Qualified Plan Administrators, Inc.
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2019 Plan Sponsor ERISA Compliance Calendar

January

15 Deadline for defined benefit (DB) plans to make their last required quarterly contribution for 2018 to the plan trust—i.e., due 15 days after the last plan-year quarter-end.

30 Deadline to provide participants and beneficiaries with the DB notice of benefit restrictions if the plan is less than 60% funded. Note: Due January 30, or 30 days after the valuation date at which the restriction is determined.

31 Many recordkeepers require participant data for average deferral percentage (ADP)/average contribution percentage (ACP), top-heavy and 402(g) compliance testing to be returned by this date.

31 Deadline for sending Form 1099-R to participants who received distributions during the previous year.

February

14 Deadline for participant-directed defined contribution (DC) plans to provide participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses actually charged to individual plan accounts during last quarter of 2018. Note: Due 45 days after the end of the quarter.

28 Deadline for filing Form 1099-R with the IRS if not filed electronically, to report distributions made in the previous year.

28 The Pension Benefit Guaranty Corporation (PBGC) Form 1-ES estimated premium payment—i.e., the flat-rate premium for plans with over 500 participants—is due to the PBGC. Note: Due by the last day of the second month in the premium payment year.

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March

15 Employer contributions due to the retirement plan's trust for S-corporations and partnerships with December 31 fiscal year-ends, in order to take deductions with no corporate tax extension.

15 Forms 1042 and 1042-S due to the IRS to report, respectively, income tax withheld from distributions made to nonresident aliens and retirement plan distributions made to nonresident aliens.

15 Deadline for distributing ADP/ACP refunds without incurring a 10% excise tax on the employer—i.e., due 2 1/2 months following the plan year-end. Note: A special deadline applies to plans satisfying the requirements of an eligible automatic contribution arrangement (EACA). (See July.)

15 Deadline to apply to the IRS for a waiver of the minimum funding standard for DB and money purchase pension plans—i.e., no later than the 15th day of the third month after the close of the plan year for which the waiver is requested.

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April

1 Electronic filings of Form 1099-R for 2018 distributions are due to the IRS. Note: Deadline is normally March 31, which this year falls on a Sunday.

1 Initial required minimum distribution (RMD) is due to participants who turned 70 1/2 in 2018.

15 402(g) distributions of excess deferral amounts is due to participants.

15 Deadline for DB plans to make the first required quarterly contribution for the 2019 plan year to their plan trust.

15 Employer contributions due to the plan's trust for C-corporations with December 31 fiscal year-ends in order to take deductions with no corporate tax extension.

30 Deadline for sponsors of single and multiemployer DB pension plans to send their annual funding notice to participants, beneficiaries and labor organizations representing participants. Small plans—i.e., those covering fewer than 100 participants—must provide the notice by the IRS filing due date of the plan's form 5500; the notice takes the place of the summary annual report for a DB plan.

30 Final 2018 comprehensive PBGC premium due to the PBGC for plans that filed an earlier estimated variable rate premium in the October 15, 2018, comprehensive filing.

May

15 Deadline for participant-directed DC plans to supply participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses actually charged to individual plan accounts during first quarter of this year. Note: Due 45 days after the end of the quarter.

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July

1 Deadline for retirement plans with publicly traded employer securities to file their Form 11-K annual report—i.e., by 180 days after the end of the retirement plan year. Note: Deadline is normally June 29, which this year falls on a Saturday.

1 ADP/ACP refunds for EACA plans are due to highly compensated employees (HCEs), to avoid a 10% excise tax on the employer. Note: Deadline is normally June 30, which this year falls on a Sunday.

15 Deadline for DB plans to make the second-quarter contribution for the 2019 plan year to their plan trust.

29 Summary of material modifications is due to participants—i.e., 210 days after the end of the plan year in which the change was adopted—unless it was included in a timely updated summary plan description (SPD).

31 Form 5330, which reports excise taxes related to employee benefit plans, is due to the IRS.

31 Form 5500 is due to the IRS for plans with a December 31 plan year-end—i.e., due seven months after year-end.

31 Form 5558 is due to the IRS; also called the Application for Extension of Time to File Certain Employee Plan Returns, it is used to apply for an extension to file forms 5500 and/or 5330.

31 Deadline for nonparticipant-directed DC plans and Employee Retirement Income Security Act (ERISA) 403(b) plans to disseminate their annual benefit statement to participants.

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August

14 Deadline for participant-directed DC plans to provide participants with the quarterly benefit/disclosure statement and statement of plan fees and expenses that were charged to individual plan accounts during second quarter of 2019. Note: Due 45 days after the end of the quarter.

September

16 Deadline for money purchase pension, target benefit and DB plans to make required contributions to their plan trust—i.e., by 8 1/2 months after the plan year-end—and for sponsors that filed a corporate tax extension to make 2018 employer profit-sharing and matching contributions. Note: Deadline is normally September 15, which this year falls on a Sunday.

