2019 Aon Compliance Calendar—Significant Compensation and Benefit Due Dates

Prepared by Aon

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2019 Aon Compliance Calendar—Significant Compensation and Benefit Due Dates

Aon is pleased to present its 2019 Compliance Calendar to help plan sponsors identify significant compensation and benefit due dates for retirement and health and welfare plans. This Compliance Calendar includes relevant dates involving plan disclosures, contribution and distribution requirements, and various plan-related regulatory filings.

This Compliance Calendar assumes a plan administered on a calendar year basis by an employer with a calendar fiscal year. In general, the information for pension plans applies to single employer plans; other plans, such as multiemployer plans (*e.g.*, Taft-Hartley plans) or government plans, may be subject to different requirements, and are not included. Additionally, certain compliance dates related to group health plan coverage or retiree prescription drug coverage have been included where applicable.

The Compliance Calendar is intended to alert the reader to some of the more significant dates for 2019 and is not intended to identify all compliance obligations or due dates.

Overview of Key Benefit Due Dates for 2019. This portion of the calendar provides a high-level summary of due dates, based on a January 1 through December 31 plan year.

Detailed Compensation and Benefit Due Dates for 2019. Details of the dates are provided in the Retirement and Health and Benefits sections of this document. The due date column serves as an alert of a filing deadline so that plan sponsors have the opportunity to confirm their individual filing due date(s) with their advisors. Therefore, the due date column indicates the general rule; however, if the required due date falls on a weekend or legal holiday, the Compliance Calendar lists, as the due date, the business day immediately preceding the weekend or legal holiday (except when an outside limit applies to how far in advance disclosures can be provided). Further, the information contained in this Compliance Calendar is subject to change due to the ongoing release of additional or clarifying legislative or regulatory guidance by the Internal Revenue Service (IRS), Department of Labor (DOL), or other regulatory agencies throughout the year. Aon is not a law firm, and the contents of this Compliance Calendar are not intended to replace or supersede the advice of legal counsel. This information provides only general guidance, and not all rules and requirements are reflected.

Regulatory agencies may provide extensions in certain situations for employee benefit plans that have been impacted by recent natural disasters (*e.g.*, recent announcements where the DOL and IRS provide specific guidance and relief for plan sponsors, fiduciaries, and other service providers whose plans may have been affected by Hurricanes Florence and Michael). Please reach out to your Aon consultant if your plans have been impacted by these events where extensions (such as Form 5500 filings) may be required.

We hope that this Compliance Calendar serves as a useful reference tool. Please contact your Aon consultant if you have any questions, or if we can be of assistance with any plan compliance issues.

Overview of Key Benefit Due Dates for 2019

Retirement

January	February	March	April	May	June
1/15 4Q contribution for DB plan for previous plan year **1/31** Form 1099-DIV to recipients **1/31** Form W-2 to employees and/or recipients **1/31** Form 1099-R to employees and/or recipients	**2/14** Quarterly pension benefit statements to participants and beneficiaries for last quarter of previous year **2/14** Quarterly statement of plan fees and expenses actually charged to individual plan accounts during last quarter of previous plan year **2/28** Form 1099-DIV filing with IRS (paper filings only) **2/28** Form 1099-R filing with IRS (paper filings only)	**3/15** Employer contributions for plans with 12/31 fiscal year-end **3/15** Prior year excess ADP/ACP amounts returned to highly compensated employees to avoid penalty tax **3/15** Forms 1042-S and 1042 filings with IRS; Form 1042 furnished to recipients **3/15** Application for waiver of minimum funding standards	**4/1** Form 1099-DIV for electronic filings **4/1** Form 1099-R for electronic filings **4/1** Initial RMD from retirement plan if age 70½ attained in prior year **4/15** 1Q contribution for DB Plan for current plan year **4/15** Excess deferrals over prior year § 402(g) dollar limit returned to participants **4/15** PBGC Notice of Underfunding **4/15** Employer contributions for plans with 12/31 fiscal year-end **4/30** Prior year Annual Funding Notice **4/30** Final comprehensive PBGC premium for prior year, for plans that filed an earlier estimated variable rate premium in 4Q of prior year comprehensive filing	**5/15** Quarterly pension benefit statements to participants and beneficiaries for 1Q of plan year **5/15** Quarterly statement of plan fees and expenses actually charged to individual plan accounts during 1Q of current plan year	

