

Plan Number - 002  
EIN - 41-0693979

**ST. OLAF COLLEGE**  
**SALARY REDUCTION SAVINGS PLAN**  
Northfield, Minnesota

FINANCIAL STATEMENTS  
Including Independent Auditors' Report

As of January 1, 2015 and December 31, 2014  
and for the Period Ended January 1, 2015

# ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN

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Note: Supplemental schedules required by the Employee Retirement Income Security Act of 1974 not included as part of these statements are not applicable to St. Olaf College Salary Reduction Savings Plan.

**INDEPENDENT AUDITORS' REPORT**

To the Plan Administrator of the  
St. Olaf College Salary Reduction Savings Plan  
Northfield, Minnesota

***Report on the Financial Statements***

We were engaged to audit the accompanying financial statements of St. Olaf College Salary Reduction Savings Plan (the Plan), which comprise the statements of net assets available for benefits as of January 1, 2015 and December 31, 2014, and the related statement of changes in net assets available for benefits for the period ended January 1, 2015, and the related notes to the financial statements.

***Management's Responsibility for the Financial Statements***

Plan management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to error or fraud.

***Auditors' Responsibility***

Our responsibility is to express an opinion on these financial statements based on conducting our audits in accordance with auditing standards generally accepted in the United States of America. Because of the matters described in the Basis for Disclaimer of Opinion paragraph, however, we were not able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion.

***Basis for Disclaimer of Opinion***

As permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974, the Plan administrator instructed us not to perform, and we did not perform, any auditing procedures with respect to the investment information summarized in Note 3, which was certified by TIAA-CREF, both as the custodian for the Plan and as an authorized agent of JPMorgan Chase Bank, N.A., except for comparing such information with the related information included in the financial statements. We have been informed by the Plan administrator that the custodian, along with JPMorgan Chase Bank, N.A., holds the Plan's investment assets and executes investment transactions. The Plan administrator has obtained a certification from the custodian as of December 31, 2014, that the information provided to the Plan administrator by the custodian is complete and accurate.

As described in Note 8, the Plan has excluded from investments in the accompanying financial statements certain annuity and custodial accounts issued to current and former employees prior to January 1, 2009, as permitted by the Department of Labor's Field Assistance Bulletin No. 2009-02. Accounting principles generally accepted in the United States of America (US GAAP) require that these accounts and the related income and distributions be included in the accompanying financial statements. Management has not determined the impact of this departure from US GAAP, but estimates that it could be material to the financial statements.

***Disclaimer of Opinion***

Because of the significance of the matters described in the Basis for Disclaimer of Opinion paragraph, we have not been able to obtain sufficient, appropriate audit evidence to provide a basis for an audit opinion. Accordingly, we do not express an opinion on these financial statements.

***Emphasis of Matter***

As further discussed in Note 1 to the financial statements, the Plan merged with the St. Olaf College Matched Savings Plan to create a single plan that is known as the St. Olaf College 403(b) Retirement Savings Plan, effective January 1, 2015.

***Report on Form and Content in Compliance with DOL Rules and Regulations***

The form and content of the information included in the financial statements, other than that derived from the information certified by the custodian, have been audited by us in accordance with auditing standards generally accepted in the United States of America and, in our opinion, are presented in compliance with the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974.

*Baker Tilly Virchow Krause, LLP*

Minneapolis, Minnesota  
November 13, 2015

**ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN**

**STATEMENTS OF NET ASSETS AVAILABLE FOR BENEFITS**  
As of January 1, 2015 and December 31, 2014

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| <b>ASSETS</b>                            | <u>2015</u>        | <u>2014</u>                 |
|--|--------------------|-----------------------------|
| Investments, at fair value               | <u>\$ -</u>        | <u>\$ 44,701,635</u>        |
| <b>NET ASSETS AVAILABLE FOR BENEFITS</b> | <u><u>\$ -</u></u> | <u><u>\$ 44,701,635</u></u> |

See accompanying notes to financial statements.

**ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN**

**STATEMENT OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS**  
For the Period Ended January 1, 2015

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|   | <u>2015</u>          |
|---|----------------------|
| Transfer to Another Plan (See Note 1)                             | <u>\$ 44,701,635</u> |
| Net decrease in net assets available for benefits                 | (44,701,635)         |
| <b>NET ASSETS AVAILABLE FOR BENEFITS -</b><br>Beginning of period | <u>44,701,635</u>    |
| <b>NET ASSETS AVAILABLE FOR BENEFITS -</b><br>End of period       | <u>\$ -</u>          |

See accompanying notes to financial statements.

# ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS  
As of January 1, 2015 and December 31, 2014  
And for the Period Ended January 1, 2015

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## **NOTE 1 - Description of the Plan**

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The following description of the St. Olaf College Salary Reduction Savings Plan (the "Plan") provides only general information. Participants should refer to the Plan's summary plan description for a more complete description of the Plan's provisions.

### *General*

The Plan is a defined contribution plan established by St. Olaf College (the "College"), and is subject to the provisions of the Employee Retirement Income Security Act of 1974 and the requirements of Section 403(b) of the Internal Revenue Code. The College is the sponsor and administrator of the Plan. TIAA-CREF (along with JP Morgan Chase Bank, N.A.) is the custodian (the "Custodian"). The Custodian manages the investments of the Plan as directed by the participants. In addition, the Custodian provides recordkeeping services for the Plan.

### *Plan Merger*

Effective January 1, 2015, the St. Olaf College Salary Reduction Savings Plan merged with the St. Olaf College Matched Savings Plan to create a single plan that is known as the St. Olaf College 403(b) Retirement Savings Plan. There were no contributions or new participants into the plan during the period ended January 1, 2015. All participants electing to contribute began making contributions to the 403(b) Retirement Savings Plan effective January 1, 2015.

### *Participant Accounts*

Each participant's account was credited with the participant's salary reduction contributions, rollover contributions, catch-up contributions and an allocation of the Plan earnings (net of administrative expenses), based on the participant's selected investment options. The benefit to which a participant is entitled is the benefit that can be provided from the participant's vested account.

### *Investment Options*

For each investment category, which calculates fair value based on net asset value outside of an active market, a description of the significant investment strategies of the investee is disclosed.

Variable Annuities- Real Estate Account- This account is an insurance company pooled separate account of TIAA investing mainly in real estate and real estate-related investments. This account seeks favorable long-term returns primarily through rental income and appreciation of real estate and real estate-related investments owned by the account. The account will also invest in non-real estate-related publicly traded securities and short-term higher quality liquid investments that are easily converted to cash to enable the account to meet participant redemption requests, purchase or improve properties or cover other expenses. The account intends to have between 75% and 85% of its net assets invested directly in real estate or real estate-related assets, with the goal of producing favorable long-term returns. Under the account's investment guidelines, investments in direct foreign real estate, together with foreign real estate-related securities and foreign non-real estate-related liquid investments may not comprise more than 25% of the account's net assets. The account will invest the remaining portion of its assets (targeted between 15% and 25% of net assets) in publicly traded, liquid investments.

# ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS  
As of January 1, 2015 and December 31, 2014  
And for the Period Ended January 1, 2015

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## **NOTE 1 - Description of the Plan (cont.)**

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### *Vesting and Forfeited Accounts*

Participants were immediately vested at the time contributions were deposited into their accounts; as such the Plan had no forfeitures.

### *Plan Loans*

Participants may borrow amounts from TIAA-CREF using the assets of the Plan as collateral for the loans. General guidelines are that the minimum loan amount be \$1,000, while the maximum is equal to the lesser of \$50,000 or 45% of their vested account balance. The loans do not reduce the balance of participants' accounts unless the loan is in default at the time when the benefits are distributable. The Plan loan requires the participant to maintain at least 110% of the loan collateral within their TIAA Traditional Annuity GSRA. The loans bear interest at variable rates tied to the Monthly Average Corporate yield, published by Moody's Investor Service, but the rate remains the same for the first year. Principal and interest is paid directly to TIAA-CREF.

As of January 1, 2015 and December 31, 2014, outstanding loans totaled \$224,603. As of January 1, 2015, there were five individuals with loans in default totaling \$13,306.

