

2023 key administrative dates and deadlines for calendar-year single-employer defined benefit plans

Subject to ERISA and the Internal Revenue Code



JANUARY

- 1/1** ▪ Valuation data and carryover/prefunding balance
- 1/13** ▪ Form 5500 Schedule SB posting (prior year's filing)
- 1/13*** ▪ Quarterly contribution
- 1/23** ▪ Pension Benefit Guaranty Corporation (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)
- 2/13*** ▪ PBGC Form 10
- 2/14** ▪ Triennial benefit statement
- 2/28** ▪ Form 1099-R (paper) or 8809

MARCH

- 3/1** ▪ Notice of Minimum Funding Standard Waiver Application
- 3/15** ▪ Minimum Funding Standard Waiver
▪ Forms 1042 and 1042-S
- 3/30** ▪ Summary Plan Description
- 3/31** ▪ Form 1099-R (paper, with extension, or electronic)
▪ Adjusted funding target attainment percentage (AFTAP) certification

APRIL

- 4/1** ▪ Benefit restrictions commence
▪ Required minimum distributions
- 4/14*** ▪ Quarterly contribution
- 4/17*** ▪ PBGC Form 4010
- 4/24** ▪ PBGC Form 200
- 4/28*** ▪ 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

- 7/14*** ▪ Quarterly contribution
- 7/24** ▪ PBGC Form 200
- 7/28*** ▪ Summary of Material Modifications
- 7/31** ▪ Form 5500 or 5558
▪ Small plan annual funding notice
▪ Form 8955-SSA or 5558
▪ Notice to terminated vested employees

AUGUST

- 8/14** ▪ PBGC Form 10

SEPTEMBER

- 9/15** ▪ Minimum funding contribution
▪ Credit balance election
- 9/25** ▪ PBGC Form 200
- 9/29*** ▪ Summary Annual Report for non-PBGC-covered plans
▪ AFTAP certification

OCTOBER

- 10/1** ▪ AFTAP-triggered benefit restrictions
- 10/13*** ▪ Quarterly contribution
- 10/16*** ▪ PBGC Form 10
▪ Corrective plan amendment
▪ Small plan annual funding notice alternative
▪ Form 5500
▪ Form 8955-SSA
▪ Notice to terminated vested employees
▪ PBGC Comprehensive Premium Filing
- 10/23** ▪ PBGC Form 200
- 10/30** ▪ Notice of funding-based limitation

NOVEMBER

- 11/13** ▪ 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

* The date reflected is either the business day prior to or following a filing date of an IRS, U.S. Department of Labor (DOL), or Pension Benefit Guaranty Corporation (PBGC) form that otherwise would fall on a Saturday, Sunday, or a legal holiday.

Plan sponsors affected by disasters declared by the Federal Emergency Management Agency (FEMA) may have an automatically approved delayed filing date under the Infrastructure Investment and Jobs Act (IIJA).

The Milliman 2023 single-employer defined benefit 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.

