

**MEMO# 32011**

October 16, 2019

# IRS and Treasury Release 2019-2020 Priority Guidance Plan

[32011]

October 16, 2019 TO: ICI Members  
Pension Committee

Pension Operations Advisory Committee SUBJECTS: Pension RE: IRS and Treasury Release  
2019-2020 Priority Guidance Plan

The IRS and Treasury Department have released their 2019-2020 Priority Guidance Plan listing their priorities for tax regulations and other administrative guidance through June 2020.[\[1\]](#) The plan includes several projects that relate to retirement savings, including:

- Guidance relating to certain IRS, Tax Exempt and Government Entities, Employee Plans programs, including the Pre-approved Plan Program, the Determination Letter Program, and the Employee Plans Compliance Resolution System (EPCRS).
- Regulations under §§219, 408, 408A, and 4973 regarding IRAs.[\[2\]](#)
- Regulations under §401(a)(9) updating life expectancy and distribution period tables for purposes of the required minimum distribution rules and addressing certain other issues under §401(a)(9).
- Guidance on student loan payments and qualified retirement plans and §403(b) plans.
- Guidance on missing participants, including guidance on uncashed checks.[\[3\]](#)
- Guidance on the timing of amendments to §403(b) plans.[\[4\]](#)
- Guidance updating rules for service credit and vesting under §411.
- Regulations and related guidance on the unified plan rule for §413(c) multiple employer plans.[\[5\]](#)
- Regulations on the definition of governmental plan under §414(d).
- Guidance regarding the aggregation rules under §414(m).
- Regulations relating to the reporting requirements under §6057.

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**endnotes**

[1] The 2019-2020 Priority Guidance Plan is available here: [https://www.irs.gov/pub/irs-utl/2019-2020\\_pgp\\_initial.pdf](https://www.irs.gov/pub/irs-utl/2019-2020_pgp_initial.pdf). For a description of the Institute's retirement savings recommendations for the 2019-2020 guidance plan, see ICI Memorandum No. 31795, dated June 10, 2019, available here: [https://www.ici.org/my\\_ici/memorandum/memo31795](https://www.ici.org/my_ici/memorandum/memo31795).

[2] Section references are to the Internal Revenue Code.

[3] Guidance on uncashed checks was published in Rev. Rul. 2019-19. See ICI Memorandum No. 31912, dated August 20, 2019, available here: [https://www.ici.org/my\\_ici/memorandum/memo31912](https://www.ici.org/my_ici/memorandum/memo31912)

[4] This guidance was published in Rev. Proc. 2019-39, available here: <https://www.irs.gov/pub/irs-drop/rp-19-39.pdf>.

[5] Proposed regulations modifying the unified plan rule were published in July 2019. See ICI Memorandum No. 31843, dated July 9, 2019, available here: [https://www.ici.org/my\\_ici/memorandum/memo31843](https://www.ici.org/my_ici/memorandum/memo31843). For the Institute's comment letter on the proposal, see ICI Memorandum No. 31990, dated October 1, 2019, available here: [https://www.ici.org/my\\_ici/memorandum/memo31990](https://www.ici.org/my_ici/memorandum/memo31990).

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