Best Practices for 403(b)
and Related Retirement Plans
Information Sharing - Minimum and
Comprehensive Data Elements

Version 1.04

Updated on February 14, 2011

Effective as of October 1, 2011

**Best Practices for 403(b) and Related Retirement Plans Information Sharing -
Minimum and Comprehensive Data Elements[1]
Version 1.04 (Updated on February 14, 2011)**

General Information

These "Best Practices" set forth:
1. The data elements for information sharing between 403(b) plan employers or employer representatives and vendors.
2. A basic file convention layout.
3. The frequency of data transmissions.
4. An approach for sharing and transmitting data on a transaction or daily basis when agreed upon by both the sending and receiving parties.

The document does **not** define best practices for: (1) the methods of data transmission, or (2) information sharing with respect to specific plan transactions or events (e.g., loans).

The Best Practices were developed for purposes of facilitating compliance with the final regulations by identifying the specific data elements necessary to coordinate plan administration. Additionally, the Best Practices are offered with a view to facilitating uniform expectations among 403(b) vendors and employers who will be engaged in data sharing and to facilitate efficient information technology design and development. The Best Practices represent the views of The SPARK Institute only and are not intended as the sole or exclusive means of effecting 403(b) data sharing.

Overview

This document originally consisted of four parts. However, as explained below, Part III has been moved to a separate document.

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[1] These data sharing best practices identify both (a) the minimum data sharing elements required to support a plan that has adopted the model language published in Rev. Proc. 2007-71, and (b) the additional data sharing elements that an employer and vendor may agree to share to support plan features in addition to those addressed by the model language (e.g., employer contributions or Roth features).

Part I – Identifies conventions in formatting and providing data that applies to all of the data elements identified in the Best Practices.

Part II – Identifies and describes the data elements. Generally, each data element description (1) identifies the data element (field) name, (2) identifies the field's maximum length, (3) identifies the data format (e.g., alphanumeric), (4) provides an example, (5) identifies whether the data field is required for plans with minimum features, required for plans with additional features, or is "conditional" based on certain circumstances, and (6) provides additional explanatory comments. Additionally, this Part identifies the core participant account data needed to administer Hardships and Loans.

Part III – This Part, which covered census and remittance processing practices, has been removed from this document and published as a separate document entitled "Best Practices for Multiple Vendor Plans Remittance and Census Data Elements." The document is available on The SPARK Institute website at http://www.sparkinstitute.org/comments-and-materials.php. In order to minimize confusion among the Companies that are already using the Data Elements Best Practices, the Parts in this document have not been renumbered and will continue to be referred to by their previous Part designations.

Part IV – Describes the data standards for distributions. While not every distribution made by a vendor is required to be reported under the 403(b) plan regulation, a number of SPARK Institute members reported that some employers or their representatives have asked for this information. In addition to loans and hardship withdrawals, other distribution types including contract exchanges, in-service withdrawals, rollovers, deaths, disability, required minimum distributions, QDROs and separation from service are supported.

Summary of Version 1.04 Updated on February 14, 2011

This update to Version 1.04 reflects certain industry developments that occurred since it was originally published in June 2009. Additionally, the update incorporates answers to certain questions that had been posted on The SPARK Institute website. The update does not change the file structure or format, except in connection with Part II, Section G, Fields 3 and 5 (previously "filler" fields) relating to Loan Amount Available Data. We note that anyone using the previously released Version 1.04 may continue to do so without making any programming change as a result of this update. In order to facilitate the continued use of the prior version, this update was not assigned a new version number (i.e., 1.05) which would have required all users to reprogram their systems to adjust the affected header record field.

More specifically, this update includes the following:
1. Establishes that the best practice for data transmission is on a weekly basis (instead of monthly) in response to plan needs and industry requests for more up to date data for use in monitoring plan activity and approving transactions.
2. Establishes approaches for transmitting daily file updates as either a full file refresh or a partial file refresh ("Daily Delta Files") when the affected parties specifically agree.

3. Incorporates clarifications and updates in response to questions we received from the 403(b) plan community and previously answered on The SPARK Institute website, i.e., Questions 55 (over 99 loans), 58 (inception to date), 61 and 62 (distribution amounts), 63 (Vendor Source ID), 70 (HEART distributions), 72 (Defaulted loans), 78 and 79 (Term Date and Product ID), 81 (Daily Delta Files), 86 (whole numbers), and 89 (Gross Amount).
4. Identifies each field within each record by number in order to make it easier to reference and locate them. **Please note that the field numbers are for reference purposes only and do not require any changes**.

A summary of prior version changes is provided under Appendix B.

Effective Date - In order to facilitate an effective transition, this update will become effective on October 1, 2011. Additionally, as of October 1, 2011 any and all prior versions of the Best Practices (i.e., Version 1.03 and all earlier versions) will be considered obsolete. The pre-publishing of this update is intended to provide all affected and interested parties time to review and make any changes that they deem necessary. **This Version can be implemented prior to October 1, 2011 as agreed to by both the sending and receiving parties.**

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The SPARK Institute may release revised versions of the Best Practices periodically. Anyone with questions about this version should contact Larry Goldbrum at Larry@sparkinstitute.org.

THIS MATERIAL HAS NOT BEEN REVIEWED, APPROVED, OR AUTHORIZED BY THE TREASURY DEPARTMENT OR THE INTERNAL REVENUE SERVICE AS MEETING THE REQUIREMENTS OF ANY APPLICABLE RULES OR REGULATIONS. THE SPARK INSTITUTE DOES NOT PROVIDE LEGAL ADVICE. USERS OF THIS MATERIAL SHOULD CONSULT WITH THEIR LEGAL COUNSEL BEFORE USING IT.

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PART I

File Layout Conventions for Data Sharing
Between Vendors and Employers or Employer Representatives (Aggregators)

This update establishes that the best practice for data transmission is on a weekly basis (instead of monthly) in response to plan needs and industry requests for more up to date data for use in monitoring plan activity and approving transactions. Feedback from SPARK Institute members and others in the 403(b) plans community has identified the need among many industry providers and plan sponsors for information to be provided on a timelier basis to facilitate transaction processing. Parties that adopt a weekly transmission schedule would not be expected to also exchange monthly files. Please note that the "as of" date of any file that is transmitted is specified by the "Valuation Date" in file Header field (Part I, Section C, Field 8). The affected parties should agree upon the appropriate Valuation Dates for data transmissions, including whether transmission as of a month-end or year-end is needed. Additionally, please note Sections A, 8 and 9 below that describe a "Daily Delta File" transmission option that can be used in conjunction with the weekly transmissions as the affected parties agree.

A. General File Layout Conventions

1. The extract file should be an ASCII file that is pipe "|" delimited, with no spaces between the data element and pipe at either end.

2. The file will be variable length.

3. In order to maintain file layout consistency, **all fields**, including NULL fields, **must be provided**. Note that within Part II, Section G. Loan Amount Available, multiple outstanding (active or deemed /defaulted) or paid off loans during the prior 12 months, would be reported as recurring loan components (one set of loan components for each outstanding (active or deemed/defaulted loan) or paid off loan during the prior 12 months) within a single Account record, rather than repeating loan records for the same Account. For those vendors unable to supply detailed loan information for each outstanding (active or deemed/defaulted) or paid off loan during the prior 12 months, a single set of loan component data can be reported in which information has been summarized for all outstanding (active or deemed/defaulted) or paid off loans during the prior 12 months. If there have been no outstanding (active or deemed/defaulted) or paid off loans during the last 12 months, no loan component data is reported and in this case, no NULL fields are needed because the loan component data is at the end of the record. A "Method of Reporting Loan Data" of "M" and a "Number of Sets of Loan Component Data" = "0" would signify that no loan component data is reported.

