



# 2017 Concordia Retirement Savings Plan Administrative Guide

For Employers enrolled in the CRSP



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# What is the Concordia Retirement Savings Plan?

The Concordia Retirement Savings Plan (CRSP) is a 403(b)(9) retirement savings plan. A 403(b) plan works much like a 401(k) plan in the corporate world but is designed for individuals who work for certain not-for-profit organizations. The CRSP is a “church plan” as described in Section 414(e) of the Internal Revenue Code.

The CRSP is a savings vehicle that allows workers to plan and save for their retirement and have additional income to supplement their Concordia Retirement Plan benefits and other retirement income. The CRSP offers both pre-tax savings and after-tax Roth savings options.

There are many advantages to saving in the CRSP including:

- **Flexibility:** Workers can save on a pre-tax basis, which lowers taxable income now, so the money they contribute will not be subject to tax until withdrawn from the Plan (It is also exempt from SECA taxes for ministers of religion), or workers can save on an after-tax basis with the Roth Option. When the worker is ready to take a qualifying distribution in retirement, these Roth contributions and any earnings can be distributed penalty and tax free.
- **Immediate Vesting:** Workers are immediately 100% vested in the money they contribute, including any funds rolled over into the CRSP and investment gains on those amounts. In most cases, applicable CRSP Employer Contributions are also 100% vested.
- **Investment Assistance:** Workers can utilize the ProManage PROgram™, an optional allocation program that will determine a diversified investment portfolio based on a worker’s individual data. Enrollment in ProManage is automatic; however, workers can opt out of the program if they prefer to make their own investment selections or work with a financial advisor.
- **Financial Planning Resources:** Planning tools and educational materials are easily accessible through Fidelity. Workers can use tools online, over the phone, or for more complex situations, in person at one of Fidelity’s Investor Centers.

## Fidelity as Administrator

Fidelity Investments was selected as our service provider because of the knowledge and resources it has dedicated to serving church plans.

Fidelity is one of the world’s largest providers of financial services offering investment management, retirement planning, and other financial products to more than 20 million individuals and institutions. Fidelity is the number one provider of workplace retirement savings plans.

## CRSP Contribution Rates

All LCMS employers can adopt the CRSP for no additional charge.

Your workers will pay an administrative fee based on their CRSP account balance and enrollment in the Concordia Retirement Plan (see page 12 for more information).



### About This Guide

This administrative guide is designed solely for the Concordia Retirement Savings Plan (CRSP).

The information and benefits presented in this guide reflect the benefits, plan provisions, and administrative guidelines in effect as of January 1, 2017.

If you are an employer offering the CRSP as the only 403(b) retirement savings plan for your workers, Concordia Plan Services will provide a written plan document and assume many of the administrative and compliance responsibilities. However, employers do have some administrative responsibilities. This booklet is designed to provide information to assist you in properly administering our plan.

If you are offering other 403(b) plan vendors in addition to CRSP, please see page 13 for additional administrative responsibilities.

# Steps Before You Can Begin Remitting Contributions

EBSO is our contribution consolidator for the CRSP. All employers must use EBSO (formerly SOMI) to remit contributions to the CRSP.

## ACH Form

All employers must first complete an Automated Clearing House Funding Authorization Form (ACH form). The ACH form gives EBSO permission to withdraw the funds from your organization's bank account. Please complete the form and return it, along with a voided check, to EBSO for processing. The ACH form is available on our website: [ConcordiaPlans.org/Forms](http://ConcordiaPlans.org/Forms).

Send the ACH form and voided check to:

EBSO Inc.  
Attn: Concordia Retirement Savings Plan  
2145 Ford Parkway Suite 200  
St. Paul, MN 55116

Or fax the information to EBSO at: 877-373-4889. If you have any questions, please contact EBSO at 800-486-7664 ext 2556.

To be eligible to offer the Concordia Retirement Savings Plan to your workers, your organization must have adopted the Plan.

