

# 2020 Key Administrative Dates and Deadlines for Calendar-Year Single-Employer Defined Benefit Plans<sup>1</sup>

Subject to ERISA and the Internal Revenue Code



## JANUARY

- 1/1** ▪ Valuation Data and Carryover/Prefunding Balance
- 1/13** ▪ Form 5500 Schedule SB Posting
- 1/15** ▪ Quarterly Contribution
- 1/27\*** ▪ PBGC Form 200
- 1/31** ▪ Required Minimum Distributions
  - Forms W-2, W-3, 8809
  - Form 1099-R
  - Form 945

## FEBRUARY

- 2/10** ▪ Form 945 (alternative date)
- 2/14** ▪ Triennial Benefit Statement
  - PBGC Form 10
- 2/28** ▪ Form 1099-R (paper) or 8809

## MARCH

- 3/1** ▪ Notice of Minimum Funding Standard Waiver Application
- 3/15** ▪ Minimum Funding Standard Waiver
- 3/16\*** ▪ Forms 1042 and 1042-S
- 3/30** ▪ Summary Plan Description
- 3/31** ▪ Form 1099-R (paper, with extension, or electronic)
  - AFTAP Certification

## APRIL

- 4/1** ▪ Benefit Restrictions Commence
  - Required Minimum Distribution
- 4/15** ▪ Quarterly Contribution
  - PBGC Form 4010
- 4/27\*** ▪ PBGC Form 200
- 4/29** ▪ Large Plan Annual Funding Notice
- 4/30** ▪ Form 1099-R (electronic, with extension)

## MAY

- 5/1** ▪ Notice of Funding-Based Limitation
- 5/15** ▪ PBGC Form 10

## JUNE

- 6/1** Request to use Substitute Mortality Tables

## JULY

- 7/15** ▪ Quarterly Contribution
- 7/27\*** ▪ PBGC Form 200
- 7/28** ▪ Summary of Material Modifications
- 7/31** ▪ Form 5500 or 5558
  - Plan Audit
  - Small Plan Annual Funding Notice
  - Form 8955-SSA or 5558
  - Notice to Terminated Vested Employees
  - Form 5330 or 5558

## AUGUST

- 8/14** ▪ PBGC Form 10

## SEPTEMBER

- 9/15** ▪ Minimum Funding Contribution
  - Credit Balance Election
- 9/25** ▪ PBGC Form 200
- 9/30** ▪ Summary Annual Report for Non-PBGC-Covered Plans
  - AFTAP Certification

## OCTOBER

- 10/1** ▪ AFTAP-Triggered Benefit Restrictions
- 10/15** ▪ Quarterly Contribution
  - Corrective Plan Amendment
  - PBGC Form 10
  - Small Plan Annual Funding Notice Alternative
  - Form 5500
  - Form 8955-SSA
  - Notice to Terminated Vested Employees
  - PBGC Comprehensive Premium Filing
- 10/26\*** ▪ PBGC Form 200
- 10/30** ▪ Notice of Funding-Based Limitation

## NOVEMBER

- 11/16\*** ▪ PBGC Form 10

## DECEMBER

- 12/15** ▪ Summary Annual Report for Non-PBGC-Covered Plans
- 12/31** ▪ AFTAP "Range" Certification Expiration
  - Annual Benefit Statement Availability Notice
  - Election to Reduce Credit Balance
  - Revocation of Credit Balance Election

