

LTPT Guidance: At Last!

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Your Presenters Today



Stephen W. Forbes



S. Derrin Watson



Alison J. Cohen



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LTPT Guidance:





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Timeline

- December 2019: Congress passes SECURE Act with LTPT rules
- September 2020: IRS releases Notice 2020-68
 - Q&As on SECURE Act
 - Gave guidance on LTPT vesting (now obsolete)
- January 1, 2021: Service starts to count to determine LTPT status
- December 2022: Congress passes SECURE Act modifying LTPT rules
 - Expands them to include ERISA 403(b) plans





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Timeline Continues

- 2023: Some people qualify as LTPTs, depending on plan
- November 24, 2023: Treasury releases proposed LTPT regulations
 - Proposed effective date January 1, 2024
 - Taxpayers may rely
- January 1, 2024: Many employees will enter 401(k) plans as LTPT Employees
- First day of 2025 plan year:
 - LTPT service requirement drops from 3 years to 2 years
 - LTPT Employees eligible to defer to 403(b) plans





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Summary

- LTPT Employee has 2 or 3 consecutive years with 500-999 HOS/Age 21
- LTPT Employee must be allowed to defer if satisfies plan's Other Conditions
- LTPT Employees and Former LTPT Employees entitled to special vesting rules
- Don't have to make employer contributions for LTPT Employees
- Option to exclude LTPT Employees from testing



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Agenda

- Definitions
- Who is an LTPT Employee?
- How do you avoid having LTPT Employees?
- When does an LTPT Employee become eligible to defer?
- Who is a Former LTPT Employee?
- How does vesting work for LTPT Employees?
- Employer contributions and testing for LTPT Employees
- Testing for LTPT Employees
- Plan amendment considerations
- Questions






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USEFUL DEFINITIONS THAT AREN'T IN THE PROPOSED REGULATIONS





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"LTPT Period"

- 12-month period that counts to determine if an employee is an LTPT Employee
- First LTPT Period begins on hire date (first HOS performed)
- Plan choice on subsequent periods:
 - Can use anniversary of hire date
 - Can switch to plan year
 - If you switch, first two years overlap
- Same pattern as eligibility computation period





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Example

- Calendar year 401(k) plan
- Mark is hired on 12/15/2024
 - Works 50 hours/month
 - First LTPT Period is 12/15/2024 to 12/14/2025
 - 600 HOS
- Plan switches to plan year for subsequent periods
 - Second LTPT Period is 2025 calendar plan year
 - 600 HOS
- Result: "2 year period" becomes tantamount 1 year.



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The Problem With Not Switching LTPT Period ...


- Because LTPT involves tracking more than one consecutive year period, keeping eligibility on employment year means getting employment year hours of service for eligibility purposes for more than the first year
 - Vesting, on the other hand, is usually based on plan years
 - So, this requires getting and collecting hours of service for different computation periods for each potential LTPT
 - Are you requesting that information?
 - Where will you keep that information on your system?






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Question for the Speakers

- Can we choose employment years for LTPT but plan years for regular eligibility purposes?
- Example:
 - Plan requires 1 YOS to enter for most purposes
 - Plan shifts to plan year after first year
 - Plan requires 3 LTPT Periods to enter as LTPT Employee
 - Plan stays with anniversary of hire date








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Lop Off the Early Years

- 401(k): Disregard LTPT Periods starting before 1/1/2021
- 403(b): Disregard LTPT Periods starting before 1/1/2024
- Example:
 - 401(k) plan switches LTPT Periods to calendar plan year
 - Felicity hired 3/1/2020
 - First LTPT Period 3/1/2020 to 2/28/2021: DISREGARDED
 - First LTPT Period that counts: 2021 calendar year
- No break in service exceptions; can't ignore years before plan is effective





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"500 Year"

- LTPT Period with at least 500 HOS (and not more than 999)
- Can count actual HOS or use an approved equivalency method


Method	Hours
Daily	10
Weekly	45
Semi-monthly	95
Monthly	190

- Cannot use elapsed time





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"Normal Requirements"

- Plan's normal age and service requirements for deferrals
 - Example: Age 21/1 YOS
 - Example: 6 months after hire
 - Example:
 - Full time employees enter immediately
 - Part time employees enter after 1 YOS
- Any age/service requirement earlier than LTPT rules is a Normal Requirement





