

2016 Key Administrative Dates and Deadlines for Calendar-Year Defined Contribution Retirement Plans¹

Subject to ERISA and the Internal Revenue Code



JANUARY

MARCH

- 3/15/16** • Corrective Distributions
- Deductible Contributions
- Forms 1042 and 1042-S
- 3/31/16** • Forms W-2 and W-3 (electronic)
- Form 1099-R (electronic)
- Form 5330

MAY

- 5/15/16** • Quarterly Benefit Statements
- 5/16/16*** • Forms 990 and 8868

JULY

- 7/28/16** • Summary of Material Modifications

SEPTEMBER

- 9/15/16** • Money Purchase Plan Contributions
- Form 5500 and Plan Audit
- Annual Benefit Statements
- Deductible Contributions
- 9/30/16** • Summary Annual Report

NOVEMBER

- 11/14/16** • Quarterly Benefit Statements

FEBRUARY

- 2/1/16*** • Form 5300 (Cycle A)
- Form 5300 (Cycle E)
- Form W-2 (recipients)
- Form 1099-R (recipients)
- Form 945
- 2/10/16** • Form 945 (Alternative Date)
- 2/14/16** • Quarterly Benefit Statements
- 2/29/16** • Forms W-2 and W-3 (paper)
- Forms 1099-R and 1096 (paper)

APRIL

- 4/1/16** • Required Minimum Distributions
- 4/15/16** • Excess Deferrals and Allocable Income
- Form 1065 or Form 7004

JUNE

- 6/30/16** • EACA Corrective Distributions

AUGUST

- 8/1/16*** • Form 5500 or Form 5558
- Form 8955-SSA or Form 5558
- Notice to Terminated Vested Employees
- Plan Audit
- Annual Benefit Statements
- Form 5330
- 8/14/16** • Quarterly Benefit Statements
- Annual Benefit Statements
- 8/15/16** • Form 5500 and Plan Audit

OCTOBER

- 10/3/16*** • Safe Harbor Notices
- Automatic Enrollment Notices
- 10/15/16** • Corrective Plan Amendment
- 10/17/16*** • Form 5500 and Plan Audit
- Annual Benefit Statements
- Summary Annual Report
- Form 8955-SSA
- Notice to Terminated Vested Employees

DECEMBER

- 12/2/16** • QDIA Notices
- Safe Harbor Notices
- Automatic Enrollment Notices
- 12/15/16** • Summary Annual Report
- 12/31/16** • Corrective Distributions and QNECs
- Safe Harbor, QACA, or EACA Elections
- Required Minimum Distributions
- Participant Notices
- Discretionary Plan Amendments
- Remove Safe Harbor Feature

¹Click on any item for more information or refer to pp. 2-4.

*The date reflected is the next business day following a filing date of an IRS or Department of Labor form that otherwise would fall on a Saturday, Sunday, or a legal holiday.

The Milliman 2016 Defined Contribution Plan Calendar contains general information that is not intended to constitute the rendering of legal, tax, investment, or accounting advice. Application to specific circumstances should rely on further professional guidance.

2016 Key Administrative Dates and Deadlines for Calendar-Year Defined Contribution Retirement Plans Subject to ERISA and the Internal Revenue Code