<sup>1</sup> Click on any item for more information or refer to pp. 2-5

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

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DATE	ITEM	ACTION
1/1	<b>Valuation Data and Carryover/Prefunding Balance</b>	For plans with 100 or more participants, data for the 1/1/20 valuation must reflect the participant census as of 1/1/20, requiring plan sponsors to submit the data to the valuation actuary in a timely manner to enable compliance with the statutory reporting dates in this calendar. Plan asset data is used to calculate the carryover balance or prefunding balance as of 1/1/20.
1/13	<b>Form 5500 Schedule SB Posting</b>	Post 2018 Form 5500 ( <i>Annual Return/Report of Employee Benefit Plan</i> ) basic plan information and 2018 Schedule SB ( <i>Actuarial Information</i> ) on the plan sponsor's existing intranet site, if 2018 Form 5500 was filed on 10/15/19; if filed prior to 10/15/19, the deadline is 90 days from the date of the filing.
1/15	<b>Quarterly Contribution</b>	Due date for the fourth required quarterly contribution for 2019, either through cash contributions or a signed election to use available carryover and/or prefunding balances. (Note: A failure to satisfy the requirement within 60 days of this due date may trigger, if applicable, a requirement to notify participants, beneficiaries, and alternate payees within a "reasonable period.")
1/27*	<b>PBGC Form 200</b>	File PBGC Form 200 ( <i>Notice of Failure to Make Required Contributions</i> ), if the plan sponsor failed to timely make a 1/15/20 required contribution that resulted in more than \$1 million in cumulative unpaid contributions. (The filing is made by the plan sponsor or a contributing plan sponsor's parent corporation.)
1/31	<b>Required Minimum Distributions</b>	For participants who previously commenced age 70-1/2 required minimum distributions (RMD), pay any increase to reflect additional benefits that accrued in 2019.
1/31	<b>Forms W-2, W-3, 8809</b>	Provide 2019 IRS Form W-2 ( <i>Wage and Tax Statement</i> ) to employees, reporting wages and coverage as an "active participant" in a qualified plan unless a formal request for an extension was made to and approved by the IRS. File the Form(s) W-2 with the Social Security Administration (SSA) using Form W-3 ( <i>Transmittal of Wage and Tax Statements</i> ) unless a 30-day extension has been granted upon a filing of a timely request using Form 8809 ( <i>Application for Extension of Time to File Information Returns</i> ).
1/31	<b>Form 1099-R</b>	Provide 2019 IRS Form 1099-R ( <i>Distributions From Pensions, Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance Contracts, etc.</i> ) to recipients of 2019 distributions.
1/31	<b>Form 945</b>	File IRS Form 945 ( <i>Annual Return of Withheld Federal Income Tax</i> ) to report income tax withheld from 2019 distributions. (If deposits were made on time in full payment of the taxes for the year, an alternative return filing date optionally applies.)
2/10	<b>Form 945 (alternative date)</b>	File IRS Form 945, if the withholding taxes on 2019 distributions were timely paid in full.
2/14	<b>Triennial Benefit Statement</b>	For any plan that last provided the triennial benefit statement for the plan year ending 12/31/16, provide the triennial benefit statement to participants.
2/14	<b>PBGC Form 10</b>	File PBGC Form 10 ( <i>Post-Event Notice of Reportable Events</i> ) if the 1/15/20 required quarterly contribution was missed by more than 30 days, unless PBGC Form 200 was already filed or a waiver applies.
2/28	<b>Form 1099-R (paper) or 8809</b>	Transmit paper copies of 2019 Form 1099-R to IRS using Form 1096 ( <i>Annual Summary and Transmittal of U.S. Information Returns</i> ) if not filing electronically, unless a 30-day extension request on Form 8809 is timely filed.
3/1	<b>Notice of Minimum Funding Standard Waiver Application</b>	Earliest date of the 14-day advance period to notify plan participants, beneficiaries, alternate payees, employee organizations, and the PBGC of a planned application for a waiver of the 2019 minimum funding standard.
3/15	<b>Minimum Funding Standard Waiver</b>	Deadline to apply for a waiver of 2019 minimum funding standard, if sponsor will be unable to make the required contribution and will meet the conditions to qualify for a funding waiver.
3/16*	<b>Forms 1042 and 1042-S</b>	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 2019 to certain nonresident aliens. File Copy A of IRS Form 1042-S ( <i>Foreign Person's U.S. Source Income Subject to Withholding</i> ) to report distributions made in 2019 to certain nonresident aliens, and provide Copies B, C, and D to recipients.
3/30	<b>Summary Plan Description</b>	Deadline to provide an SPD to an individual who became a plan participant on 1/1/20; otherwise within 90 days of a participant becoming covered by the plan or after first receiving pension benefits.
3/31	<b>Form 1099-R (paper, with extension, or electronic)</b>	Transmit paper copies of 2019 Form 1099-R to the IRS using Form 1096 if the deadline was extended by a timely filed Form 8809. File copies of 2019 IRS Form 1099-R electronically, unless a 30-day request using Form 8809 is timely filed.

