



Compliance calendar for defined contribution plans

Vanguard Strategic Retirement Consulting annual reference for recurring compliance and notice requirements*

January

January 31

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

February

February 28

Deadline for filing Form 1099-R with IRS to report distributions made in previous year. Deadline for electronic filing is March 31.

March

March 15

Deadline for processing corrective distributions for failed actual deferral percentage (ADP)/actual contribution percentage (ACP) test without 10% excise tax.

Note: A special deadline may apply to plans that satisfy the requirements of an eligible automatic contribution arrangement (EACA). See "June."

Deadline for filing partnership tax returns and contribution deadline for deductibility (without extension) for companies operating on calendar-year fiscal year.

Deadline for requesting automatic extension (to September 15) for partnership tax returns.

March 31

Deadline for electronic filing of Form 1099-R to report distributions made in previous year.

April

April 1

Required beginning date for participants attaining age 70½ or retiring after age 70½ in prior year [Deadline for taking first required minimum distribution (RMD) under Internal Revenue Code (IRC) Section 401(a)(9)].

April 15

Deadline for processing corrective distributions for IRC Section 402(g) excesses.

Deadline for filing individual tax returns and contribution deadline for deductibility for self-employed individuals (without extension).

Deadline for requesting automatic extension (to October 15) for individual and corporate tax returns.

May

June

June 30

Deadline for processing corrective distributions for failed ADP/ACP test from plan with EACA without 10% excise tax (if applicable).

July

July 29

Deadline for sending Summary of Material Modification (SMM) (210 days after end of plan year in which the amendment was adopted).

July 31

Deadline for filing Form 5500 (without extension).

Deadline for filing Form 5558 to request automatic extension of time to file Form 5500 (2½ months).

Deadline for filing Form 5330—Return of Excise Taxes Related to Employee Benefit Plans—used to report and pay excise taxes on prohibited transactions and excess 401(k) plan contributions that occurred in prior year.

August

September

September 15

Extended deadline for filing tax returns for partnerships and contribution deadline for deductibility.

September 30

Deadline for distributing Summary Annual Report (SAR) to participants, unless deadline for Form 5500 was extended (later of nine months after close of plan year or two months after due date for Form 5500).

October

October 15

Deadline for adopting a retroactive amendment to correct an IRC Section 410(b) coverage or IRC Section 401(a)(4) nondiscrimination failure.

Extended deadline for filing Form 5500.

Extended deadline for individual and/or corporate tax returns and final contribution deadline for deductibility for these entities.

November

December

December 1

Deadline for sending annual 401(k) and (m) safe harbor notice.

Deadline for sending annual qualified default investment alternative (QDIA) notice.

Deadline for sending annual automatic contribution arrangement notice.

For administrative ease, a combined notice may be provided for the above notices.

December 15

Extended deadline for distributing SAR to participants.

December 31

Deadline for processing corrective distributions for failed ADP/ACP test with 10% excise tax.

Deadline for correcting a failed ADP/ACP test with qualified nonelective contributions (QNECs).

Deadline for amendment to convert existing 401(k) plan to safe harbor design for next plan year (provided notice requirement is met).

Deadline for amendment to remove safe harbor status for next plan year.

Deadline for amending plan for discretionary changes implemented during plan year (certain exceptions apply, e.g., adding salary deferrals, cutting back accrued benefits).

RMDs due under IRC Section 401(a)(9).

Reminder: Required fee disclosures

Plan sponsor/Service provider

- Initial disclosure: Required within a reasonable period before the contract is entered into or renewed.
- Annual disclosure: Required following changes in investment information.
- Additional disclosures: Required no later than 60 days after the effective date of the change for changes in compensation or services provided.

Participant

- Initial disclosure: Required on or before the date when participants can first direct investments.
- Annual disclosure: Required to be updated and distributed at least annually.
- Additional disclosures: Required at least 30 days, but no more than 90 days, prior to certain plan changes.

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* The deadlines in this calendar are for plans with calendar-year plan years. This chart is intended to provide plan sponsors with a list of notable deadlines and is not a substitute for consultation with ERISA counsel and in no way represents legal advice. Historically, when the date falls on a Saturday, Sunday, or legal holiday, the IRS has not extended the deadline for return of excess amounts and RMDs, but has extended for returns/reports.

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