DATE	ITEM	ACTION
2/1/16*	Form 5300 Determination Letter Applications (Cycle A)	First date to submit IRS Form 5300 (<i>Application for Determination for Employee Benefits Plan</i>) for individually designed defined contribution plans of sponsors with EINs ending in 1 or 6 (Cycle A).
2/1/16*	Form 5300 Determination Letter Applications (Cycle E)	Deadline to submit IRS Form 5300 for a determination letter for individually designed defined contribution plans of plan sponsors with EINs ending in 5 or 0 (Cycle E), or if the plan is a § 414(d) governmental plan for which an election has been made by the plan sponsor to treat Cycle E as the second remedial amendment cycle for the plan.
2/1/16*	Form W-2	Provide 2015 IRS Form W-2 (<i>Wage and Tax Statement</i>) to employees, reporting wages and coverage in Box 13 as an "active participant" in a defined contribution "retirement plan" (qualified profit sharing/401(k), 403(b), governmental 457(b), SEP, or SIMPLE), and reporting elective deferrals, and designated Roth contributions for 2015 in Box 12.
2/1/16*	Form 1099-R	Provide 2015 IRS Form 1099-R (<i>Distributions from Pensions, Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance Contracts, etc.</i>) to recipients of 2015 distributions.
2/1/16*	Form 945	File IRS Form 945 (<i>Annual Return of Withheld Federal Income Tax</i>) to report income tax withheld from 2015 distributions.
2/10/16	Form 945 (Alternative Date)	File IRS Form 945, if the withholding taxes on 2015 distributions were timely paid in full.
2/14/16	Quarterly Benefit Statements	Distribute fourth quarter 2015 benefit statement to participants, if individual account plan gives participants the right to direct their investments.
2/29/16	Forms W-2 and W-3 (paper)	File 2015 IRS Form W-2, reflecting employee wages, elective deferrals, and designated Roth contributions for 2015, using IRS Form W-3 (<i>Transmittal of Wage and Tax Statements</i>) with the Social Security Administration (SSA), if not filing electronically.
2/29/16	Forms 1099-R and 1096 (paper)	Transmit paper copies of IRS Form 1099-R using IRS Form 1096 (<i>Annual Summary and Transmittal of U.S. Information Returns</i>), if not filing electronically.
3/15/16	Corrective Distributions	Distribute to highly compensated employees corrective distributions for a failed 12/31/15 plan year end ADP/ACP test for excess 401(k)/(m) plan contributions and allocable income to avoid 10% excise tax assessment on plan sponsor.
3/15/16	Deductible Contributions	File IRS Form 7004 (<i>Application for Automatic Extension of Time to File Certain Business Income Tax, Information, and Other Returns</i>) to obtain a six-month extension of both IRS Form 1120 (<i>U.S. Corporation Income Tax Return</i>) and the deadline for making and deducting plan year 2015 employer contributions; otherwise, file the corporate tax return and deposit employer contributions for amounts to be considered deductible for plan year 2015.
3/15/16	Forms 1042 and 1042-S	File IRS Form 1042 (<i>Annual Withholding Tax Return for U.S. Source Income of Foreign Persons</i>) to report income taxes withheld from distributions made in 2015 to certain nonresident aliens. File Copy A of IRS Form 1042-S (<i>Foreign Persons' U.S. Source Income Subject to Withholding</i>) to report distributions made in 2015 to certain nonresident aliens, and provide Copies B, C, and D to recipients.
3/31/16	Forms W-2 and W-3 (electronic)	File 2015 IRS Forms W-2 and W-3 with SSA electronically, unless filed on paper by 2/29/16.
3/31/16	Form 1099-R (electronic)	Transmit 2015 IRS Form 1099-R electronically, unless filed on paper by 2/29/16.
3/31/16	Form 5330	File IRS Form 5330 (<i>Return of Excise Taxes Related to Employee Benefit Plans</i>) to report and pay excise taxes for 12/31/14 plan year end ADP/ACP refunds returned after 3/15/15 (or after 6/30/15 if the plan includes an eligible automatic contribution arrangement (EACA) that covers all participants).
4/1/16	Required Minimum Distributions	Deadline to make the first required minimum distributions (RMDs) to terminated vested participants who attained age 70-1/2 in 2015 and to participants older than age 70-1/2 who retired in 2015.
4/15/16	Excess Deferrals and Allocable Income	Refund to participants any 2015 excess 401(k), 403(b), and nongovernmental 457(b) plan deferrals and allocable income. (Note: Excess deferrals for governmental 457(b) plans do not require correction by the following April 15, but rather "as soon as administratively practicable.")
4/15/16	Form 1065 or Form 7004	File IRS Form 7004 to obtain a five-month extension to file 2015 IRS Form 1065 (<i>U.S. Return of Partnership Income</i>) and the deadline for making and deducting 2015 employer contributions; otherwise, file IRS 2015 partnership tax return and deposit employer contributions for amounts to be considered deductible for 2015.

* The date reflected is the next business day following a filing date of an IRS or Department of Labor form that otherwise would fall on a Saturday, Sunday, or a legal holiday.

The Milliman 2016 Defined Contribution Plan Calendar contains general information that is not intended to constitute the rendering of legal, tax, investment, or accounting advice. Application to specific circumstances should rely on further professional guidance.

