

RETIREMENT PROGRAMS COMPARISON CHART*

	403(b)	401(a) Defined Benefit	401(a) Defined Contribution	401(k)	457(b)
Eligible Employer	Public education employer; 501(c)(3) organization.	All employers.	All employers.	All non-governmental employers; governmental employers with grandfathered plan adopted before May 6, 1986.	State and local governments; any tax-exempt organization under Subtitle A of the Internal Revenue Code, except a church or church controlled organization.
Eligibility	Common law employees who perform services for the institution.	Common law employees who perform services for the institution.	Common law employees who perform services for the institution.	Common law employees who perform services for the institution.	For <u>governmental institutions</u> , common law employees who perform services for the institution and independent contractors. For <u>tax-exempt institutions</u> , a select group of management or highly compensated employees and independent contractors.

*This chart compares retirement programs that are "tax-qualified" under the Internal Revenue Code. In addition to these options, a governmental or tax-exempt employer can establish a Code Section 457(f) ineligible deferred compensation plan. A governmental employer can also establish a qualified governmental excess benefit arrangement (QEBA) under Code Section 415(m)(3).

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	403(b)	401(a) Defined Benefit	401(a) Defined Contribution	401(k)	457(b)
Contribution Limits	<p>1. 415 Limit: Total contributions limited to the lesser of 100% includible compensation or \$45,000 for 2007. The \$45,000 is indexed for inflation in \$1,000 increments thereafter.</p> <p>Note: This limit is separate from the limits applicable to a 457(b) plan, a 401(a) plan, or a 401(k) plan (unless the participant controls another business that maintains a 401(k) or 401(a) defined contribution plan).</p> <p>2. 402(g) Limit: Participant elective deferrals limited to lesser of 100% of compensation or \$15,500 for 2007, which is thereafter indexed for inflation in \$500 increments.</p> <p>Note: This limit applies to elective deferrals made to all 403(b) and/or 401(k) plans in which an individual participates, whether or not sponsored by the employer.</p>	<p>415 Limit: For <u>governmental institutions</u>, annual benefit is limited to \$180,000 in 2007, indexed for inflation in \$5,000 increments thereafter.</p> <p>For <u>tax-exempt institutions</u>, annual benefit limited to lesser of 100% of average compensation for the participant's high three years or \$180,000 for 2007. The \$180,000 is indexed for inflation in \$5,000 increments thereafter.</p> <p>Note: This limit may be adjusted if benefits begin earlier or later than normal retirement age or if the participant has less than 10 years of participation.</p> <p>Note: This limit is separate from the limits applicable to a 403(b) plan and a 401(a) defined contribution or 401(k) plan. However, the 401(a) defined contribution limits apply to after-tax contributions to a 401(a) defined benefit plan. Governmental plans have special limits.</p> <p>Note: Annual benefit is defined in terms of a straight life annuity without regard to after-tax employee contributions and rollovers.</p>	<p>415 Limit: Total contributions limited to the lesser of 100% compensation or \$45,000 for 2007. The \$45,000 is indexed for inflation in \$1,000 increments thereafter.</p> <p>Note: This limit is separate from the limits applicable to a 457(b) plan, a 401(a) defined benefit plan (except after-tax employee contributions to a 401(a) defined benefit plan), or a 403(b) plan (unless a participant in a 403(b) plan controls another business that maintains a 401(a) defined contribution plan).</p>	<p>1. 415 Limit: Total contributions limited to the lesser of 100% compensation or \$45,000 for 2007. The \$45,000 is indexed for inflation in \$1,000 increments thereafter.</p> <p>Note: This limit is separate from the limits applicable to a 457(b) plan, a 401(a) defined benefit plan (except after-tax employee contributions to a 401(a) defined benefit plan), or a 403(b) plan (unless a participant in a 403(b) plan controls another business that maintains a 401(k) plan).</p> <p>Note: If an employer sponsors both a 401(a) defined contribution plan and a 401(k) plan, contributions to both must be aggregated before applying this limit.</p> <p>2. 402(g) Limit: Participant elective deferrals limited to lesser of 100% of compensation or \$15,500 for 2007, which is thereafter indexed for inflation in \$500 increments.</p> <p>Note: This limit applies to elective deferrals made to all 403(b) and/or 401(k) plans in which an individual participates, whether or not sponsored by the employer.</p>	<p>Total contributions (both employer and employee) limited to the lesser of 100% includible compensation or \$15,500 for 2007. The \$15,500 is indexed for inflation in \$500 increments thereafter.</p> <p>Note: This limit is separate from the limits applicable to a 403(b) plan, a 401(a) plan, or a 401(k) plan.</p>

