IceMiller
LEGAL COUNSEL

COMPARISON OF RETIREMENT PROGRAMS[1] AVAILABLE TO CHURCH AND CHURCH-RELATED EMPLOYERS[2]

	403(b) PLAN	401(a) DEFINED CONTRIBUTION PLAN	401(k) PLAN	457(b) PLAN	401(a) DEFINED BENEFIT PLAN
ELIGIBLE EMPLOYER	Public education employers and 501(c)(3) tax-exempt organizations, including a **church, QCCO, and non-QCCO.**[3]	All employers, including a **church, QCCO, and non-QCCO**.	All non-governmental employers including a **church, QCCO, and non-QCCO**, and governmental employers with grandfathered plans adopted before May 6, 1986.	State and local governments and tax-exempt organizations, including a **non-QCCO**. **A church or QCCO is <u>not</u> eligible to establish a 457(b) plan.**	All employers, including a **church, QCCO, and non-QCCO**.
ELIGIBLE EMPLOYEE	Common law employees who perform services for an employer **and self-employed ministers in the performance of their ministry.**	Common law employees who perform services for an employer.	Common law employees who perform services for an employer.	For <u>governmental employers and</u> **<u>tax-exempt organizations that are non-QCCOs</u>**, common law employees who perform services for an employer and independent contractors. For <u>tax-exempt employers</u> (**other than non-QCCOs)**, a select group of management or highly compensated common law employees and independent contractors.	Common law employees who perform services for an employer.
TYPES OF CONTRIBUTIONS	• Employer contributions, including mandatory employee contributions. • Employee pre-tax and Roth	• Employer contributions, including mandatory employee contributions. • Employee after-tax	• Employer contributions, including mandatory employee contributions. • Employee pre-tax and Roth	• Employer contributions. • Employee pre-tax elective deferrals.	• Employer contributions, including mandatory employee contributions. • Employee after-tax

[1] This chart compares retirement programs that are "tax-qualified" under the Internal Revenue Code. In addition to these options, a non-qualified church controlled employer (non-QCCO) can establish a Code Section 457(f) ineligible deferred compensation plan. A church or qualified church controlled organization (QCCO) cannot establish a 457(f) plan, but can establish a non-qualified deferred compensation plan under Code Sections 451 and 83.
[2] This chart covers the general rules that apply to each of these types of retirement programs to provide context. However, the rules that apply **<u>only</u>** to church and church-related employers are **<u>bolded in red</u>**.
[3] A church is generally a house or worship or congregation, but can also include an elementary or secondary school that is controlled, operated or principally supported by a church. A non-QCCO is a 501(c)(3) tax-exempt organization that is controlled by or associated with a church and for which the following are both true: (i) it offers goods, services or facilities for sale to the general public (other than on an incidental basis and/or for a nominal charge) and (ii) it receives more than 25% of its financial support from governmental sources and/or receipts from sales or services in related activities or businesses. A QCCO is a 501(c)(3) tax-exempt organization that is controlled by or associated with a church that does not qualify as a non-QCCO under the previous sentence.

