

# 2019 Compliance Calendar Defined Contribution Plans

## Calendar Plan Year & Calendar Employer Tax Year\*

### JANUARY

S	M	T	W	T	F	S
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### FEBRUARY

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### MARCH

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31						

### APRIL

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### MAY

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### JUNE

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#### January 2019

- 15** Last day to file Form 945 to report withheld federal income tax from distributions
- 15** Last day to furnish Form 1099-R to recipients of distributions in 2018

#### February 2019

- 14** Last day to furnish fourth quarter 2018 benefit statement to a participant or beneficiary in an individual account plan that permits participant investment direction
- 28** Last day to file Form 1096 and Form 1099-R on paper with the IRS

#### March 2019

- 15** Last day to refund excess contributions (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test) for 2018 to avoid 10% excise tax (unless plan is an EACA)

#### April 2019

- 01** Last day to make required minimum distributions (for first distribution calendar year) to applicable plan participants
- 01** Last day to file Form 1099-R electronically with the IRS
- 01** Last day (unextended deadline) to file Form 5330 and pay excise tax on 2017 plan year excess contributions or excess aggregate contributions where excess amounts not distributed (or forfeited, if forfeitable) by Mar. 15, 2018 (or by June 30, 2018 in case of an EACA)
- 15** Last day to distribute excess deferrals in excess of 402(g) dollar limits for 2018 to applicable participants
- 15** Last day for C corporation employer plan sponsors to make contributions and take tax deductions for 2018 without corporate tax return extension

#### May 2019

- 15** Last day to furnish first quarter 2019 benefit statement to a participant or beneficiary in an individual account plan that permits participant investment direction

#### June 2019

- 30** Last day to refund excess contributions (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test) for 2018 to avoid 10% excise tax – in case of an EACA

## July 2019

- 29** Last day to furnish Summary of Material Modifications (SMM) to participants and beneficiaries receiving benefits
- 31** Last day to file Form 5500 for 2018 without extension
- 31** Last day to file Form 8955-SSA without extension
- 31** Last day to provide a notice to terminated vested participants describing deferred vested retirement benefits (in conjunction with Form 8955-SSA)
- 31 (or the day Form 5500 is filed, if earlier)** – Last day (without 5500 extension) to furnish annual benefit statement to a participant or beneficiary in an individual account plan that does not provide for participant investment direction
- 31** Last day (unextended deadline) to file Form 5330 and pay excise tax on nondeductible contributions, prohibited transactions, certain employee stock ownership plan dispositions, and certain prohibited allocations of qualified securities by an ESOP (if applicable)

## August 2019

- 14** Last day to furnish second quarter 2019 benefit statement to a participant or beneficiary in an individual account plan that permits participant investment direction
- 30** Last day to furnish annual participant fee disclosures in a participant-directed individual account plan (or up to 14 months from last disclosure notice, if later)

## September 2019

- 15** Last day to pay balance of remaining required contributions for 2018 plan year to satisfy minimum funding requirements for plans subject to minimum funding requirements (such as money purchase pension plans)
- 30** Last day to furnish Summary Annual Report for 2018 plan year to participants and beneficiaries if an extension to file Form 5500 was not obtained

## October 2019

- 15** Last day to file Form 5500 (with extension)
- 15** Last day to file Form 8955-SSA (with extension)
- 15** Last day to provide a notice to terminated vested participants describing deferred vested retirement benefits (in conjunction with Form 8955-SSA)
- 15 (or the day Form 5500 is filed, if earlier)** – Last day (with 5500 extension) to furnish annual benefit statement to a participant or beneficiary in an individual account plan that does not provide for participant investment direction
- 15** Last day to adopt and implement retroactive corrective plan amendment to correct 2018 410(b) coverage or 401(a)(4) nondiscrimination failures
- 15** Last day for C corporation employer plan sponsors to make contributions and take a tax deduction for 2018 if 6-month automatic extension to file federal income tax return was obtained

JULY						
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AUGUST						
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OCTOBER						
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NOVEMBER						
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DECEMBER						
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### **November 2019**

- 14** Last day to furnish third quarter 2019 benefit statement to a participant or beneficiary in an individual account plan that permits participant investment direction