4. Hardship and Loans Data for surrendered or closed contacts (e.g. the participant is terminated from the plan and all account value has been distributed) **-** The hardship and loan sections of Part II should still reflect key items such as the HOLB (Highest Outstanding Loan Balance 12 months component or the summary data within the component) and date of last hardship. The vendor should continue to send Part II records as long as the HOLB is greater than zero or the last hardship distribution date is less than or equal to 12 months from the date of reporting (i.e., if either condition is true).

5. Sending Participant Data records for an account with a zero balance should occur if any of the following conditions are met:

   a. A new account is set-up and the participant has not funded the account through a payroll contribution. The Investment Provider should include these records in their file.
   b. An active account is fully surrendered.
   c. An active account is fully surrendered that had a hardship or loan. The investment Providers should continue to report the record for a rolling 12 months.
   d. Additionally, if the fully surrendered account had a defaulted loan, report this record, including the defaulted loan information, for as long as administratively possible beyond the rolling 12 months after the account was surrendered. Note: Some plans do not allow a participant who has defaulted on a loan to take another loan.

6. When sending a file that contains no activity, for example a Part II (as agreed to by Investment Providers) or Part IV file that had no transactions in the prior reporting period, the sender should send an empty file that contains the Header and Trailer records without any detail records. The file should be sent according to the agreed upon frequency between the Investment Providers.

7. File name: The file name is a combination of:
   a. Vendor Name/Employer Name - Text.
   b. Aggregator - Text.
   c. Frequency - One character.
   d. Frequency Values: A = Annually, B = Bi-Weekly, D = Daily, M = Monthly, Q = Quarterly, S = Semi-Annually, T = Semi-Monthly, W = Weekly and X = Daily Delta.
   e. Record type - Two characters.
      Record Type Values: 01 = Account, 02 = Distributions, 12 = Both Account, and Distribution data.
   f. Date and Time - YYMMDD_HHMMSS
   g. File name extension - ".TXT"

   A Vendor is the Investment Provider, a.k.a. "IP". An "Aggregator" is a firm responsible for consolidating the Vendor reported data associated with a Plan on behalf of the Employer. The Aggregator may also act as the Administrator of the Plan on behalf of the Employer. Some Vendors may also provide Aggregator services. Third Party Administrators (TPAs) may also provide Aggregator services. A date/time stamp is important in case replacement files are created.

   Example: A file sent by "Vendor Name" to "Aggregator" as a weekly file for Part I data on December 31, 2010 should be named:
        "Vendor Name_Aggregator_W_01_101231_110503.TXT"

   The above naming protocols should be used for both Part II and IV file submissions.

8. "Daily Delta File" defined: A Daily Delta File is a file transmission where daily records are sent whenever any of the transactions identified below are executed for an account.

These files should contain a full record refresh of all Part II data for participants with the specified transaction activity. The transactions that are included in the list below are those that could have a material impact on the availability of loans and hardships. A Daily Delta File can also be sent when other transactions are executed for an account as an optional extension of the Daily Delta File process. Daily Delta Files should only be used by parties that submit a full file refresh on at least a weekly basis according to the best practices under this updated Version 1.04.

Daily Delta Files should be used and formatted as follows:
a. A Daily Delta File should be used to transmit information whenever any of the following transaction is executed for an account:
    i. Loan initiation
    ii. Loan default
    iii. Loan payoff (total loan repayment)
    iv. Withdrawal (including Hardship)
    v. Lump sum contribution (e.g., rollover, contract exchange, etc.). Note: This does not include ordinary plan contributions.
    vi. Reversal of any of the above transactions.
b. The format of a Daily Delta File will be exactly the same as a file sent on any other basis. Note: The file name changes to indicate a frequency of "X" for Daily Delta File.
c. If Part IV records are included with Daily Delta Files, they should only include the transaction(s) processed on the day the file is sent.
d. Daily Delta Files should only be used to update existing accounts from the last weekly full file refresh. The Daily Delta File process should **not** be used to add new participant accounts.
e. Recipients of a Daily Delta File should identify the account(s) for which an update is received and replace all Part II data on record with the updated data.

9. All files other than a Daily Delta File are to be sent as a total replacement of the information sharing data sent in any prior transmission.

10. NULL fields should contain no values/spaces between delimiters. A NULL value is reported as two delimiters with no embedded spaces, as follows: ‖

11. All date fields should be formatted as CCYYMMDD.
All "Required" date fields must be reported. Any "Optional" date field may contain a valid date or be NULL (two delimiters with no embedded space) indicating that the date is not available.

12. Any "Required" TEXT field can not be reported as NULL. All text fields are not case sensitive and should be all uppercase.

13. Any "Optional" TEXT field can be reported as Null or a valid value.

14. Although certain fields are generally considered "Optional" under the Best Practices, we note that some Aggregators may require some optional fields to be populated under their service arrangements. For example, a TPA that tracks state approved products may

require Field 1 ("Contract Certificate Issue Date") in Part II, Section E and Field 5 ("Product ID") in Part II, Section G to be populated.

15. All numeric fields that have fractional numbers included should have an explicit decimal point. For example, if the format for an amount field is "11.2" it means 8 significant digits to the left of an explicit decimal point and two digits to the right of the decimal point; in total occupying at most 11 positions.

    Examples of acceptable numeric values include:

    |0.00|
    |0.01|
    |1.00|
    |1.23|
    |12345678.12|

    Examples of unacceptable numeric values include:

    || (invalid; when a numeric field is required, it can not be reported as NULL)
    |.|
    |0|
    |1|
    |.0|
    |0.|
    |.00|
    |00.|
    |0.0|
    |1.234|
    |12345678901.45|

    In addition Numeric fields should be right justified.

16. All amount fields in Parts II represent the latest available data and therefore are positive amounts; no sign is necessary. However, the "Distributions Made" Part IV data now allows for a negative amount to be reported, indicating the reversal of a previous processed distribution. Any "Required" numeric field must be reported; 0.00 is the default value and will be treated as the reported amount. Any "Optional" numeric field may contain a numeric, including 0.00 or be NULL (two delimiters with no embedded space) indicating that the field is not available.

B. Identification of Record Types

1. Each file will contain at least one SPARK Institute Header and one SPARK Trailer record. Detail records will appear between the SPARK Institute Header and Trailer records. The SPARK Institute Header contains a "Data Type" field which identifies the data following the SPARK Institute Header as:

   01- Account data
   02- "Distributions Made" data

2. There can be multiple SPARK Institute Header, Detail and SPARK Institute Trailer records on a single transmitted file; an example follows:

   a. SPARK Header for Vendor 1's data of Data Type "01" (Account) from Sender A
   b. SPARK formatted (Account) Detail records for Vendor 1
   c. SPARK Trailer for Vendor 1's (Account) data
   d. SPARK Header for Vendor 1's data of Data Type "02" (Distributions Made) from Sender A
   e. SPARK formatted (Distributions Made) Detail records for Vendor 1
   f. SPARK Trailer for Vendor 1's (Distributions Made) data

3. There is no requirement to send both "Account" and "Distributions Made" data in the same file. The Account data is necessary to allow Employers or Employer representatives (Aggregator/Administrator) to make decisions about Hardship and/or Loan requests. The "Distributions Made" data may be required by certain Employers who want to be aware of Distributions Made to their plan participants; however, "Distributions Made" data is not required to make decisions about Hardship or Loan requests unless specified by the Plan.

4. When Vendors share files for more than one employer (or more than one plan for the same employer) and account data is being supplied in one file, only one Header and Trailer record should be used (i.e., do not send a Header and Trailer for each Employer (or individual employer plans) within the file). The same protocol applies to the "Distributions Made" data.