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	elective deferrals. • Employee after-tax contributions.	contributions.	elective deferrals. • Employee after-tax contributions.	• For governmental employers, Roth elective deferrals.	contributions.
CONTRIBUTION / BENEFIT LIMITS	1. **415(c) Limit**: Total contributions are limited to the **lesser** of 100% of includible compensation or $58,000 for 2021. The $58,000 is indexed for inflation in $1,000 increments. **Note**: The 415(c) 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). **Note: For a grandfathered 403(b)(9) defined benefit plan maintained by a tax-exempt employer that is a church, the 415(b) defined benefit limit applies. Under the 415(b) limit, the annual benefit is limited to $230,000 for 2021, indexed for inflation in $5,000 increments; provided that for any employee who is a highly compensated employee (for 2021, earned $130,000 in 2020), the 100% of average compensation for the participant's high three years also applies, if less.** **Note: A tax-exempt employer that is a church employer may**	1. **415(c) Limit:** Total contributions are limited to the **lesser** of 100% of compensation or $58,000 for 2021. The $58,000 is indexed for inflation in $1,000 increments. **Note:** The 415(c) 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). **Note:** If an employer sponsors both a 401(a) defined contribution plan and a 401(k) plan, this limit is applied to the aggregate contributions made to both plans.	1. **415(c) Limit:** Total contributions are limited to the **lesser** of 100% of compensation or $58,000 for 2021. The $58,000 is indexed for inflation in $1,000 increments. **Note:** The 415(c) 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). **Note:** If an employer sponsors both a 401(a) defined contribution plan and a 401(k) plan, this limit is applied to the aggregate contributions made to both plans. 2. **402(g) Limit:** Participant elective deferrals are limited to the **lesser** of 100% of compensation or $19,500 for 2021. The $19,500 is indexed for inflation in $500 increments. **Note:** The 402(g) limit applies to elective deferrals made to all 403(b) and/or 401(k) plans in	1. **457(b) Limit:** Total contributions are limited to the **lesser** of 100% of includible compensation or $19,500 for 2021. The $19,500 is indexed for inflation in $500 increments. **Note:** The 457(b) limit is separate from the limits applicable to a 403(b) plan, a 401(a) plan, or a 401(k) plan.	1. **415(b) Limit:** For governmental employers, the annual benefit is limited to $230,000 for 2021. The $230,000 is indexed for inflation in $5,000 increments. For tax-exempt employers **(but not churches and QCCOs)**, the annual benefit is limited to the **lesser** of 100% of average compensation for the participant's high three years or $230,000 for 2021. The $230,000 is indexed for inflation in $5,000 increments. **For tax-exempt employers that are church or QCCOs, the annual benefit is limited to $230,000 for 2021, indexed for inflation in $5,000 increments; provided that for any employee who is a highly compensated employee (for 2021, earned $130,000 in 2020), the 100% of average compensation for the participant's high three years also applies, if less.** **Note:** The 415(b) 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.

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	also make a contribution on behalf of a foreign missionary of up to $3,000 per year regardless of the 415(c) limit if he/she has income of less than $17,000. **Note: A tax-exempt employer that is a church employer may also make contributions of up to $10,000 per year on behalf of a participant who is an employee of the church regardless of compensation, up to a lifetime maximum of $40,000 under this exception.** 2. **402(g) Limit:** Participant elective deferrals are limited to the **lesser** of 100% of compensation or $19,500 for 2021. The $19,500 is indexed for inflation in $500 increments. **Note:** The 402(g) 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, but is separate from the limits applicable to a 457(b) plan.		which an individual participates, whether or not sponsored by the employer, but is separate from the limits applicable to a 457(b) plan.		**Note:** The 415(b) limit is separate from the limits applicable to a 457(b) plan, 403(b) plan, 401(a) defined contribution plan, or 401(k) plan. However, the 401(a) defined contribution limits under 415(c) apply to after-tax contributions to a 401(a) defined benefit plan. **Note:** Annual benefit is defined in terms of a straight life annuity without regard to after-tax employee contributions and rollovers.
CATCH-UP CONTRIBUTION LIMITS	1. **15 Years of Service Catch-Up:** 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,	Not Applicable.	1. **Age 50 Catch-Up:** Participants age 50 or older by the end of the year who have maxed out their contributions under other limits may contribute additional elective deferrals in an amount equal to the **lesser**	1. **Last Three Years of Service Catch-Up:** 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)	Not Applicable.