July	August	September	October	November	December
7/15 2Q contribution for DB plan for current plan year **7/29** Summary of Material Modifications provided to participants and beneficiaries for plan changes adopted in prior year **7/31** Form 5500 (Annual Return/Report of Employee Benefit Plan to the IRS) if no extension **7/31** Annual pension benefit statements to participants and beneficiaries in individual account plans subject to ERISA **7/31** Form 8955-SSA (Annual Registration Statement Identifying Separated Participants With Deferred Vested Benefits) if no extension **7/31** Form 5558 to the IRS	**8/14** Quarterly pension benefit statements to participants and beneficiaries for 2Q of current plan year **8/14** Quarterly statement of plan fees and expenses actually charged to individual plan accounts during 2Q of current plan year	**9/13** * Required minimum contribution for money purchase pension, target benefit, and DB plans for prior plan year **9/13** * Prior year employer contributions for those sponsors that filed income tax extensions **9/13** * Form 5500 and Form 8955-SSA if the sponsor's tax return extension is granted **9/30** Summary Annual Report (SAR) to participants (if no extension of Form 5500 due date)	**10/3 – 12/2** Annual Notice QACA (employee notice by plans using ADP and/or ACP safe harbor) **10/3 – 12/2** Annual Notice of EACA (ERISA § 514(e)(3)) **10/3 – 12/2** Annual Notice of Automatic Contribution Arrangement (ACA) **10/3 – 12/2** Annual Safe Harbor Status Notice to inform participants of plan's ADP and/or ACP safe harbor status/contribution rates/vesting **10/15** 3Q contribution for DB plan for current plan year **10/15** Prior year Annual Funding Notice (plans with 100 or fewer participants) **10/15** Comprehensive PBGC premium filing **10/15** Last date for prior year Form 5500 and Form 8955-SSA, including all extensions	**11/14** Quarterly pension benefit statements to participants and beneficiaries for 3Q of the current plan year **11/14** Quarterly statement of plan fees and expenses actually charged to individual plan accounts during 3Q of current plan year **11/15** SAR to participants (if Form 5500 due date is extended due to plan sponsor's tax return extension)	**12/13** * SAR to participants (if Form 5500 due date is extended due to Form 5558 filing) **12/31** Annual pension benefit notice for DB plans **12/31** Excess prior year ADP/ACP amounts returned to highly compensated employees to avoid plan disqualification; as applicable, elective deferrals refunded and other contributions distributed or forfeited **12/31** Required minimum distribution from retirement plan, if applicable

* This due date falls on a weekend or a legal holiday, including any legal holiday in the District of Columbia. As noted in the introduction to this Calendar, in an effort to facilitate timely compliance with delivery requirements, the Compliance Calendar reflects a suggested due date of the business day immediately preceding this weekend or holiday due date.

Health and Benefits

January	February	March	April	May	June
1/31 Form W-2 to employees and/or recipients	**2/28** Form 1095-B, Form 1095-C to IRS using Form 1094-B, or Form 1094-C (filed on paper)	**3/1** Creditable/Non-Creditable Annual Disclosure to Centers for Medicare and Medicaid Services (CMS) **3/1** Form M-1 (Annual Report for Multiple Employer Welfare Arrangements (MEWA) and Certain Entities Claiming Exceptions (ECEs) to Employee Benefits Security Administration (EBSA)) **3/4** Form 1095-B or Form 1095-C to participants	**4/1** Medicare Part D Retiree Drug Subsidy Reconciliation **4/1** Forms 1095-B and 1095-C to IRS using Form 1094-B or 1094-C (if filed electronically)		
July	**August**	**September**	**October**	**November**	**December**
7/29 Summary of Material Modifications provided to participants and beneficiaries for plan changes adopted in prior year **7/31** Form 5500 (Annual Return/Report of Employee Benefit Plan to the IRS) if no extension **7/31** Form 720 filing to report Comparative Effectiveness Research Fee **7/31** Form 5558 to the IRS	**8/1** Medical Loss Ratio (MLR) rebate notices and payments for previous calendar year	**9/13** * Form 5500 and Form 8955-SSA if the sponsor's tax return extension is granted **9/30** Summary Annual Report (SAR) to participants (if no extension of Form 5500 due date)	**10/2** Medicare Part D Retiree Drug Subsidy Application, Retiree List, and Attestation for next year's calendar year plan **Prior to 10/15** Medicare Part D Creditable/Non-Creditable Coverage Notice	**11/15** SAR to participants (if Form 5500 due date is extended due to plan sponsor's tax return extension)	**12/13** * SAR to participants (if Form 5500 due date is extended due to Form 5558 filing) **12/31** Women's Health and Cancer Rights Act Notice **12/31** EEOC Wellness Notice (if applicable) **12/31** Children's Health Insurance Program (CHIP) Notice **12/31** Patient Protection Provider Choice Notice (if applicable)

* This due date falls on a weekend or a legal holiday, including any legal holiday in the District of Columbia. As noted in the introduction to this Calendar, in an effort to facilitate timely compliance with delivery requirements, the Compliance Calendar reflects a suggested due date of the business day immediately preceding this weekend or holiday due date.

Detailed Compensation and Benefit Due Dates for 2019

Retirement

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
Annually	Notice of Qualified Default Investment Alternative (QDIA)	Initial notice at least 30 days before the date of plan eligibility, at least 30 days before the first investment in QDIA, or no later than the date of plan eligibility if the participant may make a permissible withdrawal within 90 days without penalty **Notes**: ▪ Thereafter, annual notice must be provided within a reasonable period of time of at least 30 days in advance of each subsequent plan year ▪ The QDIA Notice is often combined with the QACA Notice or the EACA Notice, as described later in this calendar	ERISA individual account plans that permit participants to direct their investments (*e.g.*, a 401(k) plan), assuming the plan sponsor wishes to have certain fiduciary relief
No later than 90 days after Form 5500 filing[1]	Posting of identification, basic plan information, and actuarial information to plan sponsor's intranet	ERISA requires the DOL to post identification, basic plan information, and actuarial information on its own website within 90 days of receiving the Form 5500 filing; therefore, it may be reasonable for the employer to post this information to an intranet within 90 days of the Form 5500 filing date	Defined benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements) covering participants for whom the plan sponsor maintains an intranet for purposes of communicating with the employees and not the public
Annually	Disclosure of plan-related information, including fees and expenses that may be charged to individual plan accounts. Must include a comparative chart with specific information relating to plan investment options	DOL regulations require the disclosure to be furnished to a new participant or beneficiary on or before the date that such participant or beneficiary can first direct his or her investments under the plan, and "at least annually thereafter." Those regulations also define the quoted phrase to mean at least once in any 14-month period Plan sponsors have flexibility from year to year in determining the exact date for this disclosure, but may want to set a regular disclosure date as part of their compliance calendar (considering the date of disclosure used in the preceding year)	ERISA individual account plans that permit participants to direct their investments (*e.g.*, a 401(k) plan)
1/15/2019	4th quarter contribution for defined benefit plan for the 2018 plan year	15 days after end of the applicable quarter	Qualified defined benefit pension plans subject to accelerated quarterly contribution schedule

