







- Administrative Policies & Procedures
- Plan Governance
- Practical Examples

Process Expectations Phone call from IRS to Plan Sponsor Information Document Request (IDR) Plan Document, Employee Handbook, Forms On-site Auditors Involve Key Personnel COO, Legal, Finance, HR, Provider Typical Duration — approximately 9 months, depending on size of employer & responsiveness of key personnel





- Distinguishing an audit from a non-audit inquiry - Ex: Employee Plans Compliance Unit (EPCU)
- Expect multiple IDRs, not just one; can involve negotiation
- It helps to have procedures
- Important role for counsel

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Of	ficial Plan I	Documents & Forms
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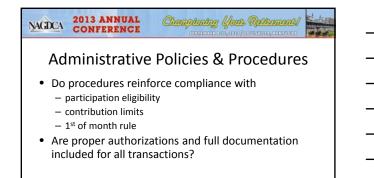


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- Auto Enrollment

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	Official Plan Documents & Forms
•	Plan Forms Do forms include all required information for the event in question? Are forms processed timely – following first of month rule? What is the process to ensure compliance, e.g., with contribution limits?
•	Forms can be hard copy or electronic



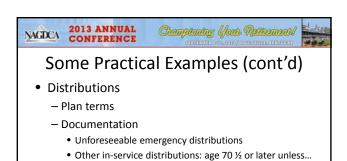


- Plan sponsor vs. Provider Responsibility
 - Responsible party must be clearly identified
 - If provider, plan sponsor approval must be clearly documented

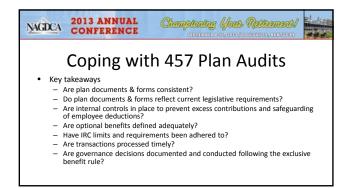
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Plan	Governance
 Auditor will requesting minutes 	lest committee meeting
 Have decisions be Plan Document? 	peen made in compliance with
– Is committee go	vernance process following

exclusive benefit rule?

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Some Practic	al Examples
 Catch-up contributions Election: generally; of special 457(lege 50, or special 457(lege 50) 	pecific catch-up option
Documentation	
Plan terms (fixed or floatin	•
Election (ex: floating NRA) Supporting data (contribute	



• RMDs





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