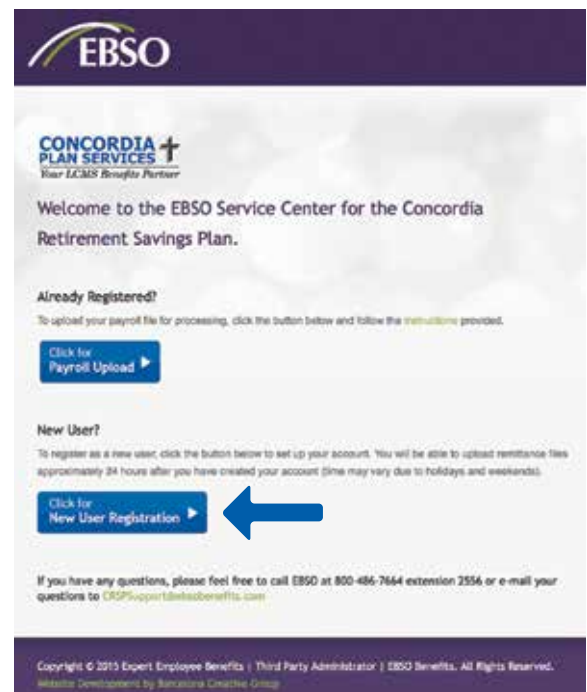
To adopt the Concordia Retirement Savings Plan, contact Concordia Plan Services at 888-927-7526 and ask to speak with an Employer Resources Team Member.

## EBSO Online Service Center

The preferred method for contribution remittance is the EBSO Online Service Center. The EBSO Online Service Center allows employers to upload their remittance file each pay period through a safe, secure environment. You will need to register online with the EBSO Service Center by visiting their website: [ebsobenefits.com/CRSP](http://ebsobenefits.com/CRSP).

To create an account, click on the "New User Registration" button. You will set up your user profile by creating a username and password. You will need to provide information about the organization that you represent, including your five-digit employer number with Concordia Plans.

**Note: Your password cannot contain any of the following symbols: @ # ? : / \**



An employer can have more than one representative with an EBSO Service Center account at a time; however, each of these accounts is considered a unique user. Even if they are associated with the same employer, a user will not be able to view/access files uploaded by another user.

After you have created an account, there will be a 24-hour waiting period\* before you can log in to the EBSO Service Center. During this waiting period Concordia Plan Services will verify your information and EBSO will create your account. You should receive a confirmation e-mail when you can access your account.

*\*The length of the waiting period may vary due to holidays or weekends.*

If you are an existing user and have already created an account with the EBSO Service Center, you will click the "Payroll Upload" button on the Service Center homepage. You will be asked to log in by entering your username and password.

From there, follow the detailed instructions on how to upload a contribution remittance file by clicking the "Instructions" link.

## EBSO Automatic Contribution Remittance Election Form

The EBSO Automatic Contribution Remittance Election Form is a remittance method designed for employers whose workers rarely change their salary deferral amount. Using the Automatic Contribution Remittance Election Form will instruct EBSO to process the same dollar amount based on the payroll cycle that is indicated on the form. EBSO will continue to process the amount each pay period as indicated, until you notify them otherwise by completing a new form. EBSO will process the indicated contributions from your organizations' bank account via ACH.

If remitting contributions to the EBSO Online Service Center by uploading a remittance file each pay period or using the Automatic Remittance method is not a good fit for your organization, please contact a CRSP Representative at **CRSP@ConcordiaPlans.org** or by calling 888-927-7526 extension 6008 to explore different options.

Worker contributions, any CRSP Employer Contributions, and loan repayments\* should be remitted each pay period. You will begin remitting contributions after the first payroll is processed with salary deferrals withheld from the worker's paycheck. No funds can be withheld prior to the worker's initial eligibility date.

Contributions must be remitted no later than 20 business days following the month in which they would otherwise be paid to the member.

*\*Payments for any loan established on July 1, 2015 or later will be made by the member directly to Fidelity. Loans established prior to July 1, 2015 will continue to be repaid through payroll deduction.*

## Partner with Paychex

If your organization processes payroll through Paychex, you have the opportunity to have Paychex remit CRSP contributions on your behalf. To get set up with Paychex as your payroll administrator or to have Paychex remit your CRSP Contributions, visit our website at **ConcordiaPlans.org/Paychex**.

## Contact Information

Below is the contact information for EBSO. Your employer number for EBSO is the same employer number used by Concordia Plan Services. This number should be included on all correspondence.