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
1/31/2019	Form 1099-DIV (Dividends and Distributions) to recipients (Also see 2/28/2019 and 3/29/2019[2] due dates)	Statements for the calendar year should generally be provided to recipients by January 31 of the following year **Note**: Statements may be issued earlier in some situations, as provided by the regulations	Any payer (trustee, etc.) who provided any person with a dividend or distribution on stock of $10 or more. Payments of Internal Revenue Code (IRC) § 404(k) dividends directly from the corporation to plan participants or beneficiaries are reported on Form 1099-DIV 404(k) dividends that are paid to the ESOP and then distributed from the plan to the participant or beneficiary are reported on Form 1099-R
1/31/2019	2018 Form W-2 (Wage and Tax Statement) to employees/recipients 2018 Form 1099-R (Distributions from Pensions, Annuities, Retirement or Profit Sharing Plans, IRAs, or Insurance Contracts) to employees/recipients (Also see 2/28/2019 and 3/29/2019[2] due dates)	Statements for the calendar year should generally be provided to employees and/or recipients by January 31 of the following year	Employees, qualified retirement plans, section 403(b) plans, insurance contracts, etc. Eligible rollover distributions and direct rollovers should be reported on Form 1099-R
2/14/2019[3]	Quarterly pension benefit statements to participants and beneficiaries for the last quarter of 2018 plan year	On or before the 45th day following the end of the calendar quarter	ERISA individual account plans that permit participants to direct their investments (*e.g.*, a 401(k) plan)
2/14/2019	Quarterly statement of plan fees and expenses actually charged to individual plan accounts during last quarter of 2018 plan year	A statement of the total fees and expenses actually deducted from the individual account of a plan participant (or beneficiary), if any, must be furnished to such participant (or beneficiary) on a quarterly basis These statements may be provided together with the quarterly pension benefit statements, each of which is due on or before the 45th day following the end of the respective calendar quarter	ERISA individual account plans that permit participants to direct their investments (*e.g.*, a 401(k) plan)
2/28/2019 *Paper filing*	2018 Form 1099-DIV (Dividends and Distributions) filing with IRS (Also see 4/1/2019 due date for electronic filings)	Form 1099-DIV should generally be filed with IRS no later than February 28 **Note**: An extension may be available by filing Form 8809 (Application for Extension of Time To File Information Returns)	Any payer (trustee, etc.) who provided any person with a dividend or distribution on stock of $10 or more. Payments of IRC § 404(k) dividends directly from the corporation to plan participants or beneficiaries are reported on Form 1099-DIV 404(k) dividends that are paid to the ESOP and then distributed from the plan to the participant or beneficiary are reported on Form 1099-R

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
2/28/2019 *Paper filing*	2018 Form 1099-R (Distributions from Pensions, Annuities, Retirement Plans, IRAs, or Insurance Contracts) to IRS (Also see 4/1/2019 due date for electronic filings)	Form 1099-R should generally be filed with the IRS no later than February 28 **Note**: An extension may be available by filing Form 8809 (Application for Extension of Time To File Information Returns)	Employees, retirement plans, dependent care plans, life insurance contracts, compensation plans, etc. Eligible rollover distributions and direct rollovers should be reported on Form 1099-R
3/15/2019	2018 employer contributions for plans with December 31 fiscal year-end in order to take tax deduction (assuming the plan sponsor does not file an income tax extension)	Payment must be made not later than the time prescribed by law for filing the income tax return for such fiscal year For S corporations and partnerships whose fiscal year is the calendar year, the income tax return is due by March 15 of the following year	Qualified retirement plans
3/15/2019	Excess 2018 ADP/ACP amounts returned to highly compensated employees to avoid penalty tax; as applicable, elective deferrals refunded, and other contributions distributed or forfeited	2½ months after end of plan year **Note**: Deadline is extended to 6 months after end of the plan year for a plan that includes all eligible employees in an eligible automatic contribution arrangement (EACA)	401(k) plans (ADP Excess) 401(k) and 403(b) plans contributions (ACP Excess)
3/15/2019	Form 1042-S (Foreign Person's U.S. Source Income Subject to Withholding); and Form 1042 (Annual Withholding Tax Return for U.S. Source Income of Foreign Persons)	March 15 following close of prior calendar year Forms 1042-S and 1042 filed with the IRS to report certain retirement plan distributions made to nonresident aliens and income tax withheld from distributions made to nonresident aliens Form 1042-S: ▪ Furnished to recipient of the income ▪ An extension may be available by filing Form 8809 (Application for Extension of Time To File Information Returns) Form 1042: ▪ An extension may be available by filing Form 7004 (Application for Automatic Extension of Time To File Certain Business Income Tax, Information, and Other Returns). Form 7004 does not extend the time for payment of tax	Retirement plans
3/15/2019	Application for waiver of minimum funding standard for defined benefit and money purchase pension plans	Due no later than the 15th day of the 3rd month after the close of the plan year for which the waiver is requested	Qualified defined benefit plans and money purchase pension plans