	403(b)	401(a) Defined Benefit	401(a) Defined Contribution	401(k)	457(b)
Catch-Up Contribution Limits	<p>1. Participants who have 15 or more years of service with a qualified employer (which includes any educational organization, hospital, home health service agency, health and welfare service agency, church or convention of churches) may contribute additional elective deferrals in an amount equal to the lesser of (i) \$3,000 or (ii) \$5,000 times years of service with their employer less total elective deferrals made by the participant during all prior years of employment with the employer. The total limit under this catch-up is \$15,000. This catch-up must be used before the age 50 catch-up applies.</p> <p>2. Participants age 50 or older, who have maxed out on their contributions under other limits, may contribute additional elective deferrals in an amount equal to the lesser of 100% of compensation or \$5,000 for 2007. The \$5,000 is indexed for inflation in \$500 increments thereafter.</p>	Not Applicable.	Not Applicable.	<p>Participants age 50 or older, who have maxed out on their contributions under other limits, may contribute additional elective deferrals in an amount equal to the lesser of 100% of compensation or \$5,000 for 2007. The \$5,000 is indexed for inflation in \$500 increments thereafter.</p> <p>Note: A participant employed by a <u>governmental institution</u> can take advantage of two age 50 catch-ups, one through a 403(b) or 401(k) plan, and one through a 457(b) plan. A participant employed by a <u>tax-exempt institution</u> may only take advantage of the age 50 catch-up once, through either a 403(b) or 401(k) plan.</p> <p>Note: The age 50 catch-up does not count against the \$45,000 total contribution limit under 415.</p>	<p>1. For the three years prior to the year the participant attains "normal retirement age," the limit is the lesser of the (i) regular limit for the year plus unused limits from prior years or (ii) twice the otherwise applicable regular limit for the year.</p> <p>2. For <u>governmental institutions</u>, participants age 50 or older, who have maxed out on their contributions under other limits, may contribute additional elective deferrals in an amount equal to the lesser of 100% compensation or \$5,000 for 2007. The \$5,000 is indexed for inflation in \$500 increments thereafter.</p> <p>Note: A participant employed by a <u>governmental institution</u> can take advantage of two age 50 catch-ups, one through a 403(b) or 401(k) plan, and one through a 457(b) plan.</p> <p>Note: If a participant is eligible for both of these catch-up limits, the participant may use whichever limit is higher for that year, but not both.</p>

	403(b)	401(a) Defined Benefit	401(a) Defined Contribution	401(k)	457(b)
Catch-Up Contribution Limits (continued)	<p>Note: A participant employed by a <u>governmental institution</u> can take advantage of two age 50 catch-ups, one through a 403(b) or 401(k) plan, and one through a 457(b) plan. A participant employed by a <u>tax-exempt institution</u> may only take advantage of the age 50 catch-up once, through either a 403(b) or 401(k) plan.</p> <p>Note: The age 50 catch-up does not count against the \$45,000 total contribution limit under 415.</p>				
Post-Retirement Contributions	<p>Post-retirement contributions can be made for up to five years after severance from employment. Only employer contributions are permitted, and the total limit on contributions is the lesser of 100% of includible compensation for the most recent year of service, or \$45,000 for 2007. The \$45,000 is indexed for inflation in \$1,000 increments thereafter.</p>	Not Applicable.	Not Applicable.	Not Applicable.	Not Applicable.