   For each account detail record within the Header and Trailer record the following conditions should exist:

   a. The SPARK Institute Best Practices version number (e.g., 1.04) identified in each data type should be the same across all data types.
   b. The cash valuation dates reported within the account detail records should be the same as the Header throughout the record.
   c. A participant should only be listed once under the same employee account number and Vendor Plan ID.

   Samples of File and Data sharing file formats are available on The SPARK Institute website at http://www.sparkinstitute.org/comments-and-materials.php.

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5. All Header and data records should be followed by a CR-LF (Carriage Return – Line Feed). Data for each participant should be sent on a separate line. This is typically automatically generated by the FTP process.

C. **SPARK Institute File Header for All Data Files** - Every Vendor and Employer Data File should contain a file Header with the following information and layout.

No.	Field	Max Length	Data Type	Example	Required for all Plans	Comments
1	Header	6	Text	SPARKH	Required	Constant value: SPARKH.
2	Data Type	2	Numeric	01, 02, 03, 04	Required	Identifies the type of data which follows until a SPARK Institute Trailer record appears 01-Account Data 02-Distributions Data.
3	Data Source	30	Text	For Vendor: Vendor_ABC For Employer: ER_XYZ School District For Aggregator: Aggregator_AnyCoName	Required	Identifies the data source as the Vendor (Investment Provider), Employer or Aggregator.
4	File Creation Date/Time	15	Text	20081001-110503	Required	Format: CCYYMMDD-HHMMSS (time is in Military format 120000 for noon, 190000 for 7:00pm).
5	Contact	40	Text	Free-form J.Smith1-222-333-4444 x123	Optional	Identifies an individual and phone number if there are questions about the content of the file.
6	Sender	40	Text	Free-form ABC Firm as Aggregator for Vendors D, E and F in School District Z.	Optional	Identifies sender name and role (i.e., Aggregator or Vendor).
7	SPARK Institute 403(b) Data Elements Version No.	4	Text	1.04	Required	SPARK Institute Best Practices version number in which the data is formatted.
8	Valuation Date	8	Date Format	CCYYMMDD	Required	Indicates the Valuation date of data provided in layout.

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D. **SPARK Institute File Trailer for All Data Files** – Every Vendor and Employer Data File should contain a file Trailer identifying the number of records within the file and record type, including the Header and the Trailer records.

No.	Field	Max Length	Data Type	Example	Required for all Plans	Comments
1	Trailer	7	Text	SPARKTR	Required	Constant value SPARKTR.
2	Record Count	8	Numeric	00045678	Required	Total number of ALL records INCLUDING Header and Trailer records. Format 99999999, right justified, spaces filled with zeros.
3	Filler	65	Text	Blank	Null	Spaces, reserved for future use.

**Data Sharing Elements for Vendor File Account Point-in-Time
Detail Records to be Shared with Employers or Employer Representatives**

A. Basic Account Data

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
1	Employer EIN	10	Alpha-numeric	AB-1234567	Conditional, if no Aggregator has been assigned and the Employer has multiple Plans	Conditional, if no Aggregator has been assigned and the Employer has multiple Plans	Identifies the Employer. The Employer EIN is used to tie multiple Plans of the same Employer together when there is no Aggregator involved. If there are multiple Employer EINs associated with the same Plan(s) of that Employer, the Employer must specify which EIN to associate with all of their Plans.
2	Vendor EIN	10	Alpha-numeric	CD-7654321	Required	Required	Identifies the Vendor (I.P.)
3	Vendor Source Name	20	Text	Varies	Required	Required	Identity of the Vendor associated with the Account.
4	Aggregator Source Name	20	Alpha-numeric	Varies	Optional, required if an Aggregator has been selected by the Employer to consolidate data of all vendors associated with the Employer's plan participants	Optional, required if an Aggregator has been selected by the Employer to consolidate data of all vendors associated with the Employer's plan participants	Identity of Aggregator, if any, supplying the fields. NULL if no Aggregator has been selected by the Employer.
5	Vendor Source ID	20	Alpha-numeric	Varies	Optional	Optional	The identifier used by the Aggregator (if any) to identify the Vendor.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
6	Aggregator Plan ID	20	Alpha-numeric	Varies	Conditional, required if an Aggregator has been selected by the Employer	Conditional, required if an Aggregator has been selected by the Employer	The identifier used by the Aggregator (if any) to identify the Plan. Must be provided if the Employer Plan ID is NULL.
7	Vendor Plan ID	20	Alpha-numeric	Varies	Required	Required	The identifier used by the Vendor to identify the Plan. May be the same as the Aggregator Plan ID if that vendor also serves as the Aggregator for the plan. .
8	Employer Plan ID	20	Alpha-numeric	AB-1234567001	Conditional, required if no Aggregator has been selected	Conditional, required if no Aggregator has been selected	The Employer Plan ID uniquely identifies the Plan as defined by the Employer. Suggested format is Employer's EIN plus a sequential number to differentiate multiple plans of the same Employer.
9	Employee Account Number	25	Alpha-numeric	Varies	Conditional if multiple accounts within the same Plan	Conditional if multiple accounts within the same Plan	Employee specific account/contract number at the Vendor. This is the Participant's contract or account number at the Vendor level. Participants may have more than one account or contract with the same Vendor. This field is needed in order to properly reflect the account values at the contract level. A participant should not be listed more than once with the same Employee Account Number and Vendor Plan ID.
10	Employee SSN	9	Numeric	123456789	Required	Required	The participant's social security number will be used to identify the participant.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
11	Employee ID	20	Alpha-numeric	Varies	Optional	Optional	Employee identification found on the Employer records; default to SSN if employer does not use a unique ID.
12	Employee First Name	35	Text	Varies	Required	Required	For research purposes only. Will be used in the event of a record rejecting.
13	Employee Last Name	35	Text	Varies	Required	Required	For research purposes only. Will be used in the event of a record rejecting.
14	Date of Birth	8	Date Format	CCYYMMDD	Required	Required	For research purposes only. Will be used in the event of a record rejecting.
15	Cash Value Type[2]	1	Alpha-numeric	G or N Assume that Vested=40K Unvested=10K Outstanding loans = 20K **GROSS = 40K+10K=50K** **NET = 50K-20K=30K**	Required	Required	Identifies all account Cash Values as either Gross or Net. It is understood that some vendors may not have vesting schedule information so all Cash Values should reflect the total of vested and unvested amounts. (Treat as if all amounts are 100% vested). If Gross, report cash value as of the reporting date, including both vested and unvested amounts without any reduction for outstanding/defaulted loans. If Net, report Gross less all outstanding/defaulted loan balances.