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
4/1/2019 *Electronic filings*	Form 1099-DIV (Dividends and Distributions) (Also see 1/31/2019 and 2/28/2019 due dates)	Electronic statements are generally due to be filed with the IRS by March 31 Statements for the calendar year should be provided to recipients by January 31 of the following year (see 1/31/2019 due date) **Notes**: ▪ Instructions to 2018 Form 1099-DIV require electronic filings to be made by April 1, 2019 ▪ All distributions from an ESOP that are IRC § 404(k) dividends must be reported on Form 1099-R ▪ Eligible rollover distributions and direct rollovers should be reported on Form 1099-R ▪ An extension may be available by filing Form 8809 (Application for Extension of Time To File Information Returns)	Any payer (trustee, etc.) who provided a person with a dividend or distribution on stock of $10 or more. Payments of IRC § 404(k) dividends directly from the corporation to plan participants or beneficiaries are reported on Form 1099-DIV
4/1/2019 *Electronic filings*	2018 Form 1099-R (Distributions from Pensions, Annuities, Retirement Plans, IRAs, or Insurance Contracts) to the IRS (if filed electronically) (Also see 1/31/2019 and 2/28/2019 due dates)	Form 1099-R are generally due to be filed with the IRS by March 31 if filed electronically **Note**: ▪ Instructions to 2018 Form 1099-R require electronic filings to be made by April 1, 2019 ▪ An extension may be available by filing Form 8809 (Application for Extension of Time To File Information Returns)	Employees, retirement plans, dependent care plans, life insurance contracts, compensation plans, etc.
4/1/2019	Initial required minimum benefit distribution from retirement plan if age 70½ attained in 2018 (terminated employment in 2018, after previously attaining age 70½, and not a 5-percent owner)	April 1 of calendar year, following the calendar year in which an individual attains age 70½ or retires, whichever is later	Qualified retirement plans, 457(b) plans, and 403(b) plans
4/15/2019	1st quarter contribution for defined benefit plan for the 2019 plan year	15 days after end of the applicable quarter	Qualified defined benefit pension plans subject to accelerated quarterly contribution schedule
4/15/2019	Excess deferrals over 2018 § 402(g) dollar limit returned to participants	April 15 following close of employee’s taxable year	401(k) plans, 403(b) plans, simplified employee pension plans, and simple retirement accounts

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
4/15/2019	Pension Benefit Guaranty Corporation (PBGC) Notice of Underfunding (Regarding ERISA § 4010 filing with PBGC for sponsors with unfunded liabilities)	105th day after end of "information year" (generally, fiscal year) Exemption may apply if: (1) Unfunded liability of all plans is $15 million or less, disregarding interest rate stabilization; (2) Controlled group has fewer than 500 total plan participants; or (3) Reporting would be solely due to a missed contribution or funding waiver, and the missed contribution or funding waiver has been reported to the PBGC prior to the § 4010 filing due date	Pension plans subject to Title IV of ERISA (Plan Termination Insurance) that generally have a funding target attainment percentage (FTAP) that is less than 80%, disregarding the interest rate stabilization enacted in the Moving Ahead for Progress in the 21st Century Act (MAP-21) and subsequent legislation
4/15/2019	2018 employer contributions for plans with December 31 fiscal year-end in order to take tax deduction (with no plan sponsor tax extension)	Payment must be made not later than the time prescribed by law for filing the income tax return for such fiscal year For C corporations whose fiscal year is the calendar year, the income tax return is due by April 15 of the following year	Qualified retirement plans
4/30/2019	2018 Annual Funding Notice to participants, beneficiaries, labor organizations representing participants, and the PBGC	Plans generally must furnish funding notices no later than 120 days after the close of each plan year Small plans, covering fewer than 100 participants, counting all defined benefit plans in a controlled group, must provide the notice by the earlier of the date the Form 5500 is filed and the due date of the Form 5500 including extensions	Qualified defined benefit pension plans subject to Title IV of ERISA (Plan Termination Insurance)
4/30/2019	Final comprehensive PBGC premium for 2018 for plans that filed an earlier estimated variable rate premium in the 10/15/2018 comprehensive filing	Last day of 16th full month after end of the plan year preceding the premium payment year	Pension plans subject to Title IV of ERISA (Plan Termination Insurance)
5/15/2019	Quarterly pension benefit statements to participants and beneficiaries for 1st quarter of 2019 plan year	On or before 45th day following the end of the calendar quarter	ERISA individual account plans that permit participants to direct their investments (*e.g.*, a 401(k) plan)
5/15/2019	Quarterly statement of plan fees and expenses actually charged to individual plan accounts during 1st quarter of 2019 plan year	To the extent that fees or expenses are charged to individual accounts, a statement must be furnished on a quarterly basis In many cases, these statements are provided together with the quarterly benefit statements, each of which is due on or before the 45th day following the end of the calendar quarter	ERISA individual account plans that permit participants to direct their investments (*e.g.*, a 401(k) plan)

