days prior to merger, consolidation, transfer or spin-off of plan assets/liabilities	Filed with the IRS	IRS rules provide for several exceptions.
Distribution Tax Notice	Due 30-180 days prior to distribution date; the minimum 30-day period may be waived by the participant or beneficiary, subject to certain requirements	Sent to participants and beneficiaries	Typically handled by the plan's vendor.
SPD	Within 90 days after the participant joins the plan or, as applicable, the beneficiary begins to receive benefits	Sent to participants, retirees, and beneficiaries	SPD must be issued 120 days after the plan effective date for a new plan. Applies to profit sharing, 401(k) plans and 403(b) plans subject to ERISA.
Fidelity Bond	Continuously	Not applicable	ERISA requires that fiduciaries and anyone else who handles plan funds be bonded. Many employers overlook the fidelity bond requirement, or assume their fiduciary liability insurance policy supplies the coverage.

RECURRING OBLIGATIONS

Description	When Due	Sent to/Filed With	Action
Deposit of Employee Deferral Contributions	Continuously	Sent to custodian of plan assets	Plan sponsors must always deposit employee contributions as soon as administratively possible but in no event later than 15 business days after the end of month deferrals, loan repayments, or after-tax contributions are taken out of employees' paychecks. The 15th business day after end of the month rule is not a safe harbor deadline. Employee contributions must always be deposited on the earliest date the plan sponsor can segregate the contributions from its general assets. The DOL has provided a seven business day safe harbor for employers who sponsor plans with fewer than 100 participants to remit employee contributions to the plan.
Plan Documents	Continuously	Provided upon written request	Copies of certain plan documents must be furnished upon written request, and the plan administrator must have copies available for examination, including the plan document, updated SPD, latest Form 5500, and trust agreement.
Explanation of Rollover and Tax Options (for all rollover-eligible retirement plans)	Not less than 30 or more than 180 days prior to initial payment starting date	Sent to participants and to beneficiaries who will receive or can elect to receive an eligible rollover distribution	Notice to recipient of a distribution eligible for rollover to an eligible retirement plan explaining rules for rollovers and mandatory withholding on amounts not rolled over.
Service Provider Fee Disclosure	<i>Initial Disclosure:</i> Required within a reasonable period before the contract is entered into or renewed. <i>Annual Disclosure:</i> Required following changes in investment fees (e.g., expense ratios) and record keeping fees. <i>Additional Disclosures:</i> Required following changes to compensation or services provided no later than 60 days from the date the changes are approved.	Received from covered service provider	Disclosure should address services provided to the plan under a contract; direct and indirect compensation received by the service provider and its affiliates; statement as to whether any services may give rise to fiduciary status under ERISA or the Advisers Act of 1940; and a calculation for repaying any prepaid compensation or surrender penalties in the event that the contract is terminated.
Participant Fee Disclosure	<i>Initial Disclosure:</i> Required on or before the date when participants can first direct investments. <i>Annual Disclosure:</i> Required to be updated and distributed at least annually. <i>Change Disclosures:</i> Required at least 30 days, but no more than 90 days, prior to plan-related changes.	All eligible participants	Typically handled by the plan's vendor.

GLOSSARY OF TERMS (in alphabetical order)

ADP—Actual Deferral Percentage test

ACP—Actual Contribution Percentage test

DC—Defined Contribution

DOL—Department of Labor

EACA—Eligible Automatic Contribution Arrangement

EIN—Employer Identification Number

ERISA—Employee Retirement Income Security Act of 1974

IRS—Internal Revenue Service

QACA—Qualified Automatic Contribution Arrangement

QDIA—Qualified Default Investment Alternative

QJSA—Qualified Joint and Survivor Annuity

QMAC—Qualified Matching Contribution

QNEC—Qualified Nonelective Contribution

QOSA—Qualified Optional Survivor Annuity

QSLOB—Qualified Separate Lines of Business

SAR—Summary Annual Report

SMM—Summary of Material Modification

SPD—Summary Plan Description

The deadlines included in this calendar are for calendar-year plans.

Generally, if the due date falls on a Saturday, Sunday, or legal holiday, to be conservative, the due date listed will be the previous business day. Certain filing returns will be considered filed timely if filed on the next succeeding day that is not a Saturday, Sunday, or legal holiday.

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