### EBSO Online Service Center

Attn: Concordia Retirement  
Savings Plan  
2145 Ford Parkway, Suite 200  
St. Paul, MN 55116  
CRSPSupport@EBSOBenefits.com  
Phone: 800-486-7664 ext 2556

### EBSO Remittance Form

Attn: Concordia Retirement  
Savings Plan  
2145 Ford Parkway, Suite 200  
St. Paul, MN 55116  
LCMS@EBSOBenefits.com  
Phone: 651-695-2590  
Fax: 651-695-2690

Note: Do not mail forms that have already been faxed.

### ACH Form

Attn: Concordia Retirement  
Savings Plan  
2145 Ford Parkway, Suite 200  
St. Paul, MN 55116  
Fax: 877-373-4889



## Steps Your Workers Must Take to Participate in the CRSP

To begin remitting a worker's contributions you will need to:

- Make sure that the worker's standard enrollment form has been submitted to Concordia Plan Services, and
- Confirm a Salary Deferral Agreement has been completed by the worker and submitted to the payroll manager, congregational treasurer, or other designated payroll representative.

Your workers can access their CRSP account information with Fidelity by going to **myCPS.org** and accessing their account through the link located with CRSP benefit information. Workers and other plan members can also go directly to Fidelity's website (**NetBenefits.com/atwork**).

**A worker must have taxable income in order to make contributions to the CRSP.**

## Worker Election Forms

### Salary Deferral Agreement

Before you can begin withholding CRSP contributions from your workers' paychecks, you will need to have each worker complete a Salary Deferral Agreement. This agreement gives you permission to withhold and remit funds from the worker's paycheck to the CRSP. You should retain completed Salary Deferral Agreements in your records. Neither Concordia Plan Services nor Fidelity will need a copy of the Salary Deferral Agreement, unless catch-up contributions are being made.

Workers can start, adjust or stop contributions at any time by simply completing a new Salary Deferral Agreement. There are no restrictions on the number of times workers can change their salary deferral amount. The Salary Deferral Agreement is available on our website: **ConcordiaPlans.org/Forms**

Salary Deferral Agreements are effective the month following receipt of the form, or as soon as administratively possible thereafter. Receipt of a new properly completed form nullifies any previous forms submitted by the worker.

If a worker wants to make Age 50 Catch-up contributions, this will be indicated on the Salary Deferral Agreement. See page 8 for more information.

### CRSP Application for Service Catch-up

If a worker is contributing Service Catch-up contributions (see page 7 for more information) he/she will need to complete a CRSP Application for Service Catch-up Contributions form. Concordia Plan Services will need a copy of this form along with a copy of the worker's completed Salary Deferral Agreement.

The CRSP Application for Service Catch-up Contributions form is effective the month following receipt of the form, or as soon as administratively possible thereafter. Receipt of a new properly completed form nullifies any previously submitted form.

**Service Catch-up contributions and Age 50 Catch-up contributions are an annual election and must be renewed each year. If you have not obtained a new form for the new year from your worker, then you should only deduct his/her regular elective contributions.**

# Worker Eligibility

A worker is eligible to participate in the CRSP if he/she is considered a full-time worker, eligible to participate in other Concordia Plans, and employed by an employer that has adopted the CRSP.

A new worker is enrolled and becomes eligible for the CRSP on the first day of the month following the date of full-time employment.\* If you have a probationary period for newly employed workers, a worker's enrollment in the CRSP is delayed until the completion of the probationary period (see sidebar for an exception). In this case, the worker would be an eligible worker on the first day of the month immediately following the date his/her probationary period ended (no more than 60 days from the date of employment). A worker who is satisfying an Eligibility Waiting Period for the Account Option of the Concordia Retirement Plan is eligible to contribute to the CRSP. The first paycheck that funds should be withheld from is the first check in which all wages were earned on and after the worker's eligibility date.

**\*Contributions may not be withheld from compensation earned prior to the worker's eligibility date.**

Once a worker has satisfied all eligibility requirements and completed a Salary Deferral Agreement, the worker may begin participating in the CRSP.

If elected by the employer, part-time workers are also eligible to participate in the CRSP. To adopt the CRSP for part-time workers, contact an Employer Resources Team Member at 888-927-7526.

Dependents are not eligible to contribute to the CRSP. Only money withheld directly from a worker's paycheck can be contributed to the CRSP. If a husband and wife both work for the same employer, they must be enrolled individually.