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	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 that employer less total elective deferrals made by the participant during all prior years of employment with the employer. The total lifetime limit under this catch-up is \$15,000. This catch-up must be used <u>before</u> the age 50 catch-up applies. 2. **<u>Age 50 Catch-Up</u>:** Participants age 50 or older by the end of the year who have maxed out their contributions under other limits may contribute additional elective deferrals in an amount equal to the **lesser** of 100% of compensation or \$6,500 for 2021. The \$6,500 is indexed for inflation in \$500 increments. **<u>Note</u>:** A participant employed by a <u>governmental employer</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 employer</u> may take advantage of the age 50 catch-up through either a 403(b) or 401(k) plan, but not both in the same year.		of 100% of compensation or \$6,500 for 2021. The \$6,500 is indexed for inflation in \$500 increments. **<u>Note</u>:** A participant employed by a <u>governmental employer</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 employer</u> may take advantage of the age 50 catch-up through either a 403(b) or 401(k) plan, but not both in the same year. **<u>Note</u>:** The age 50 catch-up does not count against the \$58,000 total contribution limit under 415(c).	twice the otherwise applicable regular limit for the year. 2. **<u>Age 50 Catch-Up</u>:** For <u>governmental employers only</u>, participants age 50 or older by the end of the year who have maxed out their contributions under the basic limit, may contribute additional elective deferrals in an amount equal to the **lesser** of 100% compensation or \$6,500 for 2021. The \$6,500 is indexed for inflation in \$500 increments. **<u>Note</u>:** A participant employed by a <u>governmental employer</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. **<u>Note</u>:** If a participant employed by a <u>governmental employer</u> is eligible for both of these catch-up limits, the participant may use whichever limit is higher for that year, but not both.	

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	Note: The age 50 catch-up does not count against the $58,000 total contribution limit under 415(c). **Note:** If a participant is eligible for both of these catch-up limits, contributions in excess of the 402(g) limit are treated as first applying to the 15 years of service catch-up and then to the age 50 catch-up.				
COMPENSATION RELATED LIMITS	1. For purposes of calculating the 100% compensation limit under 415(c), "includible compensation" includes elective deferrals to a 403(b), 401(k), or 457(b) plan, cafeteria plan contributions, and salary reduction amounts for qualified transportation benefits. **However, "includible compensation" does not include amounts designated as housing allowance.** 2. For purposes of calculating the 100% of compensation limit for age 50 catch-ups, "compensation" does not include elective deferrals that are not catch-up contributions. 3. For all employers **except tax-exempt employers that are churches and QCCOs**, compensation in excess of $290,000 for 2021 may not be used in calculating	1. For purposes of calculating the 100% compensation limit under 415(c), "compensation" includes elective deferrals to a 403(b), 401(k), or 457(b) plan, cafeteria plan contributions, and salary reduction amounts for qualified transportation benefits. **However, "compensation" does not include amounts designated as housing allowance.** 2. Compensation in excess of $290,000 for 2021 may not be used in calculating contributions. The $290,000 is indexed for inflation in $5,000 increments. For governmental employers, higher limits may apply for certain grandfathered employees.	1. For purposes of calculating the 100% compensation limit under 415(c), "compensation" includes elective deferrals to a 403(b), 401(k), or 457(b) plan, cafeteria plan contributions, and salary reduction amounts for qualified transportation benefits. **However, "compensation" does not include amounts designated as housing allowance.** 2. For purposes of calculating the 100% of compensation limit for age 50 catch-ups, "compensation" does not include elective deferrals that are not catch-up contributions. 3. Compensation in excess of $290,000 for 2021 may not be used in calculating contributions. The $290,000 is indexed for inflation in $5,000 increments. For	1. For purposes of calculating the 100% compensation limit under 457(b), "includible compensation" includes elective deferrals to a 403(b), 401(k), or 457(b) plan, cafeteria plan contributions, and salary reduction amounts for qualified transportation benefits. **However, "includible compensation" does not include amounts designated as housing allowance.** 2. For purposes of calculating the 100% of compensation limit for age 50 catch-ups, "compensation" does not include elective deferrals that are not catch-up contributions.	Compensation in excess of $290,000 for 2021 may not be used in calculating benefits. The $290,000 is indexed for inflation in $5,000 increments. For governmental employers, higher limits may apply for certain grandfathered employees.