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| DATE | ITEM | ACTION |
|-------|--|---|
| 1/1 | Valuation data and carryover/prefunding balance | For plans with 100 or more participants, collect participant data for the January 1, 2023, valuation from the plan sponsor. The plan asset data is used to calculate the carryover and/or prefunding balance as of January 1, 2023. |
| 1/13 | Form 5500 Schedule SB posting | Latest date to post 2021 Form 5500 and Schedule SB on plan sponsor's intranet site; the deadline is within 90 days of actual filing date. |
| 1/13* | Quarterly contribution | Due date for fourth required quarterly contribution for plan year 2022; cash contributions or a signed election to use available carryover and/or prefunding balances. |
| 1/23 | PBGC Form 200 | File Pension Benefit Guaranty Corporation (PBGC) Form 200 if plan sponsor failed to make a January 13, 2023, required contribution that resulted in more than \$1 million in cumulative unpaid contributions. |
| 1/31 | Required minimum distributions | For participants who previously commenced at age 70-1/2 or age 72, whichever is applicable, required minimum distributions (RMDs) pay any increase to reflect additional benefits that accrued in 2022. |
| 1/31 | Forms W-2, W-3, 8809 | Send 2022 IRS Form W-2 to employees who are "active participants" in a qualified plan unless IRS approved an extension. File these W-2s with Social Security Administration using Form W-3, unless granted a 30-day extension using Form 8809. |
| 1/31 | Form 1099-R electronic filing | Provide IRS Form 1099-R to recipients of 2022 distributions unless a 30-day extension request on Form 8809 is filed. |
| 1/31 | Form 945 | File IRS Form 945 to report income tax withheld from 2022 distributions. |
| 2/10 | Form 945 (alternative date) | File IRS Form 945, if the withholding taxes on 2022 distributions were paid in full. |
| 2/13* | PBGC Form 10 | File PBGC Form 10 if the January 13, 2023, required quarterly contribution was missed by more than 30 days, unless PBGC Form 200 was already filed or a waiver applies. |
| 2/14 | Triennial benefit statement | For plans that last provided the triennial benefit statement for the 2017-2019 period, provide the Pension Protection Act (PPA) triennial benefit statements to participants for the 2020-2022 period. Statements are due 45 days after the end of the prior plan year in written, electronic, or any other appropriate form that is accessible to participants. |
| 2/28 | Forms 1099-R paper filing or 8809 | File Copy A of 2022 IRS Form 1099-R using Form 1096 unless a 30-day extension request on Form 8809 is filed. |
| 3/1 | Notice of Minimum Funding Standard Waiver Application | 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 2022 minimum funding standard. |
| 3/15 | Minimum Funding Standard Waiver | Deadline to apply for a waiver of 2022 minimum funding standard, if sponsor will be unable to make the 2022 required contribution and will meet the conditions to qualify for a funding waiver. |
| 3/15 | Forms 1042 and 1042-S | File these forms with the IRS to report, respectively, income tax withheld from distributions made to nonresident aliens and retirement plan distributions made to nonresident aliens. |
| 3/30 | Summary Plan Description (SPD) | Deadline to provide an SPD to an individual who became a plan participant on January 1, 2023; otherwise within 90 days of a participant becoming covered by the plan. |
| 3/30 | Form 1099-R (paper, with extension, or electronic) | Transmit paper copies of 2022 Form 1099-R to IRS using Form 1096 if deadline was extended by Form 8809 (by March 30). File copies of 2022 IRS Form 1099-R electronically (by March 31), unless a 30-day request using Form 8809 is filed on time. |
| 3/31 | AFTAP certification (prior to 9/30/23 final certification) | If the 2023 adjusted funding target attainment percentage (AFTAP) is not certified by March 31, 2023, then the 2022 AFTAP minus 10 percentage points is deemed to apply for purposes of triggering Internal Revenue Code (IRC) section 436 benefit restrictions beginning April 1, 2023 (assuming such a reduction results in the imposition of benefit restrictions), and until a subsequent certification determines that the plan's funded ratio is sufficient to remove the benefit restrictions. |
| 4/1 | Benefit restrictions commence (if 3/31/23 AFTAP trigger is less than 80%) | |

