Non-ERISA 403(b) FOR PUBLIC SCHOOLS

EMPLOYER NAME: Bluffview Montessori School

PART A: RESPONSIBILITIES

The following checklist outlines responsibilities associated with the Plan and the entity obligated to each item. If there is an

item without an assignment of responsibility, such item becomes the duty of the Employer as the sponsor of the plan.

		ТРА	Vendor(s)	Employer	Other (specify)	N/A
	I. PLAN I	FINANCIAL R	EPORTING			
1.	Review and verify accuracy of Spark File or other Data Sharing Information and notify Vendor of errors. (This includes an annual audit to make sure that all amounts and sourcing did get credited to the proper participant in the Plan.)		\boxtimes			
	II. ENROLI	MENT OF PA	RTICIPANTS			
2.	If applicable, provide Employee census information prior to each entry date to determine eligibility			\boxtimes		
3.	Evaluate eligibility to determine who enters the plan on each entry date					
4.	Provide enrollment forms to eligible employee (for deferral elections, investment elections, and beneficiary designations)			\boxtimes		
5.	Provide mandatory notices at enrollment for Universal Availability					
6.	Provide other required notices at enrollment, such as "deemed" control group (owning outside business)			\boxtimes		
7.	Verify deferral percentage for new participants			\boxtimes		
8.	Analyze eligibility service and vesting service to be credited to rehired employees					\boxtimes
9.	If Plan does not provide for full and immediate vesting, determine forfeitures that must be restored for rehired participants					
10.	If certain types of compensation is excluded, evaluate compensation types for participant and ensure that deferrals are being removed from all relevant compensation types (check exclusions, e.g., stipends, coaching bonuses, club sponsorships)					\boxtimes
11.	Confirm that proposed deferrals do not exceed plan defined limits or legal maximums		\boxtimes	\boxtimes		

		ТРА	Vendor(s)	Employer	Other (specify)	N/A
12.	Verify entry and commencement of deferrals for new participants			\boxtimes	Participant	
13.	Provide completed enrollment forms to Vendor (Agent)				Participant	
14.	Maintain copies of deferral and investment elections and all changes made		\boxtimes	\boxtimes	Participant	
15.	Collect and maintain copies of beneficiary designations and changes to same				Participant	
16.	If Plan does not provide for full and immediate vesting, determine initial vesting computation period					\boxtimes
	III. CONTRI	BUTION DET	ERMINATIO	N		
17.	Identify census parameters			\boxtimes		
18.	Provide census information to determine contribution limits, vesting					
19.	If Employees are not immediately eligible, determine employees eligible to participate in each type of contribution allocation				Participant	
20.	Verify type of contributions made (pre-tax deferral, Roth, employer, rollovers, etc.)					
21.	If compensation is excluded, determine includible compensation for participant for each type of contribution, if different					
22.	Determine amount of each type of employer contribution for each participant					\boxtimes
23.	If Plan accepts Employer contributions, determine amount of true-up matching contribution at year end (if any)					\boxtimes
24.	If Plan accepts Employer contributions, verify that matching contributions do not exceed plan defined limits					\boxtimes
25.	If Plan accepts Employer contributions, determine maximum contribution under IRC §415 and verify that contributions do not exceed that limit					\boxtimes
26.	Determine and maintain records of separate accounting for all types of contributions		\boxtimes			

		ТРА	Vendor(s)	Employer	Other (specify)	N/A
	IV. VEST	ING AND FO	RFEITURES			
27.	Determine and maintain records of vesting service					
28.	Determine and maintain records of vested percent					\boxtimes
29.	Determine timing of forfeiture from a participant's account					\boxtimes
30.	Determine use of forfeiture					\boxtimes
31.	Determine amount to be contributed based on use of forfeitures to reduce employer contribution (if applicable)					\boxtimes
	V. 01	THER ALLOCA	TIONS			
32.	Allocate investment gains/losses		\boxtimes			
33.	Allocate contribution			\boxtimes		
	VI. ANNUAL	COMPLIANC	ELIMITATIO	NS		
34.	Prepare annual Universal Availability Notice			\boxtimes		
35.	Deliver annual Universal Availability Notice			\boxtimes		
36.	Monitor statutory limits – Annual 415 limit, Compensation §401(a)(17), Elective Deferrals §402(g), Age 50 Catch-up §414(v), 15 year Catch-up		\boxtimes	\boxtimes	Participant	
37.	Determine if additional plans must be aggregated with this Plan for overall limits				Participant	
	VII. E	LECTIVE DEF	ERRALS			
38.	Process and verify deferral elections each payroll period to ensure proper deferral by participant, including deferral changes			\boxtimes	Participant	
39.	Reconcile deferral changes made between payrolls			\boxtimes	Participant	
40.	Provide annual mandatory notices (Universal Availability, Automatic Enrollment, Other) (if applicable)					
41.	If Universal Availability failed, determine amount to be contributed with lost earnings. Amounts are contributed as earmarked as a QNEC (employer contribution). Amend plan to accept QNECs if necessary					