# Remitting Contributions

Worker contributions are to be remitted after each pay period. IRS regulations state that contributions must be deposited into the individual's account "within a period that is not longer than is reasonable for the proper administration of the Plan." The CRSP plan document states that it is the employer's obligation to remit such contributions "not later than the 20th business day after the end of the month in which the amount would have otherwise been paid to the Members."

**Failure to deposit such contributions within this time frame could result in penalties or other negative action from the IRS for both the CRSP and the employer.**

**Example: Money withheld in the month of June must be transmitted to EBSO by the 20th business day of July.**

If you have chosen to make employer contributions to the CRSP, these employer contributions should be remitted to EBSO at the same time and in the same manner as your workers' contributions.

**The IRS stipulates that a worker cannot defer more than his/her taxable salary, even if the worker receives other forms of compensation.**

## Non-Qualified Church-Controlled Organizations

Employers participating in the CRSP that are considered Non-Qualified Church-Controlled Organizations by the IRS (i.e., generally universities, colleges, and most social service organizations) are required to comply with 403(b) Universal Availability requirements.

This means:

- Your organization may not apply a probationary period to delay the enrollment of any eligible worker in the CRSP or the other Concordia Plans.
- Annual notices about the availability of a 403(b) plan must be sent to your eligible workers. Concordia Plan Services will handle this requirement for your organization for your full-time workers.

The IRS rules for Non-Qualified Church-Controlled Organizations state that part-time workers are those who work less than 1,000 hours per year – or less than 20 hours per week. Failure to comply with the above IRS regulations may result in an operational failure with tax consequences.

Remember: a part-time worker at a Non-Qualified Church-Controlled Organization who works 1,000 hours or more per year may be required to be enrolled in the CRP and CDSP.

## CRSP Contribution File Formatting Requirements

EBSO has specific requirements for formatting your spreadsheet when electronically submitting your CRSP contributions. This format must be followed exactly for contributions to be properly processed. The columns of the spreadsheet must include:

- A: Record Number  
(or row number)
- B: Participant's SSN  
(no dashes)
- C: Participant's Name
- D: Payroll date (YYYYMMDD)
- E: Blank Column
- F: Pre-Tax Worker Contributions
- G: Employer Contributions
- H: Loan Payments
- I: After-Tax Worker Contributions
- J: Other Contributions

### Remember:

- Enter a zero in any column that does not apply to the worker
- Do not add headers or footers to the spreadsheet
- Do not use a duplicate payroll date

For detailed instructions, please see the File Formatting Requirements flyer on our website in the CRSP Plan Administration section.

## Employers Using the EBSO Online Service Center

After you have completed the enrollment process with EBSO, you will remit your contributions by clicking the "Payroll Upload" button on the EBSO Service Center homepage. You will be asked to log in by entering your username and password. From there, follow the detailed information on how to upload a contribution remittance. The instructions can be found on the pre-log in page by clicking the "Instructions" link.

Employers are required to have their contribution files formatted in a specific way. Please see the CRSP Contribution File Formatting Requirements flyer, available on our website. Contributions must be in this **exact** format in order to be properly processed by EBSO.

Contact EBSO at [CRSPSupport@EBSObenefits.com](mailto:CRSPSupport@EBSObenefits.com) or 800-486-7664 ext 2556 if you have questions.

## Employers Using the EBSO Automatic Contribution Remittance Form

Employers can also choose to complete the CRSP 403(b) Automatic Contribution Remittance Election Form to have contributions automatically withdrawn each pay period from your organization's checking account. A new form will need to be completed only if you need to make any changes.

The CRSP 403(b) Automatic Contribution Remittance Election Form can be faxed, e-mailed, or mailed to EBSO in accordance with the directions on the bottom of the form. You should retain a copy for your records.

Do not send a check. EBSO will return the check to you, which will delay the deposit of your workers' contributions. EBSO will process the remittance form and withdraw the funds from your bank via ACH. Forms received at EBSO by 3:00 p.m. (Central Time) will be processed the next business day, or on the indicated payroll date.

## Paychex

Employers who have their payroll processing services through Paychex can have their worker deferral data and employer contribution data automatically remitted to EBSO by Paychex. EBSO will process the data and withdraw the funds from your bank via ACH. For more information, visit [ConcordiaPlans.org/Paychex](https://ConcordiaPlans.org/Paychex).



# Order of Payroll Deductions

Below is a suggested order of payroll deductions. This suggested order should be used for workers who are participating in the CRSP. Each employer should check with a tax attorney and/or applicable state government to find out if the state's requirements differ from those listed below.