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	contributions. The $290,000 is indexed for inflation in $5,000 increments. For governmental employers, higher limits may apply for certain grandfathered employees.		governmental employers, higher limits may apply for certain grandfathered employees.		
POST-RETIREMENT CONTRIBUTIONS	1. Post-retirement employer contributions can be made through the end of the year of severance of employment and for up to five years thereafter. The total limit on contributions for each year is the **lesser** of 100% of includible compensation for the most recent year of service, or $58,000 for 2021. The $58,000 is indexed for inflation in $1,000 increments. 2. Post-retirement elective deferrals of regular compensation and cash-outs of unused vacation, sick or other leave days can be made up to the later of 2 ½ months after severance from employment or the end of the calendar year. No post-retirement deferral of severance payments is permissible.	Not applicable.	Post-retirement elective deferrals of regular compensation and cash-outs of unused vacation, sick or other leave days can be made up to the later of 2 ½ months after severance from employment or the end of the calendar year. No post-retirement deferral of severance payments is permissible.	Post-retirement elective deferrals of regular compensation and cash-outs of unused vacation, sick or other leave days can be made up to the later of 2 ½ months after severance from employment or the end of the calendar year. No post-retirement deferral of severance payments is permissible.	Not applicable.
ROTH CONTRIBUTIONS	Roth contributions are permitted. A participant may also rollover distributions from a non-Roth account to a designated Roth account in the same plan, if	Not applicable.	Roth contributions are permitted. A participant may also rollover distributions from a non-Roth account to a designated Roth account in the same plan, if	For governmental employers, Roth contributions are permitted. A participant may also rollover distributions from a non-Roth account to a designated Roth	Not applicable.

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	permitted under the terms of the plan.		permitted under the terms of the plan.	account in the same plan, if permitted under the terms of the plan.	
VESTING FOR EMPLOYER CONTRIBUTIONS	Plans sponsored by governmental employers and **tax-exempt employers that are churches, QCCOs and non-QCCOs** must provide for 100% vesting upon termination of the plan. Plans sponsored by tax-exempt employers (**but not churches, QCCOs and non-QCCOs**) 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.	Plans sponsored by governmental employers and **tax-exempt employers that are churches, QCCOs and non-QCCOs** must provide for 100% vesting at normal retirement age and upon termination of the plan (including complete discontinuance of contributions). Plans sponsored by tax-exempt employers **(but not churches, QCCOs and non-QCCOs**) 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.	Plans sponsored by governmental employers and **tax-exempt employers that are churches, QCCOs and non-QCCOs** must provide for 100% vesting at normal retirement age and upon termination of the plan (including complete discontinuance of contributions). Plans sponsored by tax-exempt employers **(but not churches, QCCOs and non-QCCOs**) 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.	No vesting rules apply, but most plans provide for 100% immediate vesting since contributions count against the 457(b) contribution limit only when vested.	Plans sponsored by governmental employers and **tax-exempt employers that are churches, QCCOs and non-QCCOs** must provide for 100% vesting at normal retirement age and upon termination of the plan (including complete discontinuance of contributions). Plans sponsored by tax-exempt employers **(but not churches, QCCOs and non-QCCOs**) 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.
VESTING FOR EMPLOYEE CONTRIBUTIONS	100% immediate.	100% immediate.	100% immediate.	100% immediate.	100% immediate
MINIMUM AGE AND SERVICE REQUIREMENTS	1. **Employer contributions**. For tax-exempt employers (**but not churches, QCCOs and non-QCCOs**), if vesting is immediate, age 21 and two years of service or, for certain educational employers, age 26 and one year of service. Otherwise, age 21 and one year of service.	For tax-exempt employers **(but not churches, QCCOs, and non-QCCOs**), if vesting is immediate, age 21 and two years of service or, for certain educational employers, age 26 and one year of service. Otherwise, age 21 and one year of service. For governmental employers and **tax-exempt employers that are churches, QCCOs, and non-**	For tax-exempt employers **(but not churches, QCCOs, and non-QCCOs**), if vesting is immediate, age 21 and two years of service or, for certain educational employers, age 26 and one year of service. Otherwise, age 21 and one year of service. For governmental employers and **tax-exempt employers that are churches, QCCOs, and non-**	No minimum age and service rules apply.	For tax-exempt employers **(but not churches, QCCOs, and non-QCCOs**), if vesting is immediate, age 21 and two years of service or, for certain educational employers, age 26 and one year of service. Otherwise, age 21 and one year of service. For governmental employers and **tax-exempt employers that are churches, QCCOs, and non-**

