IceMiller LEGAL COUNSEL

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

	403(b) PLAN	401(a) DEFINED BENEFIT PLAN	401(a) DEFINED CONTRIBUTION PLAN	401(k) PLAN	457(b) PLAN
ELIGIBLE EMPLOYER	Public education employers and 501(c)(3) tax-exempt organizations, including a **church, QCCO, and non-QCCO**.	All employers, including a **church, QCCO, and non-QCCO**.	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 any tax-exempt organization, including a **non-QCCO**. **A church or QCCO is not eligible to establish a 457(b) plan.**
ELIGIBILITY	Common law employees who perform services for the employer **and self-employed ministers in the performance of their ministry.**	Common law employees who perform services for the employer.	Common law employees who perform services for the employer.	Common law employees who perform services for the employer.	For governmental employers and **tax-exempt organizations that are non-QCCOs**, common law employees who perform services for the employer and independent contractors. For tax-exempt employers (**other than non-QCCOs)**, a select group of management or highly compensated common law employees and independent contractors.
CONTRIBUTION / BENEFIT LIMITS	1. **415(c) Limit**: Total contributions are limited to the **lesser** of 100% of includible compensation or $54,000 for 2017. The $54,000 is indexed for inflation in $1,000 increments. **Note:** The 415(c) limit is separate	**415(b) Limit:** For governmental employers, the annual benefit is limited to $215,000 in 2017. The $215,000 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	**415(c) Limit:** Total contributions are limited to the **lesser** of 100% of compensation or $54,000 for 2017. The $54,000 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	1. **415(c) Limit**: Total contributions are limited to the **lesser** of 100% of compensation or $54,000 for 2017. The $54,000 is indexed for inflation in $1,000 increments. **Note:** The 415(c) limit is separate from the limits applicable to a	Total contributions (both employer and employee) are limited to the **lesser** of 100% of includible compensation or $18,000 for 2017. The $18,000 is indexed for inflation in $500 increments. **Note:** This limit is separate from the limits applicable to a 403(b)

[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 **only** to church and church-related employers are **bolded in red.**

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	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 $215,000 in 2017, indexed for inflation in $5,000 increments; provided that for any employee who is a highly compensated employee (for 2017, earned $120,000 in 2016), 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 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.**	100% of average compensation for the participant's high three years or $215,000 for 2017. The $215,000 is indexed for inflation in $5,000 increments. **For tax-exempt employers that are church or QCCOs, the annual benefit is limited to $215,000 in 2017, indexed for inflation in $5,000 increments; provided that for any employee who is a highly compensated employee (for 2017, earned $120,000 in 2016), 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. **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.	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.	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 $18,000 for 2017. The $18,000 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.	plan, a 401(a) plan, or a 401(k) plan.

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	2. **402(g) Limit:** Participant elective deferrals are limited to the **lesser** of 100% of compensation or $18,000 for 2017. The $18,000 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.				
CATCH-UP CONTRIBUTION LIMITS	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. 2. Participants age 50 or older who have maxed out their	Not Applicable.	Not Applicable.	Participants age 50 or older 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 $6,000 for 2017. The $6,000 is indexed for inflation in $500 increments. **Note:** A participant employed by a governmental employer 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 tax-exempt employer 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. **Note:** The age 50 catch-up does not count against the $54,000 total contribution limit under 415(c).	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. 2. For governmental employers, participants age 50 or older 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 $6,000 for 2017. The $6,000 is indexed for inflation in $500 increments. **Note:** A participant employed by a governmental employer can take advantage of two age 50 catch-ups, one through a 403(b) or 401(k)

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	contributions under other limits may contribute additional elective deferrals in an amount equal to the **lesser** of 100% of compensation or $6,000 for 2017. The $6,000 is indexed for inflation in $500 increments. **Note**: A participant employed by a governmental employer 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 tax-exempt employer 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. **Note**: The age 50 catch-up does not count against the $54,000 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.				plan, and one through a 457(b) plan. **Note**: If a participant employed by a governmental employer is eligible for both of these catch-up limits, the participant may use whichever limit is higher for that year, but not both.
COMPENSATION RELATED LIMITS	1. For purposes of calculating 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,**	Compensation in excess of $270,000 for 2017 may not be used in calculating benefits. The $270,000 is indexed for inflation in $5,000 increments. Higher limits may apply for certain grandfathered employees of governmental employers.	1. For purposes of calculating 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**	1. For purposes of calculating 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**	1. For purposes of calculating 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,**