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[2] All Cash Value fields are either Gross or Net. With the exception of 403(b)(7) Employer Cash Value, the sum of the other seven cash values should equal the total of the participant's account value.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
16	Employer Cash Value	11.2	Numeric	12345678.12	Does not apply, submit as 0.00	Required for Plans with employer contributions	The value of the Participant's account containing Employer Contributions. For an account containing both Employee and Employer contributions for a Retirement plan, which can not distinguish a separate value by money sources, the reported value should be combined into the more restrictive money source. If no value, submit as 0.00.
17	EE Deferral Cash Value	11.2	Numeric	12345678.12	Required	Required	The value of the Participant's account containing Employee Pre-Tax or Salary Deferral Contributions. For an account containing both Employee and Employer contributions for a 403(b) or other related retirement plan, which can not distinguish a separate value by money sources, the reported value should be combined into the more restrictive money source. If no value, submit as 0.00.
18	Rollover EE Pre-Tax Cash Value	11.2	Numeric	12345678.12	Required for Plans that allow rollover amounts	Required for Plans that allow rollover amounts	The value of the Participant's account containing Rollover Employee Pre-Tax or Salary Deferral Monies. This does not include Roth 403(b) or other related retirement rollovers that can be tracked with Rollover Roth Cash Value. If no value, submit as 0.00.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
19	Rollover EE Post-Tax Cash Value	11.2	Numeric	12345678.12	Required for Plans that allow rollover amounts	Required for Plans that allow rollover amounts	The value of the Participant's account containing the Rollover Employee Post-Tax monies. If no value, submit as 0.00.
20	Rollover Roth Cash Value	11.2	Numeric	12345678.12	Required for Plans that allow rollover amounts	Required for Plans that allow rollover amounts	The value of the Participant's account containing Rollover Roth monies. If no value, submit as 0.00.
21	EE Post-Tax Cash Value	11.2	Numeric	12345678.12	Required for Plans with EE Post-Tax contributions	Required for Plans with EE Post-Tax contributions	The value of the Participant's account containing Employee Post-Tax Contributions. If no value, submit as 0.00.
22	Roth Cash Value (Originally named "Roth 403(b) Cash Value")	11.2	Numeric	12345678.12	Does not apply, submit as 0.00	Required for Plans with Roth features	The value of the Participant's account containing Roth Contributions, excluding any Roth Rollover amounts which are reported separately in the Roth Rollover Cash Value field. If no value, submit as 0.00.
23	Date of First Roth Contribution	8	Date Format	CCYYMMDD	Does not apply, create as Null	Required for Plans with Roth features	The date of the first Roth Contribution.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
24	403(b)(7) Employer Cash Value (Originally named "403(b)(7) Cash Value")	11.2	Numeric	12345678.12	Conditional, required if Account Type = "008" (reflecting both 403(b)(1) and 403(b)(7) account	Conditional, required if Account Type = "008" (reflecting both 403(b)(1) and 403(b)(7) account	Due to regulatory requirements for more stringent distribution restriction handling: Represents the 403(b)(7) portion of the Employer Cash Value for a combination account --- OR --- The Employer dollars that were part of a prior exchange from a 403(b)(7) to a 403(b)(1) account. Note that the 403(b)(7) Employer Cash Value amount should be excluded when determining the total cash value for the account, as this amount is already included in the Employer Cash Value field. If no value, submit as 0.00.
25	Cash Value Date	8	Date Format	CCYYMMDD	Required	Required	The Date of Valuation of all Cash Value fields provided within this file.
26	Type of Account	3	Text	001, 007, 008, 009, 01a, 01k 457	Required	Required	001 = 403(b)(1) 007 = 403(b)(7) 008 = Both 403(b)(1) and (7) 009 = 403(b)(9) 01a = 401a 01k = 401k 457 = 457

B. Deferral Limit Monitoring / 415 Limit Monitoring Data

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
1	Year-to-Date EE Contributions	11.2	Numeric	12345678.12	Required	Required	The amount of the Participant's contributions, (Employee Pre-Tax and Roth) year to date. This is needed for 402g limit monitoring. If no value, submit as 0.00.
2	Year-to-Date ER Contributions	11.2	Numeric	12345678.12	Conditional, if Employer makes contributions	Conditional, if Employer makes contributions	The amount of the Employer's contributions, year to date, needed for 415 limit monitoring. If no value, submit as 0.00.
3	Account Inception-to-Date EE Contributions	11.2	Numeric	12345678.12	Optional	Optional	The amount of the Participant's contributions, (Employee Pre-Tax and Roth) since account inception, for calculation of 15 Year Catch-Up. This value is the gross contributions – not reduced for distributions, charges or other items. If no value, submit as 0.00
4	Account Inception-to-Date 15 Year Catch-Up Contributions	11.2	Numeric	12345678.12	Optional	Optional	The total of all 15 Year Catch-Up contributions (Employee Pre-Tax and Roth) submitted since account inception. (Includes current year deferrals reclassified as Catch-Up. This value is the gross contributions – not reduced for distributions, charges or other items. If no value, submit as 0.00

C. Required Minimum Distribution Data

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
1	12/31/86 Cash Value – EE	11.2	Numeric	12345678.12	Does not apply as no RMD coordination is required across vendors. Submit as 0.00	Required for Plans seeking to coordinate minimum required distributions.	The value of the Participant's account, containing Employee Pre-Tax or Voluntary Contributions, as of 12/31/1986. For an account containing both Employee and Employer contributions for a 403(b) or other related retirement plan, which can not distinguish a separate value by money sources, the reported value should be combined into the more restrictive money source. If no value, submit as 0.00.
2	12/31/86 Cash Value – ER	11.2	Numeric	12345678.12	Entry required. However, does not apply as no RMD coordination is required across vendors. Default entry is 0.00	Required for Plans seeking to coordinate minimum required distributions. Default entry is 0.00	The value of the Participant's account, containing Employer Contributions, as of 12/31/1986. For an account containing both Employee and Employer contributions for a 403(b) or other related retirement plan, which can not distinguish a separate value by money sources, the reported value should be combined into the more restrictive money source. If no value, submit as 0.00.

D. <u>**Hardship Amount Available Data**</u> - Provide calculated hardship amount available or components, if hardship withdrawals are allowed under the plan. Hardship information reported in this section should be limited to those which have been taken within the last rolling 12 months.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
1	Method of Reporting Hardship Amount Available Data	1	Alpha-numeric	M or C	Required	Required	The method of reporting Hardship Amount Available data. M = Maximum hardship available reported. Note that if reporting M, each component field must still be reported as "0.00", to maintain integrity of the record format. C = Hardship components are reported. If no Hardships are permitted under the Plan, enter M and 0.00 in the Total Hardship Amount Available field below.
2	Total Hardship Amount Available	11.2	Numeric	12345678.12	Conditional, Required if a) b) c) d) are not supplied	Conditional, Required if a) b) c) d) are not supplied	The value of the Participant's account available for withdrawal on account of a hardship. This amount is calculated by adding (a) 12-31-88 Cash Value-EE (b) 12-31-88 Cash Value-ER (c) post 12-31-88 EE contributions and subtracting (d) post 12-31-88 withdrawals If no value, submit as 0.00.
3	Latest Hardship Distribution Type	2	Alpha-numeric	D or HP	Required; if Hardships are not allowed or not taken, enter "NO"	Required; if Hardships are not allowed or not taken, enter "NO"	The reason for the most recent Hardship Withdrawal C = Casualty Loss D = Disability F = Funeral HP = Home Purchase M = Medical NO = No Hardship taken in the last 12 months PF = Prevent Foreclosure T = Tuition O = Other U = Unknown