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	For governmental employers and **tax-exempt employers that are churches, QCCOs and non-QCCOs**, no minimum age and service rules apply. 2. **Elective deferrals**. For governmental employers and tax-exempt employers **including non-QCCOs (but not churches or QCCOs**), age and service requirements are not permitted. For **tax-exempt employers that are churches or QCCOs**, no minimum age and service rules apply.	**QCCOs**, no minimum age and service rules apply.	**QCCOs**, no minimum age and service rules apply.		**QCCOs**, no minimum age and service rules apply.
WRITTEN PLAN DOCUMENT	Required, except with respect to a 403(b)(1) plan or 403(b)(7) plan sponsored by a **tax-exempt employer that is a church or QCCO**.	Required.	Required.	Required.	Required.
WRITTEN SUMMARY FOR EMPLOYEES	Not required for governmental employers (unless state law requires) or tax-exempt employers exempt from ERISA, **including churches, QCCOs, and non-QCCOs**. Required for tax-exempt employers covered by ERISA. All employers except **tax-exempt employers that are churches or QCCOs** must communicate eligibility for elective deferrals at	Not required for governmental employers (unless state law requires) or tax-exempt employers exempt from ERISA, **including churches, QCCOs, and non-QCCOs**. Required for tax-exempt employers covered by ERISA.	Not required for governmental employers (unless state law requires) or tax-exempt employers exempt from ERISA, **including churches, QCCOs, and non-QCCOs**. Required for tax-exempt employers covered by ERISA	Not required unless state law requires for governmental employers.	Not required for governmental employers (unless state law requires) or tax-exempt employers exempt from ERISA, **including churches, QCCOs, and non-QCCOs**. Required for tax-exempt employers covered by ERISA.

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	least once a year. **This requirement applies to non-QCCOs.**				
LOANS	Permitted.	Permitted.	Permitted.	Permitted in plans sponsored by governmental employers only.	Not applicable.
DISTRIBUTABLE EVENTS	1. Distributions of elective deferrals and amounts held in a custodial account (and earnings thereon) are not permitted prior to: • severance from employment • age 59½ • disability • death • financial hardship (with respect to elective deferrals only, not including earnings) • a qualified birth or adoption Elective deferrals may be distributed to a member of the reserves who has been ordered or called to active duty for a period exceeding 179 days or for an indefinite period. Distributions may be made to a participant performing service in the uniformed services while on active duty for a period of more than 30 days under a deemed	For a money purchase pension plan, distributions are not permitted prior to: • severance from employment • disability • death • age 59½ • a qualified birth or adoption (but not prior to one of the preceding events) For a profit-sharing plan, distributions are not permitted prior to: • severance of employment • a fixed number of years • attainment of a stated age • occurrence of an event such as layoff, illness, disability, retirement or death • a qualified birth or adoption	Distributions are not permitted prior to: • severance from employment • age 59½ • disability • death • financial hardship • a qualified birth or adoption Elective deferrals may be distributed to a member of the reserves who has been ordered or called to active duty for a period exceeding 179 days or for an indefinite period. Distributions may be made to a participant performing service in the uniformed services while on active duty for a period of more than 30 days under a deemed severance from employment.	Distributions are not permitted prior to: • severance from employment • age 70½ (age 59½ for governmental employers) • death • unforeseeable emergency • for governmental employers only, a qualified birth or adoption Distributions may be made to a participant performing service in the uniformed services while on active duty for a period of more than 30 days under a deemed severance from employment.	Distributions are not permitted prior to: • severance from employment • disability • normal retirement age • age 59½

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	severance from employment. 2. Distributions of employer contributions held in an annuity contract (and earnings thereon) are not permitted prior to: • severance from employment • a fixed number of years • attainment of a stated age • the occurrence of an event such as disability • a qualified birth or adoption				
EARLY DISTRIBUTION TAX	Amounts withdrawn prior to attainment of age 59½ are subject to an additional 10% early withdrawal tax, subject to certain exceptions including: (1) death (2) disability (3) separation from service after attainment of age 55 (substitute "age 50" for "age 55" for qualified public safety employees) (4) series of substantially equal periodic payments after separation from service (5) tax levy (6) distribution to alternate payee	Amounts withdrawn prior to attainment of age 59½ are subject to an additional 10% early withdrawal tax, subject to certain exceptions including: (1) death (2) disability (3) separation from service after attainment of age 55 (substitute "age 50" for "age 55" for qualified public safety employees) (4) series of substantially equal periodic payments after separation from service (5) tax levy (6) distribution to alternate	Amounts withdrawn prior to attainment of age 59½ are subject to an additional 10% early withdrawal tax, subject to certain exceptions including: (1) death (2) disability (3) separation from service after attainment of age 55 (substitute "age 50" for "age 55" for qualified public safety employees) (4) series of substantially equal periodic payments after separation from service (5) tax levy (6) distribution to alternate	Early withdrawal tax does not apply. **Note:** For governmental employers, 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 withdrawal tax.	Amounts withdrawn prior to attainment of age 59½ are subject to an additional 10% early withdrawal tax, subject to certain exceptions including: (1) death (2) disability (3) separation from service after attainment of age 55 (substitute "age 50" for "age 55" for qualified public safety employees) (4) series of substantially equal periodic payments after separation from service (5) tax levy (6) distribution to alternate