	403(b)	401(a) Defined Benefit	401(a) Defined Contribution	401(k)	457(b)
Vesting for Employer Contributions	<p>Plans sponsored by <u>governmental institutions</u> must provide for 100% vesting at normal retirement age or upon termination of the plan.</p> <p>For plan years beginning in 2007, plans sponsored by <u>tax-exempt institutions</u> must provide for 100% vesting after three years of service or vesting in 20% increments beginning the second year of service, or, if earlier, at normal retirement age.</p>	<p>Plans sponsored by <u>governmental institutions</u> must provide for 100% vesting at normal retirement age or upon termination of the plan.</p> <p>Plans sponsored by <u>tax-exempt institutions</u> must provide for full vesting after five years of service or vesting in 20% increments beginning the third year of service, or, if earlier, at normal retirement age.</p>	<p>Plans sponsored by <u>governmental institutions</u> must provide for 100% vesting at normal retirement age or upon termination of the plan.</p> <p>Plans sponsored by <u>tax-exempt institutions</u> must provide for full vesting after five years of service or vesting in 20% increments beginning the third year of service, or, if earlier, at normal retirement age.</p>	<p>Plans sponsored by <u>governmental institutions</u> must provide for 100% vesting at normal retirement age or upon termination of the plan.</p> <p>For plan years beginning in 2007, plans sponsored by <u>tax-exempt institutions</u> must provide for 100% vesting after three years of service or vesting in 20% increments beginning the second year of service, or, if earlier, at normal retirement age.</p>	No limits on vesting, but application of annual limits may make delayed vesting difficult.
Vesting for Employee Contributions	100% immediate.	100% immediate.	100% immediate.	100% immediate.	100% immediate.
Waiting Periods	<p>For <u>tax-exempt institutions</u>, if vesting is immediate, age 21 and two years of service or age 26 and one year of service. If vesting is delayed, age 21 and one year of service.</p> <p>For <u>governmental institutions</u>, no rules with respect to waiting periods.</p>	<p>For <u>tax-exempt institutions</u>, if vesting is immediate, age 21 and two years of service or age 26 and one year of service. If vesting is delayed, age 21 and one year of service.</p> <p>For <u>governmental institutions</u>, no rules with respect to waiting periods.</p>	<p>For <u>tax-exempt institutions</u>, if vesting is immediate, age 21 and two years of service or age 26 and one year of service. If vesting is delayed, age 21 and one year of service.</p> <p>For <u>governmental institutions</u>, no rules with respect to waiting periods.</p>	<p>For <u>tax-exempt institutions</u>, if vesting is immediate, age 21 and two years of service or age 26 and one year of service. If vesting is delayed, age 21 and one year of service.</p> <p>For <u>governmental institutions</u>, no rules with respect to waiting periods.</p>	Not Applicable.

	403(b)	401(a) Defined Benefit	401(a) Defined Contribution	401(k)	457(b)
Written Plan Document	<p>Not currently required for <u>governmental institutions</u> (unless state law requires) or <u>tax-exempt institutions</u> sponsoring a 403(b) plan exempt from ERISA. Final regulations under 403(b) expected to be issued in 2007 will require written plan document.</p> <p>Required for <u>tax-exempt institutions</u> sponsoring a 403(b) plan covered by ERISA.</p>	Required.	Required.	Required.	Required. Model amendments have been issued under Rev. Proc. 2004-56 with respect to EGTRRA requirements for <u>governmental institutions</u> .
Written Summary for Employees	<p>Not generally required for <u>governmental institutions</u> (unless state law requires) or <u>tax-exempt institutions</u> sponsoring a 403(b) plan exempt from ERISA, except that eligibility for salary deferrals must be communicated.</p> <p>Required for <u>tax-exempt institutions</u> sponsoring a 403(b) plan covered by ERISA.</p>	<p>Not required for <u>governmental institutions</u> (unless state law requires).</p> <p>Required for <u>tax-exempt institutions</u>.</p>	<p>Not required for <u>governmental institutions</u> (unless state law requires).</p> <p>Required for <u>tax-exempt institutions</u>.</p>	<p>Not required for <u>governmental institutions</u> (unless state law requires).</p> <p>Required for <u>tax-exempt institutions</u>.</p>	Not required for <u>governmental institutions</u> (unless state law requires) or <u>tax-exempt institutions</u> .
Loans	Permitted.	Permitted.	Permitted.	Permitted.	Permitted in plans sponsored by <u>governmental institutions</u> only.