### **December 2019**

- 01** Last day to provide a notice of intent to use safe harbor contribution formula for 2020 plan year to eligible employees
- 01** Last day to provide an automatic contribution arrangement notice for 2020 plan year to all eligible employees
- 01** Last day to furnish a qualified default investment alternative (QDIA) notice for 2020 plan year to participants and beneficiaries on whose behalf an investment in a QDIA may be made
- 15** Last day (with 5500 extension) to furnish Summary Annual Report for 2018 plan year
- 31** Last day to refund excess contribution (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test) for the 2018 plan year
- 31** Last day to make required minimum distributions to applicable participants for distribution calendar years other than for the first distribution calendar year
- 31** Last day for plan sponsors to adopt discretionary plan amendments that would be effective for the current plan year

*\*This calendar is designed to provide a general overview of certain key compliance dates and is not meant to indicate all possible compliance dates that may affect your plan. Please note that the "Detailed Information" section on the following pages provides additional details and explanation for these summary calendar items. Also, please refer to footnote 1 at the end of this calendar regarding assumptions for the due dates in the calendar.*

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## 2019 Calendar of Significant Due Dates for DEFINED CONTRIBUTION RETIREMENT PLANS

### CALENDAR PLAN YEAR AND CALENDAR EMPLOYER TAX YEAR

#### DETAILED INFORMATION

Due Date <sup>1</sup>	Determination of Due Date	Action Item	Provide to/Other
<b>Jan. 31, 2019</b>	Jan. 31, 2019. [However, IRS 2018 Instructions for Form 945 indicate if deposits were made on time in full payment of the taxes for the year, then may file Form 945 by Feb. 11, 2019.]	Last day to <b>file Form 945</b> , Annual Return of Withheld Federal Income Tax, to report withheld federal income tax from non-payroll payments, including pensions, annuities, and IRA distributions.	IRS
<b>Jan. 31, 2019</b>	Jan. 31, 2019	Last day to <b>furnish Form 1099-R</b> to recipients of distributions in 2018.	Recipients of distributions during 2018 calendar year
<b>Feb. 14, 2019</b>	No later than 45 days following the end of the quarter	Last day to <b>furnish fourth quarter 2018 benefit statement</b> to a participant or beneficiary in an individual account plan that permits participant investment direction.	Participants and beneficiaries who have the right to direct investments in his or her account under the plan
<b>Feb. 28, 2019</b>	Feb. 28, 2019	Last day to <b>file Form 1096 and Form 1099-R on paper</b> . [An automatic 30-day extension of time to file Form 1099-R may be obtained by completing and filing Form 8809 by the due date of the returns.]	IRS
<b>Mar. 15, 2019</b>	2½ months after the close of the plan year to which excess amounts relate.	Last day to <b>refund excess contributions (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test)</b> for 2018 to avoid 10% excise tax under <i>Code Section 4979</i> [unless plan is an eligible automatic contribution arrangement (EACA); see entry below for June 30, 2019 for EACAs].	Certain highly compensated employees with associated excess amounts
<b>Apr. 1, 2019</b>	Generally Apr. 1 of calendar year following the later of the calendar year in which participant attains age 70½ or retires.  5% owners generally must start required minimum distributions by Apr. 1 of calendar year following calendar year in which participant attains age 70½.  Plan provisions may provide that the required beginning date for all participants is Apr. 1 of calendar year following calendar year in which participant attains age 70½ regardless of whether participant is a 5% owner.	Last day to <b>make first required minimum distributions</b> (for first distribution calendar year) to applicable plan participants.	Applicable plan participants

