

2020 Compliance Calendar Defined Contribution Plans

Calendar Plan Year & Calendar Employer Tax Year*

JANUARY

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

FEBRUARY

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

MARCH

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

APRIL

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

MAY

S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
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24	25	26	27	28	29	30
31						

JUNE

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

January 2020

- 31** Last day to file Form 945 to report withheld federal income tax from distributions
- 31** Last day to furnish Form 1099-R to recipients of distributions in 2019

February 2020

- 14** Last day to furnish fourth quarter 2019 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 2020

- 15** Last day to refund excess contributions (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test) for 2019 to avoid 10% excise tax (unless plan is an EACA)
- 31** Last day to file Form 1099-R electronically with the IRS
- 31** Last day (unextended deadline) to file Form 5330 and pay excise tax on 2018 plan year excess contributions or excess aggregate contributions where excess amounts not distributed (or forfeited, if forfeitable) by Mar. 15, 2019 (or by June 30, 2019 in case of an EACA)

April 2020

- 01** Last day to make required minimum distributions (for first distribution calendar year) to applicable plan participants
- 15** Last day to distribute excess deferrals in excess of 402(g) dollar limits for 2019 to applicable participants
- 15** Last day for C corporation employer plan sponsors to make contributions and take tax deductions for 2019 without corporate tax return extension

May 2020

- 15** Last day to furnish first quarter 2020 benefit statement to a participant or beneficiary in an individual account plan that permits participant investment direction

June 2020

- 30** Last day to refund excess contributions (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test) for 2019 to avoid 10% excise tax – in case of an EACA

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JULY						
S	M	T	W	T	F	S
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5	6	7	8	9	10	11
12	13	14	15	16	17	18
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26	27	28	29	30	31	

AUGUST						
S	M	T	W	T	F	S
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16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

SEPTEMBER						
S	M	T	W	T	F	S
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27	28	29	30			

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

July 2020

- 28** Last day to furnish Summary of Material Modifications (SMM) to participants and beneficiaries receiving benefits
- 31** Last day to file Form 5500 for 2019 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 2020

- 14** Last day to furnish second quarter 2020 benefit statement to a participant or beneficiary in an individual account plan that permits participant investment direction

September 2020

- 15** Last day to pay balance of remaining required contributions for 2019 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 2019 plan year to participants and beneficiaries if an extension to file Form 5500 was not obtained

October 2020

- 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 2019 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 2019 if 6-month automatic extension to file federal income tax return was obtained

2020 Compliance Calendar

Defined Contribution Plans

NOVEMBER

S	M	T	W	T	F	S
1	2	3	4	5	6	7
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15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

DECEMBER

S	M	T	W	T	F	S
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20	21	22	23	24	25	26
27	28	29	30	31		

November 2020

- 14** Last day to furnish third quarter 2020 benefit statement to a participant or beneficiary in an individual account plan that permits participant investment direction

December 2020

- 01** Last day to provide a notice of intent to use safe harbor contribution formula for 2021 plan year to eligible employees
- 01** Last day to provide an automatic contribution arrangement notice for 2021 plan year to all eligible employees
- 01** Last day to furnish a qualified default investment alternative (QDIA) notice for 2021 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 2019 plan year
- 31** Last day to refund excess contribution (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test) for the 2019 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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2020 Compliance Calendar Defined Contribution Plans

2020 Calendar of Significant Due Dates for DEFINED CONTRIBUTION RETIREMENT PLANS CALENDAR PLAN YEAR AND CALENDAR EMPLOYER TAX YEAR