	403(b)	401(a) Defined Benefit	401(a) Defined Contribution	401(k)	457(b)
Compensation Related Limits	<ol style="list-style-type: none"> For purposes of calculating 100% compensation limit, "includible compensation" includes elective deferrals to a 403(b), 401(k), or 457(b) plan, cafeteria plan deferrals, and salary reduction amounts for qualified transportation benefits. For purposes of calculating 100% of compensation for age 50 catch-up, compensation does <u>not</u> include elective deferrals. Compensation in excess of \$225,000 for 2007 may not be used in calculating contribution. Higher limits may apply for certain grandfathered employees of <u>governmental institutions</u>. 	<ol style="list-style-type: none"> For purposes of calculating 100% compensation limit, compensation includes elective deferrals to a 403(b), 401(k), or 457(b) plan, cafeteria plan deferrals, and salary reduction amounts for qualified transportation benefits. Compensation in excess of \$225,000 for 2007 may not be used in calculating contribution. Higher limits may apply for certain grandfathered employees of <u>governmental institutions</u>. 	<ol style="list-style-type: none"> For purposes of calculating 100% compensation limit, compensation includes elective deferrals to a 403(b), 401(k), or 457(b) plan, cafeteria plan deferrals, and salary reduction amounts for qualified transportation benefits. Compensation in excess of \$225,000 for 2007 may not be used in calculating contribution. Higher limits may apply for certain grandfathered employees of <u>governmental institutions</u>. 	<ol style="list-style-type: none"> For purposes of calculating 100% compensation limit, compensation includes elective deferrals to a 403(b), 401(k), or 457(b) plan, cafeteria plan deferrals, and salary reduction amounts for qualified transportation benefits. For purposes of calculating 100% of compensation for age 50 catch-up, compensation does <u>not</u> include elective deferrals Compensation in excess of \$225,000 for 2007 may not be used in calculating contribution. Higher limits may apply for certain grandfathered employees of <u>governmental institutions</u>. 	<ol style="list-style-type: none"> For purposes of calculating 100% of compensation limit, "includible compensation" includes elective deferrals to a 403(b), 401(k) or 457(b) plan, cafeteria plan deferrals, and salary reduction amounts for qualified transportation benefits. For purposes of calculating 100% of compensation for age 50 catch-up, compensation does <u>not</u> include elective deferrals. The IRS has taken the position that compensation in excess of \$225,000 for 2007 may not be used in calculating contribution.

	403(b)	401(a) Defined Benefit	401(a) Defined Contribution	401(k)	457(b)
Distributable Events	<p>Elective deferrals and amounts invested in custodial accounts cannot be distributed prior to severance from employment, age 59 ½, disability, death or financial hardship (with respect to elective deferrals, not including earnings, only).</p> <p>Elective deferrals may be distributed to a participant who is a reservist or national guardsman ordered or called to active duty for a period in excess of 179 days or for an indefinite period after September 11, 2001 and before December 31, 2007.</p>	<p>Normal retirement age, disability, severance from employment, or, for distributions made in plan years beginning in 2007, age 62.</p> <p>Under a <i>bona fide</i> phased retirement program, partial distributions may be made at age 59 ½ if certain requirements are satisfied.</p>	<p>For money purchase pension plan, severance from employment, disability, death, or, for distributions made in plan years beginning in 2007, age 62.</p> <p>For profit-sharing plan, fixed number of years, attainment of a stated age, or occurrence of some event.</p>	<p>Severance from employment, age 59 ½, disability, death or financial hardship (with respect to elective deferrals, not including earnings, only).</p> <p>Elective deferrals may be distributed to a participant who is a reservist or national guardsman ordered or called to active duty for a period in excess of 179 days or for an indefinite period after September 11, 2001 and before December 31, 2007.</p>	<p>Severance from employment, age 70 ½, death, or unforeseeable emergency.</p>
Early Distribution Tax	<p>Amounts withdrawn prior to attainment of age 59½ are subject to additional 10% early withdrawal tax, subject to certain exceptions:</p> <ol style="list-style-type: none"> (1) death (2) disability (3) series of substantially equal periodic payments after separation from service (4) deductible medical expenses (5) tax levy (6) separation from service after attainment of age 55 (7) distribution to alternate payee under QDRO (8) qualified reservist distribution 	<p>Amounts withdrawn prior to attainment of age 59½ are subject to additional 10% early withdrawal tax, subject to certain exceptions:</p> <ol style="list-style-type: none"> (1) death (2) disability (3) series of substantially equal periodic payments after separation from service (4) deductible medical expenses (5) tax levy (6) separation from service after attainment of age 55 (for distributions after August 17, 2006, substitute “age 50” for “age 55” for qualified public safety employees) (7) distribution to alternate payee under QDRO 	<p>Amounts withdrawn prior to attainment of age 59½ are subject to additional 10% early withdrawal tax, subject to certain exceptions:</p> <ol style="list-style-type: none"> (1) death (2) disability (3) series of substantially equal periodic payments after separation from service (4) deductible medical expenses (5) tax levy (6) separation from service after attainment of age 55 (7) distribution to alternate payee under QDRO 	<p>Amounts withdrawn prior to attainment of age 59½ are subject to additional 10% early withdrawal tax, subject to certain exceptions:</p> <ol style="list-style-type: none"> (1) death (2) disability (3) series of substantially equal periodic payments after separation from service (4) deductible medical expenses (5) tax levy (6) separation from service after attainment of age 55 (7) distribution to alternate payee under QDRO (8) qualified reservist distribution 	<p>Early distribution tax does not apply.</p> <p>Note: For <u>governmental institutions</u>, if the 457(b) plan contains rollover amounts from a 403(b) plan, a 401(a) plan, or a 401(k) plan, then those amounts are subject to the early distribution tax.</p>

