



Changes in 2020 Deadlines for Plans* and Individuals

*For calendar year plans

Questions? Please contact us at ipb@ipbtax.com or 202.393.7600

Upcoming Deadlines for Qualified Defined Benefit Plans		
	Ordinary Deadline	New Deadline
Certification of funded status for multiemployer plans	March 30	July 15
AFTAP certification if plan was nearly underfunded ¹ in 2019	March 31	No Change
Section 436 benefit restrictions apply if AFTAP <80% as of March 31	April 1	Can elect to use 2019 AFTAP for this purpose
Required minimum distributions for most participants who attained age 70 ½ in 2019	April 1	No change ²
PBGC Form 4010 due	April 15	No change
Quarterly Contributions for 2020 Q1	April 15	January 1, 2021
PBGC Form 200 if failed to make Q1 contributions and amount exceeds \$1 mil.	April 25	January 10, 2021
Annual funding notice for large plans	April 30	No change
Adopt pre-approved DB plan and submit determination letter application	April 30	July 31
Update funding improvement plan and contribution schedules or rehabilitation plan and contribution schedule for multiemployer plans	180 days after CBA expires	July 15, if would have been due between March 30 and July 15
Quarterly contributions for 2020 Q2	July 15	January 1, 2021
PBGC Form 200 if failed to make Q2 quarterly contributions and amount due exceeds \$1 mil.	July 25	January 10, 2021
SMM or New SPD to participants for 2019 modifications	July 28	No change
Plan Audit	July 28	No change
Form 5500 to DOL or Form 5558 for extension	July 31	No change
Form 5330 to IRS (or Form 5558) if required by IRC §4975 (related to prohibited transactions)	July 31	No change
Election to carry over prefunding balance and standard carry over balance	August 15	No change
Minimum required contributions for 2019	September 15	January 1, 2021
Minimum required contributions for purposes of receiving 2019 deductions	September 15	No change
SAR to participants if filed Form 5500 in July	September 30	No change
AFTAP certification if plan was not nearly underfunded in 2019	September 30	
Benefit restrictions under IRC § 436 commence if no AFTAP certification or if AFTAP <80% as of September 30	October 1	No change
Quarterly contributions for 2020 Q3	October 15	January 1, 2021
Forms 5500, 5300, and 8955-SSA, if obtained extension	October 15	No change
Upcoming Deadlines for Qualified Defined Contribution Plans		
	Ordinary Deadline	New Deadline
Form 1099-R (electronic version) to IRS	March 31	No change

¹ Plans are “nearly underfunded” if the AFTAP for the preceding year was not more than 10 percentage points greater than the percentage required to avoid IRC § 436 limitations.

² The CARES Act provision that suspends RMDs does not apply to defined benefit plans.

Form 5330 to IRS or Form 5558 for extension if required under IRC § 4979 (related to excess contributions)	March 31	No change
Notice of employer stock fund diversification rights to participants who have attained age 55 and 10 years of participation	March 31	No change
Required minimum distribution for participants who attained age 70 ½ in 2019	April 1	Suspended ³
Rollover of 2020 RMDs that are recharacterized as eligible rollover distributions	Within 60 days of distribution	July 15, if would have been due between April 1 and July 15
Refund 2019 excess deferrals	April 15	July 15
Q1 benefit statement and fee disclosure	May 15	No change
Corrections for 2019 excess contributions for some EACAs to avoid 10% excise tax	June 30	July 15
SMM or new SPD to participants for 2019 modifications	July 28	No change
Form 5500 and 8955-SSA to IRS or Form 5558 for automatic 2.5-month extension	July 31	No change
Form 5330 to IRS or Form 5558 for extension if required by IRC §4975 (related to prohibited transactions)	July 31	No change
Individual statement to separated participants w/deferred vested benefits (if filed Form 8955-SSA)	July 31	No change
Q2 benefit statement and fee disclosure	August 15	No change
SAR to participants if filed Form 5500 in July	September 30	No change
Forms 5500, 5330, and 8955-SSA, if obtained an extension	October 15	No change
Individual statement to separate participants w/deferred vested benefits, if obtained extension for Form 8955-SSA	October 15	No Change
Form 5310 to IRS for QSLOB election	October 15	No change
Additional Upcoming Deadlines for 403(b) Plans		
	Ordinary Deadline	New Deadline
Deadline to make remedial amendments	March 31	June 30
Rollover contribution to another eligible retirement plan ⁴	Within 60 days of receiving distribution	July 15 if would have been due between April 1 and July 15
Upcoming Deadlines for 529 Qualified Tuition Plans		
	Ordinary Deadline	New Deadline
File 1099-G for 2019	Feb 28	No change
Recontribution of refund	Within 60 days of refund	July 15 if would have been due between April 1 and July 15
Rollover contribution to another qualified tuition program or ABLE account	Within 60 days after date of distribution	July 15 if would have been due between April 1 and July 15

³ Applies to section 401(a) individual account plans (including 401(k) plans), 403(a) and 403(b) plans, governmental section 457(b) plans, and IRAs.

