

**MEMO# 1511**

November 2, 1989

## **IRS EXTENSION OF CUT-OFF DATE FOR ADOPTING MODEL CODA AMENDMENT**

November 2, 1989 TO: PENSION MEMBERS NO. 49-89 RE: IRS EXTENSION OF CUT-OFF DATE  
FOR ADOPTING MODEL CODA AMENDMENT

Earlier this year, the IRS announced that it would discontinue the model amendment published in Notice 87-34 for use by sponsors of master or prototype profit-sharing plans to incorporate a cash or deferred arrangement (CODA) under section 401(k) of the Code. (See Institute Memorandum to Pension Members No. 28-89, dated June 8, 1989.) Notice 89-68 provided that the IRS would not accept applications for opinion letters with respect to the model CODA after October 31, 1989. Attached is a copy of IRS Announcement 89-139, which states that the cut-off date for such applications has been extended to March 31, 1990 in order to conform with the extended deadline for submission of master or prototype plan amendments under Revenue Procedure 89-9. (See Institute Memorandum to Pension Members No. 45-89, dated October 3, 1989.) We will keep you informed of further developments. Kathy D. Ireland Associate General Counsel Attachment

---

Copyright © by the Investment Company Institute. All rights reserved. Information may be abridged and therefore incomplete. Communications from the Institute do not constitute, and should not be considered a substitute for, legal advice.