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| 4/1 | Required minimum distributions | Deadline to make first RMD in 2023 to terminated vested participants who, during 2022, attained age 70½ or age 72, whichever is applicable, and to participants who retired in 2022 who were older than age 70½ or age 72, whichever is applicable. |
| 4/14* | Quarterly contribution | Due date for first required quarterly contribution for plan year 2023; cash contributions or a signed election to use available carryover and/or prefunding balances. |
| 4/17 | PBGC Form 4010 | For employers with calendar-year fiscal years, file PBGC Form 4010 if plan meets the “gateway” test for 2022, unless an exception applies. |
| 4/24 | PBGC Form 200 | File PBGC Form 200, if plan sponsor failed to make an April 14, 2023, required contribution on time that resulted in more than \$1 million in cumulative unpaid contributions. |
| 4/28* | Large plan annual funding notice (more than 100 participants) | Provide 2022 annual funding notice (AFN) to participants, beneficiaries, labor organizations representing participants and beneficiaries, and the PBGC. A notice to the PBGC is not required if plan has less than \$50 million in underfunding. |
| 5/1* | Form 1099-R (electronic, with extension) | Transmit copies of 2022 Form 1099-R electronically to the IRS if deadline was extended by Form 8809. |
| 5/1 | Notice of funding-based limitation | Provide a notice of IRC section 436 benefit restrictions to plan participants if the 2023-certified AFTAP or deemed AFTAP is less than 80% as of April 1, 2023, and notice was not previously provided. |
| 5/15* | PBGC Form 10 | File PBGC Form 10 if the April 14, 2023, required quarterly contribution was missed by more than 30 days, unless PBGC Form 200 was already filed or a waiver applies. |
| 6/1 | Request to use substitute mortality tables | Deadline for plan sponsors to submit IRS request to begin using substitute mortality tables for plan year 2024. |
| 7/14* | Quarterly contribution | Due date for second required quarterly contribution for plan year 2023; cash contributions or a signed election to use available carryover and/or prefunding balances. |
| 7/24 | PBGC Form 200 | File PBGC Form 200, if plan sponsor failed to make a July 14, 2023, required contribution on time, which resulted in more than \$1 million in cumulative unpaid contributions. |
| 7/28* | Summary of Material Modifications (SMM) | Provide a SMM to participants if plan adopted amendments for the plan year ending December 31, 2022, unless the information was included in an SPD. |
| 7/31 | Form 5500 or 5558 | File 2022 Form 5500 or Form 5558 to extend the Form 5500 filing due date by two and a half months. |
| 7/31 | Small plan annual funding notice (100 or fewer participants) | Provide 2022 annual funding notice (AFN) to participants, beneficiaries, labor organizations representing participants and beneficiaries, and the PBGC. A notice to the PBGC is not required if the plan has less than \$50 million in underfunding. |
| 7/31 | Form 8955-SSA or 5558 | File IRS Form 8955-SSA or File Form 5558 to extend the Form 8955-SSA filing due date by two and a half months. |
| 7/31 | Notice to terminated vested employees | Provide a notice describing the amount of the vested accrued benefit at normal retirement age to terminated vested employees who were reported on 2022 Form 8955-SSA. |
| 7/31 | Form 5330 or 5558 | File IRS Form 5330 to report and pay excise taxes on 2022 prohibited transactions and nondeductible contributions, unless the due date was extended by an approved IRS Form 5558. |
| 8/14 | PBGC Form 10 | File PBGC Form 10 if the July 14, 2023, required quarterly contribution was missed by more than 30 days, unless PBGC Form 200 was already filed or a waiver applies. |
| 9/15 | Minimum funding contribution | Due date to make a final contribution to satisfy the plan year 2022 minimum funding requirement or to make any contribution to be included on the 2022 Schedule SB. |
| 9/15 | Credit balance election | Deadline to elect to add to the 2023 prefunding balance or to use the plan’s carryover and/or prefunding balance to offset the minimum required contribution for 2022 by providing an irrevocable written notification to the plan’s enrolled actuary and plan administrator. |
| 9/25 | PBGC Form 200 | File PBGC Form 200, if plan sponsor failed to make a September 15, 2023, required contribution that resulted in more than \$1 million in cumulative unpaid contributions. |

