

IRS Publishes 2019 Required Amendments List

December 10, 2019

In Notice 2019-64, the IRS published the Required Amendments List for 2019, which lists statutory and administrative changes in plan qualification requirements that (i) are first effective in the plan year in which the list is published and (ii) may require a plan amendment. This year's list contains two items related to the final regulations for (x) hardship distributions, which implement legislative changes enacted in the Bipartisan Budget Act of 2018, and (y) certain collectively bargained cash balance/hybrid defined benefit plans maintained pursuant to one or more collective bargaining agreements ratified on or before November 13, 2015. The deadline for adopting any required amendments described in this year's list is December 31, 2021.

In addition, any required amendments that were listed in the 2017 Required Amendments List must be adopted (if applicable to an employer's plan) by December 31, 2019. The 2017 list included three items that relate to (i) certain market rate of return requirements for hybrid and cash balance plans, (ii) benefit restrictions for certain defined benefit plans that are eligible cooperative plans or eligible charity plans, and (iii) partial annuity distribution options for defined benefit plans. Additional information on the 2017 list is available in our prior blog post [here](#). Notice 2019-64 is available [here](#).