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	under QDRO (7) qualified birth or adoption distribution (8) deductible medical expenses (9) qualified reservist distribution (10) payments excepted by federal law related to emergencies and disasters	payee under QDRO (7) qualified birth or adoption distribution (8) deductible medical expenses (9) payments excepted by federal law related to emergencies and disasters	payee under QDRO (7) qualified birth or adoption distribution (8) deductible medical expenses (9) qualified reservist distribution (10) payments excepted by federal law related to emergencies and disasters		payee under QDRO (7) deductible medical expenses (8) payments excepted by federal law related to emergencies and disasters
DISTRIBUTION REQUIREMENTS	Minimum distribution requirements under 401(a)(9) apply. Undistributed account balances as of December 31, 1986, must comply with minimum distribution incidental benefit requirements (e.g., age 75 rule). Spousal annuity rules apply if annuity options are available and the plan is subject to ERISA. **Note: Churches, QCCOs, and non-QCCOs are subject to minimum distribution requirements under 401(a)(9) but are not subject to spousal annuity rules.**	Minimum distribution requirements under 401(a)(9) apply. If a money purchase pension plan, spousal annuity rules apply, if plan is subject to ERISA. If a profit sharing plan, spousal annuity rules apply if annuity options are available and plan is subject to ERISA. **Note: Churches, QCCOs, and non-QCCOs are subject to minimum distribution requirements under 401(a)(9) but are not subject to spousal annuity rules.**	Minimum distribution requirements under 401(a)(9) apply. Spousal annuity rules apply if annuity options are available and plan is subject to ERISA. **Note: Churches, QCCOs, and non-QCCOs are subject to minimum distribution requirements under 401(a)(9) but are not subject to spousal annuity rules.**	Minimum distribution requirements under 401(a)(9) apply.	Minimum distribution requirements under 401(a)(9) apply. Spousal annuity rules apply, if plan is subject to ERISA. **Note: Churches, QCCOs, and non-QCCOs are subject to minimum distribution requirements under 401(a)(9) but are not subject to spousal annuity rules.**
REPORTING	Form 1099-R	Form 1099-R	Form 1099-R	For plans sponsored by governmental employers, Form 1099-R for income tax reporting and Form W-2 for FICA reporting. For plans sponsored by tax-exempt employers, **including non-QCCOs**, Form W-2.	Form 1099-R