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DATE	ITEM	ACTION
3/31 and 4/1	<b>AFTAP Certification (prior to 9/30/20 final certification)</b>  <b>Benefit Restrictions Commence (if 3/31/20 AFTAP trigger is less than 80%)</b>	If the 2020 AFTAP is not certified by 3/31/20, the 2019 AFTAP minus 10 percentage points is deemed to apply for purposes of triggering IRC section 436 benefit restrictions beginning 4/1/20 and until a subsequent certification determines that the plan's funded ratio is sufficient to remove the benefit restrictions.
4/1	<b>Required Minimum Distribution</b>	Deadline to make the first RMD to vested participants who terminated before 2019 and attained age 70-1/2 in 2019 and to participants older than 70-1/2 who terminated employment in 2019.
4/15	<b>Quarterly Contribution</b>	Due date for the first required quarterly contribution for 2020, either through cash contributions or a signed election to use available carryover and/or prefunding balances. (Note: A failure to satisfy the requirement within 60 days of this due date may trigger, if applicable, a requirement to notify participants, beneficiaries, and alternate payees within a "reasonable period.")
4/15	<b>PBGC Form 4010</b>	For employers with calendar-year fiscal years, file PBGC Form 4010 ( <i>Notice of Underfunding</i> ) if plan meets the "gateway" test for 2019, unless an exception applies.
4/27*	<b>PBGC Form 200</b>	File PBGC Form 200, if the plan sponsor failed to timely make a 4/15/20 required contribution that resulted in more than \$1 million in cumulative unpaid contributions. (The filing is made by the plan sponsor or a contributing plan sponsor's parent corporation.)
4/29	<b>Large Plan Annual Funding Notice</b>	For plans with more than 100 participants, provide the 2019 annual funding notice to participants, beneficiaries, labor organizations representing participants and beneficiaries, and PBGC. Include a supplement regarding the effect of MAP-21/HATFA segment rate stabilization. (Note: A notice to PBGC is not required if the plan has less than \$50 million in underfunding, but the plan sponsor must provide the notice within 30 days of a PBGC request.)
4/30	<b>Form 1099-R (electronic, with extension)</b>	Transmit copies of 2019 Form 1099-R electronically to the IRS if the deadline was extended by a timely filed Form 8809.
5/1	<b>Notice of Funding-Based Limitation</b>	Provide a notice of IRC section 436 benefit restrictions to plan participants if the 2020 certified AFTAP or deemed AFTAP is less than 80% as of 4/1/20 and notice was not previously provided. (Note: If the AFTAP was certified prior to 3/31/20, the deadline to notify participants is 30 days after the restriction first applies.)
5/15	<b>PBGC Form 10</b>	File PBGC Form 10 if the 4/15/20 required quarterly contribution was missed by more than 30 days, unless PBGC Form 200 was already filed or a waiver applies.
6/1	<b>Request to use Substitute Mortality Tables</b>	Deadline for plan sponsors to submit request to begin using substitute mortality tables for 2021.
7/15	<b>Quarterly Contribution</b>	Due date for the second required quarterly contribution for 2020, either through cash contributions or a signed election to use available carryover and/or prefunding balances. (Note: A failure to make the contribution within 60 days of this due date may trigger, if applicable, a requirement to notify participants, beneficiaries, and alternate payees within a "reasonable period.")
7/27*	<b>PBGC Form 200</b>	File PBGC Form 200, if the plan sponsor failed to timely make a 7/15/20 required contribution that resulted in more than \$1 million in cumulative unpaid contributions. (The filing is made by the plan sponsor or a contributing plan sponsor's parent corporation.)
7/28	<b>Summary of Material Modifications</b>	Provide a Summary of Material Modifications to participants if the plan adopted amendments for the plan year ending 12/31/19, unless the information was included in an updated and timely distributed SPD.
7/31	<b>Form 5500 or 5558</b>	File 2019 Form 5500 or file IRS Form 5558 ( <i>Application for Extension of Time to File Certain Employee Plan Returns</i> ) to extend the Form 5500 filing due date by 2-1/2 months, unless a Form 7004 was filed to obtain a six-month extension of corporate income tax return (Form 1120). (A posting of the 2019 Form 5500 basic plan information and 2019 Schedule SB on the plan sponsor's existing intranet site is required within 90 days of filing Form 5500.)
7/31	<b>Plan Audit</b>	Deadline to obtain a qualified accountant's audit report or limited scope audit to include with Schedule H ( <i>Financial Information</i> ) as an attachment to 2019 Form 5500, if there are more than 100 eligible participants, unless the filing deadline for Form 5500 is extended.