⁴ Also applicable for rollovers under 708(d)(3) and 457(e)(16)(B)

Upcoming Deadlines for Deferred Compensation, Equity Pay, and Fringe Benefits

	Ordinary Deadline	New Deadline
Short-term deferral payments exempt from 409A	March 15	No change
Performance-based pay criteria established to satisfy 409A definition (for which deferrals may be made 6 months prior to end of performance period)	Within 90 days following the beginning of the period of the performance period	No change – changed performance criteria can cause pay to fail to be performance-based under 409A
83(b) elections	30 days after receipt of unvested property	July 15 if would have been due between April 1 and July 15
83(i) elections	30 days after receipt of qualified stock (upon option exercise or RSU settlement)	July 15 if would have been due between April 1 and July 15

Upcoming Deadlines for Employers

	Ordinary Deadline	New Deadline
Payment of employer-side payroll taxes after March 27, 2020	Monthly or bi-weekly	50% by December 31, 2021 50% by December 31, 2022

Upcoming Deadlines for Archer MSAs

	Ordinary Deadline	New Deadline
Last day participant can to contribute to account for 2019	April 15	July 15
Provide contribution information to account holder	May 31	July 15
Form 5498-SA to IRS for 2019	May 31	August 31
Rollover contribution to another Archer MSA	Within 60 days of receiving a payment or distribution	July 15 if would have been due between April 1 and July 15

Upcoming Deadlines for HSAs

	Ordinary Deadline	New Deadline
Last day participant can to contribute to account for 2019	April 15	July 15
Rollover Contribution to another Qualified HSA	Within 60 days of payment or distribution	July 15 if would have been due between April 1 and July 15
Provide contribution information to account holder	May 31	July 15
Form 5498-SA to IRS for 2019	May 31	August 31

Upcoming Deadlines for IRAs

	Ordinary Deadline	New Deadline
Last day participant can contribute to IRA for 2019	April 15	July 15
Contribution information to owner	May 31	July 15

Form 5498 to IRS for 2019	May 31	August 31
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Upcoming Deadlines for Individuals, Corporations, and Partnerships		
	Ordinary Deadline	New Deadline
Individual federal income tax payments and return filings on Forms 1040, 1040-SR, 1040-NR, 1040-NR-EZ, 1040-PR, and 1040-SS.	April 15	July 15
Calendar year or fiscal year corporate income tax payments and return filings on Forms 1120, 1120-C, 1120-F, 1120-FSC, 1120-H, 1120-L, 1120-ND, 1120-PC, 1120-POL, 1120-REIT, 1120-RIC, 1120-S, and 1120-SF	April 15	July 15
Calendar year or fiscal year partnership return filings on Forms 1065 and 1066	March 15	July 15 if filed for extension by March 15
Q1 and Q2 estimated taxes calculated on or submitted with Forms 1040-ES, 1040-EZ (NR), 1040-ES (PR), 1041-ES, and 1120-W	April 15 and June 15	July 15
Pay employer-side equivalent of SECA taxes on self-employment income for period up to January 1, 2021	Quarterly	50% by December 31, 2021
Other time-sensitive actions listed in either Treas. Reg. 301.7508A-1(c)(1)(iv)-(vi) or Revenue Procedure 2018-50 that would otherwise have a deadline falling between April 1 and July 15	Varies	July 15

Upcoming Deadlines for Estates, Trusts, and Tax-Exempt organizations		
	Ordinary Deadline	New Deadline
Estate and trust income tax payments and return filings on Forms 1041, 1041-N, and 1041-QFT	April 15	July 15
Estate and generation-skipping transfer tax payments and return filings on Forms 706, 706-NA, 706-A, 706-QDT, 706-GS(T), 706-GS(D), and 706-GS(D-1)	Within 9 months of decedents death	July 15 if due date would have fallen between April 1 and July 15
File Form 8971	30 days after date on which Form 706 is or is required to be filed	July 15 if due date would have fallen between April 1 and July 15
Gift and generation-skipping transfer tax payments and return filings on Form 709 that are due on the date estate is required to file Forms 706 or 706-NA	Within 9 months after decedents death	July 15 if due date would have fallen between April 1 and July 15
Gift and generation-skipping transfer tax payments and return filings on Form 709 that are due on April 15	April 15	July 15
Estate payments of principal or interest due under IRC section 6166, 6161, or 6163 and annual recertification under IRC section 6166	Installments	July 15 for installments that would have been due between April 1 and July 15
Exempt organization business income tax and other payment and return filings on Form 990-T	May 15	July 15
Exempt organizations business income tax payments and return filings on Forms 990 and 990-EZ	May 15	No Change

Excise tax payments on investment and return filings on Forms 990-PF and 4720	Varies	July 15
Q1 and Q2 estimated taxes calculated on or submitted with Forms 990-W	April 15 and June 15	July 15
Annual electronic filing requirement for small exempt organization on Form 990-N	May 15	July 15

Click [here](#) for a list of changes to upcoming state deadlines.