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No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
4	Latest Hardship Distribution Date	8	Date Format	CCYYMM DD	Optional if a Hardship Withdrawal has been taken	Optional if a Hardship Withdrawal has been taken	The date of the most recent Hardship Withdrawal taken so the employer can implement 6 month deferral suspension. Where the participant has made multiple hardship requests, the Employer can determine if any have been distributed and reflected in the Total Hardship Amount Available figure. If no Hardship has ever been taken, then report as NULL.
5	Latest Hardship Distribution Amount	11.2	Numeric	12345678. 12	Optional if a Hardship Withdrawal has been taken	Optional if a Hardship Withdrawal has been taken	The amount of the most recent Hardship Withdrawal taken. If no value, submit as 0.00.
6	Hardship Component a) 12/31/88 Cash Value – EE	11.2	Numeric	12345678. 12	Conditional, Required if "Hardship Amount Available" is not supplied	Conditional, Required if "Hardship Amount Available" is not supplied	The value of the Participant's account, containing Employee Pre-Tax or Voluntary Contributions, as of 12/31/1988. For an account containing both Employee and Employer contributions for a 403(b) or other related retirement plan, which can not distinguish a separate value by money sources, the reported value should be combined into the more restrictive money source. If no value, submit as 0.00.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
7	Hardship Component b) 12/31/88 Cash Value – ER	11.2	Numeric	12345678. 12	Does not apply, submit as 0.00	Conditional, Required if "Hardship Amount Available" is not supplied	The value of the Participant's account, containing Employer Contributions, as of 12/31/1988. For an account containing both Employee and Employer contributions for a 403(b) or other related retirement plan, which can not distinguish a separate value by money sources, the reported value should be combined into the more restrictive money source. If no value, submit as 0.00.
8	Hardship Component c) Post 12/31/88 Contributions – EE	11.2	Numeric	12345678. 12	Conditional, Required if "Hardship Amount Available" is not supplied	Conditional, Required if "Hardship Amount Available" is not supplied	The value of the Participant's post 12/31/88 Employee contributions. If no value, submit as 0.00.
9	Hardship Component d) Post 12/31/88 Withdrawals	11.2	Numeric	12345678. 12	Conditional, Required if "Hardship Amount Available" is not supplied	Conditional, Required if "Hardship Amount Available" is not supplied	The value of the Participant's post 12/31/88 withdrawals. Include only if above components (a, b, c) have not been reduced by these withdrawals. If no value, submit as 0.00.

E. Employer Contribution Restriction Grandfathering Data (for 403(b)(1) Annuity Contracts Only)

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
1	Contract Certificate Issue Date	8	Date Format	CCYYMMDD	Does not apply, Blank	Required for 403(b)(1) Plans with Employer contributions	The final 403(b) regulations require that Employer contributions not be distributable until severance from employment or prior to the occurrence of some event, such as after a fixed number of years, the attainment of a stated age, or disability. The new rule does not apply to contracts issued by an insurance company before 01/01/2009, so this issue date is needed in connection with plans that did not impose restrictions on distribution of Employer contributions that were at least as stringent as the new rule.

F. Non-Emergency Withdrawal Data (In Service Withdrawals)

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
1	In Service Available Cash Value	11.2	Numeric	12345678.12	Required	Required	The value of the Participant's account containing Employee Pre Tax, or Voluntary Contributions, as of 12/31/88, reduced by all post 12/31/88 distributions, if applicable. (For annuity contracts) Any Post 12/31/88 money available for In Service distributions should be added to the In Service Available Cash Value reported regardless if it is Employer or Employee money. Should be used for any In Service Money that is available prior to taking a hardship distribution. If ER or other monies information is not available, then report the EE value. If no value, submit as 0.00.

G. Loan Amount Available Data

Note – Examples that illustrate the Best Practices methodology are available on The SPARK Institute website under the 403(b) Plans Materials Section of the Comments and Materials page, which is located at the following web address:

http://www.sparkinstitute.org/comments-and-materials.php

THE EXAMPLES WERE DEVELOPED BY THE SPARK INSTITUTE PROJECT TEAM AND ARE INTENDED SOLELY AS ILLUSTRATIONS OF HOW THE BEST PRACTICES ARE INTENDED TO OPERATE. THE EXAMPLES HAVE NOT BEEN REVIEWED, APPROVED, OR AUTHORIZED BY THE TREASURY DEPARTMENT OR THE INTERNAL REVENUE SERVICE AS MEETING THE REQUIREMENTS OF ANY APPLICABLE RULES OR REGULATIONS. THE SPARK INSTITUTE DOES NOT PROVIDE LEGAL ADVICE. USERS OF THIS MATERIAL SHOULD CONSULT WITH THEIR LEGAL COUNSEL REGARDING THE APPLICABILITY OF THE EXAMPLES TO THEIR PARTICULAR SITUATIONS.

The following guidelines should be followed in connection with providing the loan amount available data.

Provide calculated "Maximum Loan Amount Eligible at this Vendor" ("MLAE-Vendor"), subject to all IRS, plan, product and fund restrictions, if any, without reducing this amount for any outstanding or defaulted loans. If there have been any outstanding, defaulted or paid off loans during the prior 12 months, then loan data must be reported for all of the loans within the Loan Component data fields, on either a detailed, loan-by-loan basis or as a "SUMMARY" of all loans (active, defaulted, offset and/or paid off) during the prior 12 months.

The Aggregator (or Employer if self-administering loans) should perform the calculations necessary across all vendors to determine the "Maximum Loan Amount Available-Plan" ("MLAA-Plan"). A vendor's product restrictions may reduce this amount for accounts at that particular vendor.

Loan Status Definitions

Set forth below are guidelines for reporting the status of certain loans using the codes under the Best Practices. However, some vendors may choose to report certain situations differently (e.g., one vendor may report an Offset Defaulted/Deemed Loan as "defaulted" while another vendor may report the same loan situation as "paid").

"A" - Active

Use this code when all of the following conditions are satisfied.
1. The participant who has a loan is a participant in the plan.
2. The participant has an outstanding loan balance in the prior 12 months and is currently in the repayment phase.

3. The participant has not died.
4. The plan has not terminated.

"P" - Paid

Use this code when all of the following conditions are satisfied.
1-1. An "active" loan has been fully repaid and the terms of the loan agreement have been satisfied.
1-2. The participant is an active participant in the plan.
1-3. The repaid loan currently has a zero loan balance.
1-4. The loan was repaid within the last 12 rolling months.
1-5. The plan has not terminated.

OR

Use this code when all of the following conditions are satisfied.
2-1. A loan that was previously considered deemed distributed is paid off in full. (assumes funding vehicle allows for repayment after tax)
2-2. The repaid deemed distributed loan currently has a zero loan balance.
2-3. The deemed distributed loan was repaid within the last 12 rolling months.

"D" – Defaulted

Use this code when in any of the following situations.

1. A scheduled loan payment remains past due at the end of the calendar quarter following the quarter in which the payment was originally due unless the plan has a different grace period or requirement.
2. The plan is terminated.
3. The participant retires or otherwise severs employment and does not either repay the loan in full or continue to make payments following the separation from employment.
4. The participant dies.
5. A default occurs under the terms of the loan agreement.
6. An amount remains unpaid at the end of the loan term.

Defaulted loans also include all of the following situations that should be reported as "D" – Defaulted.

A. Deemed Distributed
  A-1. The participant fails to abide by the terms of the loan agreement.
  A-2. The participant is not eligible for a plan distribution (e.g., an active participant under age 59 1/2). Please note that rules may vary by plan.

B. Active Deemed Distributed
  B-1. Conditions for Deemed Distribution under A immediately above are satisfied;
  B-2. The participant resumes payment of the loan; and
  B-3. The loan has an outstanding balance.

C. Offset of Defaulted/Deemed Loan
    C-1.   The participant fails to abide by the terms of the loan agreement;
    C-2.   The participant is eligible to receive all or part of their account as a distribution, even though a distribution does not necessarily occur (see conditions for defaulted loan above);
    C-3.   The participant is no longer considered an active participant in the plan and the plan does not prohibit distributions upon separation from service;
    C-4.   The offset occurred within the last 12 rolling months; and
    C-5.   The offset loan balance is greater than zero.

