

## Emergency justification -1545-1674

Rev. Proc. 2017-xx is guidance that is an essential part of an administrative priority to eliminate burdens on plan sponsors, employers and the Service with respect to TE/GE's Employee Plans pre-approved plan programs. Due to a lack of resources, the IRS made significant changes to the individually designed program, generally effective January 1, 2017, that reduced the instances under which employers maintaining individually designed plans could submit a determination letter request. As a result of this contraction, the TE/GE Employee Plans Division is continuing to encourage and facilitate the use of pre-approved plans in order to enable more employers to obtain reliance that their plans are qualified. A critical part of this effort includes issuing Rev. Proc. 2017-xx, which expands current pre-approved plan program availability to include additional types of employers (governmental employers and non-electing churches) and by combining the current Master & Prototype (M&P) and Volume Submitter (VS) pre-approved programs into a combined, streamlined program with modified rules and procedures which provide greater flexibility in plan design.

This combined pre-approved program generally incorporates characteristics that were previously in either or both of the M&P or the VS programs. Thus, the vast majority of sponsoring organizations that offered pre-approved M&P or VS plans, or both, will generally be familiar with the characteristics and requirements of the combined program. However, the current submission under the program begins August 1, 2017. Sponsors of these plans will need several months of lead time after release of the revenue procedure to prepare their submissions. If clearance of the procedure is delayed, in addition to delaying this high profile program covering over 300,000 employer sponsored retirement plans, separate guidance would need to be issued ASAP that would extend the submission deadline.

We ask that OMB approve the collection of information on an expedited basis. The Employee Plans Division of the IRS and the Chief Counsel's Office of the IRS have consulted with stakeholders in drafting the guidance in order to take all practicable steps to minimize the burden of the collection of information.