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
7/15/2019	2nd quarter contribution for defined benefit plan for the 2019 plan year	15 days after end of the applicable quarter	Qualified defined benefit pension plans subject to accelerated quarterly contribution schedule
7/29/2019	Summary of Material Modifications provided to participants and beneficiaries for plan changes adopted in 2018	210 days after end of plan year in which change adopted, unless included in timely updated summary plan description	Benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements)
7/31/2019	2018 Form 5500 (Annual Return/Report of Employee Benefit Plan to the IRS) if no extension (Also see 7/31/2019 Form 5558 due date if extension is needed)	Last day of 7th month after end of plan year	Benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements)
7/31/2019	Annual pension benefit statement to participants and beneficiaries in individual account plans subject to ERISA	The statement is required to be furnished annually. Per FAB 2007-03, the statement must be provided by the date the Form 5500 is filed, but no later than the due date of Form 5500 for the plan year, including extensions	Individual account defined contribution retirement plans that do not permit participants to direct investments. (The required quarterly statements meet this requirement for individual account defined contribution retirement plans that permit participants to direct investments)
7/31/2019	2018 Form 8955-SSA (Annual Registration Statement Identifying Separated Participants With Deferred Vested Benefits) if no extension is needed (Also see 7/31/2019 Form 5558 due date if extension is needed)	Last day of 7th month after end of plan year Used to report information regarding separated participants with deferred vested benefits	Plans subject to the vesting standards of ERISA § 203
7/31/2019 *For Form 5500 or Form 8955-SSA due date extension*	Form 5558 (Application for Extension of Time to File Certain Employee Plan Returns) to the IRS (Also see 10/15/2019 Forms 5500 and 8955-SSA due dates)	Used to apply for extension of time to file Forms 5500, 5330, or 8955-SSA On or before due date for filing Forms 5500, 5330, or 8955-SSA. The due date varies for extending the Form 5330 due date, depending on the nature of the excise tax due. (Be sure to file Form 5558 in sufficient time for the IRS to consider and act on it before the Form 5330 normal due date)	In the case of Form 5500, benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements) In the case of Form 8955-SSA, plans subject to the vesting standards of ERISA § 203 In the case of Form 5330, employee benefit plans subject to certain excise taxes
8/14/2019	Quarterly pension benefit statements to participants and beneficiaries for 2nd quarter of 2019 plan year	On or before 45th day following the end of the calendar quarter	ERISA individual account plans that permit participants to direct their investments (*e.g.*, a 401(k) plan)

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
8/14/2019	Quarterly statement of plan fees and expenses actually charged to individual plan accounts during 2nd quarter of 2019 plan year	To the extent that fees or expenses are charged to individual accounts, a statement must be furnished on a quarterly basis In many cases, these statements are provided together with the quarterly benefit statements, each of which is due on or before the 45th day following the end of the calendar quarter	ERISA individual account plans that permit participants to direct their investments (*e.g.*, a 401(k) plan)
9/13/2019[2]	Required minimum contribution for money purchase pension, target benefit, and defined benefit plans for the 2018 plan year	8½ months after end of plan year, for minimum funding requirement (also see quarterly contributions for underfunded defined benefit plans)	Qualified retirement plans subject to IRC § 430 or 412 funding requirements
9/13/2019[2]	2018 employer contributions for those corporate sponsors that filed an income tax extension	The due date for contributions to be deductible is the corporate plan sponsor's tax return due date for the fiscal year in which the plan year ends, including extensions For S corporations and partnerships whose fiscal year is the calendar year, the income tax return is due by September 15 of the following year	Qualified retirement plans
9/13/2019[2]	2018 Form 5500 (Annual Return/Report of Employee Benefit Plan to the IRS); and Form 8955-SSA (Annual Registration Statement Identifying Separated Participants With Deferred Vested Benefits) if the sponsor's tax return extension is granted	Automatic extension to extended due date of corporate plan sponsor's tax return (if certain conditions are met, Form 5558 need not be submitted)	In the case of Form 5500, benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements) In the case of Form 8955-SSA, plans subject to the vesting standards of ERISA § 203
9/30/2019	2018 Summary Annual Report (SAR) to participants (if no extension of Form 5500 due date) (Also see 11/15/2019 and 12/13/2019[2] due dates if filing Form 5500 with an extension)	Due to participants 9 months after end of plan year	Benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements), excluding defined benefit plans, which are instead required to provide the Annual Funding Notice to participants
10/3/2019–12/2/2019	Annual Notice of Qualified Automatic Contribution Arrangement (QACA) (employee notice by plans using ADP and/or ACP "safe harbor")	Generally, no earlier than 90 days, but no later than 30 days preceding each plan year relying on the "safe harbor" **Note**: Initial notice must be provided to newly eligible employees no later than 1st individual deferral	401(k) plans and 403(b) plans that elect to rely on QACA "safe harbor" to satisfy ADP and/or ACP testing

