

2016 Compliance Calendar for Defined Contribution Plans



Employee Fiduciary Retirement Consulting annual reference for recurring compliance and notice requirements*

January

January 31

Deadline for determination letter submission for individually designed plan documents. Year of submission determined by last digit of employer identification number (EIN). For 2015, this applies to plan sponsors with EINs ending in 4 or 9.***

February

February 1

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

March

March 15

Deadline for processing corrective distributions for failed average deferral percentage (ADP)/average contribution percentage (ACP) test without 10% excise tax.***
Note: A special deadline applies to plans that satisfy the requirements of an Eligible Automatic Contribution Arrangement (EACA). See "June."

March 15

Deadline for filing corporate 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) of corporate 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 and/or partnership tax returns and contribution deadline for deductibility for unincorporated entities (without extension).

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

May

June

June 30

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

July

July 28

Deadline for sending Summary of Material Modification (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 corporate tax returns and contribution deadline for deductibility.

September 30

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).

October

October 15

Extended deadline for filing Form 5500.

Deadline for adopting a retroactive amendment to correct an IRC Section 410(b) coverage or IRC Section 401(a)(4) nondiscrimination failure for 2015.

Extended deadline for filing tax returns for unincorporated businesses and final contribution deadline for deductibility for these entities.

November

December

December 2

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 Summary Annual Report (SAR) to participants.

December 31

Deadline for processing corrective distributions for failed 2015 ADP/ACP test with 10% excise tax.

Deadline for correcting a failed 2015 ADP/ACP test with qualified nonelective contributions (QNEC).

Deadline for amendment to convert existing 401(k) plan to safe harbor design for next plan year. 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).

*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.

**The due date shown for this item is the day following the normal due date that does not fall on a Saturday, Sunday, or legal holiday.

***This date falls on a Saturday or Sunday. Historically, the IRS has not extended this deadline.

Note: Generally, when the due date for an IRS or Department of Labor (DOL) form falls on Saturday, Sunday, or a legal holiday, the deadline is extended to the next business day.