

Participant Count Date Logic for 2021 Plan Years Forward

PYC = Plan Year Commencing date

P-Count date expected to equal the PYC of the filing if:

- PYC is \geq 01/01/2021

AND

- New/newly covered

OR

- Reporting a non-de minimis transfer (any type) where the effective date of that transfer equals the filing

OR

- Reporting a de minimis transfer (merger type only) where the effective date of that transfer equals the filing PYC and the surviving plan was smaller.

If none of those three things occur, then P-Count expected to be (PYC – 1 day).