16 Minimum funding deadline for pension plans. Note: Deadline is normally September 15, which this year falls on a Sunday.

16 Form 5500 due to the Employee Benefits Security Administration (EBSA) from plans eligible for an automatic extension linked to a corporate tax extension. Note: Deadline is normally September 15, which this year falls on a Sunday.

30 Summary annual reports are due to participants from plans with a December 31 year-end—i.e., due nine months after the plan year-end or two months after filing Form 5500.

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October

1 Start of the period to disseminate annual notices to participants, including the 401(k) safe harbor, automatic contribution arrangement (ACA), qualified automatic contribution arrangement (QACA) safe harbor, and qualified default investment alternative (QDIA)—i.e., from90 to 30 days prior to the end of the current plan year.

15 PBGC Form I annual premium payment is due to the PBGC—i.e., by the 15th day of the 10th full month after the month the plan year began. Schedule A—i.e., single employer plan variable rate portion of premium, and PBGC Form 1-EZ for flat-rate premiums—is also due.

15 IRS deadline for filing Form 5500 after a plan files from 5558 to request an extension.

15 Deadline for DB plans to make the third-quarter contribution for the 2019 plan year to their plan trust.

15 IRS deadline for filing the retroactive amendment to correct an Internal Revenue Code (IRC) Section 410(b) coverage or Section 401(a) (4) nondiscrimination failure.

15 Form 5310-A due to the IRS to give notice of the establishment of qualified separate lines of business.

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November

14 Deadline for participant-directed DC plans to provide participants with quarterly benefit/disclosure statement and statement of plan fees and expenses actually charged to individual plan accounts during third quarter of 2019. Note: Due 45 days after the end of the quarter.

15 Summary annual reports due to participants if the Form 5500 deadline was extended because of a corporate tax filing extension.

December

2 Final deadline to disseminate the 401(k) safe harbor annual notice to plan participants. Note: Deadline is normally December 1, which this year falls on a Sunday.

2 Final deadline for supplying the QDIA annual required notice to all participants who were defaulted into a QDIA no more than 30 days prior to the beginning of the plan year. Note: Deadline is normally December 1, which this year falls on a Sunday.

2 Final deadline to provide participants with the annual automatic enrollment and default investment notices; these may be combined with the QDIA notice. Note: Deadline is normally December 1, which this year falls on a Sunday.

16 Extended deadline for providing summary annual reports to participants if the Form 5500 deadline was extended because of filing Form 5558. Note: Deadline is normally December 15, which this year falls on a Sunday.

31 Age 70 1/2 RMD is due to participants who turned 70 1/2 prior to 2019.

31 Deadline for a plan to make ADP/ACP corrective distributions for the previous plan year to affected participants in order to maintain qualified status.

31 Deadline for correcting a failed ADP/ACP test by making a qualified non-elective contribution (QNEC) to all non-highly compensated employees.

31 Deadline to adopt discretionary amendments to the plan, subject to certain exceptions—e.g., anti-cutbacks.

31 Deadline for a safe harbor plan to remove its safe harbor status for the following year or for an existing DC plan to convert to a safe harbor plan.

Participant Fee Disclosure Requirements

- Plan sponsors must furnish fee disclosures to participants on or before the date on which they or their beneficiary can first direct their investments in the plan and at least annually thereafter.
- Plan sponsors must, at least quarterly, furnish participants with a statement of account expenses and the services for which they apply.
- If any changes are made to fee information, plan sponsors must communicate the change to participants at least 30 days, but not more than 90 days, in advance of it.

Miscellaneous Requirements

- Defined contribution (DC) plan statements must be provided at least annually for participants who do not have the right to direct their investments, and at least quarterly for those who do have the right.

- A QDIA [qualified default investment alternative] notice for plans that choose to use a QDIA must be provided to participants 30 days prior to their first investment. Note: If the plan has immediate eligibility, participants must be given the notice as soon as administratively feasible.

- Notice to participants of a qualified automatic contribution arrangement (QACA) or an eligible automatic contribution arrangement (EACA), and of a participant's ability to opt out, must be provided 30 days prior to eligibility and then annually. For plans with immediate eligibility, notice may be given on or as soon as feasible after eligibility.

- Defined benefit (DB) or money purchase pension (MPP) plans must provide the Pension Benefit Guaranty Corporation (PBGC) with a notice of failure to meet minimum funding standards within 60 days of a missed payment or denial of payment waiver.

- An explanation of a plan's pre-retirement survivor annuity must be provided to a participant between the first day of the plan year in which he reaches age 32 and the last day of plan year in which he reaches 35. If a participant is over 35 when hired, he should be given the explanation within one year of hire.

- An explanation of a joint and survivor annuity must be made to affected plan participants between 90 and 30 days before the annuity's starting date.