Due Date <sup>1</sup>	Determination of Due Date	Action Item	Provide to/Other
<b>Apr. 1, 2019</b>	Generally, the due date for filing Form 1099-R is Mar. 31. The IRS 2018 Form 1099-R (Instructions for Payer) indicates that the due date for filing the 2018 Form 1099-R electronically with the IRS is Apr. 1, 2019.	Last day to <b>file Form 1099-R electronically</b> . [An automatic 30-day extension of time to file Form 1099-R may be obtained by completing and filing with the IRS Form 8809 by the due date of the returns.]	IRS
<b>Apr. 1, 2019</b>	Generally, the due date for filing Form 5330 in this case is the last day of 15 <sup>th</sup> month after the close of the plan year to which the excess contributions or excess aggregate contributions relate. The IRS Instructions for Form 5330 provide that if the filing due date falls on a Saturday, Sunday, or a legal holiday, the return may be filed on the next business day.	Last day (unextended deadline) to <b>file Form 5330<sup>2</sup> and pay excise tax</b> on 2017 plan year excess contributions or excess aggregate contributions (under <i>Code Section 4797</i> ) where the excess amounts were not distributed (or forfeited, if forfeitable) by Mar. 15, 2018 (or by June 30, 2018 in the case of an eligible automatic contribution arrangement).	IRS
<b>Apr. 15, 2019</b>	Not later than the first Apr. 15 following the close of the taxable year of an individual with excess deferrals for that tax year (the plan may require an earlier date).	Last day to <b>distribute excess deferrals</b> for 2018 made to 401(k) and 403(b) plans in excess of <i>Code Sec. 402(g)</i> dollar limits for plans that provide for the return of excess deferrals.	Plan participants with excess deferrals
<b>Apr. 15, 2019</b>	15 <sup>th</sup> day of the 4 <sup>th</sup> month after the end of the tax year (C corporation employer plan sponsors).	C corporation employer plan sponsors - last day to <b>make contributions and take a tax deduction</b> for 2018 unless an extension of the filing date for the federal corporate tax return has been obtained.	Plan Trust
<b>May 15, 2019</b>	No later than 45 days following the end of the quarter.	Last day to <b>furnish first quarter 2019 benefit statement</b> to a participant or beneficiary in an individual account plan that permits participant investment direction.	Participants and beneficiaries who have the right to direct investments in his or her account under the plan
<b>Jun. 30, 2019</b>	6 months after the close of the plan year to which excess amounts relate – in case of eligible automatic contribution arrangement (EACA).	Last day to <b>refund excess contributions (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test)</b> for 2018 to avoid 10% excise tax under <i>Code section 4979</i> - in case of eligible automatic contribution arrangement (EACA).	Certain highly compensated employees with associated excess amounts
<b>Jul. 29, 2019</b>	Not later than 210 days after the close of the plan year in which the modification or change was adopted.	Last day to <b>furnish Summary of Material Modifications (SMM)</b> for 2018 plan year material modifications or changes in required SPD information.	Plan participants and beneficiaries receiving benefits under the plan
<b>Jul. 31, 2019</b>	Last day of 7 <sup>th</sup> calendar month after end of plan year.	Last day (unextended deadline) to <b>file Form 5500</b> annual report for 2018. [An automatic extension of time (up to 2½ months) to file Form 5500 may be obtained by completing and filing with the IRS Form 5558 on or before the normal due date of the Form 5500.]	File electronically under computerized ERISA Filing Acceptance System (EFAST2), (DOL)

Due Date <sup>1</sup>	Determination of Due Date	Action Item	Provide to/Other
Jul. 31, 2019	Last day of 7 <sup>th</sup> month after end of plan year.	Last day (unextended deadline) to <b>file Form 8955-SSA</b> , Annual Registration Statement Identifying Separated Participants with Deferred Vested Benefits. [An automatic extension of time (up to 2½ months) to file Form 8955-SSA may be obtained by completing and filing with the IRS Form 5558 on or before the normal due date of the Form 8955-SSA.]	IRS
Jul. 31, 2019	Last day of 7 <sup>th</sup> month after end of plan year (linked to due date to file Form 8955-SSA).	Last day (unextended deadline) to <b>provide a notice to terminated vested employees</b> describing the deferred vested retirement benefit to which the participant is entitled. [Regarding extension, see the information for entry for the Due Date Oct. 15, 2019, regarding a notice to terminated vested employees.]	Terminated vested employees
Jul. 31, 2019 (or day Form 5500 is filed, if earlier)	On or before the date on which the Form 5500 annual report is filed by the plan (but in no event later than the date, including extensions, on which the Form 5500 is required to be filed by the plan) for the plan year to which the statement relates (DOL FAB 2007-03).	Last day (unextended deadline) to <b>furnish annual benefit statement</b> to a participant or beneficiary in an individual account plan that does not provide for participant investment direction.	Participants and beneficiaries in individual account plans that do not provide for participant direction of investments
Jul. 31, 2019	Last day of 7 <sup>th</sup> month after the end of the tax year of the employer or other person.	Last day (unextended deadline) to <b>file Form 5330<sup>2</sup> and pay excise tax</b> on: 1) nondeductible contributions during 2018 under <i>Code Section 4972</i> . 2) prohibited transactions under <i>Code Section 4975</i> . 3) certain employee stock ownership plan dispositions under <i>Code Section 4978</i> . 4) certain prohibited allocations of qualified securities by an ESOP under <i>Code Section 4979A</i> .	IRS
Aug. 14, 2019	No later than 45 days following the end of the quarter.	Last day to <b>furnish second quarter 2019 benefit statement</b> to a participant or beneficiary in an individual account plan that permits investment direction.	Participants and beneficiaries who have the right to direct investments in his or her account under the plan
Aug. 30, 2019	At least annually (generally beginning no later than Aug. 30, 2012). [But may be up to 14 months from last disclosure notice.]	Last day to <b>furnish annual participant fee disclosures</b> in a participant-directed individual account plan. [The annual disclosure notice must be furnished annually (at least once in any 14 month period)].	Participants and beneficiaries who have the right to direct investments in his or her account under the plan
Sep. 15, 2019	8½ months after the close of the plan year	Last day to <b>pay balance of remaining required contributions</b> for 2018 plan year to satisfy minimum funding requirements for plans subject to minimum funding requirements (such as money purchase pension plans).	Plan Trust
Sep. 30, 2019	9 months after the close of the plan year	Last day to <b>furnish Summary Annual Report (SAR)</b> for 2018 plan year if an extension to file Form 5500 was not obtained.	Plan participants and beneficiaries receiving benefits under the plan