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
10/3/2019–12/2/2019	Annual Notice of Eligible Automatic Contribution Arrangement (EACA)/ERISA § 514(e)(3)	Generally, no earlier than 90 days, but no later than 30 days preceding each plan year to which the EACA applies **Notes**: ▪ Initial notice must be provided to newly eligible employees no later than 1st individual deferral ▪ An EACA notice must include an explanation of the permissive withdrawal, which permits a participant to withdraw deferrals during the 90-day period following the individual's first deferral	401(k) plans and 403(b) plans covered by ERISA that choose to use EACA
10/3/2019–12/2/2019	Annual Notice of Automatic Contribution Arrangement (ACA)	Generally, no earlier than 90 days, but no later than 30 days preceding each plan year to which the ACA applies A default election begins to apply with respect to an eligible employee no earlier than a reasonable period of time after receipt of a notice describing the automatic contribution arrangement **Note**: Initial notice must be provided to newly eligible employees no later than the first individual deferral	401(k) and 403(b) plans with automatic enrollment that are not EACAs or QACAs
10/3/2019–12/2/2019	Annual Safe Harbor Status Notice to inform participants of plan's ADP and/or ACP safe harbor status/contribution rates/vesting	Generally, no earlier than 90 days, but no later than 30 days preceding each plan year	ADP/ACP safe harbor 401(k) and ACP safe harbor 403(b) plans
10/15/2019	3rd quarter contribution for defined benefit plan for the 2019 plan year	15 days after end of the applicable quarter	Qualified defined benefit pension plans subject to accelerated quarterly contribution schedule
10/15/2019	2018 Annual Funding Notice (for a plan with 100 or fewer participants) to participants, beneficiaries, labor organizations representing participants, and the PBGC	Generally, due within 120 days following the close of the plan year (see above); for small plans covering 100 or fewer participants (counting all defined benefit plans in a controlled group), the due date for the notice is the earlier of the date the Form 5500 is filed and the due date of the Form 5500 (including extensions)	Qualified defined benefit pension plans subject to Title IV of ERISA (Plan Termination Insurance)

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
10/15/2019	2018 Form 5500 (Annual Return/Report of Employee Benefit Plan to the IRS); and Form 8955-SSA (Annual Registration Statement Identifying Separated Participants With Deferred Vested Benefits) last date, including all extensions	See Form 5558 entry above	In the case of Form 5500, benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements) In the case of Form 8955-SSA, plans subject to the vesting standards of ERISA § 203
10/15/2019	Comprehensive PBGC premium filing including PBGC flat rate premium payment for 2019 and estimate of variable rate premium for 2019 for all plans, regardless of size	15th day of 10th full month after end of the plan year preceding the premium payment year	Pension plans subject to Title IV of ERISA (Plan Termination Insurance), regardless of size
11/14/2019	Quarterly pension benefit statements to participants and beneficiaries for 3rd quarter of the 2019 plan year	On or before 45th day following the end of the calendar quarter	ERISA individual account plans that permit participants to direct their investments (*e.g.*, a 401(k) plan)
11/14/2019	Quarterly statement of plan fees and expenses actually charged to individual plan accounts during 3rd quarter of the 2019 plan year	To the extent that fees or expenses are charged to individual accounts, a statement must be furnished on a quarterly basis. In many cases, these statements are provided together with the quarterly benefit statements, each of which is due on or before the 45th day following the end of the calendar quarter	ERISA individual account plans that permit participants to direct their investments (*e.g.*, a 401(k) plan)
11/15/2019	2018 SAR to participants (if Form 5500 due date is extended due to plan sponsor's tax return extension) (Also see 12/13/2019[2] due date if filing Form 5500 with an extension)	2 months after Form 5500 due date, as extended	Benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements), excluding defined benefit plans, required instead to provide the Annual Funding Notice to participants
12/13/2019[2]	2018 SAR to participants (if Form 5500 due date is extended due to Form 5558 filing)	2 months after Form 5500 due date	Benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements), excluding defined benefit plans, which are instead required to provide the Annual Funding Notice to participants
12/31/2019	Annual pension benefit statement notices to participants and beneficiaries in defined benefit plans subject to ERISA	A plan must provide a benefit statement every 3 years, or an annual notice of the availability of a benefit statement upon request	Qualified defined benefit plans

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
12/31/2019	Excess 2018 ADP/ACP amounts returned to highly compensated employees to avoid plan disqualification; as applicable, elective deferrals refunded, and other contributions distributed or forfeited	Before end of plan year after plan year for which contribution is made	401(k) plans and 403(b) plans with employee after-tax contributions or employer matching contributions
12/31/2019	Required minimum distribution from retirement plan, if applicable (Also see 4/1/2019 initial required minimum benefit distribution, if age 70½ attained in 2018)	Before end of calendar year for the year following the calendar year in which an individual attains age 70½ or retires, whichever is later (and for all following calendar years for which a minimum distribution is required to be paid)	Qualified retirement plans, 457(b) plans, and 403(b) plans