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TAXATION	When distributed.	When distributed.	When distributed.	For plans sponsored by governmental employers, when distributed. For plans sponsored by tax-exempt employers, **including non-QCCOs**, when paid or made available.	When distributed.
FUNDING	Plan assets must be held in a 403(b)(1) annuity contract or a 403(b)(7) custodial account. Custodial accounts must be invested in mutual funds. **For tax-exempt employers that are churches, QCCOs or non-QCCOs, plan assets may be held in retirement income accounts.** **Minimum funding rules do not apply to grandfathered 403(b)(9) defined benefit plans sponsored by churches.** Plan assets are not subject to the employer's creditors.	Trust is required and plan assets are not subject to the employer's creditors. For money purchase plans only, minimum funding rules apply to tax-exempt employers (**but not churches, QCCOs, or non-QCCOs**).	Trust is required and plan assets are not subject to the employer's creditors.	For governmental employers, trust is required and plan assets are not subject to the employer's creditors. For tax-exempt employers **including non-QCCOs**, plan must be unfunded, except to the extent that plan assets are held in a rabbi trust that is subject to the employer's creditors.	Trust is required and plan assets are not subject to the employer's creditors. Minimum funding rules apply to tax-exempt employers (**but not churches, QCCOs, or non-QCCOs**).
PORTABILITY	1. A plan must allow eligible rollover distributions to be rolled over by a participant or surviving spouse to an eligible retirement plan (IRA, Roth IRA, SIMPLE IRA (if established for at least two years), 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). The plan must also allow eligible rollover distributions to be rolled over	1. A plan must allow eligible rollover distributions to be rolled over by a participant or surviving spouse to an eligible retirement plan (IRA, Roth IRA, SIMPLE IRA (if established for at least two years), 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). The plan must also allow eligible rollover distributions to be rolled over	1. A plan must allow eligible rollover distributions to be rolled over by a participant or surviving spouse to an eligible retirement plan (IRA, Roth IRA, SIMPLE IRA (if established for at least two years), 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). The plan must also allow eligible rollover distributions to be rolled over	1. A plan sponsored by a governmental employer must allow eligible rollover distributions to be rolled over by a participant or surviving spouse to an eligible retirement plan (IRA, Roth IRA, SIMPLE IRA (if established for at least two years), 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plan). The plan must	1. A plan must allow eligible rollover distributions to be rolled over by a participant or surviving spouse to an eligible retirement plan (IRA, Roth IRA, SIMPLE IRA (if established for at least two years), 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). The plan must also allow eligible rollover distributions to be rolled over

COMPARISON OF RETIREMENT PROGRAMS AVAILABLE TO CHURCH AND CHURCH-RELATED EMPLOYERS

	403(b) PLAN	401(a) DEFINED CONTRIBUTION PLAN	401(k) PLAN	457(b) PLAN	401(a) DEFINED BENEFIT PLAN
	by a nonspouse beneficiary to an inherited IRA by trustee-to-trustee transfer. 2. A plan may accept rollovers from IRA, SIMPLE IRA (if established for at least two years), 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plans. Rollovers may include after-tax amounts if made by trustee-to-trustee transfer and plan provides separate accounting. Rollovers may include Roth if a trustee-to-trustee transfer and plan permits Roth elective deferrals. 3. A 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. **Transfers between 403(b) and 401(a) plans are permitted if the plans are sponsored by a church, QCCO or non-QCCO.**	by a nonspouse beneficiary to an inherited IRA by trustee-to-trustee transfer. 2. A plan may accept rollovers from IRA, SIMPLE IRA (if established for at least two years), 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plans. Rollovers may include after-tax amounts if made by trustee-to-trustee transfer and plan provides separate accounting. 3. Transfers between 401(a) (including 401(k)) plans are permitted. **Transfers between 403(b) and 401(a) plans are permitted if the plans are sponsored by a church, QCCO or non-QCCO.**	by a nonspouse beneficiary to an inherited IRA by trustee-to-trustee transfer. 2. A plan may accept rollovers from IRA, SIMPLE IRA (if established for at least two years), 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plans. Rollovers may include after-tax amounts if made by trustee-to-trustee transfer and plan provides separate accounting. Rollovers may include Roth if a trustee-to-trustee transfer and plan permits Roth elective deferrals. 3. Transfers between 401(a) (including 401(k)) plans are permitted. **Transfers between 403(b) and 401(a) plans are permitted if the plans are sponsored by a church, QCCO or non-QCCO.**	also allow eligible rollover distributions to be rolled over by a nonspouse beneficiary to an inherited IRA by trustee-to-trustee transfer. 2. A plan sponsored by a governmental employer may accept rollovers from an IRA, SIMPLE IRA (if established for at least two years), 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plan, provided the plan must account separately for amounts rolled into the plan from non-457(b) plans. Rollovers may not include after-tax amounts. Rollovers may include Roth if a trustee-to-trustee transfer and plan permits Roth elective deferrals. 3. A plan sponsored by a governmental employer 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. 4. No rollovers are permitted to or from a plan sponsored by tax-exempt employer, **including a non-QCCO**. 5. For both governmental and tax-exempt employers,	by a nonspouse beneficiary to an inherited IRA by trustee-to-trustee transfer. 2. A plan may accept rollovers from IRA, SIMPLE IRA (if established for at least two years), 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plans. Rollovers may include after-tax amounts if made by trustee-to-trustee transfer and plan provides separate accounting. 3. A plan sponsored by a governmental employer 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. 4. Transfers between 401(a) plans are permitted. **Transfers between 403(b) and 401(a) plans are permitted if the plans are sponsored by a church, QCCO or non-QCCO.**

