

# 2019 403(b) Retirement Plan Compliance Calendar



## JANUARY

S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

## FEBRUARY

S	M	T	W	T	F	S
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17	18	19	20	21	22	23
24	25	26	27	28		

## MARCH

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24	25	26	27	28	29	30
31						

## APRIL

S	M	T	W	T	F	S
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28	29	30				

## MAY

S	M	T	W	T	F	S
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26	27	28	29	30	31	

### JANUARY 2019

- 31** Census data submitted for calculation that 402(g) limit for 2018 has not been exceeded; add automated 402(g) limit in payroll system  
**Responsible party:** Plan Sponsor
- 31** Form 1099Rs due to participants to report 2018 distributions  
**Responsible party:** Plan Vendor(s)

### FEBRUARY 2019

- 28\*** Form 1099R information transmitted to IRS  
*\*4/1/2019, if filed electronically*  
**Responsible party:** Plan Vendor(s)

### APRIL 2019

- 1** Initial age 70½ Required Minimum Distributions (RMDs) due to inactive participants who turned age 70½ during 2018  
*Note: Normally by 12/31 of each tax year, but extended to 4/1 of following year for initial distribution*  
**Responsible party:** Plan Vendor(s) provides initial notification to participants; if no response, plan sponsor would need to instruct plan vendor(s) to process the RMD (or if contract language prevents processing, notify participants of consequences)
- 15** Distributions of 2018 402(g) excess deferral amounts due to participants  
**Responsible party:** Plan Sponsor instruction to plan vendor

## JUNE

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## JULY

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## AUGUST

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## SEPTEMBER

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## OCTOBER

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## JULY 2019

- Updated required fee disclosure provided to plan sponsor under ERISA section 408(b)(2) if investment-related changes have been made since 7/1/2018  
*Note: If other types of changes have been made, disclosures must be provided within 60 days of the change (ERISA plans only)*  
**Responsible party:** Most service providers to the plan, including plan vendor(s) and advisors
- Summary of Material Modifications due to participants, if amendments made to plan in 2018  
*Note: Due no later than 210 days after the end of the plan year in which the plan change was adopted (ERISA plans only)*  
**Responsible party:** Plan Sponsor
- Form 5500 due to the EBSA, unless plan is put on extension (in which case Form 5558 should be filed) (ERISA plans only)  
**Responsible party:** Plan Vendor(s) provides signature-ready form; plan sponsor submits
- Form 8955-SSA due to the IRS (ERISA plans only)  
**Responsible party:** Plan Vendor(s) provides signature-ready form; plan sponsor submits

## SEPTEMBER 2019

- Summary Annual Report due to participants  
*Note: Due later of 9 months after plan year ends or 2 months after filing Form 5500 (ERISA plans only)*  
*\*12/15/2019 if 5500 filing extended*  
**Responsible party:** Plan Sponsor

## OCTOBER 2019

- Extended deadline for Form 5500 filing for calendar-year plans after the plan sponsor files a Form 5558 to request an extension.  
**Responsible party:** Plan Vendor(s) provides signature-ready form; plan sponsor submits

## NOVEMBER

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## DECEMBER

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29	30	31				

## DECEMBER 2019

- 2** QDIA Notice (for plans with QDIA), 401(m) Safe Harbor Notice (for plans with safe harbor match or non-elective), and/or automatic enrollment notices (for plans with automatic enrollment) required to be sent to participants  
**Responsible party:** Plan Sponsor
- 31** Age 70½ Required Minimum Distributions (RMDs) due to participants who have begun receiving distributions  
**Responsible party:** Plan Vendor(s)
- 31** Plan amendments, if any, should be executed by the last day of the plan year (however, 403(b) plans still subject to “good faith” standard until IRS prototype documents are available)  
**Responsible party:** Plan Sponsor
- 31** Deadline for failed 2018 ACP test corrective distribution (plans with an employer matching contribution)  
*Note: “Steeple” Churches/QCCOs and governmental plans are exempt from the test; 10% excise tax applies for corrective distributions after 3/15/2019 (6/30/2019 for EACA plans)*  
**Responsible party:** Plan Sponsor

### ADDITIONAL REQUIREMENTS | \*Actual Dates May Vary

- 1/1/2020** Update plan to eliminate hardship withdrawal deferral suspension for distributions made on or after January 1, 2020
- Ongoing\*** Plan must be operated in good faith in accordance with the plan document  
*Note: The EPCRS correction program is now available for all operational failures in failing to follow the plan document, provided a written plan was adopted prior to 1/1/2010*  
**Responsible party:** Plan Sponsor
- Ongoing\*** Plan must be operated in accordance with established practices and procedures designed to promote and facilitate overall compliance with applicable Code requirements in order to be eligible for self-correction of operational failures  
**Responsible party:** Plan Sponsor
- Ongoing\*** Deposits of amounts withheld as salary deferrals by participants required to be submitted as soon as they are able to be segregated from employer’s general assets (ERISA plans only); or within a period no longer than is reasonable for proper plan administration (non-ERISA plans), in no case later than 15 business days after the end of the month withheld from employees’ pay  
**Responsible party:** Plan Sponsor
- Ongoing\*** SPD provided to new hires within 90 days of their coverage under the plan (ERISA plans only)  
**Responsible party:** Plan Sponsor
- Ongoing\*** Initial required fee disclosure under 404(a)(5) provided to new hires on or before the date they can first direct plan investments (ERISA plans only)  
**Responsible party:** Plan Vendor(s)
- Quarterly\*** Quarterly benefit statements provided to participants  
*Note: Typically mailed 5 business days after the end of each calendar quarter but no later than 45 days after the close of each quarter*  
**Responsible party:** Plan Vendor(s)
- Quarterly\*** Actual dollar amount of fees charged to an individual participant disclosed under ERISA 404(a)(5) (ERISA plans only)  
*Note: Within 45 days after the close of each calendar quarter; presumably as part of quarterly benefit statements*  
**Responsible party:** Plan Vendor(s)
- Annually\*** Required fee disclosure provided to plan participants under ERISA section 404(a)(5) (ERISA plans only)  
**Responsible party:** Plan Sponsor
- Annually\*** To comply with Universal Availability rules, notice must be provided to employees of their right to participate in the plan  
*Note: Annually, although the IRS has taken the position that “meaningful opportunity” will require year-round activity*  
**Responsible party:** Plan Sponsor

Note that some dates may only apply to particular plan types and there may be additional deadlines for some plans that are not covered. Plans with non-calendar years may be subject to different deadlines. Please consult counsel familiar with your unique retirement plan. If you would like more information on this calendar, please contact us at [info@cammackretirement.com](mailto:info@cammackretirement.com).