## Suggested Order for Processing Deductions from a Rostered Worker's Gross Pay

**Step 1** Calculate the rostered worker's gross pay (including housing allowance)

**Step 2** Deduct the following from the rostered worker's gross pay (in the order listed below):

- CRSP pre-tax and/or any other pre-tax 403(b) contributions
- Pre-tax Concordia Health Plan contributions
- Section 125 flex contributions (flexible spending accounts)
- Section 125 contributions to a Health Savings Account

**Step 3** SECA taxes are based on the resulting balance after Step 2

**Step 4** Deduct housing allowance

**Step 5** Calculate and deduct any voluntary federal and state withholding based on the resulting balance through Step 4

**Step 6** Deduct any other after-tax voluntary deductions, CRSP Roth contributions and CRSP loan repayments

**Step 7** After following the above directions, the resulting amount is the rostered worker's net pay

## Suggested Order for Processing Deductions from a Lay Worker's Gross Pay

**Step 1** Calculate the lay worker's gross pay

**Step 2** Deduct the following from the lay worker's gross pay (in the order listed below):

- Pre-tax Concordia Health Plan contributions
- Section 125 flex contributions (flexible spending accounts)
- Section 125 contributions to a Health Savings Account

**Step 3** Calculate FICA taxes on the resulting total from Step 2

**Step 4** Deduct CRSP pre-tax and/or other 403(b) pre-tax contributions

**Step 5** Calculate and deduct required federal and state withholding based on the resulting balance through Step 4

**Step 6** Deduct any other after-tax voluntary deductions, CRSP Roth contributions, and CRSP loan repayments

**Step 7** After following the above directions, the resulting amount is the lay worker's net pay



### Visit Our Website!

The Concordia Plan Services website, [ConcordiaPlans.org](https://www.concordiaplans.org), contains valuable information about the CRSP and financial planning. You will also find the most up-to-date forms for administering the CRSP.

Our website includes:

- The CRSP Official Plan Document
- Financial Planning Worksheets
- Retirement Planning Tools
- Salary Deferral Agreement
- Investment Fund Lineup and Performance



### Normal 403(b) Contributions Limit

The regular deferral limit for 403(b) contributions is established each year by the IRS. For 2017, the limit is \$18,000 or 100% of includable compensation, whichever is less.

Note: Housing and other non-taxable allowances should not be included when calculating maximum annual contributions.

# Catch-up Contributions

A worker may be eligible to contribute additional funds to his/her CRSP account by making catch-up contributions. A worker must first satisfy the annual regular deferral contribution limit set forth by the IRS before being eligible to make catch-up contributions. Catch-up contributions need to be elected each year that a worker makes them. Concordia Plan Services will need a copy of the form requesting catch-up contributions to be made.

## Age 50 Catch-up Contributions

If a worker is age 50 or older during the calendar year, the worker is eligible to make an additional catch-up contribution for the year. In 2017, the Age 50 Catch-up Contribution limit is \$6,000. This Age 50 Catch-up Contribution limit is established by federal law and is subject to change. To make Age 50 Catch-up contributions, a worker needs to complete the applicable section of a Salary Deferral Agreement.

## Service Catch-up Contributions

Beginning on January 1, 2016, the CRSP began to phase out Service Catch-up Contributions, which were available to workers with 15 or more years of LCMS service. Any worker who made Service Catch-up Contributions prior to December 31, 2015 may elect to continue making them, up to the lifetime maximum. However, no new workers will be eligible to make Service Catch-up Contributions.

If a worker qualifies for 2017, he/she may be eligible to contribute up to the least of the following amounts:

- \$3,000;
- \$15,000 lifetime maximum for Special Election contributions minus all prior Service Catch-up contributions; or
- \$5,000 multiplied by his/her years of service with all LCMS employers, minus all prior elective deferrals for the worker in prior years.

As the employer, you should review the CRSP Application for Service Catch-up Contributions to determine if the worker has made Service Catch-up contributions with another provider. Those contributions are also subject to the lifetime maximum limit. Once a worker reaches the \$15,000 lifetime limit for Service Catch-up contributions, no further Service Catch-up contributions can be made.