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DATE	ITEM	ACTION
7/31	<b>Small Plan Annual Funding Notice</b>	For plans with 100 or fewer participants, provide the 2019 annual funding notice to participants, beneficiaries, labor organizations representing participants and beneficiaries, and PBGC no later than when the Form 5500 is filed (including extensions, if applicable). (Note: A notice to PBGC is not required if the plan has less than \$50 million in underfunding, but the plan sponsor must provide the notice within 30 days of a PBGC request.) Include a supplement regarding the effect of MAP-21/HATFA segment rate stabilization if the plan has more than 50 participants.
7/31	<b>Form 8955-SSA or 5558</b>	Deadline to file 2019 IRS Form 8955-SSA ( <i>Annual Registration Statement Identifying Separated Participants With Deferred Vested Benefits</i> ), unless a Form 7004 was filed to obtain a six-month extension of corporate income tax return (Form 1120), or file IRS Form 5558 to extend the filing deadline for Form 8955-SSA by 2-1/2 months.
7/31	<b>Notice to Terminated Vested Employees</b>	Provide a notice describing the amount of the vested accrued benefit at normal retirement age to terminated vested employees who are reported on 2019 Form 8955-SSA, unless a Form 7004 or a Form 5558 was filed.
7/31	<b>Form 5330 or 5558</b>	File IRS Form 5330 ( <i>Return of Excise Taxes Related to Employee Benefit Plans</i> ) to report and pay excise taxes on 2019 prohibited transactions, nondeductible contributions, or a minimum funding deficiency, unless the IRS has approved an extension to file via the plan sponsor's timely filing of Form 5558. (The filing extension does not extend the date to pay excise taxes.)
8/14	<b>PBGC Form 10</b>	File PBGC Form 10, if the 7/15/20 required quarterly contribution was missed by more than 30 days, unless PBGC Form 200 was already filed or a waiver applies.
9/15	<b>Minimum Funding Contribution</b>	Due date to make a final contribution to satisfy the 2019 minimum funding requirement or to make any contribution to be included on 2019 Form 5500 Schedule SB. (Note: A failure to satisfy the minimum funding requirement may trigger, if applicable, a requirement to notify participants, beneficiaries, and alternate payees within a "reasonable period.")
9/15	<b>Credit Balance Election</b>	Deadline to elect to add to the 2020 prefunding balance or to use the plan's carryover and/or prefunding balance to offset the minimum required contribution for 2019 by providing an irrevocable written notification to the plan's enrolled actuary and the plan administrator. (Note: A failure to satisfy the minimum funding requirement may trigger, if applicable, a requirement to notify participants, beneficiaries, and alternate payees within a "reasonable period.")
9/25	<b>PBGC Form 200</b>	File PBGC Form 200, if the plan sponsor failed to make a 9/15/20 required contribution that resulted in more than \$1 million in cumulative unpaid contributions.
9/30	<b>Summary Annual Report for Non-PBGC-Covered Plans</b>	For non-PBGC-covered plans (e.g., "professional service employers" with fewer than 26 employees, electing church groups), distribute Summary Annual Report to participants, unless extended by a timely filed IRS Form 5558.
9/30	<b>AFTAP Certification</b>	Deadline for completion of the actuarial valuation and certification of the final 2020 AFTAP, unless the 2020 AFTAP was "range" certified. (If the AFTAP is not certified by this date, the AFTAP is deemed to be less than 60% for the remainder of the plan year.)
10/1	<b>AFTAP-Triggered Benefit Restrictions</b>	Commence IRC section 436 benefit restrictions if the plan's certified or deemed 2020 AFTAP (see 9/30 entry) is less than 80%.
10/15	<b>Quarterly Contribution</b>	Due date for the third required quarterly contribution for 2020, either through cash contributions or a signed election to use available carryover and/or prefunding balances. (Note: A failure to satisfy the requirement within 60 days of this due date may trigger, if applicable, a requirement to notify participants, beneficiaries, and alternate payees within a "reasonable period.")
10/15	<b>Corrective Plan Amendment</b>	Deadline to adopt a retroactive corrective plan amendment, if the plan fails minimum coverage, nondiscrimination, and/or compensation requirements for 2019.
10/15	<b>PBGC Form 10</b>	File PBGC Form 10, if the 9/15/20 final contribution for plan year 2019 was missed by more than 30 days, unless PBGC Form 200 was already filed or a waiver applies.
10/15	<b>Small Plan Annual Funding Notice Alternative</b>	For plans with 100 or fewer participants, provide the 2019 annual funding notice to participants, beneficiaries, labor organizations representing participants and beneficiaries, and PBGC, if the 5500 due date was extended by a timely filed IRS Form 5558. If Form 5500 is filed prior to this date, the annual funding notice should be provided to participants at that time. (Note: A notice to PBGC is not required if the plan has less than \$50 million in underfunding, but the plan sponsor must provide the notice within 30 days of a PBGC request.) Include a supplement regarding the effect of MAP-21/HATFA segment rate stabilization if the plan has more than 50 participants.