Special situations involving limited data available – Whenever there has been an outstanding, defaulted (including deemed distributable, offset) or paid loan during the prior 12 months loan component data fields must be reported. While the best practice is to report each loan separately, The SPARK Institute project team recognized that some vendors may be unable to separately report each outstanding, defaulted (offset) and paid-off loan. In this case, the loan data can be summarized and reported within the first (and only) set of loan component data fields, using default values as follows:

1. Number of Sets of Loan Component Data Reported = 1
2. Vendor Loan Number = "SUMMARY" (This will inform the Aggregator that the loan component data represents a summary of multiple loans, instead of a single loan.)
3. Loan Initiation Date = date of the most recently issued loan.
4. Loan Status = If any loan is defaulted (offset) during the prior 12 months, enter "D", if all loans have been paid off during the prior 12 months, enter "P", otherwise, enter "A".
5. Loan Type Indicator = Enter "G" (General) unless it is known that at least one of the loans (Active, Defaulted (offset) or Paid Off) is Residential, in which case, enter "R".
6. Original Loan Amount = total of the original loan amounts for all outstanding and/or defaulted loans.
7. Remaining Loan Balance = total remaining balances of all outstanding and/or defaulted ((offset) during the prior 12 months) loans.
8. Remaining Balance Date = Cash Value date of the account with regards to the loan balance.
9. Highest Outstanding Balance-12 Months = Aggregated sum of the highest outstanding loan balances for all outstanding, defaulted (offset) and paid off loans during the prior 12 months.

Special situations involving vendors with more than 99 loans – If there are more than 99 loans and the loan reporting method is "C" for loan components, loans 1-98 should be reported as usual. For loans 99 and above, the loan data should be summarized and reported in loan number 99. Example: If a participant has 105 loans to be reported, report 1-98 individually and 99-105 as a summary in the 99th loan.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
1	Method of Reporting Loan Data	1	Alpha-numeric	M or C	Required	Required	The method of reporting Loan data. M = the Maximum Loan Amount Eligible at this vendor will be reported as there have been no loans (Active, Defaulted (offset) or Paid Off) during the prior 12 months. C = Loan components data will be reported because there has been at least one loan (Active, Defaulted (offset) or Paid Off) during the prior 12 months. Although it is preferred to report loan component data for each loan separately, the data format allows a Vendor to summarize loan component data for all loans into a single set of loan components. If no Loans are permitted under the Plan, enter M and default values for other fields

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
2	Maximum Loan Amount Eligible-Vendor	11.2	Numeric	12345678.12	Required	Required	The Maximum Loan Amount Eligible at this vendor subject to all IRC, Plan, Product, or Fund rules with the exception of: *Reducing any outstanding loan balances (i.e. for active and defaulted loans)* The Aggregator (or Employer if self-administered Plan) will apply any loan level restrictions under that Plan when calculating the Maximum Loan Amount Eligible Vendor. If the provider does not have the ability to reduce the Loan Eligible amounts because of Plan or Product loan restrictions then just send the Maximum Loan Amount eligible. The Maximum Loan Amount Eligible should not exceed the IRS Maximum limit of $50K. If it does, report the value as $50K. If no value, submit as 0.00.
3	Separation from Service Date	8	Date Format	CCYYMMDD	Optional	Optional	The date the participant separated from service. NOTE: This field was previously a filler field from prior versions of the Best Practices and has been leveraged for a new purpose so as to minimize changes to the file format.
4	Number of Loans Outstanding	2	Numeric	2 or 10	Required	Required	Number of Outstanding "Active" and "Defaulted" Loans . If none, submit a 0. If there are any Outstanding (or Defaulted) Loans, then this field must be greater than 0 and less than 100.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
5	Product ID	11	Alpha-numeric	CreativePro	Optional	Optional	The product name/ identification used by the Investment Provider. The coding/decoding of the values should be provided by the Investment Provider. NOTE: This field was previously a filler field from prior versions of the Best Practices and has been leveraged for a new purpose so as to minimize changes to the file format. This field has changed from Numeric 11.2 to Alphanumeric 11.
6	Loan Default Loan Indicator	1	Alpha-numeric	Y or N	Required	Required	If the loan has been issued after 01/01/2004, indicates there is currently an outstanding defaulted Loan for the account. If Number of Loans Outstanding is 0, enter "N"
7	Number of Sets of Loan Component Data Reported	2	Numeric	02	Required if Reporting Method is C	Required if Reporting Method is C	If the Method of Reporting is M, then submit 0 to indicate that no loan component data will follow. If the Method of Reporting is C, this value represents the number of sets of Loan component data which follow. Note that a number of loans can be summarized and reported in a single set of Loan component data, in which case, enter "1". If the Method of Reporting is C, this number must be greater than 0 and not more than 99.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
8	Vendor Loan Number Component[3]	20	Text	Varies	Conditional, Required if Method of Reporting is "C"	Conditional, Required if Method of Reporting is "C"	Loan Number as defined by the Vendor. If loan data has been summarized for all loans (Active, Defaulted (offset) and/or Paid Off), then enter "SUMMARY" to let Aggregators know that only one set of loan components are reported for multiple loans.
9	Loan Initiation Date Component[3]	8	Date Format	CCYYMMDD	Conditional, Required if Method of Reporting is "C"	Conditional, Required if Method of Reporting is "C"	Original Date the loan was taken on this account. If "SUMMARY" loan data is reported, enter the date of the most recently issued loan.

10	Loan Status Component[3]	1	Text	A, P or D	Conditional, Required if Method of Reporting is "C"	Conditional, Required if Method of Reporting is "C"	Status of loan as last reported from the Investment Provider.
							  (A) Active,
							  (P) Paid or
							  (D) Defaulted.
							Paid or "offset" loans must be reported for 12 months following the paid-off or offset date.
							
							If SUMMARY loan data is reported, enter as follows: enter "D" If any loan is defaulted, or offset in the last 12 months, enter "P", if all loans have been paid off in the last 12 months, otherwise enter "A".

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[3] If Loan Component data is reported, then all loan component fields should repeat for every Outstanding (Active and/or Defaulted) loan and any Loan Paid Off or offset in the last 12 months.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
11	Loan Type Indicator Component[3]	1	Text	G or R	Conditional, Required if Method of Reporting is "C"	Conditional, Required if Method of Reporting is "C"	(G) General or (R) Residential. If SUMMARY loan data is reported enter as follows: Enter "G" unless it is known that at least one of the active or defaulted, offset or paid off in the last 12 months loans (if any) is Residential, in which case, enter "R".
12	Original Loan Amount Component[3]	11.2	Numeric	12345678.12	Conditional, Required if Method of Reporting is "C"	Conditional, Required if Method of Reporting is "C"	Amount initially taken. If SUMMARY loan data is reported, enter the total of the original loan amounts for all outstanding and/or defaulted, offset or paid off loans in the last 12 months.
13	Remaining Loan Balance Component[3]	11.2	Numeric	12345678.12	Conditional, Required if Method of Reporting is "C"	Conditional, Required if Method of Reporting is "C"	Current loan balance (principal and interest). If SUMMARY loan data is reported, enter the total remaining balances (principal and interest) of all outstanding and/or defaulted loans.
14	Remaining Balance Date Component[3]	8	Date Format	CCYYMMDD	Conditional, Required if Method of Reporting is "C"	Conditional, Required if Method of Reporting is "C"	Cash Value Date of account with regards to loan data.

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[3] If Loan Component data is reported, then all loan component fields should repeat for every Outstanding (Active and/or Defaulted) loan and any Loan Paid Off or offset in the last 12 months.

No.	Field	Max Length	Data Type	Example	Required for Plans with Minimum Features	Required for Plans with Additional Features	Comments
15	Highest Outstanding Loan Balance-12 Months Component[3]	11.2	Numeric	12345678.12	Conditional, Required if Method of Reporting is "C"	Conditional, Required if Method of Reporting is "C"	The highest outstanding balance of the loan over the past 12 month period. If SUMMARY loan data is reported, enter the aggregated sum of the highest outstanding loan balances for all outstanding, defaulted, offset or paid off loans during the last 12 months.

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[3] If Loan Component data is reported, then all loan component fields should repeat for every Outstanding (Active and/or Defaulted) loan and any Loan Paid Off or offset in the last 12 months.