Due Date <sup>1</sup>	Determination of Due Date	Action Item	Provide to/Other
<b>Oct. 15, 2019</b>	(1) The 15 <sup>th</sup> day of the 3 <sup>rd</sup> month after the Form 5500 normal (unextended) due date (in the case of Form 5558 maximum extension). (2) An extension to Oct. 15, 2019 to file the C corporation employer federal corporate income tax return (where a Form 7004 application for six month automatic extension was filed on or before the due date of the federal corporate income tax return) automatically triggers an Oct. 15, 2019 extension to file Form 5500 if certain conditions are met.	Last day to <b>file Form 5500</b> annual report for 2018 plan year if (1) Form 5558 was filed on or before the normal Form 5500 due date (not including any extensions) and the maximum extension period was requested, or (2) a C corporation employer plan sponsor filed on or before the due date of the federal corporate tax return on Form 7004 for the six month automatic extension to Oct. 15, 2019 to file the federal corporate income tax return.	File electronically under computerized ERISA Filing Acceptance System (EFAST2), (DOL)
<b>Oct. 15, 2019</b>	(1) The 15 <sup>th</sup> day of the 3 <sup>rd</sup> month after the Form 8955-SSA normal (unextended) due date (in the case of Form 5558 maximum extension). (2) An extension to Oct. 15, 2019 to file the C corporation employer federal corporate income tax return (where a Form 7004 application for six month automatic extension was filed on or before the due date of the federal corporate income tax return) automatically triggers an Oct. 15, 2019 extension to file Form 8955-SSA if certain conditions are met.	Last day to <b>file Form 8955-SSA</b> , Annual Registration Statement Identifying Separated Participants with Deferred Vested Benefits, if (1) Form 5558 was filed on or before the normal Form 8955-SSA due date (not including any extensions) and the maximum extension period was requested, or (2) if a C corporation employer plan sponsor filed on or before the due date of the federal corporate tax return on Form 7004 for the six month automatic extension to Oct. 15, 2019 to file the federal corporate income tax return.	IRS
<b>Oct. 15, 2019</b>	Extended due date for this notice is linked to Oct. 15, 2019 extended date to file Form 8955-SSA (see entry immediately above for extended due date to file Form 8955-SSA).	Last day (where time to file Form 8955-SSA has been extended as described in entry immediately above) to <b>provide a notice to terminated vested employees</b> describing the deferred vested retirement benefit to which the participant is entitled.	Terminated vested employees
<b>Oct. 15, 2019 (or day Form 5500 is filed, if earlier)</b>	On or before the date on which the Form 5500 annual report is filed by the plan (but in no event later than the date, including extensions, on which Form 5500 is required to be filed for the plan) for the plan year to which the statement relates (DOL FAB 2007-03). The extended due date for this annual benefit statement is linked to Oct. 15, 2019 extended date to file Form 5500 (see entry above for extended due date to file Form 5500).	Last day (where time to file Form 5500 has been extended as described in entry above) to <b>furnish annual benefit statement</b> to a participant or beneficiary in an individual account plan that does not provide for participant investment direction.	Participants and beneficiaries in individual account plans that do not provide for participant direction of investments
<b>Oct. 15, 2019</b>	On or before the 15 <sup>th</sup> day of the 10 <sup>th</sup> month after the close of the 2018 plan year.	Last day to <b>adopt and implement retroactive corrective plan amendment</b> to correct 2018 410(b) coverage or 401(a)(4) nondiscrimination failures.	Not applicable (see Action Item)

