

**MEMO# 31364**

August 30, 2018

# IRS Extends Deadline for Pre-approved DC Plan Opinion Letter Applications

[31364]

August 30, 2018 TO: ICI Members

Pension Committee

Pension Operations Advisory Committee SUBJECTS: Pension RE: IRS Extends Deadline for Pre-approved DC Plan Opinion Letter Applications

The IRS has issued Revenue Procedure 2018-42,<sup>[1]</sup> extending the deadline for submitting on-cycle applications for opinion letters for pre-approved defined contribution (DC) plans for the third six-year remedial amendment cycle.<sup>[2]</sup> The previous deadline announced under Revenue Procedure 2017-41 was October 1, 2018.<sup>[3]</sup> The new extended deadline is December 31, 2018.

Elena Barone Chism

Associate General Counsel - Retirement Policy

## endnotes

<sup>[1]</sup> Rev. Proc. 2018-42 is available here: <https://www.irs.gov/pub/irs-drop/rp-18-42.pdf>.

<sup>[2]</sup> Under Rev. Proc. 2016-37, the third six-year remedial amendment cycle for pre-approved DC plans began on February 1, 2017, and ends on January 31, 2023. See ICI Memorandum No. 30015, dated July 6, 2016. Available at [https://www.ici.org/my\\_ici/memorandum/memo30015](https://www.ici.org/my_ici/memorandum/memo30015).

<sup>[3]</sup> See ICI Memorandum No. 30768, dated July 7, 2017. Available at [https://www.ici.org/my\\_ici/memorandum/memo30768](https://www.ici.org/my_ici/memorandum/memo30768). Rev. Proc. 2017-41 combined the master and prototype and volume submitter programs into one opinion letter program and modified the on-cycle submission period for pre-approved defined contribution plan providers to submit applications for opinion letters for the third six-year remedial amendment cycle to begin on October 2, 2017, and end on October 1, 2018.

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