

## DEFINED BENEFIT RETIREMENT PLAN | 2021 COMPLIANCE CALENDAR Calendar Plan Year and Calendar Employer Tax Year

Retirement plan sponsors are responsible for compliance with many ongoing reporting, disclosure and notice requirements. This Retirement Plan Compliance Calendar summarizes the major requirements that apply to Defined Benefit (“DB”) plans for 2021. Due dates are based on a calendar year plan year and calendar employer tax year and are applicable to plans subject to the Employee Retirement Income Security Act of 1974 (“ERISA”). Please contact your USI Consulting Group representative if you have questions regarding these requirements and their application to your plan(s).

Month	Requirement	Due Date	Status
<b>JANUARY</b>	Final Contribution date for delayed 2020 calendar year contributions under the CARES Act. An amended IRS filing may be due if 2019 Plan Year contributions were delayed.	<b>January 4</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Due date to make fourth quarter required contribution for 2020 plan year (Quarterly contribution due 15 days after the end of applicable quarter).	<b>January 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day to furnish Form 1099-R to recipients of distributions during 2020 calendar year.	<b>January 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
<b>FEBRUARY</b>	Last day to file Form 945 to report federal income tax withheld from distributions in 2020.	<b>February 1</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
<b>MARCH</b>	Last day to file Form 1096 and Form 1099-R on paper with the IRS for prior year distributions.	<b>March 1</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Application for Waiver for Minimum Funding Standard due for Defined Benefit plans, where applicable (due no later than the 15th day of the 3rd month after the close of the plan year for which the waiver is requested).	<b>March 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day to file Form 1099-R electronically with the IRS for prior year distributions.	<b>March 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Deadline for enrolled actuary to certify Adjusted Funding Target Attainment Percentage (AFTAP) in order to avoid presumption that the current year AFTAP is to be the prior year AFTAP minus 10% (assuming benefit restrictions did not apply in the prior year).	<b>March 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
<b>APRIL</b>	Presumed AFTAP takes effect unless and until enrolled actuary issues certification of AFTAP for current plan year (if applicable).	<b>April 1</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day to make Required Minimum Distributions (RMD) (for first Distribution Calendar Year (DCY) 2020) to applicable plan participants under IRC Section 401(a)(9).	<b>April 1</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day to file financial and actuarial information under ERISA Section 4010 with PBGC (if applicable) (May be different if fiscal year is not the same as the plan year).	<b>April 14</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A

Month	Requirement	Due Date	Status	
<b>APRIL</b>	Due date to make first quarter required contribution for 2021 plan year. (Quarterly contribution due 15 days after the end of applicable quarter).	<b>April 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
	Last day for C corporation employer plan sponsors to make contributions and take tax deduction for 2020 without corporate tax return Extension (Form 1120). (For plans with a tax year ending December 31, without corporate tax extension).	<b>April 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
	Deadline to file Form 7004 (Request Automatic Extension for Corporate Tax Returns to October 15).	<b>April 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
	Last day to furnish Annual Funding Notice to participants, beneficiaries, and labor organizations representing participants from plan sponsors of single and multiemployer DB pension plans covered by the PBGC that have more than 100 participants (Due within 120 days after the close of the plan year).	<b>April 29</b>		
	Last day to distribute Notice of Benefit Limitations and Restrictions to participants of limitations on benefit increases, benefit payments and benefit accruals that apply if a plan's AFTAP is less than specific percentages. (Or 30 days after certain specified dates to which the benefit restriction applies).	<b>April 30</b>		
<b>MAY</b>	Last day to provide notice of benefit restrictions, if restrictions are applicable as of April 1, 2021.	<b>May 1</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
<b>JULY</b>	Due date to make second quarter required contribution for 2021 plan year.	<b>July 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
	Last day to furnish Summary of Material Modifications (SMM) to participants and beneficiaries receiving benefits (due no later than 210 days after the end of the plan year in which the plan change is adopted).	<b>July 28</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
	Last day to file Form 5500 for 2020 without extension (due seven months after plan year ending December 31, unless extension applies).	<b>July 31*</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
	Last day to file Form 8955-SSA without extension (report certain information relating to each participant with a deferred vested benefit).	<b>July 31*</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
	Last day to file Form 5558 – Application for Extension of Time to File Certain Employee Plan Returns (Form 5500) (due on or before normal due date for filing Form 5500).	<b>July 31*</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
	Last day (unextended deadline) to file Form 5330 and pay excise tax on nondeductible contributions and prohibited transactions (if applicable).	<b>July 31*</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
	Last day to provide a notice to terminated vested participants describing deferred vested retirement benefits (in conjunction with Form 8955-SSA).	<b>July 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
	Last day without extension to furnish Annual Funding Notice (for PBGC covered plans with 100 or fewer participants). (or the day Form 5500 is filed, if earlier).	<b>July 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	
	<b>SEPTEMBER</b>	Last day to add excess contributions for the 2020 Plan Year to the January 1, 2021 Prefunding Balance and/or use Credit Balance for the 2020 Plan Year contribution requirement.	<b>September 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
		Last day to pay balance of remaining required contributions for 2020 plan year to satisfy minimum funding requirements.	<b>September 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
Last day for plans with plan year ending December 31 to furnish Summary Annual Report (SAR) to participants and beneficiaries for DB plans not subject to the Annual Funding Notice Requirement. (for non-PBGC covered plans) (9 months after year-end or 2 months after filing Form 5500).		<b>September 30</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A	

\* IRS deadline extended to the next business day if due date falls on weekend or legal holiday (Internal Revenue Code Section 7503).