**Note: If a worker is eligible for both the annual Service Catch-up and the Age 50 Catch-up contributions, the worker must first satisfy the Service Catch-up contribution limit before he/she can contribute Age 50 Catch-up funds.**

# CRSP Employer Contributions

As an employer, you also have the option of making contributions to your workers' accounts. You can offer:

- **Matching contributions**—For workers to receive this type of contribution, they must contribute their own money to the CRSP. Matching contributions are often represented as a percentage of worker contributions up to a certain maximum (as defined by the employer, e.g., 50% matching contributions, up to 3% of compensation). This approach encourages workers to play an active role in saving for their retirement. You will only be making contributions to a worker's account if the worker is participating.
- **Non-elective contributions**—Workers do not need to contribute their own money to receive this type of employer contribution. An employer can set a contribution rate, either a percentage of pay (e.g., 3% of annual pay) or a flat dollar amount (e.g., \$45 biweekly), to contribute to a worker's CRSP account. This approach makes estimating employer costs very straightforward. Every worker must be treated equally and receive employer contributions even if the worker is not deferring his/her own compensation.
- **A combination of matching and non-elective contributions**—Although administration may be more complex, this combination approach provides a certain benefit to all workers and also encourages workers to save their own money for retirement.

To elect to offer a CRSP Employer Contributions to your workers, you need to complete an Employer Contributions Election form and return it to Concordia Plan Services. Your CRSP Employer Contributions are remitted in the same manner as your workers' deferrals. In general, the Employer Contributions election can be changed once per calendar year.

While employers are not obligated to make employer contributions, if employer contributions are made to the CRSP such contributions should be allocated to all eligible workers.

## Beneficiary Designation

Workers will need to designate a beneficiary for their CRSP account directly with Fidelity. They can do this on Fidelity's website at [NetBenefits.com/atwork](https://www.fidelity.com/NetBenefits.com/atwork) or they can call 800-343-0860 and request a paper copy of the Beneficiary Designation Form. Workers can update their beneficiary designation at any time. Please remind your workers to keep an up-to-date beneficiary designation for the CRSP.

CRSP beneficiary information did not transfer from MetLife to Fidelity in 2015.

In the event of a worker's death, if no beneficiary designation is on file with Fidelity, the account will be distributed on the basis of the CRSP provisions.

### PLEASE NOTE:

The Beneficiary Designation Form for the Concordia Disability and Survivor Plan (CDSP) applies to CDSP and Accident Insurance Program benefits only. A separate CRSP Beneficiary Designation Form must be completed. Fidelity keeps beneficiary information for the CRSP.

Concordia Plan Services does not need a copy of the CRSP Beneficiary Designation Form.

# Other Important Information

## Loans

Only active workers may take a loan against their CRSP account. If a worker is interested in applying for a loan, please have him/her contact Fidelity at 800-343-0860 for information. In compliance with IRS 403(b) regulations, the CRSP loan application includes questions regarding current and previous 403(b) loans and requires identification of all current 403(b) account balances. A worker may have only one CRSP loan outstanding at a time.

Payments for new loans granted after July 1, 2015 will be made directly to Fidelity by the worker.

Any loan that was processed prior to July 1, 2015 will continue to be repaid through the employer by payroll deduction and remitted to EBSO. A loan repayment must be made each pay period. Loan payments are withheld through payroll deduction on an after-tax basis. A worker can continue to contribute to his/her CRSP account while repaying a CRSP loan.

Newly hired workers should inform you if they have an outstanding loan balance so that arrangements can be made to remit loan payments. If a worker is on disability, in the process of transferring, or on a leave of absence, he/she will need to make loan payments directly to Fidelity and should contact Fidelity directly at 800-343-0860 to make arrangements. Not doing so can create tax issues for the worker.

The minimum loan amount is \$1,000.

The maximum loan amount is the lesser of:

- \$50,000 reduced by the highest outstanding balance of the worker's 403(b) plan loans during the one-year period ending on the day before the loan is made, if any, or
- one half of the worker's total account balance.

**There are no additional costs to the employer when a worker is granted a loan. Loan fees are the responsibility of the worker.**

## Hardship Distributions

The CRSP does not permit hardship distributions. However, if a worker has another 403(b) plan that he/she currently contributes to or has contributed to in the past, those plans may permit hardship distributions. If an active worker takes a hardship distribution from another 403(b) plan, IRS Regulations require that all salary deferral contributions by such workers to the CRSP, must be suspended for 6 months.