Health and Benefits

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
Must be provided within 90 days of group health plan enrollment	Consolidated Omnibus Budget Reconciliation Act (COBRA) Notice	Initial notice generally provided at the time of annual and mid-year enrollments	Group health plans of employers that normally employ 20 or more employees
For calendar year 2019 the notice will be provided prior to 1/1/2019, or in conjunction with mid-year enrollment	Health Insurance Portability and Accountability Act (HIPAA) Privacy Notice	Generally provided at the time of annual and mid-year enrollment (required to be provided at the time of enrollment and notice of availability every 3 years)	Most group health plans (other than self-insured plans with fewer than 50 participants that do not utilize a third-party administrator)
At or before initial offer of group health plan enrollment	Notice of Special Enrollment Rights	Generally provided at the time of annual and mid-year enrollments	Most group health plans
Must be included with any summary of benefits provided to group health plan participants and beneficiaries	Grandfathered Plan Notice	Generally provided at the time of annual and mid-year enrollments	Group health plans in existence as of 3/23/2010 that have only had minimal changes since that date
Must be provided as part of group health plan enrollment materials	Summary of Benefits and Coverage	Issuer of insurance policy or plan sponsor of self-insured group health plan	Most fully-insured and self-insured group health plans
Must be provided to new employees within 14 days of employee’s start date	Notice Informing Employees of Health Coverage Options (Availability of Exchange)	Model notice is available	All employers subject to the Fair Labor Standards Act

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
1/31/2019	2018 Form W-2 (Wage and Tax Statement) to employees and/or recipients	Statements for the calendar year should generally be provided to employees and/or recipients by January 31 of the following year The 2018 Form W-2 for employers who were required to file 250 or more Forms W-2 for 2017 must report the cost of group health plan coverage provided to employees	Employees, dependent care plans, life insurance contracts, group health plans, etc.
2/28/2019 *For paper filings*	2018 Form 1095-B (Health Coverage); or 2018 Form 1095-C (Employer-Provided Health Insurance Offer and Coverage) to IRS using Form 1094-B (Transmittal of Health Coverage Information Returns); or 2018 Form 1094-C (Transmittal of Employer-Provided Health Insurance Offer and Coverage Information Returns)	Forms 1094-B, 1094-C, 1095-B, and 1095-C, as applicable should be filed with the IRS no later than the last day of February **Note**: An extension may be available by filing Form 8809 (Application for Extension of Time To File Information Returns)	Employers, group health plans, and health insurance
3/1/2019	Creditable/Non-Creditable Annual Disclosure to Centers for Medicare and Medicaid Services (CMS)	60 days after the beginning of the plan year	All employers that offer prescription drug coverage
3/1/2019	Form M-1 (Annual Report for Multiple Employer Welfare Arrangements (MEWA) and Certain Entities Claiming Exceptions (ECEs) to Employee Benefits Security Administration (EBSA))	March 1 following close of prior calendar year **Note**: Filers generally granted an automatic 60-day extension until May 1, if requested	Certain MEWAs and entities claiming exception from MEWA status
3/4/2019	2018 Form 1095-B (Health Coverage); or 2018 Form 1095-C (Employer-Provided Health Insurance Offer and Coverage)	Statements for the calendar year should be provided to employees and/or recipients by January 31 of the following year, subject to a 30-day extension, if requested **Notes**: ▪ An extension of up to 30 days may be requested by letter to the IRS stating the reason for the delay ▪ IRS Notice 2018-94 extended the January 31, 2019 due date to March 4, 2019. Considering this extension, the IRS is not permitting any automatic 30-day extension in addition to the extended due date	Employers, group health plans, and health insurance

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
4/1/2019 *For electronic filings*	2018 Form 1095-B (Health Coverage); or 2018 Form 1095-C (Employer-Provided Health Insurance Offer and Coverage) to IRS using Form 1094-B (Transmittal of Health Coverage Information Returns); or 2018 Form 1094-C (Transmittal of Employer-Provided Health Insurance Offer and Coverage Information Returns)	Forms 1094-B, 1094-C, 1095-B, and 1095-C, as applicable should be filed with the IRS by April 1 if filed electronically **Note**: An extension may be available by filing Form 8809 (Application for Extension of Time To File Information Returns)	Employers, group health plans, and health insurance
4/1/2018 *2017 calendar year plans*	Medicare Part D Retiree Drug Subsidy Reconciliation	Due no later than 15 months after the end of the plan year **Note**: Significant data review is required well in advance of reconciliation	Employers that offer retiree prescription drug coverage and choose to apply for the 28% Retiree Drug Subsidy. An employer will forfeit its 28% Retiree Drug Subsidy if the plan is not timely reconciled
7/29/2019	Summary of Material Modifications provided to participants and beneficiaries for plan changes adopted in 2018	210 days after end of plan year in which change adopted, unless included in timely updated summary plan description (SPD) 60 days after a material reduction in group health plan covered services or benefits adopted; or 90 days if employee communications that would report such reduction are provided at regular intervals	Benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements)
7/31/2019 *Annual fee that applies to plan years ending after 9/30/2012 and before 10/1/2019*	Comparative Effectiveness Research Fee multiplied by average number of covered lives Plan years ending on or after 10/1/2017 and before 10/1/2018 — $2.39 Plan years ending on or after 10/1/2018 and before 10/1/2019 — $2.45	Fee is reported and paid once per year on IRS Form 720 by July 31 of the calendar year immediately following the end of the plan year The fee and report for the 2018 calendar year is due by 7/31/2019	Imposed on issuer of insurance policy or plan sponsor of self-insured health plan
7/31/2019	2018 Form 5500 (Annual Return/Report of Employee Benefit Plan to the IRS) if no extension (Also see 7/31/2019 Form 5558 due date if extension is needed)	Last day of 7th month after end of plan year	Benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements)