2016 Key Administrative Dates and Deadlines for Calendar-Year Defined Contribution Retirement Plans Subject to ERISA and the Internal Revenue Code

DATE	ITEM	ACTION
5/15/16	Quarterly Benefit Statements	Distribute first quarter 2016 benefit statements to participants, if individual account plan gives participants the right to direct their investments.
5/16/16*	Forms 990 and 8868	For tax-exempt employers with calendar fiscal years, file IRS Form 8868 (<i>Application for Extension of Time to File an Exempt Organization Return</i>) to obtain a three-month extension to file 2015 IRS Form 990 (<i>Return of Organization Exempt from Income Tax</i>); otherwise, file IRS 2015 tax-exempt organization information return and deposit 2015 employer contributions being reported on Form 990.
6/30/16	EACA Corrective Distributions	If the plan includes an EACA that covers all participants, distribute to highly compensated employees corrective distribution for 2015 excess ADP/ACP amounts to avoid 10% excise tax assessment on plan sponsor.
7/28/16	Summary of Material Modifications	Provide a Summary of Material Modifications (SMM) to participants if the plan adopted amendments for the plan year ending 12/31/15, unless the information was included in an updated and timely distributed Summary Plan Description (SPD).
8/1/16*	Form 5500 or Form 5558	File 2015 Form 5500 (<i>Annual Return/Report of Employee Benefit Plan</i>) using DOL EFAST2 or file IRS Form 5558 (<i>Application for Extension of Time to File Certain Employee Plan Returns</i>) to extend Form 5500 filing due date by 2-1/2 months to 10/17/16.
8/1/16*	Form 8955-SSA or Form 5558	Deadline to file 2015 IRS Form 8955-SSA (<i>Annual Registration Statement Identifying Separated Participants with Deferred Vested Benefits</i>) or file IRS Form 5558 to extend the filing deadline for Forms 8955-SSA to 10/17/16.
8/1/16*	Notice to Terminated Vested Employees	Provide a notice describing the amount of the account balance as of the date of termination to terminated vested employees who were reported on 2015 Form 8955-SSA, unless IRS Form 5558 is filed to obtain an extension to 10/17/16 to file Form 8955-SSA.
8/1/16*	Plan Audit	Deadline to obtain an independent qualified public accountant's audit report or limited scope audit to include in Schedule H (<i>Financial Information</i>) as an attachment to 2015 Form 5500, if there are more than 100 eligible participants, unless IRS Form 5558 is filed to obtain an extension to 10/17/16 to file Form 5500.
8/1/16*	Annual Benefit Statements	Distribute 2015 annual benefit statements to individual account plan participants who do not have the right to direct their investments, unless IRS Form 5558 is filed to obtain an extension to 10/17/16 to file Form 5500.
8/1/16*	Form 5330	File IRS Form 5330 to report and pay excise taxes on 2015 plan year prohibited transactions and nondeductible contributions. Form 5558 may be filed to request an extension of time of up to six months to file Form 5330, but does not extend the time to pay the excise taxes. The amount of estimated excise tax due must be paid with Form 5558. Interest is charged on taxes not paid by the due date even if an extension of time to file is granted.
8/14/16	Quarterly Benefit Statements	Distribute second quarter 2016 benefit statements to participants, if individual account plan gives participants the right to direct their investments.
8/14/16	Annual Benefit Statements	For tax-exempt employers, distribute annual benefit statements to individual account plan participants who do not have the right to direct their investments, if no IRS Form 5558 was filed but an extension request (IRS Form 8868) was timely filed for the employer's IRS Form 990 information return.
8/15/16	Form 5500 and Plan Audit	For tax-exempt employers, file 2015 Form 5500 with DOL, if no IRS Form 5558 was filed but an extension request (IRS Form 8868) was timely filed for the employer's IRS Form 990 information return.
9/15/16	Money Purchase Plan Contributions	Deadline to make required employer contributions to money purchase plans for the 2015 plan year.
9/15/16	Form 5500 and Plan Audit	For corporate and partnership employers, file 2015 Form 5500 using DOL EFAST2, if no IRS Form 5558 was filed but an extension request (IRS Form 7004) was timely filed for the company's income tax return (either corporate IRS Form 1120 or partnership IRS Form 1065).
9/15/16	Annual Benefit Statements	For corporate and partnership employers, distribute 2015 annual benefit statements to individual account plan participants who do not have the right to direct their investments, if no IRS Form 5558 was filed to extend 2015 Form 5500 but an extension request (IRS Form 7004) was timely filed for the company's 2015 income tax return (either corporate IRS Form 1120 or partnership IRS Form 1065).
9/15/16	Deductible Contributions	Deadline to make 2015 plan year deductible contributions if an extension request (IRS Form 7004) was timely filed for the company's income tax return (either corporate IRS Form 1120 or partnership IRS Form 1065).
9/30/16	Summary Annual Report	Distribute to participants 2015 Summary Annual Reports, unless 2015 Form 5500 is extended by a timely filed IRS Form 5558.

