

Project Summary

Section 409A Document and Operational Compliance Review

Impacted Companies

- Companies with recently implemented deferred compensation plans
- Companies with a significant number of plans (due to acquisitions or implementation of new plans on a frequent basis or over a longer period of time)
- Companies with turnover in administrative personnel
- Companies that have switched payroll/HRIS systems
- · Companies undergoing IRS audit
- · Companies reviewing policies, procedures and controls

Services

- Review all relevant documents including plan documents; employee elections; payroll schedules, and W-2s
- Review administrative policies and procedures
- Reconcile computations of pre-tax deferrals, company matching contributions, earnings credits, and distributed amount
- Consult on and provide recommendations for enhancing controls and complying with Section 409A requirements

Key Stakeholders

- Tax
- Legal
- HR

Deliverables

- Report of findings and recommendations
- Gap analysis