	403(b)	401(a) Defined Benefit	401(a) Defined Contribution	401(k)	457(b)
Distribution Requirements	Minimum distribution requirements under 401(a)(9) applicable to post-1986 accumulation. Spousal annuity rules apply if annuity options are available.	Minimum distribution requirements under 401(a)(9) applicable. Spousal annuity rules apply.	Minimum distribution requirements under 401(a)(9) applicable. If a money purchase pension plan, spousal annuity rules apply.	Minimum distribution requirements under 401(a)(9) applicable.	Minimum distribution requirements under 401(a)(9) applicable.
Reporting	1099-R	1099-R	1099-R	1099-R	For plans sponsored by <u>governmental institutions</u> , 1099-R for income tax reporting and Form W-2 for FICA reporting. For plans sponsored by <u>tax-exempt institutions</u> , Form W-2.
Taxation	When distributed.	When distributed.	When distributed.	When distributed.	For plans sponsored by <u>governmental institutions</u> , when distributed. For plans sponsored by <u>tax-exempt institutions</u> , when paid or made available.
Funding	Funding is required and plan assets are not subject to the institution's creditors.	Funding is required and plan assets are not subject to the institution's creditors. Minimum funding requirements apply, which have been significantly revised for plan years beginning in 2007.	Funding is required and plan assets are not subject to the institution's creditors. For money purchase pension plans, minimum funding requirements apply.	Funding is required and plan assets are not subject to the institution's creditors.	For <u>governmental institutions</u> , funding is required and plan assets are not subject to the institution's creditors. For <u>tax-exempt institutions</u> , plan must be unfunded, except to the extent that plan assets are held in a rabbi trust and subject to the institution's creditors.