Due Date <sup>1</sup>	Determination of Due Date	Action Item	Provide to/Other
<b>Oct. 15, 2019</b>	6-month extension from original due date of Apr. 15, 2019.	C corporation employer plan sponsors – last day to <b>make contributions and take a tax deduction</b> for 2018 if 6-month automatic extension to file federal corporate income tax return was obtained.	Plan Trust
<b>Nov. 14, 2019</b>	No later than 45 days following the end of the quarter.	Last day to <b>furnish third quarter 2019 benefit statement</b> to a participant or beneficiary in an individual account plan that permits participant investment direction.	Participants and beneficiaries who have the right to direct investments in his or her account under the plan
<b>Dec. 1, 2019</b>	At least 30 days, but no more than 90 days, before the beginning of the plan year.	Last day to <b>provide a notice of intent to use safe harbor contribution formula</b> for 2020 plan year to meet “deemed” reasonable notice period for plan electing to use safe harbor (annual notice).	All eligible employees
<b>Dec. 1, 2019</b>	For ACA – at least 30 days before the beginning of the plan year.  For EACA and QACA – at least 30 days, but no more than 90 days, before the beginning of the plan year.	Last day to <b>provide an automatic contribution arrangement notice</b> for 2020 plan year for plan electing to use an automatic contribution arrangement (annual notice).	All eligible employees
<b>Dec. 1, 2019</b>	Within a reasonable period of time of at least 30 days in advance of each plan year.	Last day to <b>furnish a qualified default investment alternative (QDIA) notice</b> for 2020 plan year (annual notice).	A participant or beneficiary on whose behalf an investment in a QDIA may be made
<b>Dec. 15, 2019</b>	2 months after the Form 5500 requested or automatic due date extension to Oct. 15, 2019 (see Action Item).	Last day to <b>furnish Summary Annual Report (SAR)</b> for 2018 plan year if (1) Form 5558 was filed and the maximum extension period to file Form 5500 was requested, or (2) C corporation employer plan sponsor filed on or before the due date of the federal corporate income tax return on Form 7004 for the six month automatic extension to Oct. 15, 2019 to file the federal corporate income tax return.	Plan participants and beneficiaries receiving benefits under the plan
<b>Dec. 31, 2019</b>	Within 12 months after the close of the plan year in which the excess amounts arose.	Last day to <b>refund excess contributions (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test)</b> for the 2018 plan year.	Certain highly compensated employees with associated excess amounts
<b>Dec. 31, 2019</b>	Dec. 31 of applicable distribution calendar year other than the first distribution calendar year.	Last day to <b>make required minimum distributions</b> to applicable participants for distribution calendar years other than for the first distribution calendar year.	Applicable plan participants
<b>Dec. 31, 2019</b>	No later than Dec. 31, 2019 (last day of 2019 plan year).	Last day for <b>plan sponsors to adopt discretionary plan amendments</b> that would be effective for the current plan year.	Not applicable (see Action Item)

Please note that this calendar is designed to provide a general overview of certain key compliance dates and is not meant to indicate all possible compliance dates that may affect your plan. Copyright © 2019 by Findley, Inc. All rights reserved.

**Footnotes:**

1. The due dates in this calendar assume: the plan is a single-employer defined contribution plan; the plan is not a government or non-electing church plan; the plan year is a full calendar year (not a short plan year); and the sponsoring employer uses the calendar year as its tax year and a short tax year is not involved.
2. To request an extension to file Form 5330, you must file Form 5558 in sufficient time for the IRS to consider and act on the request before the Form 5330 normal due date (an extension of time to file does not extend the time to pay the tax due).