# **CO**RONA**VI**RUS **DI**SEASE 2019 (COVID-19)

**CARES Act Retirement Plans Loans and Withdrawals Important Reminders and Updates** 



Audience: Colleagues

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# CARES Act Loans and Withdrawals Important Dates and Deadlines

Fidelity, our retirement plans partner, is taking several steps to support Trinity Health colleagues as certain provisions under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) will expire at the end of 2020. As always, if you have questions, please contact Fidelity at 800-343-0860 or access your account at <a href="https://www.netbenefits.com">www.netbenefits.com</a>.

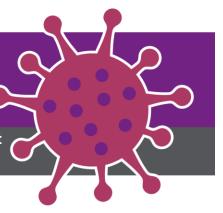
#### CARES Act Loan Update

The CARES Act permitted qualified individuals who are participants to delay certain plan loan payments until December 31, 2020 without causing the loans to violate the Internal Revenue Code for loans certified by the participant. Additionally, the CARES Act permitted an increase to the maximum loan limit for qualified participants to the lesser of 100% of the participant's vested account balance or \$100,000 (reduced by the highest outstanding loan balance in the past 12 months) from all plans of the employer and any related employer from March 27, 2020 through September 22, 2020.

## When loan payments will begin

Given that the deferment continues through Dec. 31, 2020, "reamortization" of loans (recalculation of the loan repayment schedule) will begin Jan. 8, 2021 for participants who initiated a CARES Act loan or requested loan deferment.

- CARES ACT LOAN DEFERMENT: In Jan. 2021, Fidelity will reamortize a participant's loan balance plus the interest accrued during the deferment period. The term of the loan will be extended by the length of the deferment period. This updated amount will reflect the outstanding principal balance of the loan, the loan interest rate, the interest accrued during the deferment period, and the maturity date. Participants will be advised when the new amount will be available to view on <a href="NetBenefits.com">NetBenefits.com</a>.
- CARES ACT LOANS: In January 2021, Fidelity will reamortize a participant's outstanding loan balance
  plus the interest accrued during the deferment period over the term of the loan. This updated amount
  will reflect the outstanding principal balance of the loan, the loan interest rate, the interest accrued
  during the deferment period, and the maturity date. Participants will be advised when the new amount
  will be available to view on NetBenefits.com.



# What you need to do

Participants making loan payments using automated clearing house transactions (ACH) are responsible for ensuring their ACH information is current and that their payments begin on a timely basis. Fidelity will notify the group of reamortized ACH loan payment amounts after the deferment period ends and prior to the payment start date. Fidelity will reach out to participants who pay by ACH to help ensure payments begin. Fidelity also distributed a reminder about CARES Act loans and loan deferments in November.

### December Deadlines for CARES Act Distributions

The CARES Act provides special tax treatment for up to \$100,000 in distributions from the Trinity Health 401(k) and 403(b) Retirement Savings Plans before December 31, 2020. The taxable portion of a distribution may be spread evenly over a three-year period for income tax purposes and will not be subject to the 10% early withdrawal penalty.

Key Deadlines: The December deadline for processing CARES Act distributions depends on the type of request initiated and the investments held in the participant's account. The information below identifies the relevant information and deadline when a request must be initiated so that it can be processed by December 30, 2020.

Type of CARES Act Distribution Request Initiated	Investment Type	Information and/or Documentation Must Be Received by Fidelity in Good Order by the Deadline (Close of Market)
Fidelity NetBenefits (online) or Contacting a Phone Representative (Preapproved Transactions)	Mutual Funds (no investment restrictions), unitized employer stock funds, commingled pools, or custom funds	Dec. 30, 2020 (the last business day before Dec. 30, 2020 if the market is not open on Dec. 30, 2020)
2. Fidelity NetBenefits (online) or Contacting a Phone Representative (Preapproved Transactions)	Employer stock that is share- accounted, self-directed brokerage, other unique assets, or plan distribution restrictions	Dec. 23, 2020
3. Spousal consent required transactions.  The paperwork must be completed by the participant, and spouse, if applicable, and reviewed and approved by Fidelity.	All assets	1. 1. If the assets are invested in mutual funds (no investment restrictions), then Fidelity must receive the documentation in good order by Dec. 30, 2020.  2.2. If the assets are invested in self-directed brokerage, then Fidelity must receive the documentation in good order by Dec. 23, 2020.

#### **CARES Act Recontributions**

Qualified individuals may recontribute part or all their CARES Act distribution to an IRA or an eligible retirement plan if it accepts rollover contributions. Recontributions must be made within the three-year period beginning on the day after the date the original CARES Act distribution was received and can be made in separate transactions. All recontributions will be subject to the plan's rules and requirements.

A qualified individual may be required to file an amended federal income tax return and use IRS Form 8915-E (Qualified 2020 Disaster Retirement Plan Distributions and Repayments) to report the amount of any recontribution and potentially recover some or all of the income taxes that were originally paid on the CARES Act distribution. Please refer to the IRS website at IRS.gov and IRS Notice 2020-50 (Guidance for Coronavirus-Related Distributions and Loans from Retirement Plans Under the CARES Act) for further information. Participants must complete a Recontribution of CARES Act Distribution(s) (Rollover Contribution Form) for any recontribution they make. The recontribution form is available there.

Please contact your Fidelity service representative if you have any questions. Visit the Plan Sponsor COVID-19 Resource Center for the latest resources.

You are a qualified individual if:

You, your spouse, or your dependent (as defined in Internal Revenue Code section 152) is diagnosed with the virus SARS-CoV-2 or with coronavirus disease 2019 (both referred to as "COVID -19") by a test approved by the Centers for Disease Control and Prevention (including a test authorized under the Federal Food, Drug, and Cosmetic Act); or you have experienced adverse financial consequences because:

- a. you, your spouse, or a member of your household was quarantined, furloughed or laid off, or had work hours reduced due to COVID-19:
- b. you, your spouse, or a member of your household was unable to work due to lack of childcare due to COVID-19;
- c. a business owned or operated by you, your spouse, or a member of your household closed or reduced hours due to COVID-19; or
- d. you, your spouse, or a member of your household had a reduction in pay (or self-employment income) due to COVID-19 or had a job offer rescinded or start date for a job delayed due to COVID-19.

Note: A "member of your household" is someone who shares your principal residence.