DETAILED INFORMATION

Due Date ¹	Determination of Due Date	Action Item	Provide to/Other
Jan. 31, 2020	Jan. 31, 2020. [However, IRS 2019 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. 10, 2020.]	Last day to file Form 945 , Annual Return of Withheld Federal Income Tax, to report withheld federal income tax from non-payroll payments, including pensions, annuities, and IRA distributions.	IRS
Jan. 31, 2020	Jan. 31, 2020	Last day to furnish Form 1099-R to recipients of distributions in 2019.	Recipients of distributions during 2019 calendar year
Feb. 14, 2020	No later than 45 days following the end of the quarter	Last day to furnish fourth quarter 2019 benefit statement 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
Feb. 28, 2020	Feb. 28, 2020	Last day to file Form 1096 and Form 1099-R on paper . [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 these returns.]	IRS
Mar. 15, 2020	2½ months after the close of the plan year to which excess amounts relate.	Last day to refund excess contributions (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test) for 2019 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, 2020 for EACAs].	Certain highly compensated employees with associated excess amounts
March 31, 2020	Generally, the due date for filing Form 1099-R is March 31. The IRS 2019 Form 1099-R (Instructions for Payer) indicates that the due date for filing the 2019 Form 1099-R electronically with the IRS is March 31, 2020.	Last day to file Form 1099-R electronically . [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 these returns.]	IRS
March 31, 2020	Generally, the due date for filing Form 5330 in this case is the last day of 15 th month after the close of the	Last day (unextended deadline) to file Form 5330² and pay excise tax on 2018 plan year excess contributions or excess aggregate contributions (under <i>Code Section 4979</i>) where the excess	IRS

2020 Compliance Calendar Defined Contribution Plans

Due Date ¹	Determination of Due Date	Action Item	Provide to/Other
	plan year to which the excess contributions or excess aggregate contributions relate.	amounts were not distributed (or forfeited, if forfeitable) by Mar. 15, 2019 (or by June 30, 2019 in the case of an eligible automatic contribution arrangement).	
Apr. 1, 2020	<p>Generally Apr. 1 of calendar year following the later of the calendar year in which participant attains age 70 ½ or retires.</p> <p>5% owners generally must start required minimum distributions by Apr. 1 of calendar year following calendar year in which participant attains age 70 ½.</p> <p>Note that plan provisions may vary. Plan provisions may provide that the required beginning date for all participants is April 1 of calendar year following calendar year in which participant attains age 70 1/2 regardless of whether participant is a 5% owner.</p>	Last day to make first required minimum distributions (for first distribution calendar year) to applicable plan participants.	Applicable plan participants
Apr. 15, 2020	Not later than the first April 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 distribute excess deferrals for 2019 made to 401(k) and 403(b) plans in excess of Code Sec. 402(g) dollar limits for plans that provide for the return of excess deferrals.	Plan participants with excess deferrals
Apr. 15, 2020	15 th day of the 4 th month after the end of the tax year (C corporation employer plan sponsors).	C corporation employer plan sponsors - last day to make contributions and take a tax deduction for 2019 unless an extension of the filing date for the federal corporate tax return has been obtained.	Plan Trust
May 15, 2020	No later than 45 days following the end of the quarter.	Last day to furnish first quarter 2020 benefit statement 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
Jun. 30, 2020	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 refund excess contributions (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test) for 2019 to avoid 10% excise tax under Code section 4979 - in case of eligible automatic contribution arrangement (EACA).	Certain highly compensated employees with associated excess amounts

2020 Compliance Calendar Defined Contribution Plans

Due Date ¹	Determination of Due Date	Action Item	Provide to/Other
Jul. 28, 2020	Not later than 210 days after the close of the plan year in which the modification or change was adopted.	Last day to furnish Summary of Material Modifications (SMM) for 2019 plan year material modifications or changes in required SPD information.	Plan participants and beneficiaries receiving benefits under the plan
Jul 31, 2020	Last day of 7 th calendar month after end of plan year.	Last day (unextended deadline) to file Form 5500 annual report for 2019. [An automatic extension of time (up to 2 and ½ 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)
Jul. 31, 2020	Last day of 7 th month after end of plan year.	Last day (unextended deadline) to file Form 8955-SSA , Annual Registration Statement Identifying Separated Participants with Deferred Vested Benefits. [An automatic extension of time (up to 2 and ½ 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, 2020	Last day of 7 th month after end of plan year (linked to due date to file Form 8955-SSA).	Last day (unextended deadline) to provide a notice to terminated vested employees 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, 2020, regarding a notice to terminated vested employees.]	Terminated vested employees
Jul. 31, 2020 (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 furnish annual benefit statement 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, 2020	Last day of 7 th month after the end of the tax year of the employer or other person.	Last day (unextended deadline) to file Form 5330² and pay excise tax on: <ol style="list-style-type: none"> 1) nondeductible contributions during 2019 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, 2020	No later than 45 days following the end of the quarter.	Last day to furnish second quarter 2020 benefit statement to a participant or beneficiary in an individual account plan that permits investment	Participants and beneficiaries who have the right to