	403(b)	401(a) Defined Benefit	401(a) Defined Contribution	401(k)	457(b)
Portability	<ol style="list-style-type: none"> 1. Plan must allow eligible rollover distributions to be rolled over by a participant or surviving spouse to eligible retirement plan (IRA, 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). Effective in 2007, eligible rollover distributions may be made by a non-spouse beneficiary to an IRA by trustee-to-trustee transfer. 2. Plan may accept rollovers from IRA, 401(a), 401(k), 403(a), governmental 457(b), 403(b) plans. Rollovers may include after-tax amounts if trustee-to-trustee transfer and separate accounting. 3. Plan may permit a plan-to-plan in-service transfer to a governmental 401(a) defined benefit plan for the purchase of permissive service credit or repayment of contributions. 4. Transfers between 403(b) plans are permitted. 	<ol style="list-style-type: none"> 1. Plan must allow eligible rollover distributions to be rolled over by a participant or surviving spouse to eligible retirement plan (IRA, 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). Effective in 2007, eligible rollover distributions may be made by a non-spouse beneficiary to an IRA by trustee-to-trustee transfer. 2. May accept rollovers from IRA, 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plan. Rollovers may include after-tax amounts if trustee-to-trustee transfer and separate accounting. 3. If sponsored by a <u>governmental institution</u>, plan may accept a plan-to-plan in-service transfer from a 403(b) plan or a governmental 457(b) plan for the purchase of permissive service credit or repayment of contributions. 	<ol style="list-style-type: none"> 1. Plan must allow eligible rollover distributions to be rolled over by a participant or surviving spouse to eligible retirement plan (IRA, 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). Effective in 2007, eligible rollover distributions may be made by a non-spouse beneficiary to an IRA by trustee-to-trustee transfer. 2. May accept rollovers from IRA, 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plan. Rollovers may include after-tax amounts if trustee-to-trustee transfer and separate accounting. 	<ol style="list-style-type: none"> 1. Plan must allow eligible rollover distributions to be rolled over by a participant or surviving spouse to eligible retirement plan (IRA, 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). Effective in 2007, eligible rollover distributions may be made by a non-spouse beneficiary to an IRA by trustee-to-trustee transfer. 2. May accept rollovers from an IRA, 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plan. Rollovers may include after-tax amounts if trustee-to-trustee transfer and separate accounting. 	<ol style="list-style-type: none"> 1. Plans sponsored by <u>governmental institutions</u> must allow eligible rollover distributions to be rolled over by a participant or surviving spouse to eligible retirement plan (IRA, 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plan). Effective in 2007, eligible rollover distributions may be made by a non-spouse beneficiary to an IRA by trustee-to-trustee transfer. 2. Plans sponsored by <u>governmental institutions</u> may accept rollovers from an IRA, 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plan. Must account separately for amounts rolled into plan from non-457(b) plans. Rollovers may include after-tax amounts. 3. Plans sponsored by <u>governmental institutions</u> may permit a plan-to-plan in-service transfer to a governmental 401(a) defined benefit plan for the purchase of permissive service credit or repayment of contribution.

	403(b)	401(a) Defined Benefit	401(a) Defined Contribution	401(k)	457(b)
Portability (continued)					<p>4. No rollovers are permitted to or from plans sponsored by <u>tax-exempt institutions</u>.</p> <p>5. For both <u>governmental</u> and <u>tax-exempt institutions</u>, transfers between like 457(b) plans permitted.</p>
Nondiscrimination Rules	<p>For <u>tax-exempt</u> and <u>governmental institutions</u>, universal availability rule applies with respect to elective deferrals.</p> <p>For <u>tax-exempt institutions</u>, coverage rules and additional non-discrimination rules apply.</p>	<p>For <u>governmental institutions</u>, coverage and non-discrimination rules do not apply.</p> <p>For <u>tax-exempt institutions</u>, coverage, participation, and non-discrimination rules apply.</p>	<p>For <u>governmental institutions</u>, coverage and non-discrimination rules do not apply.</p> <p>For <u>tax-exempt institutions</u>, coverage and non-discrimination rules apply.</p>	<p>For <u>governmental institutions</u>, coverage and non-discrimination rules do not apply.</p> <p>For <u>tax-exempt institutions</u>, coverage and non-discrimination rules apply.</p>	<p>There are no coverage and discrimination rules applicable to <u>governmental institutions</u>. For <u>tax-exempt institutions</u>, the plan must be discriminatory by design.</p>
Form 5500	Yes, for <u>tax-exempt institutions</u> who sponsor a 403(b) plan subject to ERISA.	Yes, for <u>tax-exempt institutions</u> .	Yes, for <u>tax-exempt institutions</u> .	Yes, for <u>tax-exempt institutions</u> .	Yes, for <u>tax-exempt institutions</u> , but only if they fail to do one-time top hat filing for plan.
Determination Letter	Not available, but an institution can seek a private letter ruling.	Recommended.	Recommended.	Recommended.	Not available, but an institution can seek a private letter ruling. For <u>governmental institution</u> , if plan does not use model amendments under Rev. Proc. 2004-56 to reflect EGTRRA requirements, institution must describe in ruling request how plan provisions differ from model.
IRS Correction Programs	Yes.	Yes.	Yes.	Yes.	Yes.