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"Other Conditions" "Excluded Class"

- Proposed Regs say plans don't have to let LTPT Employees defer if they don't satisfy other requirements to participate that are not related to age and service
- We call these requirements "Other Conditions"
 - Employees who don't meet the Other Conditions are in the "Excluded Class"
- Proposed regulations say Other Conditions cannot be "a proxy for imposing an age or service requirement"



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Examples of Other Conditions

Condition	Example
Job classification	Associate attorneys aren't eligible
Hourly/salaried	Hourly employees aren't eligible
Participating employer	Employees of a related employer that has not signed a participation agreement aren't eligible
Reclassified employees	Employees who do not receive a W-2 aren't eligible
Geographic	Only California employees are eligible

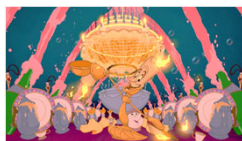


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Be Our Guess Webcast Scoreboard!

- We said that we think IRS will allow plans to exclude LTPT employees based on Other Conditions
 - "Cannot use classification that is a proxy for hours of service, such as seasonal or part-time"
- We nailed it!



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Example: Exclusions

- Law firm maintains a 401(k) plan that excludes associate attorneys and law clerks
 - Most of the associate attorneys are full-time employees
 - All of the law clerks are part-time employees
- The exclusion of the associate attorneys is an Other Condition because it's not a proxy for a service condition
- Is the classification of Law Clerks a proxy for a service condition?
 - Similar issue for interns



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Question for the Speakers

- Plan provides for immediate entry except for part-time, seasonal, temporary employees who have to have 1,000 HOS
- **Are the part-time, seasonal, temporary classifications proxies for a service condition?**



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WHO IS AN LTPT EMPLOYEE?



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LTPT Employee

1. Complete 2 consecutive 500 Years
 - For plan years beginning before 2025, 3 consecutive 500 Years
2. Attain age 21 by second (third) 500 Year
3. Not union employee/nonresident alien (union HOS count)
4. Does not otherwise satisfy Normal Requirements
 - Employee who satisfies Normal Requirements before (or at same time) as LTPT conditions is NEVER an LTPT Employee
 - Employee who satisfies Normal Requirements after becoming LTPT Employee ceases to be LTPT Employee and becomes Former LTPT Employee



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Example: LTPT Employee

- Normal Requirements: 1 YOS/Age 21
- Employee hired 3/1/2020, age 30
- Plan bases subsequent LTPT Periods on calendar plan year
- Eliza has 500 Years in 2021, 2022, and 2023
 - Becomes LTPT Employee on December 31, 2023
- Eliza has only 400 HOS in 2024
 - She stays an LTPT Employee



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Example: Immediate Eligibility (Avoiding the LTPT EE Rules)

- Company X maintains a calendar year 401(k) plan (with discretionary match and profit sharing) with 1 YOS/age 21 eligibility provision
- X amends the plan effective 1/1/24 to provide for immediate eligibility for elective deferrals
 - Will the plan have any LTPT Employees? No.
 - Will the plan need to apply the LTPT Employee vesting rules? No.
 - Can the plan keep 1 YOS/Age 21 for employer contributions? Yes.



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Example: 500 HOS/12 Months

- Company X maintains a calendar year 401(k) plan (with discretionary match and profit sharing) with 1 YOS/age 21 eligibility provision
- X amends the plan effective 1/1/24 to require that an EE complete 500 HOS within an eligibility computation period (12 months) to be eligible for elective deferrals
 - Will the plan have any LTPT EEs? No.
 - Will the plan need to apply the LTPT EE vesting rules? No.



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Be Our Guess Webcast Scoreboard!

- We said:
 - “LTPT Rules Only Apply if the Only Reason a Person Participates is LTPT”
 - “Can avoid LTPT complexities if part-time people come into the plan under the eligibility provisions”
 - “e.g., passage of 12 months since hire”
 - “e.g., 500 hours in eligibility computation period”
 - “But, exclusions from ADP, coverage testing do not apply”
- We nailed it!