PART III

**Data Sharing Elements for Employer or Employer Representative
(Aggregator) Census and/or Remittance Detail Records to be shared with Vendors**

Part III has been removed from the Data Elements Best Practices document as part of the changes made in Version 1.04. The Census and Remittance Best Practices are addressed in a new document entitled "Best Practices for Multiple Vendor Plans Remittance and Census Data Elements."   The document is available on The SPARK Institute website at the following address:

http://www.sparkinstitute.org/comments-and-materials.php

PART IV

Data Sharing Elements for Employer or Employer
Representative (Aggregator) Distributions Made by Vendors

1. Information reported under this Part IV should be for a rolling 12 months period (i.e., the 12 months prior to the Valuation Date (Business Process Date) on the Header record).

2. For Part IV data, each distribution should be reported separately, including multiple distributions for the same participant. For example, a participant that received three In Service Withdrawals in one day should be reported with three distinct distribution detail records.

3. Distribution Reason Codes are only required for Hardship Distributions. For all other distributions the Distribution Reason Code should be reported as NULL.

4. The following transactions types should *not* be included in Part IV:

   a. Return of Contributions
   b. Excess Deferrals
   c. Account Fees
   d. Service Credits – unless specified by the aggregator, vendors and plan sponsor.

5. The following commonly used transaction types can be included in Part IV and classified as follows:

   a. Participant Annuitization should be classified as a Distribution Type '06' - Separation of Service.
   b. Service Credits if agreed to as mentioned above should be Distribution Type '03' - In Service Withdrawal.
   c. Transfers should be classified as a Distribution Type '01' - (Contract) Exchange.

6. If vendor providing data does not have enough detail to break out QDROs and RMDs then use the following, otherwise provide the detail for each item as a separate Distribution Type.

   a. Qualified Domestic Relations Orders would be classified as a Distribution Type '03' - In Service Withdrawal.
   b. Required Minimum Distributions would be classified as a Distribution Type '06' - Separation of Service.

7. Distribution amounts are reported as positive numbers. The only exception is the reversal of a distribution that should be reported as a negative number. For example, a $45,000 distribution should be reported as 45000.00.

Reminder: The Valuation Date (Business Process Date) should be used when determining which distributions should be reported in the rolling 12 months or other reporting period. The Trade Date should not be used for reporting this information.

A. Distributions Made by Vendors Data

No.	Field	Max Length	Data Type	Example	Required/ Optional	Comments
1	Aggregator Plan ID	20	Alphanumeric	Varies	Conditional, Required if Employer Plan ID is not present	The identifier used by the Aggregator (if any) to identify the Plan.
2	Employer Plan ID	20	Alphanumeric	AB-1234567001	Conditional, Required if Aggregator Plan ID is not present	Plan ID used by the Employer to uniquely identify the Plan. May be the same as the Aggregator Plan ID.
3	Vendor Plan ID	20	Alphanumeric		Optional at discretion of Vendor	The Plan ID used by the vendor to identify the Plan.
4	Employee SSN	9	Numeric	123456789	Required	
5	Employee Account Number	25	Alphanumeric	Varies	Conditional, if multiple Accounts within the same Plan	Employee specific account/ contract number at the Vendor. This is the Participant's contract or account number at the Vendor level. Participants may have more than one account or contract with the same Vendor. This field is needed in order to properly reflect the account values at the contract level.
6	Vendor Transaction Number	20	Alphanumeric	G0001200832	Optional, at discretion of Vendor	A unique identifier of this Distribution transaction at the Vendor's discretion.
7	Distribution Type	2	Numeric	02	Required	Type of Distribution Made 01 – (Contract) Exchange 02 – Hardship Withdrawal, (including HEART withdrawals) 03 – In Service Withdrawal 04 – Loan 05 – Rollover 06 – Separation from Service 07 – Death 08 – Disability 09 – Required Minimum Distribution (RMD) 10 – Qualified Domestic Relations Order (QDRO)

No.	Field	Max Length	Data Type	Example	Required/ Optional	Comments
8	Distribution Date	8	Date Format	CCYYMMDD	Required	Trade date of the distribution.
9	Distribution Amount	11.2	Numeric	5000.00 or -5000.00	Required	The Gross amount of the Distribution made. (Amount prior to any fees, charges or taxes.) Reversals of distributions are identified by a negative (-) sign that precedes the leading digit of the distribution amount. If no value submit as 0.00
10	Distribution Reason	2	Alphanumeric	HP	Conditionally Required when Distribution Type = '02'	The reason for this distribution C = Casualty Loss D = Disability F = Funeral HP = Home Purchase M = Medical PF = Prevent Foreclosure T = Tuition O = Other U = Unknown If a Specific Distribution Reason is not known and Distribution Type = Hardship - '02', submit as 'U' Null Value for any other Distribution Type other than Hardship - '02'
11	Vendor Source ID	20	Alphanumeric	Varies	Optional	The identifier used by the Aggregator (if any) to identify the Vendor.

Best Practices for 403(b) and Related Plans Information Sharing
Version 1.04 (Updated on February 14, 2011)

VERSION CONTROL LOG

Version	Description	Date Published	Page Reference	Description of Revisions
1.00	Initial version	05/7/08	n/a	
1.01	Version including DTCC specific fields and protocols	07/10/08	n/a	Revisions related to: 1) DTCC planned information sharing services 2) Cosmetic and mechanical corrections.
1.02	Technical corrections and DTCC related changes	10/29/08		Revisions related to: 1) DTCC postponement of information sharing services. 2) Revisions and clarifications in response to questions from vendors/TPA's, as identified below.
			Version 1.01 pages affected: ii, iii, iv, 1, 2,3,5,6,22,29, 30, Exhibit A	Removed references to DTCC data fields, Header/Trailer records and processing.
			Page 4	Updated SPARK Institute Best Practices version number.
			Page 8	Clarification of GROSS vs. NET Cash Value Type.
			Page 10	Clarification that separate reporting of 403(b)(7) Cash Value is only for account type "008" (combined 403(b)(1) and 403(b)(7) plans).
			Page 11	Addition of Account Type "009" for church plans.
			Page 14	Clarification of Hardship reporting.

Version	Description	Date Published	Page Reference	Description of Revisions
			Pages 18-23	Section G: Loan Data 1) Clarification to reporting Loan Data 2) Reporting Loans in SUMMARY format 3) Two data fields originally defined are now identified as Filler1 and Filler2 as the data they represent will be available within the loan component data fields. "Filler" data elements reported as "NULL" have been specified to maintain the original file format.
			Page 24	Header record for Part III data. Data Type = 04-Remittance-Census Data.
			Page 25	Correct format of Payroll Date.
			Pages 26, 28	Clarify use of Marital Status on Census and Remittance-Census Data.
			Page 27	Correct Header record for Part III Remittance data, Data Type = 03-Census Data.
			Page 29	Correct Employee Account Number to 25 characters.
			Page 30	Addition of "Vendor Source ID" data element to Part IV "Distributions Made" data.
			Pages 31-32	Addition of Appendix A - Version Control Log.
1.03	Technical corrections	12/05/08		Revisions and clarifications in response to questions from vendors/TPAs, as identified below. A few cosmetic changes to properly capitalize data field names were also made but not listed below.
			Page iii	Summary of version 1.03 changes.
			Page 4	Record type 04 is both Remittance and Census data.
			Page 4	Updated SPARK Institute Best Practices version number.
			Page 7	Clarification that the Vendor Plan ID may be the same as the Aggregator Plan ID if that vendor also serves as the Aggregator for the plan.