COMPARISON OF RETIREMENT PROGRAMS AVAILABLE TO CHURCH AND CHURCH-RELATED EMPLOYERS

	403(b) PLAN	401(a) DEFINED CONTRIBUTION PLAN	401(k) PLAN	457(b) PLAN	401(a) DEFINED BENEFIT PLAN
				transfers between like 457(b) plans permitted.	
NON-DISCRIMINATION RULES	1. **Elective Deferrals**. For governmental employers and tax-exempt employers **including non-QCCOs (but not churches or QCCOs**), universal availability rule applies with respect to elective deferrals. **The universal availability rule does not apply to churches or QCCOs.** 2. **Employer Contributions**. For tax-exempt employers **including non-QCCOs (but not churches or QCCOs**), coverage rules and additional non-discrimination rules apply with regard to employer contributions. For governmental employers and **tax-exempt employers that are churches and QCCOs**, no non-discrimination rules apply to employer contributions.	For governmental employers no non-discrimination rules apply. For tax-exempt employers **(but not churches, QCCOs and non-QCCOs)** non-discrimination and coverage rules apply. For **tax-exempt employers that are churches, QCCOs and non-QCCOs**, non-discrimination rules apply and pre-ERISA coverage rules apply.	For governmental employers no non-discrimination rules apply. For tax-exempt employers **(but not churches, QCCOs and non-QCCOs)** non-discrimination and coverage rules apply. For **tax-exempt employers that are churches, QCCOs and non-QCCOs**, non-discrimination rules apply and pre-ERISA coverage rules apply.	No non-discrimination rules apply to plans sponsored by governmental employers or **tax-exempt employers that are non-QCCOs**. For tax-exempt employers (**but not non-QCCOs**), the plan must be discriminatory by design.	For governmental employers no non-discrimination rules apply. For tax-exempt employers **(but not churches, QCCOs and non-QCCOs)** non-discrimination and coverage rules apply. For **tax-exempt employers that are churches, QCCOs and non-QCCOs**, non-discrimination rules apply and pre-ERISA coverage rules apply.
FORM 5500	Required if the employer is subject to ERISA. **Not required for churches, QCCOs, or non-QCCOs**.	Required if the employer is subject to ERISA. **Not required for churches, QCCOs, or non-QCCOs**.	Required if the employer is subject to ERISA. **Not required for churches, QCCOs, or non-QCCOs**.	Not required, but tax-exempt employers (**but not non-QCCOS**) must make a one-time top hat filing.	Required if the employer is subject to ERISA. **Not required for churches, QCCOs, or non-QCCOs**.
DETERMINATION LETTER	Not available, but IRS has adopted a pre-approved plan program.	Currently, a determination letter is only available upon adoption and termination of a plan, and may in	Currently, a determination letter is only available upon adoption and termination of a plan, and may in	Not available, but an employer can seek a private letter ruling.	Currently, a determination letter is only available upon adoption and termination of a plan, and may in

	403(b) PLAN	401(a) DEFINED CONTRIBUTION PLAN	401(k) PLAN	457(b) PLAN	401(a) DEFINED BENEFIT PLAN
		the future be available in other limited circumstances. It is not required, but recommended, to apply for a determination letter on the qualified status of the plan when available. IRS has adopted a pre-approved plan program.	the future be available in other limited circumstances. It is not required, but recommended, to apply for a determination letter on the qualified status of the plan when available. IRS has adopted a pre-approved plan program.		the future be available in other limited circumstances. It is not required, but recommended, to apply for a determination letter on the qualified status of the plan when available.
IRS CORRECTION PROGRAMS	Yes.	Yes.	Yes.	Yes.	Yes.

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