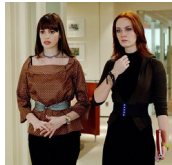


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Example 500 HOS in 6 Months

- Normal Requirements: 500 HOS in 6 months; monthly entry
- Example 1:
 - Emily hired 1/1/2024; 100 HOS/month
 - Enters plan 7/1/2024; never an LTPT Employee
- Example 2:
 - Andrea hired 1/1/2024; 50 HOS/month
 - Never satisfies Normal Requirements
 - LTPT Employee 12/31/2025; eligible to defer 1/1/2026



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Example: Elapsed Time

- Corporation X maintains a calendar year 401(k) plan (with discretionary match and profit sharing)
 - The plan requires that an EE complete a 1-year period of service (elapsed time) and attain age 21 to be eligible to defer
- If a part-time EE becomes eligible under the plan's elapsed time provision, will he/she be a LTPT employee?
 - No. The employee satisfied the Normal Requirements
- Proposed regs say "None of the employees who are eligible to make a cash or deferred election ... are long-term, part-time employees"
- But are they right?



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Question for the Speakers

- With the language in the proposed regulations, can you assume you don't have any LTPT Employees in a plan with elapsed time Normal Requirements, even if you have a strange case?
- Normal Requirements: 1 year elapsed time
- Cathy hired 1/1/24
 - Terminates 5/1/24 with 600 HOS
- Cathy rehired 8/1/25 (after experiencing a 1-year Period of Severance)
 - Has 750 HOS in 2025
- LTPT Employee on 12/31/2025
 - Even though she only has 9 months elapsed time service



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Example: Normal Requirements First

- 401(k) plan allows employees to defer after completion of one year of service or becoming an LTPT Employee
- Rachel was hired in 2024 and completed 900 hours in 2024
- She completed 1100 hours in 2025
 - She enters the plan January 1, 2026, having satisfied the Normal Requirements
- She is not, and will never be, an LTPT Employee, even if she has 500 Years in 2026 and 2027



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Example: Normal Requirements Later

- 401(k) plan with match allows employees to defer after completion of one year of service or becoming an LTPT Employee
- Chandler was hired in 2024 and had 500 Years in 2024 and 2025
 - He enters the plan as an LTPT Employee 1/1/2026
- Chandler has 1200 HOS in 2026
 - He converts to a regular employee as of 1/1/2027
 - Loses status as an LTPT Employee
 - Becomes a Former LTPT Employee



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Example: Age 21

- Joey's birthday 6/5/2005; hire date is 1/1/2024
- Has 500 Years in 2024 and 2025
 - But not LTPT Employee because he is not 21 in 2024
- Only 400 HOS in 2026 (the year Joey turns 21)
 - Not LTPT Employee: wasn't 21 in 2nd 500 Year
- Has 500 Year in 2027
 - Not LTPT Employee: Need two consecutive 500 Years
- Has 500 Year in 2028
 - Now he's an LTPT Employee



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Example: LTPT Employee Prior to 2024

- Frank's date of hire is 1/1/2021; works 50 hours/month
- Employer has 401(k) plan with February 1-January 31 plan year
- Switches to plan year for subsequent LTPT Periods
- First 500 Year is calendar year 2021
- Second 500 Year is plan year ending 1/31/2022 (overlap from 2/1/2021 to 1/31/2022)
- Third 500 Year is plan year ending 1/31/2023
- Frank is eligible to defer 2/1/2023



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Question for the Speakers



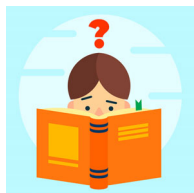
- SECURE Act §112 effective date: Plan years after 2020
- Proposed regulations effective date: Plan years after 2023
- Preamble: "The effect of disregarding 12-month periods beginning before January 1, 2021, is that employees *generally* will not become eligible to participate in a CODA [under the LTPT rules] until plan years beginning on or after January 1, 2024."
- **How do we treat employees who satisfied LTPT requirements before 2024?**



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WHEN DOES AN LTPT EMPLOYEE BECOME ELIGIBLE TO DEFER? DEFERRAL RIGHTS



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LTPT Entry Dates

- An LTPT Employee generally must be eligible to defer on earlier of the first day of the first plan year following the date he or she becomes an LTPT Employee or the date which is 6 months after the date those requirements are satisfied
 - Same as normal entry dates
- Can use semiannual, quarterly, monthly, immediate entry dates






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Question for the Speakers

- Can a plan use different entry dates for LTPT Employees than are used for other Normal Requirements?
 - Example: monthly entry for people who enter under Normal Requirements but dual entry for LTPT Employees?









