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PPA Document Overview
and What to Expect for
Restatements



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Agenda

- Overview of Pre-Approved DC IRS Procedures
- Overview of Changes to Document Software
- Detail Review of PPA Non-Std/Volume Submitter Prototype
- Guided Tour of New Features

Pre-Approved DC IRS Procedures

- Restatement period opens in early 2014 and will remain open for two years
- ftwilliam.com deadline for “switches” and modifications to PPA defined contribution documents for letters in your own name (word-for-word adopters) is December 31, 2013.
- New applications (with IRS user fee) are still accepted

Overview of Changes to Document Software

- New question style - easier to read
- New formatting:
 - Upload logo for Cover Page
 - Logo scale in percent
 - Logo position
 - Table Of Contents
 - Check Box Types include graphic boxes
 - Header options
 - Border options
 - Font type and size
 - Line spacing
 - Line spacing in paragraphs
- Batch features
 - Auto covert EGTRRA => PPA
- E-Signature

Overview of Changes to Document Software

- 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

Prototype vs. Volume Submitter

	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

Prototype vs. Volume Submitter

- 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)
- Possible that other differences may arise during the IRS review process

Detail Review of PPA Documents

- PPA Documents are DRAFT documents
- Plan language and options are subject to change during IRS review process
 - Currently in the “second round”
- Adoption Agreement Samples
 - Corresponding changes in Basic Plan Document not shown
- IRS Working Draft - DOES NOT CONTAIN NEW FORMATTING OPTIONS