2020 Compliance Calendar Defined Contribution Plans

Due Date ¹	Determination of Due Date	Action Item	Provide to/Other
		direction.	direct investments in his or her account under the plan
Sep. 15, 2020	8½ months after the close of the plan year	Last day to pay balance of remaining required contributions for 2019 plan year to satisfy minimum funding requirements for plans subject to minimum funding requirements (such as money purchase pension plans).	Plan Trust
Sep. 30, 2020	9 months after the close of the plan year	Last day to furnish Summary Annual Report (SAR) for 2019 plan year if an extension to file Form 5500 was not obtained.	Plan participants and beneficiaries receiving benefits under the plan
Oct. 15, 2020	(1) The 15 th day of the 3 rd month after the Form 5500 normal (unextended) due date (in the case of Form 5558 maximum extension). (2) An extension to Oct. 15, 2020 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, 2020 extension to file Form 5500 if certain conditions are met.	Last day to file Form 5500 annual report for 2019 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, 2020 to file the federal corporate income tax return.	File electronically under computerized ERISA Filing Acceptance System (EFAST2), (DOL)
Oct. 15, 2020	(1) The 15 th day of the 3 rd month after the Form 8955-SSA normal (unextended) due date (in the case of Form 5558 maximum extension). (2) An extension to Oct. 15, 2020 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, 2020 extension to file Form 8955-SSA if certain conditions are	Last day to file Form 8955-SSA , 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, 2020 to file the federal corporate income tax return.	IRS

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Due Date ¹	Determination of Due Date	Action Item	Provide to/Other
	met.		
Oct. 15, 2020	Extended due date for this notice is linked to Oct. 15, 2020 extended date to file Form 8955-SSA (see above).	Last day (where time to file Form 8955-SSA has been extended as described in entry immediately above) to provide a notice to terminated vested employees describing the deferred vested retirement benefit to which the participant is entitled.	Terminated vested employees
Oct. 15, 2020 (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 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, 2020 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 furnish an annual benefit statement 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
Oct. 15, 2020	On or before the 15 th day of the 10 th month after the close of the 2019 plan year.	Last day to adopt and implement retroactive corrective plan amendment to correct 2019 410(b) coverage or 401(a)(4) nondiscrimination failures.	Not applicable (see Action Item)
Oct. 15, 2020	6-month extension from original due date of Apr. 15, 2020.	C corporation employer plan sponsors – last day to make contributions and take a deduction for 2019 if 6-month automatic extension to file federal corporate income tax return was obtained.	Plan Trust
Nov. 14, 2020	No later than 45 days following the end of the quarter.	Last day to furnish third quarter 2020 benefit statement 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
Dec. 1, 2020	At least 30 days, but no more than 90 days, before the beginning of the plan year.	Last day to provide a notice of intent to use safe harbor contribution formula for 2021 plan year to meet “deemed” reasonable notice period for plan electing to use safe harbor (annual notice).	All eligible employees
Dec. 1, 2020	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 provide an automatic contribution arrangement notice for 2021 plan year for plan electing to use an automatic contribution arrangement (annual notice).	All eligible employees

2020 Compliance Calendar Defined Contribution Plans

Due Date ¹	Determination of Due Date	Action Item	Provide to/Other
Dec. 1, 2020	Within a reasonable period of time of at least 30 days in advance of each plan year.	Last day to furnish a qualified default investment alternative (QDIA) notice for 2021 plan year (annual notice).	A participant or beneficiary on whose behalf an investment in a QDIA may be made
Dec. 15, 2020	2 months after the Form 5500 requested or automatic due date extension to Oct. 15, 2020 (see Action Item).	Last day to furnish Summary Annual Report (SAR) for 2019 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, 2020 to file the federal corporate income tax return.	Plan participants and beneficiaries receiving benefits under the plan
Dec. 31, 2020	Within 12 months after the close of the plan year in which the excess amounts arose.	Last day to refund excess contributions (ADP test) and refund or forfeit (if forfeitable) excess aggregate contributions (ACP test) for the 2019 plan year.	Certain highly compensated employees with associated excess amounts

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 © 2020 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).