

SAN DIEGO COUNTY EMPLOYEES RETIREMENT ASSOCIATION
REQUIRED MINIMUM DISTRIBUTIONS – CODE SECTION 401(a)(9) POLICY

I. PURPOSE

To clarify that, as provided in the Pension Protection Act of 2006 and Treasury Regulation section 1.401(a)(9)-1, Q&A-2(d), that the San Diego County Employees Retirement Association (the "Association"), as a governmental plan defined in section 414(d) of the Internal Revenue Code of 1986, as amended (the "Code") is treated as having complied with Code section 401(a)(9) for all years to which Code section 401(a)(9) applies to the Association if the Association complies with a reasonable and good faith interpretation of Code section 401(a)(9), and to clarify Section 31485.14 of the California Government Code.

II. POLICY

Notwithstanding any provision of the Association to the contrary, the Association shall comply with Code section 401(a)(9), including the minimum distribution incidental benefits rule of Code section 401(a)(9)(G), pursuant to a reasonable and good faith interpretation of Code section 401(a)(9).

REVIEW

This policy shall be reviewed by the Board at least every three (3) years and may be amended at any time.

HISTORY

June 7, 2012	Adopted, effective immediately
June 4, 2015	Reviewed, no changes