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Two Conditions for Entry

- LTPT Employee doesn't enter on entry date if:
 - He or she is no longer employed on that date
 - He or she does not satisfy Other Conditions on that date
- However, LTPT Employee retains LTPT Employee status and enters plan immediately on rehire/satisfying Other Conditions





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Deferral Rights

- Plan cannot limit LTPT deferrals outside of conditions permitted in safe harbor plan
 - Can limit to enforce §402(g), §415 limits, etc.
 - Can limit frequency and duration of deferral elections
 - Must have at least 30 days each year to make or change elections
 - Can use reasonable definition of compensation
 - Can require deferrals in whole dollar or percentage amounts

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FORMER LTPT EMPLOYEES

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What's a Former LTPT Employee?

- Was an LTPT Employee and either:
 - Later satisfied the Normal Requirements
 - Will never be an LTPT Employee again
 - Later became part of Excluded Class (e.g., becomes union employee or changes job classification)
 - Will be LTPT Employee when again satisfies Other Conditions
- LTPT vesting rules apply to Former LTPT Employees
 - Other LTPT rules do not

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LTPT VESTING RULES

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LTPT Vesting of Employer Contributions

- Applies to LTPT Employees and to Former LTPT Employees
- 1 year of service for vesting = vesting computation period with at least 500 HOS
 - 401(k): Disregard years beginning before 2021
 - 403(b) Disregard years beginning before 2023
- Break in service for vesting is year with less than 500 HOS
- Can disregard years under normal vesting rules
 - Example: age 18; prior to plan



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LTPT Vesting

- Calendar year 401(k) plan; 6-year graded vesting
- Ellen is hired 1/1/2020
- Ellen isn't an LTPT Employee in 2024 because she doesn't have 3 consecutive 500 Years
- Ellen is eligible to defer in 2025 because she has 2 consecutive 500 Years
- But if she had 1000 HOS in 2024, she would never have been a LTPT Employee and would only have 1 YOS

Year	HOS	Notes
2020	600	Doesn't count; before 2021
2021	600	YOS 1 if become LTPT
2022	500	YOS 2 if become LTPT
2023	400	BIS; under 500 HOS
2024	600	YOS 3 if come LTPT
2025	550	Becomes LTPT; 4 YOS
2026	1000	Becomes Former LTPT: 5 YOS
2027	600	6 YOS

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Change in Excluded Class Status

- Calendar year 401(k) plan; 6-year graded vesting
- Covers Division A; Excludes Division B
- Joe is hired in Division A on 1/1/2024
- Moves to Division B on 1/1/2027
 - Former LTPT Employee those years
 - Not eligible to defer
- Returns to Division A on 1/15/2029
 - Eligible to defer on 1/15/2029

Year	HOS	Notes
2024	600	YOS 1 if become LTPT
2025	500	YOS 2; becomes LTPT
2026	700	YOS 3; Former LTPT
2027	400	BIS
2028	700	YOS 4; resumes LTPT status

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EMPLOYER CONTRIBUTIONS AND TESTING FOR LTPT EMPLOYEES



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Employer Contributions

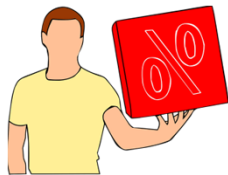
- Don't have to make employer contributions for LTPT Employees
 - Includes safe harbor contributions (but see testing)
 - Includes top heavy minimum contributions (but see testing)
- Can make contributions for them if plan chooses
 - Don't have to be the same as contributions for others
- Exception: SIMPLE 401(k) plan must make SIMPLE employer contributions for LTPT Employees
 - Note: LTPT rules do not apply to SIMPLE IRAs



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Nondiscrimination and Coverage Testing

- Plan can exclude ALL LTPT Employees (not former!) from:
 - ADP test; ADP safe harbor contributions
 - ACP test; ACP safe harbor contributions
 - Coverage test
 - §401(a)(4) nondiscrimination test
 - Minimum gateway contributions
 - Average benefit percentage test



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All or Nothing

- A plan cannot pick and choose to count some LTPT Employees and not others
- A plan cannot pick and choose to count LTPT Employees for some of these requirements and not others
- If LTPT employees are excluded from ADP or ACP safe harbor contributions, the plan document must specify that fact