Month	Requirement	Due Date	Status
<b>SEPTEMBER</b>	Last day for enrolled actuary to issue AFTAP certification for current plan year. (If a Range Certification was issued, the deadline is extended until December 31).	<b>September 30</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
<b>OCTOBER</b>	Extended deadline to file Form 1120. Extended deadline to deposit tax deductible contributions for qualified plans for those sponsors that filed a corporate tax extension. (Deadline in order to deduct contributions for 2020 plan year).	<b>October 15*</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day to file Form 5500 (with extension). (2½ month extension if Form 5558 was filed timely).	<b>October 15*</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last date to file Form 8955-SSA (with extension) (2½ month extension if Form 5558 was filed timely).	<b>October 15*</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day to provide a notice to terminated vested participants describing deferred vested retirement benefits (in conjunction with Form 8955-SSA).	<b>October 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Due date to make third quarter required contribution for 2021 plan year.	<b>October 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Deadline for DB small plans (covering 100 or fewer participants) to distribute Annual Funding Notice. (Or the date Form 5500 is filed, if earlier).	<b>October 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day to file 2021 PBGC comprehensive filing and pay premiums due (for plans covered by PBGC). Annual PBGC Premium Payment for plans of all sizes, which includes the variable-rate premium and flat-rate premium. (9 1/2 months after end of plan year).	<b>October 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day to File IRS Form 5310-A to give notice to IRS of Qualified Separate Lines of Business, where applicable.	<b>October 15*</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day to provide notice of benefit restrictions, if restrictions are applicable as of October 1, 2020.	<b>October 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
<b>DECEMBER</b>	Last day (with extension) to furnish Summary Annual Report (for non-PBGC covered plans).	<b>December 15</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day to make Required Minimum Distributions (RMD) to applicable participants who have begun receiving minimum distributions.	<b>December 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Credit Balance Elections. Deadline for plan sponsor to make a voluntary election to reduce credit balances, or revoke a previous credit balance election, for funding purposes.	<b>December 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day for enrolled actuary to issue a certification of the specific AFTAP for current year if a range certification was previously issued.	<b>December 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Last day for plan sponsors to adopt discretionary plan amendments that became effective for the current plan year.	<b>December 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Annual Benefit Statement Notice. As an alternative to furnishing a Benefit Statement once every three years, provide an annual notice to participants regarding availability and how to obtain Benefit Statements. (Benefit Statement requirement considered met if notice is provided at least once per year).	<b>December 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A
	Intranet posting of Annual Form 5500 and Schedule SB. Plan Sponsors post certain information about their Defined Benefit Plan on their intranet websites. (Recommended).	<b>December 31</b>	<input type="checkbox"/> Complete <input type="checkbox"/> N/A

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## Plan Document Compliance Deadlines for 2021 and 2022

**SECURE Act (Setting Every Community up for Retirement Enhancement Act).** This Act was signed into law on Friday, December 20, 2019. Provisions it includes are for Required Minimum Distributions (RMD); Withdrawals for Birth or Adoption; Long-Term Part-Time Employees Eligibility; Lifetime Income Disclosure Requirements; Safe Harbor Contribution Rule Changes; Pooled Employer Plans; Defined Benefit Plan Changes; an extended adoption deadline for new plans; and other miscellaneous changes.

Generally, qualified retirement plans have until the last day of the first plan year beginning on or after January 1, 2022 (or later as prescribed by the IRS) to adopt an amendment for the SECURE Act with retroactive application.

Qualified governmental plans and collectively bargained plans have until the last day of the first plan year beginning on or after January 1, 2024 to be amended.

**CARES Act (Coronavirus Aid, Relief, and Economic Security Act).** This Act was signed into law on March 27, 2020 and addressed the economic impacts associated with the Coronavirus. This Act was signed into law on March 27, 2020 and addressed the economic impacts associated with the Coronavirus. Provisions include Coronavirus-Related Distributions; Waiver of Required Minimum Distributions; and Plan Funding Relief. Except for terminating plans, plan amendments related to the CARES Act are required by the last day of the plan year that begins on or after January 1, 2022. (A longer deadline applies to governmental plans.)

*This Update has been prepared for informational purposes only and is not designed to be a comprehensive analysis of any topic discussed herein and should not be relied upon as the only source of information. Additionally, this Update is not intended to represent advice or a recommendation specific to your plan.*

*Neither USI nor its affiliates and/or employees/agents offer legal or tax advice. Prior to acting on this information, we recommend that you seek independent advice specific to your situation from a qualified legal/tax professional.*

*The information contained herein is meant for general educational purposes only.*