## CRSP Plan Provisions

If you offer multiple 403(b) providers and you have an umbrella plan document, your umbrella plan document cannot conflict with the terms of the CRSP Plan Document. For example, the umbrella plan document cannot allow hardship distributions from its 403(b) accounts, as the CRSP does not permit hardship distributions. Your umbrella plan document would need to specifically state which 403(b) plans/providers permit such distributions.

Concordia Plan Services can review your umbrella plan document to verify that it complies with the terms of the CRSP Plan Document. The two plan documents (your umbrella plan and the CRSP plan documents) must be in sync. You can contact a CRSP Representative at 888-927-7526 for assistance. We are always happy to help.

## Funds

The funds offered through the CRSP were selected by the Board of Trustees of the Concordia Retirement Savings Plan with the assistance of an independent investment consulting firm and are reviewed by Concordia Plan Services on a regular basis. Below is a list of funds offered through the CRSP as of January 1, 2017. For a current list of available funds and their performance, please visit our website [ConcordiaPlans.org/CRSP](http://ConcordiaPlans.org/CRSP).

Fund	Asset Class
New York Life Insurance Company Guaranteed Interest Account	Fixed Interest Account
Vanguard Total Bond Market Index Institutional	Passive Multi-Sector Bond
JP Morgan Core Bond Fund	Intermediate Bond Fund
PIMCO Real Return Institutional	TIPS/Real Return
Vanguard Balanced Index Fund Institutional	Balanced Fund
TransAmerica High Yield Bond R6	Active High-Yield Bond
Vanguard Institutional Index Fund	Passive US Large Cap Core
John Hancock Disciplined Value R6	Active US Large Cap Value
T. Rowe Price Institutional Large Cap Growth	Active US Large Cap Growth
Vanguard Total International Stock Index Institutional	Passive Non-US Equity
American Funds EuroPacific Growth	Active Non-US Equity
Vanguard Extended Market Index Institutional	Passive Small/Mid Core
AllianceBernstein Discovery Value Z	Active Small/Mid Value
Wells Fargo Advantage Small Co Growth R6	Active Small/Mid Growth
Aberdeen Emerging Markets Institutional	Active Emerging Markets Equity

Conservative

Aggressive



### Disabled Workers

If a worker was participating in the CRSP prior to filing for his/her disability benefits, salary deferrals and loan payments can continue while the member is receiving salary continuation or working part-time.

If your worker has an outstanding CRSP loan and is not receiving a continuation of his/her salary, monthly loan payments will need to be continued and sent directly to Fidelity in order to prevent a default on the loan.

## Year-End Reminders

- At year-end, it is especially important to remit your workers' contributions in a timely manner. CRSP Employer Contributions should be remitted by the processing deadlines. Year-end payroll processing deadlines vary annually and are communicated as soon as possible.
- Employee pre-tax salary deferrals should be reported on your workers' W-2 forms in box 12 with a code E. After-tax Roth deferrals should be in box 12 with a code BB.
- Non-Qualified Church-Controlled organizations are required to comply with annual plan testing and reporting requirements. These employers will be contacted by Fidelity and will receive information on testing each December.
- If you are using the CRSP 403(b) Automatic Contribution Remittance Election Form through EBSO, review salary deferral elections with your workers at least once each calendar year.

## Worker Fees

CRSP administrative fees are charged to a worker's account on a quarterly basis.

Worker	Fee
Active workers enrolled in the CRSP and CRP	40 basis points a year, up to a maximum of \$30 per year (\$7.50 each quarter)
Active workers enrolled in the CRSP but not enrolled in the CRP	40 basis points a year, up to a maximum of \$120 per year (\$30 each quarter)
Non-active or part-time workers who had been enrolled in the CRP and active workers no longer enrolled in the CRSP	40 basis points a year, up to a maximum of \$60 per year (\$15 each quarter)
Non-active workers who had not been enrolled in the CRP	40 basis points a year, up to a maximum of \$120 per year (\$30 each quarter)

As you can see, plan members with lower balances will incur lower CRSP administrative fees. As the plan member's account grows, the fee will increase until the fee maximum is reached. To calculate fees for active workers, use the following formula:

$$\text{CRSP Balance} \times 40 \text{ basis points } (.004) = \text{_____} \text{ or the maximum fee}$$

A separate fee is assessed for participation in the ProManage PROgram™. This fee is set each quarter. Additional information and rates can be found on our website: [ConcordiaPlans.org/Forms](http://ConcordiaPlans.org/Forms) under Publications/Retirement Planning.