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		ТРА	Vendor(s)	Employer	Other (specify)	N/A
42.	Ensure deposits of salary deferrals are made to Vendor within required timeframe			\boxtimes		
	VIII. DIST	RIBUTIONS (OF BENEFITS			
43.	Prepare and maintain distribution notices and elections		\boxtimes			
44.	Provide distribution forms to participant, including 402(f) notice for rollover information					
45.	Review distribution forms to see if fully completed and signed by appropriate parties					
46.	Evaluate eligibility to receive a distribution		\boxtimes			
47.	Authorize distributions and other transactions		\boxtimes	\boxtimes		
48.	Confirm vested interest on termination of employment					\boxtimes
49.	Determine amount to be distributed		\boxtimes			
50.	If Plan permits Roth Deferrals, determine basis in Roth Distributions					
51.	If Plan permits Roth Deferrals, determine and maintain beginning date for Roth qualification period					
52.	If Plan permits Roth Deferrals, determine whether Roth distribution is qualified					
53.	Proper Income tax withholding deposit made and IRS reporting on Form 945				Participant	
54.	Form 1099-R provided to participant and IRS		\boxtimes			
55.	Determine cash-out amounts for the year (e.g., accounts for terminated participants with less than \$1,000 value). Only available for Group Annuities or Group Custodial Agreements					\boxtimes
56.	If elected under the Plan, determine amounts to be moved to an automatic IRA rollover (e.g., amounts for terminated participants with \$1,000 to \$5,000 in value)		\boxtimes			
57.	If permitted under the Plan, evaluate eligibility for hardship distribution		\boxtimes			
58.	If permitted under the Plan, notify of ceasing deferrals for 6 months, confirm that deferrals have ceased, solicit new deferral form after 6 months					\boxtimes

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		ТРА	Vendor(s)	Employer	Other (specify)	N/A
59.	Evaluate proposed QDRO to determine if it qualifies as such		\boxtimes	\boxtimes	Employer Attorney	
60.	Communicate to participant/former spouse regarding QDRO receipt (and provide copy of QDRO Policy) and QDRO determination				Employer Attorney	
61.	Segregate account and initiate distribution to Alternate Payee		\boxtimes			
62.	62. Authorize and verify requirements for Exchanges, 403(b) Transfers and Transfers to State DB Plan		\boxtimes	\boxtimes		
	IX. PARTICI	PANT LOAN,	IF AVAILABL	.E		
63.	Provide copy of loan procedure/policies to participants					
64.	Prepare and retain loan documents (e.g., promissory note, etc.) for each participant loan				participant	
65.	Determine maximum amount that may be borrowed					
66.	Provide Loan Request Forms to participants		\boxtimes			
67.	Confirm proper completion of loan application		\boxtimes			
68.	Approve loan		\boxtimes	\boxtimes		
69.	Verify that proper loan payment procedures are in place		\boxtimes			
70.	Determine defaulted and offset loans		\boxtimes			
71.	Prepare Form 1099-R on defaulted loan		\boxtimes			
	X.	MISCELLANI	ous			
72.	Identify participants required to take a Required Minimum Distribution (RMD), including terminated employees, beneficiaries		\boxtimes			
73.	Provide timely notice of RMD requirement		\boxtimes			
74.	Determine minimum distribution amount		\boxtimes		participant	
75.	Annually review of all Vendor documents including distribution forms, custodial agreements, annuity contracts, withholding notices and elections, etc.			\boxtimes		

		ТРА	Vendor(s)	Employer	Other (specify)	N/A	
	XI. PLAN QUALIFICATION						
76.	Prepare Plan document			\boxtimes			
77.	Prepare Amendments, Required and optional			\boxtimes			
78.	Prepare written procedures/policies, where applicable		\boxtimes	\boxtimes			

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PART B: PLAN VENDOR SCHEDULE

This Schedule may be amended from time to time and must be completed and executed by the Employer. Complete multiple pages if necessary.

Please note the following procedures for Transfer/Exchanges:

- The minimum amount for Transfers/Exchanges shall be \$0 (the default shall be \$0).
- Exchanges will be permitted <u>between</u> all Approved Vendors in section I and <u>from</u> Deselected Vendors in section II unless otherwise restricted. Please specify any restrictions here: _____.
- Transfers are permitted at any time unless restricted as follows:

I. LIST OF APPROVED VENDORS

These Vendors are authorized to receive ongoing contributions and incoming Transfers and Exchanges (unless restricted above) from Approved Vendors and Deselected Vendors.

				Funding '	Vehicle
Name of Vendor	Address	Contact Person	Phone and Email	Custodial	Annuity
				Agreement	Contract
Cetera					
Horace Mann (HM Advantage Plan) ???					
,					

II. LIST OF DESELECTED VENDORS

Exchanges will be permitted <u>from</u> section II Vendors <u>to</u> section I Vendors. However, section II Vendors may not receive Exchanges and Transfers and the assets are not available for Participant Loans and Hardship Distributions unless other procedures apply; specify: ______.

				Funding \	Vehicle
Name of Vendor	Address	Contact Person	Phone and Email	Custodial	Annuity
				Agreement	Contract

Employe	er Name:	<u>Bluffview</u>	<u>Montessori</u>	<u>School</u>
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Effective Date of Plan Vendor Schedule: ☐ Immediate; or ☐ on August 22, 2019.

Note: The Plan Vendor Schedule is no longer a part of the 403(b) Plan document. Employers may therefore change the investment providers without completing a new Adoption Agreement.