SAINT PAUL PUBLIC SCHOOLS 403(B) RETIREMENT SAVINGS PLAN

QUALIFIED DOMESTIC RELATIONS ORDER PROCEDURE

In the case of any Domestic Relations Order (DRO) received by Saint Paul Public Schools 403(b) Retirement Savings Plan, its status as a Qualified Domestic Relations Order (QDRO) under the Employee Retirement Income Security Act (ERISA) and the Internal Revenue Code will be determined under the following procedures. The purpose of the QDRO Procedure is to establish a reasonable and consistent procedure for determining the qualified status of a Domestic Relations Order and for making distributions pursuant to a Domestic Relations Order which qualifies under Internal Revenue Code Section 414(p).

Procedure prior to receipt of order: The Plan will apply the following procedure prior to the Plan's receipt of a Domestic Relations Order.

1. Suspension of Participant distributions or loans. If the Plan is on notice (verbal or written) regarding a pending domestic relations action (e.g., a divorce) and has a reasonable belief the Participant's account may become subject to a QDRO, the Plan may suspend processing the Participant's distribution or loan requests pending resolution.

2**. Removing hold on the account.** After placing a hold on the account, the Plan should notify the Participant of the hold on the account. In order to remove the hold, the Plan should request the Participant to provide written confirmation that a court will not issue a QDRO with respect to the account; such as a property settlement agreement awarding the entire account to the Participant.

Procedure after receipt of order: The Plan will apply the following procedure whenever it receives a DRO which purports to be a QDRO.

1. Notice to Participant and to alternate payee. Within a reasonable time period after receipt of a domestic relations order, the Plan will notify the Participant and any alternate payee of the receipt of the order, and will deliver to the Participant and to each alternate payee a copy of this QDRO Procedure.

2. Notice to Vendor. The Plan, within a reasonable time period after receipt of a Domestic Relations Order, will notify the Vendor or Vendors of any Funding Vehicle holding all or any part of the Participant's account ("Vendor") of the receipt of the order. The Plan also will account separately for the amount of the Participant's benefit which is subject to the order. The Plan will direct the Vendor to segregate the "QDRO amount" if possible.

3. Review of order. The Plan will review the order within a reasonable time to determine its qualified status. The Plan will complete a QDRO DETERMINATION CHECKLIST with respect to each order the Plan receives. In most circumstances, the Plan will complete review of the order within 30 days of receipt. After review, the Plan Administrator will determine whether the order is a QDRO.

4. Suspension of distributions and loans. If the Participant is eligible to receive benefits or loans from the Plan at the time of receipt of the order, the Plan will suspend distributions and loans to the Participant to the extent the Plan deems necessary to comply with the order should the Plan determine the order is a QDRO.

5. Determination order is a QDRO. If the Plan determines the order is a QDRO:

a. The Plan will notify the Participant and each alternate payee that the order is a QDRO and the Plan will distribute amounts pursuant to the QDRO. The Plan will notify the Participant and each alternate payee of the decision within ten days of the determination by mailing to each party a copy of the QDRO DETERMINATION CHECKLIST, which will include the Plan's certification.

b. If the QDRO requires immediate payment, the Plan will pay the designated amounts as soon as administratively feasible. Payment of any amount the order required the Plan to pay during the determination period will include interest from the date the QDRO required the first payment, at the rate of interest determined to be reasonable. The rate of interest payable on a regular savings account is a reasonable rate of interest for this purpose.

c. If the Plan cannot make the distribution within 30 days of the determination of qualified status of the QDRO, the Plan will advise the parties of the delay, of the reason for the delay and of the date by which the Plan expects to make payment.

d. The Plan will advise the Participant when the Plan has completed payment to the alternate payee.

e. The Plan will maintain a separate accounting (which may include a segregated account) for each alternate payee until the Plan has completed benefit payments under the QDRO.

f. Each alternate payee is entitled to file with the Plan a beneficiary designation in the same manner as a Participant in the Plan, except that the joint and survivor annuity provisions do not apply to the alternate payee's spouse.

6**. Determination that the order is not a QDRO.** If the Plan determines the order is not a QDRO:

a. The Plan will advise the Participant and each alternate payee of the adverse decision and of the reasons for the adverse decision. The Plan will advise the Participant and each alternate payee of the decision within ten days of the determination by mailing to each party a copy of the QDRO DETERMINATION CHECKLIST, which will include the Plan's certification of the decision.

b. The Plan will discontinue separate accounting for the amounts payable under the order. The Plan will pay the benefits to the party entitled to receive the benefits. If the Participant is not entitled to a present distribution of any of the segregated benefits, the Plan will continue to account for the Participant's benefits as if the Plan had not received the order.

c. If the Plan determines the status of the order within the 18-month period beginning on the date the order would require the first payment, the Plan may delay distribution of any benefits subject to the order if the Plan has reason to believe a party will seek to cure the defects in the order. The Plan will continue to delay distribution during the period the Plan Administrator determines to be necessary to fulfill the Plan's fiduciary duties under the Plan.

7. Consultation with legal counsel. The Plan's legal counsel shall be consulted in case of questions which arise with respect to the interpretation of any provision of the order or with respect to the qualified status of the order.

Kenyatta McCarty
Kenyatta McCarty (Mar 3, 2020)

Authorized Signature