Version	Description	Date Published	Page Reference	Description of Revisions
			Page 10	Renamed Roth 403(b) Cash Value to Roth Cash Value and clarified usage.
			Page 10	Cosmetic change; substituted "Post-Tax" for "After tax" in "required for" columns.
			Page 10	Renamed 403(b)(7) Cash Value to 403(b)(7) Employer Cash Value and clarified its usage. Noted that this field is excluded when calculating the total cash value of the account (since the amount is already included in the Employer Cash Value field).
			Page 14	Inserted clarification that Hardship information reported is limited to hardships taken within the last 12 months.
			Page 21	Clarification as to how the "Date of the Last Loan Distributed" can be determined from the most recent of the Loan Initiation dates reported within the Loan component data.
			Page 24	Clarification that Data Type = "04" contains Remittance and Census data.
1.04	Technical Corrections	06/30/09	Title Page	Revisions and clarifications in response to questions from vendors/TPAs, as identified below. Cosmetic changes to properly capitalize data field names were also made but not listed below, Part IV changes as well. Made change to title to add Related Retirement Plans.
			Page i	Deleted Background section and modified Overview.
			Page ii	Referenced Removal of Part III. Added Summary of Version 1.04 changes.
			Page iii	Reordered the Version Summaries from most recent to older.
			Page iv	Modified Table of Contents to Remove Part III and reflect pages of current changes.

Version	Description	Date Published	Page Reference	Description of Revisions
			Page 1	Added definition around Surrendered or Closed Contracts. Added Clarification of Participant data with zero balances.
			Page 2	Added description about sending files with no activity. Addition of parameters and standards around file naming conventions.
			Page 3	Added clarification to reversal process.
			Page 4	Provided clarification of record type identification process. Added comments about when Vendors are sharing data for more than one employer.
			Page 5	Added information about data records stating each should be provided on a separate line.
			Page 6	Renamed the constant value for Header field on the Header record. Updated Best Practices version number. Added additional field to end of Header Record for Valuation Date.
			Page 7	Renamed the constant value for the Trailer field on the Trailer record.
			Page 9	Renamed Employer Account # to Employee Account Number. Clarified that the Employee Account Number should be unique per Plan.
			Pages 11,15, 17, 18	Cosmetic changes; added "other related retirement" in the comments sections.
			Page 13	Cosmetic changes; capitalized values for 01A and 01K in comments section for Type of Account.
			Page 18	Added Component (a) to comments section for what to include in Hardship Component d) Post 12/31/88 Withdrawals.

Version	Description	Date Published	Page Reference	Description of Revisions
			Page 20	Renamed the 12/31/88 Cash Value – EE to In Service Available Cash Value. Added clarification around the field to include any money available for In Service distribution prior to taking a hardship.
			Pages 21, 22	Section G: Loan Data Added Loan Status definition to provide additional clarification around how each should be populated. Provided clarifications around Defaulted Loans.
			Page 23	Cosmetic changes including references to Deemed distributable and offset loans.
			Pages 24,25	Corrected the Maximum Loan Amount Eligible-Vendor comments to remove overriding logic for frequency and Loan restrictions. Added Maximum Loan Eligible Cap comment.
			Pages 26, 27	Cosmetic changes; added offset language and last 12 months language in comments sections.
			Page 28	Provided clarification in comments section for Remaining Balance Date Component.
			Page 29	Reference the Removal of Part III to a separate Best Practices document.
			Page 30	Added a Summary of the additional transactions type included in Part IV and classification of existing transaction types. Specified the rolling 12 months requirement for the data to be sent. Added comment about how Part IV distribution data should be reported separately.

Version	Description	Date Published	Page Reference	Description of Revisions
			Pages 31-32	Addition of Transaction codes for the Distribution Type field in the comments section. Specified that the distribution date should be the trade date of the distribution in comments section. Modified the Comments section for Distribution Reason.
1.04 Updated Feb. 14, 2011	Updates related to file transmission frequency, Daily Delta Files and technical corrections/ clarifications	Feb. 14, 2011	Title Page	Cosmetic changes and added updated version and release dates.
			Page i	Updated general information.
			Page ii	Added Summary of Version 1.04 Update, including making weekly file feeds the industry standard and introducing the "Daily Delta" file sharing method.
			Page iii	Added reference to move of Prior Version Changes to a new Appendix B. Updated Effective Date.
			Page v	Added Appendix B to Table of Contents.
			Page 1	Added note that this update establishes that the best practice for data transmission has changed from monthly to weekly. Added reference to "Daily Delta" file.
			Pages 2-3	Added: - Clarifications from Q&A - Added file naming value for Daily Delta files - Defined Daily Delta file process
			Page 4	Added reference to populating certain "Optional" fields.
			Page 6	Began identifying each field within each record with a number for reference purposes.
			Pages 14-15	Changed case of codes for Type of Account from 01A to 01a and 01K to 01k. Added clarification to contribution fields that these are gross contributions not net (from Q&A).
			Page 23	Added clarification from Q&A for vendors with more than 99 outstanding loans.
			Page 25	Changed Filler 1 to Separation from Service Date (#3) as outlined in prior Q&A.

Version	Description	Date Published	Page Reference	Description of Revisions
			Page 26	Changed Filler 2 to Product ID (#5) and format from 11.2 numeric to 11 Alphanumeric as outlined in prior Q&A.
			Page 31	Added point 7 in response to a prior Q&A.
			Pages 32-33	Added clarification to comments for Distribution Type and Distribution Amount from prior Q&A.
			Page 34	Added updated version and release dates.
			Page 41	Added Appendix B – Summary of Prior Version Changes.

SUMMARY OF PRIOR VERSION CHANGES

<u>Version 1.04 Changes (Released June 30, 2009)</u> - In response to questions that were raised regarding the labeling of the "Distribution Types and Reasons" fields, The SPARK Institute determined that it was necessary to recognize additional Distribution Types and clarify the Distribution Reasons. Accordingly, Version 1.04 of the Best Practices added four additional Distribution Types: Deaths, QDROs, Disability and RMD (Required Minimum Distribution).

Additionally, The SPARK Institute took the opportunity to insert text relating to the rolling 12 months rule (for all distribution data) that previously was not expressly stated for Part IV data. Part III was removed. Several other minor clarifications to Part II and IV were made in response to questions. The changes are identified in the Version Control Log.

<u>Version 1.03 Changes</u> - In response to additional questions that have been raised relating to the labeling of the "Rollover Roth Cash Value" and "Roth 403(b) Cash Value" fields, The SPARK Institute determined that it was necessary to rename the field previously called "Roth 403(b) Cash Value" to "Roth Cash Value" and clarify its definition. Clarification has also been made by renaming the "403(b)(7) Cash Value" field to "403(b)(7) Employer Cash Value" and revising the description and pointing out that this field is a subset of the "Employer Cash Value" field and should be excluded when determining the overall cash value of the account. The file structure for Part II of the guidelines remains unchanged.

Additionally, The SPARK Institute inserted text relating to the rolling 12 months rule (for reporting Hardship Data) that was inadvertently omitted in Part II, Section D. A few other minor clarifications were included in response to industry Q&As. See the Version Control Log.

<u>Version 1.02 Changes</u> - On May 7, 2008, The SPARK Institute released the initial version of the Best Practices and on July 10, 2008 an updated version was released to include data fields and approaches in order to accommodate a planned DTCC information sharing service and several other corrections.

As vendors started making system changes, The SPARK Institute received a number of questions requesting clarifications regarding the intended use and values of the data elements. The SPARK Institute established a panel of member companies to review and respond to the questions and created a website in order to broadly communicate the questions and answers. Version 1.02 was released to reflect changes that the panel considered necessary or beneficial as a result of the questions we received, and to remove DTCC specific items. A Version Control Log was added as Appendix A. Examples regarding the intended methodology for vendor reported loan data are available on The SPARK Institute website (see Part II, Section G herein).