## Monitoring Your Workers' Contributions and IRS Limits

The annual maximum limits described below apply to all salary deferral contributions and catch-up contributions made by a worker in the calendar year and include contributions made to the CRSP and any other 401(k) or 403(b) plan.

The IRS annual limit for a worker's total salary deferral contributions for 2017 is \$18,000. Employer contributions and catch-up contributions are not included in this limit.

The annual Service Catch-up contribution limit for workers with 15 years or more of service at LCMS employers is a maximum of \$3,000 per year, with a lifetime maximum of \$15,000. The Age 50 Catch-up contribution limit for 2017 is \$6,000. For more information on catch-up contributions see page 8.

The overall annual limitation for plan contributions is \$54,000 for 2017. This includes all worker and employer contributions to all 403(b) plans maintained by an employer, other than catch-up contributions. This overall annual limit applies separately to contributions made to a non-403(b) plan maintained by the employer (such as a 401(k) plan) or to a 403(b) plan maintained by another employer, other than the CRSP. (Special rules apply to plans maintained by an employer which is 50% owned by a worker.)

The IRS maximum compensation limit for 2017 is \$270,000. The maximum compensation limit is used when calculating benefits and contribution rates for

the Concordia Retirement Savings Plan, the Concordia Retirement Plan, and the Concordia Disability and Survivor Plan.

An employer is responsible for monitoring worker contributions for compliance with annual contributions limits. If you are offering the CRSP only, you should monitor the amounts contributed to avoid any required refund of worker contributions. As Plan Administrator, Concordia Plan Services will also monitor the amounts contributed to the CRSP and will notify you if a worker's contributions are close to, or have exceeded the contribution limits.

If you have workers who are contributing to provider(s) other than the CRSP, or if you are offering other providers alongside the CRSP, you are responsible for monitoring the amounts contributed by each of your workers to make sure that the IRS limits are not exceeded. You will also need to monitor any catch-up contribution limits and matching funds to make sure workers do not exceed the annual maximum contribution totals. Failure to monitor contribution limits may result in the worker's account balance becoming taxable.

Although it is the employer's responsibility to monitor workers' contribution amounts, we encourage all workers to monitor their contributions as part of their retirement planning strategy.

**The IRS limitations described above are updated annually for cost-of-living adjustments. The IRS annually reviews limits and determines if an increase in the limits is necessary. New limits for the next calendar year are usually announced in late October each year.**

## Are You Offering Multiple 403(b) Plans?

This is not intended to be used as a guide for other 403(b) providers or plans. If you are offering multiple 403(b) plans and/or vendors, you are responsible for complying of IRS 403(b) regulations.

By offering more than one 403(b) plan, your responsibilities include, but are not limited to:

- Monitoring contributions to ensure limits are not exceeded
- Approving loans and monitoring that loan limits are not exceeded
- Suspending salary deferral contributions if a worker receives a hardship distribution
- Selecting the investment funds that are offered and monitoring their performance (for providers other than the CRSP)
- Ensuring all contributions to all providers are remitted in a timely manner
- Fulfilling the universal availability requirements (for providers other than the CRSP)
- Correcting any operational or plan failures

If you are an employer offering a 403(b) plan in addition to the CRSP, we strongly recommend that you consult with an attorney or financial or tax professional to ensure that you are meeting your fiduciary responsibilities and are in compliance with IRS regulations. Failure to comply with IRS regulations could result in adverse tax consequences for your workers and restrict your ability to offer a 403(b) plan.

If you need additional information, please contact Concordia Plan Services at 888-927-7526.

### Contributions after Termination

In certain circumstances, individuals who no longer meet the eligibility requirements to participate may elect to defer certain compensation into the CRSP, up to an annual deferral limit. Individuals may elect to defer unpaid regular pay, and unused accrued vacation or sick pay, if done before the end of the calendar year or within 2-1/2 months after they cease to be eligible for the CRSP. Under IRS regulations, severance pay is not eligible to be deferred into a 403(b) plan (reference IRS Publication 4482).

If you use the EBSO Automatic Contribution Remittance method, be sure to contact EBSO to stop contributions for terminated workers.

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