

Advanced Look at PPA Document Full Overview

Presented by Aimee Nash

August 5, 2013



Retirement & Benefits Compliance
Customer Conference

Agenda

- Document type considerations
- Format and new formatting options
- Summary of new document options (handout)
- New interface (demo) – (5 minutes)
 - Answers only format



Document Type Considerations

- PPA restatement is approaching
- Why are you using current document type? What don't you like about it?
- If you have applied for a letter in your own name, the letter can be transferred
- Apply for letter in own name for PPA?



Prototypes vs. Vol Subs

	Prototype	Volume Submitter
Document format	Adoption agreement and basic plan document	All-in-one document or adoption agreement ("prototype") format
Modifications to pre-approved language	Plan becomes individually designed	Most changes are 'minor modifications'
Hardship	Safe harbor only	Safe harbor or non-safe harbor permitted
Participant waiver/ Irrevocable opt-out	Not permitted	Permitted
Cross-testing – each participant in his own group	EGTRRA: number of groups limited by number of NHCES and must specify gateway PPA: same as volume submitters	No limit on number of groups; no need to specify gateway
Multiple Employer Plan	EGTRRA: not permitted PPA: permitted	Permitted

Use Volume Submitter Document

- If minor changes are made to the volume submitter document
 - May be submitted on a Form 5307
 - Do not lose reliance
 - If minor changes are made to a prototype document
 - Individually designed and
 - Form 5300 with a higher user fee
- Participant opt out (should never/rarely be used)
- May use non-safe harbor hardship requirements
- Choice of document formats (adoption agreement or "all-in-one"/traditional vol sub)



Document Options

- Volume Submitter Plans:

- Volume Submitter 401(k) - Prototype Format
- Volume Submitter 401(k) - Prototype Format (Answers Only) ●
- Volume Submitter Governmental Profit Sharing- Prototype Format
- Volume Submitter Governmental Money Purchase - Prototype Format
- Volume Submitter 401(k) – IDP format
- Volume Submitter Profit Sharing – IDP format
- Volume Submitter Money Purchase - IDP format

- Prototype - nonstandardized plans:

- Non standardized 401(k)/Profit Sharing
- Non standardized 401(k)/Profit Sharing (Answers Only)

- Non standardized Money Purchase

- Non standardized Target

- Prototype - standardized plans:

- Standardized 401(k)/Profit Sharing
- Standardized 401(k)/Profit Sharing (Answers Only)
- Standardized Money Purchase

- New types shown in red

- All the plans above are substantially similar in design and format.

- Non-standardized plans nearly identical to the similar volume submitter except for differences required under IRS Notice 2011-49.

New Formatting Options

- Upload logo for Cover Page
 - Logo scale in percent
 - Logo position
- Table Of Contents
- Check Box Types
 - [X]
- Header options
- Border options
- Font type and size
- Line spacing
- Line spacing in paragraphs



Caveats

- PPA Documents are DRAFT documents
- Plan language and options are subject to change during IRS review process

Review of Draft Document

Key to draft document:

 = New language/option added

 = describes language in the EGTRRA document that was removed

Other changes to note:

- Formatting changes
- Technical information removed from question (placed in notes)
- Each question has heading and sub-questions indented



Continuing Education

Please – before you leave:

1. Sign in

- Verify your attendance
- Check the box if you want your attendance reported to IRS (for ERPA reporting and those with a PTIN only)

2. Pick up your certificate of attendance

- Certificates will not be emailed after the conference