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Testing Examples

- Example 1:
 - An ADP-tested 401(k) plan has 5 LTPT Employees, all NHCEs
 - In 2026, none of them defers
 - The plan elects to disregard LTPT Employees for nondiscrimination testing
 - The NHCE ADP is not hurt by the failure of the LTPT Employees to defer
- Example 2:
 - Same facts except plan elects to count the LTPT Employees
 - The plan has 5 other NHCEs
 - NHCE ADP cut in half



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One More Testing Example

- Example 3:
 - Same facts except one of the LTPT Employees elects to defer 25% of comp
 - Employer wants to count that employee and disregard the others
 - Not an option



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Separate Election for Top-Heavy

- Separate election whether to include LTPT Employees to determine if the plan satisfies the top-heavy minimum contribution and vesting requirements of Code §416(c) and (d)
 - If you exclude them from top-heavy contributions, document must say so
- Regardless of election, accounts of LTPT Employees count to determine if plan is top-heavy
 - So, if LTPT Employee defers, it counts in TH fraction



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Top-Heavy Safe Harbor Exemption

- If:
 - Plan elects to exclude LTPT Employees from nondiscrimination, AND
 - Plan elects to exclude LTPT Employees from top-heavy
- Then plan does not lose top-heavy exemption simply because LTPT Employees don't get safe harbor contribution
- **Warning:** If any other OEE NHCE excluded from safe harbor contributions, plan loses top-heavy exemption [Rev. Rul. 2004-13]



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Be Our Guess Webcast Scoreboard!

- We said that we that LTPT Employees:
 - Get no employer contributions
 - Not in ADP/ACP/Coverage testing
 - Not eligible for TH minimum benefits
- **Generally right, but IRS answer is more nuanced**



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Roth

- Plan can allow LTPT Employees to make Roth deferrals
- If plan excludes LTPT Employees from nondiscrimination testing, can provide that LTPT Employees can't make Roth deferrals even if other employees can
 - Otherwise subject to benefits, rights, and features test



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Catch-Up

- Plan can allow eligible LTPT Employees to make catch-up deferrals
- If plan excludes LTPT Employees from nondiscrimination testing, can provide that LTPT Employees can't make catch-up contributions even if other employees can
 - Requirement for "universal availability" for catch-up contributions does not apply to LTPTs per preamble – included in exclusion from nondiscrimination testing

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Question for the Speakers

- Automatic enrollment is not discussed in the proposed regulations
- If the plan provides for automatic enrollment for other employees, must it apply to LTPT Employees (before mandatory provisions in 2025)?



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Example: Exclusions

- Forbes Family Dentistry (FFD) maintains a calendar year 401(k) plan
 - Eligibility requirements: 1 YOS/Age 21
 - Semi-annual entry dates: 1/1 and 7/1
 - Matching and Profit Sharing contributions
 - Top heavy
- Ann, a dental assistant, has worked part-time (600-800 HOS/year) for FFD since 2018
 - Because of the plan's eligibility requirements, she has never participated in the plan
 - LTPT Employee as of 12/31/2023; enters plan on 1/1/2024



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Tell Me More About Ann

- Can we keep Ann from participating by excluding part-time employees?
 - No; proxy for service condition
- Do we need to give her match, PS, top-heavy?
 - No
- Will she be included in coverage/ADP/ACP/401(a)(4)
 - Not if we elect to exclude LTPT Employees
- Does her account count in determining if plan is top-heavy?
 - Yes
- Does she get TH minimum contribution?
 - No



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PLAN AMENDMENT CONSIDERATIONS



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Amendment Deadline

- Amendment deadline for SECURE Act and SECURE 2.0 is last day of 2025 plan year, unless IRS extends it
 - Two extra years for governmental and union plans
- Must operate in compliance before then
 - Plan amendment must reflect operational choices
- According to preamble, extended deadline includes amendment to Normal Requirements to avoid the LTPT rule
 - Example: Plan changes from 1 YOS to immediate eligibility



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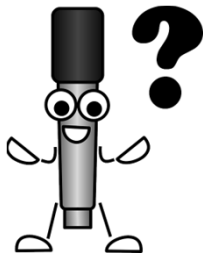
Question for the Speakers

- SECURE 2.0 §501 also provides anti-cutback relief for timely SECURE Act/SECURE 2.0 amendments
- If you want to exclude LTPT Employees from top-heavy or safe harbor in 2024, must it be in document before January 1, 2024?



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YOUR QUESTIONS



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