2016 Key Administrative Dates and Deadlines for Calendar-Year Defined Contribution Retirement Plans Subject to ERISA and the Internal Revenue Code

DATE	ITEM	ACTION
10/3/16*	Safe Harbor Notices	Earliest date to provide to participants 401(k) or 403(b) plan safe harbor notices, if applicable for 2017.
10/3/16*	Automatic Enrollment Notices	Earliest date to provide to participants 401(k) or 403(b) annual automatic enrollment notices for the 2017 plan year for plans with automatic contribution arrangements. (Note: The notice may be combined with the qualified default investment alternative (QDIA) notice.)
10/15/16	Corrective Plan Amendment	Deadline to adopt a retroactive corrective plan amendment, if the plan fails minimum coverage, nondiscrimination, and/or compensation requirements for 2015.
10/17/16*	Form 5500 and Plan Audit	File 2015 Form 5500 using DOL EFAST2, if the due date was extended by a timely filed IRS Form 5558.
10/17/16*	Annual Benefit Statements	Distribute 2015 annual benefit statements to individual account plan participants who do not have the right to direct their investments, if 2015 Form 5500 due date was extended by a timely filed IRS Form 5558.
10/17/16*	Summary Annual Report	Distribute 2015 Summary Annual Report to participants and beneficiaries, if the date was extended by a timely filed IRS Form 5558.
10/17/16*	Form 8955-SSA	File 2015 IRS Form 8955-SSA, if the due date was extended by a timely filed IRS Form 5558.
10/17/16*	Notice to Terminated Vested Employees	Provide a notice describing the amount of the account balance as of the date of termination to terminated vested employees who were reported on 2015 IRS Form 8955-SSA, if the due date to file Form 8955-SSA was extended by a timely filed IRS Form 8955-SSA.
11/14/16	Quarterly Benefit Statements	Distribute third quarter 2016 benefit statement to participants, if individual account plan gives participants the right to direct their investments.
12/2/16	QDIA Notices	Deadline to send qualified default investment alternative (QDIA) notices to participants for the 2017 plan year.
12/2/16	Safe Harbor Notices	Deadline to provide to participants 401(k) or 403(b) plan safe harbor notices, if applicable for the 2017 plan year.
12/2/16	Automatic Enrollment Notices	Deadline to provide to participants 401(k) or 403(b) annual automatic enrollment notices for the 2017 plan year for plans with automatic contribution arrangements. (Note: The notice may be combined with the QDIA notice.)
12/15/16	Summary Annual Report	Distribute to participants 2015 Summary Annual Report, if 2015 Form 5500 due date was extended by a timely filed IRS Form 5558.
12/31/16	Corrective Distributions and QNECs	Deadline to process corrective distributions to correct a failed 12/31/15 ADP/ACP test for excess 401(k)/(m) plan contributions and allocable income to maintain qualified status (10% excise tax applies); also, deadline to make a qualified nonelective contribution (QNEC) to cure a failed 12/31/15 "current year method" ADP/ACP test.
12/31/16	Safe Harbor, QACA, or EACA Elections	If desired for the 2017 plan year, deadline to amend an existing 401(k) or 403(b) plan to be a safe harbor plan or to add a QACA or EACA. (Note: This is the deadline for the amendment to the plan; however, notices to participants should be made prior to the beginning of the 2017 plan year, as indicated in "Safe Harbor Notices" and "Automatic Enrollment Notices," above.)
12/31/16	Required Minimum Distributions	Deadline to make recurring age 70-1/2 RMDs to participants.
12/31/16	Participant Notices	If not included in an SPD, provide notices to participants, if applicable, about individual account plans that allow participant-directed investments that plan sponsor is relieved of liability for certain losses resulting from the participant's exercise of his/her rights, and about the availability of any investment advice services.
12/31/16	Discretionary Plan Amendments	Deadline to amend plan for discretionary changes implemented during 2016.
12/31/16	Remove Safe Harbor Feature	Deadline to amend plan to remove an existing safe harbor plan feature for 2017.