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	"includible compensation" <u>does not include</u> amounts designated as housing allowance. 2. For purposes of calculating 100% of compensation for age 50 catch-up, compensation does not include elective deferrals. 3. For all employers **<u>except tax-exempt employers that are churches and QCCOs</u>**, compensation in excess of $270,000 for 2017 may not be used in calculating contributions. The $270,000 is indexed for inflation in $5,000 increments. Higher limits may apply for certain grandfathered employees of governmental employers.		**<u>include</u> amounts designated as housing allowance.** 2. Compensation in excess of $270,000 for 2017 may not be used in calculating contribution. The $270,000 is indexed for inflation in $5,000 increments. Higher limits may apply for certain grandfathered employees of governmental employers.	**<u>include</u> amounts designated as housing allowance.** 2. For purposes of calculating 100% of compensation for age 50 catch-up, compensation does not include elective deferrals. 3. Compensation in excess of $270,000 for 2017 may not be used in calculating contribution. The $270,000 is indexed for inflation in $5,000 increments. Higher limits may apply for certain grandfathered employees of governmental employers.	**"includible compensation" <u>does not include</u> amounts designated as housing allowance.** 2. For purposes of calculating 100% of compensation for age 50 catch-up, compensation does not include elective deferrals.
POST-RETIREMENT CONTRIBUTIONS	1. <u>Post-retirement employer contributions</u> 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 is the **lesser** of 100% of includible compensation for the most recent year of service, or $54,000 for 2017. The $54,000 is indexed for inflation in $1,000 increments. 2. <u>Post-retirement elective deferrals</u> of regular or accrued sick or vacation pay can be made for up to the **lesser** of 2½ months after severance from	Not applicable.	Not applicable.	<u>Post-retirement elective deferrals</u> of regular or accrued sick or vacation pay can be made for up to the **lesser** of 2½ months after severance from employment or the end of the calendar year in which severance from employment occurs. No post-retirement deferral of severance payments is permissible.	<u>Post-retirement elective deferrals</u> of regular or accrued sick or vacation pay can be made for up to the **lesser** of 2½ months after severance from employment or the end of the calendar year in which severance from employment occurs. No post-retirement deferral of severance payments is permissible.

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	employment or the end of the calendar year in which severance from employment occurs. No post-retirement deferral of severance payments is permissible.				
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 permitted under the terms of the plan.	Not applicable.	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 permitted under the terms of the plan.	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 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** are not subject to any vesting rules. 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 or 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 or 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 or 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 application of annual limits may make delayed vesting difficult.
VESTING FOR EMPLOYEE CONTRIBUTIONS	100% immediate.	100% immediate	100% immediate.	100% immediate.	100% immediate.

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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 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.	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-QCCOs**, 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-QCCOs**, 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-QCCOs**, no minimum age and service rules apply.	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.

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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 if covered by ERISA. All employers except **tax-exempt employers that are churches or QCCOs** must communicate eligibility for salary deferrals at least once a year. **This requirement applies to non-QCCOs.**	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 if 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 if 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 if covered by ERISA	Not required.
LOANS	Permitted.	Permitted.	Permitted.	Permitted.	Permitted in plans sponsored by governmental employers only.
DISTRIBUTABLE EVENTS	1. Elective deferrals and amounts held in a custodial account (and earnings thereon) cannot be distributed prior to: • severance from employment • age 59½ • disability • death • financial hardship (with respect to elective deferrals, not including earnings). Elective deferrals may be distributed to a member of the reserves who has been ordered or	Distributions are not permitted prior to: • severance from employment • disability • age 62	For a money purchase pension plan, distributions are not permitted prior to: • severance from employment • disability • death • age 62 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	Distributions are not permitted prior to: • severance from employment • age 59½ • disability • death • financial hardship (with respect to elective deferrals, not including earnings). 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	Distributions are not permitted prior to: • severance from employment • age 70½ • death • unforeseeable emergency 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.

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	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. 2. <u>Employer contributions</u> and earnings thereon cannot be distributed prior to: • severance from employment • a fixed number of years • attainment of a stated age • the occurrence of an event such as disability		layoff, illness, disability, retirement or death	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.	
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) 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 (substitute "age 50" for "age	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) 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 (substitute "age 50" for "age 55" for	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) 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 (substitute "age 50" for "age 55" for	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) 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 (substitute "age 50" for "age 55" for	Early distribution tax does not apply. **Note:** For <u>governmental employers</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.