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DATE	ITEM	ACTION
10/15	<b>Form 5500</b>	File 2019 Form 5500, if the due date was extended by a timely filed IRS Form 5558 or Form 7004. (A posting of the 2019 Form 5500 basic plan information and 2018 Schedule SB on the plan sponsor's existing intranet site is required within 90 days of filing Form 5500.)
10/15	<b>Form 8955-SSA</b>	File 2019 IRS Form 8955-SSA if the due date was extended by a timely filed IRS Form 5558 or Form 7004.
10/15	<b>Notice to Terminated Vested Employees</b>	Provide a notice describing the amount of the vested accrued benefit at normal retirement age to terminated vested employees who are reported on 2019 Form 8955-SSA if the due date was extended by a timely filed IRS Form 5558 or Form 7004.
10/15	<b>PBGC Comprehensive Premium Filing</b>	PBGC insured plans must file the 2020 PBGC Comprehensive Premium Filing and pay flat-rate and variable-rate premiums.
10/26*	<b>PBGC Form 200</b>	File PBGC Form 200, if the plan sponsor failed to timely make a 10/15/20 required contribution that resulted in more than \$1 million in cumulative unpaid contributions. (The filing is made by the plan sponsor or a contributing plan sponsor's parent corporation.)
10/30	<b>Notice of Funding-Based Limitation</b>	Provide a notice of IRC section 436 benefit restrictions to plan participants, if the 9/30/20 certified or deemed AFTAP is less than 80% and notice was not previously provided. (Note: If the AFTAP was certified prior to 9/30/20, the deadline to notify participants is 30 days after the restriction first applies.)
11/16*	<b>PBGC Form 10</b>	File PBGC Form 10, if the 10/15/20 required quarterly contribution was missed by more than 30 days, unless PBGC Form 200 was already filed or a waiver applies.
12/15	<b>Summary Annual Report for Non-PBGC-Covered Plans</b>	For non-PBGC-covered plans (e.g., "professional service employers" with fewer than 26 employees, electing church groups), distribute Summary Annual Report to participants, if the Form 5500 due date was extended by a timely filed Form 5558.
12/31	<b>AFTAP "Range" Certification Expiration</b>	Deadline to certify the 2020 AFTAP if the plan used a "range" certification. (Note: A failure to certify the AFTAP by 12/31/20 will result in the AFTAP for the plan year being deemed under 60% retroactively to 10/1/20.)
12/31	<b>Annual Benefit Statement Availability Notice</b>	Provide an annual notice to participants about the availability of and the means to obtain a pension benefit statement, if the alternative notification approach will be used.
12/31	<b>Election to Reduce Credit Balance</b>	Deadline to elect to reduce the plan's carryover and/or prefunding balance as of 1/1/20 (e.g., to avoid or terminate a benefit restriction) by providing an irrevocable written notification to the plan's enrolled actuary and the plan administrator.
12/31	<b>Revocation of Credit Balance Election</b>	Deadline to revoke a prior election to use a carryover or prefunding balance to meet minimum funding requirements for 2020, by providing written notification to the plan's enrolled actuary and the plan administrator. (Note: This revocation is only allowed to the extent that the amount of the prior election exceeded the minimum required contribution.)

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