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| 9/29* | Summary Annual Report for non-PBGC-covered plans | For non-PBGC-covered plans, distribute Summary Annual Report to participants, unless extended by IRS Form 5558. |
| 9/30 | AFTAP certification | Deadline for completion of the actuarial valuation and certification of the final plan year 2023 AFTAP, unless the 2023 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 plan year 2023, and until a subsequent certification determines that the plan's funded ratio is sufficient to remove the benefit restrictions. |
| 10/1 | AFTAP-triggered benefit restrictions | Commence IRC section 436 benefit restrictions if plan's certified or deemed 2023 AFTAP as of September 30, 2023, is less than 80%. |
| 10/13* | Quarterly contribution | Due date for third required quarterly contribution for plan year 2023; cash contributions or a signed election to use available carryover and/or prefunding balances. |
| 10/15 | Corrective plan amendment | Deadline to adopt a retroactive corrective plan amendment, if plan fails minimum coverage, nondiscrimination and/or compensation requirements for plan year 2022. |
| 10/16* | PBGC Form 10 | File PBGC Form 10 if the September 15, 2023, final contribution for plan year 2022 was missed by more than 30 days, unless PBGC Form 200 was already filed or a waiver applies. |
| 10/16* | Small plan annual funding notice alternative (100 or fewer participants) | Provide 2022 annual funding notice (AFN) to participants, beneficiaries, labor organizations representing participants and beneficiaries, and the PBGC if Form 5500 filing date was extended. A notice to the PBGC is not required if the plan has less than \$50 million in underfunding. |
| 10/16* | Form 5500 | File 2022 Form 5500 if the due date was extended by IRS Form 5558. |
| 10/16* | Form 8955-SSA | File 2022 Form 8955-SSA if the due date was extended by IRS Form 5558. |
| 10/16* | Notice to terminated vested employees | Provide a notice describing the amount of the vested accrued benefit at normal retirement age to terminated vested employees who were reported on 2022 Form 8955-SSA if the due date was extended by IRS Form 5558. |
| 10/16* | PBGC Comprehensive Premium Filing | File 2023 PBGC Comprehensive Premium Filing and pay flat-rate and variable-rate premiums. |
| 10/23 | PBGC Form 200 | File PBGC Form 200, if plan sponsor failed to make an October 13, 2023, required contribution on time that resulted in more than \$1 million in cumulative unpaid contributions. |
| 10/30 | Notice of funding-based limitation | Provide a notice of IRC section 436 benefit restrictions to plan participants, if the September 30, 2023, certified or deemed AFTAP is less than 80% and notice was not previously provided. |
| 11/13 | PBGC Form 10 | File PBGC Form 10 if October 13, 2023, required quarterly contribution was missed by more than 30 days, unless PBGC Form 200 was already filed or a waiver applies. |
| 12/15 | Summary Annual Report for non-PBGC-covered plans | For non-PBGC-covered plans, distribute Summary Annual Report to participants, if Form 5500 due date was extended by Form 5558. |
| 12/31 | AFTAP "range" certification expiration | Deadline to certify 2023 AFTAP if plan used a "range" certification. Failure to certify AFTAP by December 31, 2023, will result in AFTAP for plan year 2023 being deemed under 60% retroactively to October 1, 2023. |
| 12/31 | Annual benefit statement availability notice | Provide an annual notice to participants about the availability of and means to obtain a pension benefit statement, if alternative notification approach will be used. |
| 12/31 | Election to reduce credit balance | Deadline to elect to reduce plan's carryover and/or prefunding balance as of January 1, 2023, by providing an irrevocable written notification to the plan's enrolled actuary and the plan administrator. |
| 12/31 | Revocation of credit balance election | Deadline to revoke a prior election to use a carryover and/or prefunding balance to meet minimum funding requirements for 2023, by providing written notification to the plan's enrolled actuary and the plan administrator. |

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NAMES OF FORMS

| IRS or PBGC Form Number | Form Name |
|--------------------------|--|
| Form 1042 and 1042-S | Annual Withholding Tax Return for U.S. Source Income of Foreign Person |
| Form 1096 | Annual Summary and Transmittal of U.S. Information Returns |
| Form 1099-R | Distributions From Pensions, Annuities, Retirement and Profit-Sharing Plans, IRAs, Insurance Contracts, etc. |
| Form 5330 | Return of Excise Taxes Related to Employee Benefit Plans |
| Form 5500 | Annual Return/Report of Employee Benefit Plan |
| Form 5558 | Application for Extension of Time to File Certain Employee Plan Returns |
| Form 8809 | Application for Extension of Time to File Information Returns. |
| Form 8959-SSA | Annual Registration Statement Identifying Separated Participants with Deferred Vested Benefits |
| Form 945 | Annual Return of Withheld Federal Income Tax |
| Form W-2 | Wage and Tax Statement |
| Form W-3 | Transmittal of Wage and Tax Statement |
| PBGC Form 10 | Post-Event Notice of Reportable Event |
| PBGC Form 200 | Notice of Failure to Make Required Contributions |
| PBGC Form 4010 | Annual Financial and Actuarial Information |
| PBGC Premium | PBGC Comprehensive Premium Filing |
| Schedule H to Form 5500 | Financial Information for the Employee Benefit Plans During the Plan Year |
| Schedule SB to Form 5500 | Actuarial Information (for a single-employer defined benefit pension plan) |

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