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	55" for qualified public safety employees) (7) distribution to alternate payee under QDRO (8) qualified reservist distribution	qualified public safety employees) (7) distribution to alternate payee under QDRO	qualified public safety employees) (7) distribution to alternate payee under QDRO	qualified public safety employees) (7) distribution to alternate payee under QDRO (8) qualified reservist distribution	
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. 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.**	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.
REPORTING	Form 1099-R	Form 1099-R	Form 1099-R	Form 1099-R	For plans sponsored by governmental employers, 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.
TAXATION	When distributed.	When distributed.	When distributed.	When distributed.	For plans sponsored by governmental employers, when distributed. For plans sponsored by tax-exempt employers, **including non-QCCOs**,

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					when paid or made available.
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. Minimum funding rules apply to governmental employers and 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 money purchase plans only, minimum funding rules apply to governmental employers and 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 and subject to the employer's creditors.
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, 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). The plan must 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 may accept rollovers from IRA, 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	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, 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). The plan must 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 may accept rollovers from IRA, 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	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, 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). The plan must 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 may accept rollovers from IRA, 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	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, 401(a), 401(k), 403(a), governmental 457(b), 403(b) plan). The plan must 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 may accept rollovers from IRA, 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	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, 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plan). The plan must 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, 401(a), 401(k), 403(a), governmental 457(b), or 403(b) plan, provided the plan must

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

	403(b) PLAN	401(a) DEFINED BENEFIT PLAN	401(a) DEFINED CONTRIBUTION PLAN	401(k) PLAN	457(b) PLAN
	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.**	separate accounting. 3. A plan sponsored by a <u>governmental employer</u> 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.**	separate accounting. 3. 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.**	may include Roth if a trustee-to-trustee transfer and plan permits Roth elective deferrals. 3. 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.**	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 <u>governmental employer</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. 4. No rollovers are permitted to or from a plan sponsored by <u>tax-exempt employer,</u> <u>**including a non-QCCO**</u>. 5. For both <u>governmental</u> and <u>tax-exempt employers</u>, transfers between like 457(b) plans permitted.
NON-DISCRIMINATION RULES	1. <u>**Elective Deferrals**</u>. For <u>governmental employers</u> and <u>tax-exempt employers</u> <u>**including non-QCCOs**</u> **(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. <u>**Employer Contributions**</u>. For <u>tax-exempt employers</u>	For <u>governmental employers</u> no non-discrimination rules apply. For <u>tax-exempt employers</u> <u>**(but not churches, QCCOs and non-QCCOs)**</u> non-discrimination and coverage rules apply. For <u>**tax-exempt employers that are churches, QCCOs and non-QCCOs**</u>, non-discrimination rules apply and pre-ERISA coverage rules apply.	For <u>governmental employers</u> no non-discrimination rules apply. For <u>tax-exempt employers</u> <u>**(but not churches, QCCOs and non-QCCOs)**</u> non-discrimination and coverage rules apply. For <u>**tax-exempt employers that are churches, QCCOs and non-QCCOs**</u>, non-discrimination rules apply and pre-ERISA coverage rules apply.	For <u>governmental employers</u> no non-discrimination rules apply. For <u>tax-exempt employers</u> <u>**(but not churches, QCCOs and non-QCCOs)**</u> non-discrimination and coverage rules apply. For <u>**tax-exempt employers that are churches, QCCOs and non-QCCOs**</u>, non-discrimination rules apply and pre-ERISA coverage rules apply.	No non-discrimination rules apply to plans sponsored by <u>governmental employers</u> or <u>**tax-exempt employers that are non-QCCOs**</u>. For <u>tax-exempt employers</u> (**but not non-QCCOs**), the plan must be discriminatory by design.

	403(b) PLAN	401(a) DEFINED BENEFIT PLAN	401(a) DEFINED CONTRIBUTION PLAN	401(k) PLAN	457(b) PLAN
	including non-QCCOs (but not churches or QCCOs), coverage rules and additional non-discrimination rules apply with regard to employer contributions. For government employers and **tax-exempt employers that are churches and QCCOs**, no non-discrimination rules apply to employer contributions.				
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**.	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.
DETERMINATION LETTER	Not available, but IRS has adopted a pre-approved plan program.	A determination letter is available upon adoption and termination of a plan, and may in 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.	A determination letter is available upon adoption and termination of a plan, and may in 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.	A determination letter is available upon adoption and termination of a plan, and may in 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.	Not available, but an employer can seek a private letter ruling.
IRS CORRECTION PROGRAMS	Yes.	Yes.	Yes.	Yes.	Yes.

This publication is intended for general information purposes only and does not and is not intended to constitute legal advice. The reader must consult with legal counsel to determine how laws or decisions discussed herein apply to the reader's specific circumstances. For more information, please contact Tara Sciscoe at tara.sciscoe@icemiller.com or 317-236-5888.