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
7/31/2019 *For Form 5500 or Form 8955-SSA due date extension*	Form 5558 (Application for Extension of Time to File Certain Employee Plan Returns) to the IRS (Also see 10/15/2019 Forms 5500 and 8955-SSA due dates)	Used to apply for extension of time to file Forms 5500, 5330, or 8955-SSA On or before due date for filing Forms 5500, 5330, or 8955-SSA. The due date varies for extending the Form 5330 due date, depending on the nature of the excise tax due. (Be sure to file Form 5558 in sufficient time for the IRS to consider and act on it before the Form 5330 normal due date)	In the case of Form 5500, benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements) In the case of Form 8955-SSA, plans subject to the vesting standards of ERISA § 203 In the case of Form 5330, employee benefit plans subject to certain excise taxes
8/1/2019	Medical Loss Ratio (MLR) rebate notices and payments for 2018 calendar year	If applicable, MLR rebate and notice must be provided by issuers to group policyholders and all subscribers of group policies that receive an MLR rebate Notice and rebate must be provided by August 1 of the year following the MLR reporting year (calendar year)	Fully insured group health plans
9/13/2019[2]	2018 Form 5500 (Annual Return/Report of Employee Benefit Plan to the IRS)	Automatic extension to extended due date of corporate plan sponsor's tax return (if certain conditions are met, Form 5558 need not be submitted)	In the case of Form 5500, benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements)
9/30/2019	2018 Summary Annual Report (SAR) to participants (if no extension of Form 5500 due date) (Also see 11/15/2019 and 12/13/2019[2] due dates if filing Form 5500 with an extension)	Due to participants 9 months after end of plan year	Benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements)
10/2/2019 for 2020 calendar-year plans[4]	Medicare Part D Retiree Drug Subsidy Application, Retiree List, and Attestation	Due 90 days before the beginning of the plan year	Employers that offer retiree prescription drug coverage and choose to apply for the 28% Retiree Drug Subsidy
Prior to 10/15/2019	Medicare Part D Creditable/ Non-Creditable Coverage Notice	Annual mailing; notices also required at various other times	All employers with Medicare Part D-eligible participants enrolled in an employer prescription drug plan
11/15/2019	2018 SAR to participants (if Form 5500 due date is extended due to plan sponsor's tax return extension) (Also see 12/13/2019[2] due date if filing Form 5500 with an extension)	2 months after Form 5500 due date, as extended	Benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements)
12/13/2019[2]	2018 SAR to participants (if Form 5500 due date is extended due to Form 5558 filing)	2 months after Form 5500 due date	Benefit plans covered by Part 1 of Title I of ERISA (Reporting and Disclosure Requirements)

Due Date/Timing Requirement	Item/Form	Filing/Disclosure/Plan Action Requirements	Plans Affected
12/31/2019	Women's Health and Cancer Rights Act Notice	Annual mailing; notice also required upon enrollment	Employers that offer group health plan benefits that cover medical and surgical benefits with respect to mastectomy
Annual notice by 12/31/2019	EEOC Wellness Notice (if applicable)	Notice must be provided in connection with offering a wellness program to employees	Employers that provide incentives for participants to undergo a medical examination or respond to disability-related inquiries
Annual notice by 12/31/2019	Children's Health Insurance Program (CHIP) Notice	Annual mailing; can be provided with enrollment materials or SPD	Employers providing medical benefits to employees in a state that provides premium assistance through Medicaid or a state child health plan for the purchase of group health plan coverage
Annual notice by 12/31/2019	Patient Protection Provider Choice Notice (if applicable)	Provide with any description of benefits (usually with enrollment materials) and include in SPD	Group health plans (non-grandfathered) that require or allow designation of a primary care provider for an adult, child, or for obstetric or gynecological care

[1] The Pension Protection Act of 2006 (PPA) added a provision to ERISA Section 104 requiring that identification and basic plan information and actuarial information that are included in the annual report be displayed on an intranet website, if any, maintained by the plan sponsor.

[2] This due date falls on a weekend or a legal holiday, including any legal holiday in the District of Columbia. As noted in the introduction to this Calendar, in an effort to facilitate timely compliance with delivery requirements, the Compliance Calendar reflects a suggested due date of the business day immediately preceding this weekend or holiday due date. Generally, for IRS form filing dates (and not dates involving contributions or the timing of participant notices), the due date is extended to the next business day. For all other forms, required disclosures, contributions, or distributions, please file or provide on or before the above referenced due date; no extension applies when an outside limit states how early a disclosure can be provided, such as for the annual notices for automatic contribution arrangements. Also, please be aware that regulatory agencies may issue additional updates to due dates throughout the year.

[3] Section 508(a) of PPA amended ERISA Section 105 by establishing an affirmative obligation on the part of plan administrators to automatically furnish pension benefits statements to participants and beneficiaries at least once each quarter, in the case of individual account plans that permit participants to direct their investments. For more information, see DOL Field Assistance Bulletin No. 2006-03. Individual account plans must provide Pension Benefit Statements at least once each calendar year to a participant or beneficiary who does not have a right to direct the investment of assets in that account.

[4] The due date may be extended to November 2, 2019 for plans that properly request an extension.

Aon Contacts

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