### *Administrative Expenses*

General Plan administrative expenses, such as legal fees and administrative costs, are paid for with any available revenue credit funds. Any such remaining expenses not covered by the revenue credit account are paid directly by the College. Fees specific to the participant's investment selections and accounts are charged against that participant's account balance.

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## **NOTE 2 - Summary of Significant Accounting Policies**

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### *Basis of Accounting and Use of Estimates*

The accompanying financial statements have been prepared on the accrual basis of accounting. The preparation of the financial statements in conformity with accounting principles generally accepted in the United States of America requires the Plan's management to use estimates and assumptions that affect the accompanying financial statements and disclosures. Actual results could differ from these estimates.

### *Investment Valuation and Income Recognition*

The Plan's mutual fund, money market, and variable annuity investments are valued at fair value as determined by the Trustee using quoted market prices. The Plan's fixed annuity contract investments are valued at contract value, which approximates fair value. Refer to Note 4 for details on inputs, valuation techniques and fair value measurement level within the fair value hierarchy.

The Plan invests in mutual funds and variable annuity accounts that determine their fair value using the net asset value (NAV) of the funds. The NAV is determined by each fund's trustee using the fair value of the underlying securities within the fund at year end.



# ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS  
As of January 1, 2015 and December 31, 2014  
And for the Period Ended January 1, 2015

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## NOTE 2 - Summary of Significant Accounting Policies (cont.)

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### *Risk and Uncertainties*

Investments, in general, are subject to various risks, including credit, interest, and overall market volatility risks. Due to the level of risk associated with certain investment securities, it is reasonably possible that changes in values of investment securities will occur in the near term, and such changes could materially affect the amounts reported in the statements of net assets available for benefits. Plan investments are not insured by FDIC or similar coverage.

### *Payment of Benefits*

Benefits were recorded when paid.

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## NOTE 3 - Information Prepared and Certified by Custodian - Unaudited

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The following information included in the accompanying financial statements and supplemental schedule was obtained from data that has been prepared and certified to be complete and accurate by TIAA-CREF, the custodian of the Plan.

Net assets available for benefits as:

|   | January 1,<br>2015 | December 31,<br>2014 |
|---|--------------------|----------------------|
| Fixed annuity contract                  | \$ -               | \$ 12,042,405        |
| Money market                            | -                  | 450,712              |
| Mutual funds                            | -                  | 8,492,845            |
| Variable annuities - real estate        | -                  | 2,257,184            |
| Variable annuities - other              | -                  | 21,458,489           |
|   | <hr/>              | <hr/>                |
| Total net assets available for benefits | \$ -               | \$ 44,701,635        |

During the period ended January 1, 2015, the Plan's investments (including gains and losses on investments bought, sold, and held during the period) had no appreciation or depreciation.

The following investments represent 5% or more of the Plan's net assets available for benefits as of January 1, 2015 and December 31, 2014:

|                      | January 1,<br>2015 | 2014          |
|----------------------|--------------------|---------------|
| TIAA Traditional     | \$ -               | \$ 12,042,405 |
| CREF Stock           | -                  | 10,426,888    |
| CREF Global Equities | -                  | 2,734,981     |
| TIAA Real Estate     | -                  | 2,257,184     |

# ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS  
As of January 1, 2015 and December 31, 2014  
And for the Period Ended January 1, 2015

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## **NOTE 4 - Fair Value Measurements**

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The Plan follows accounting principles generally accepted in the United States of America for measuring, reporting, and disclosing fair value. These standards apply to all assets and liabilities that are measured, reported and/or disclosed on a fair value basis.

As defined in the accounting standards, fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value hierarchy ranks the quality and reliability of the information used to determine fair values. Assets and liabilities measured, reported and/or disclosed at fair value will be classified and disclosed in one of the following three categories:

Level 1 - Inputs are quoted market prices (unadjusted) in active markets for identical assets that the plan can access at the measurement date.

Level 2 - Observable market based inputs that are corroborated by market data.

Level 3 - Inputs that are unobservable and not corroborated by market data.

The asset's fair value measurement level within the fair value hierarchy is based on the lowest level of any input that is significant to the fair value measurement. Valuation techniques used need to maximize the use of observable inputs and minimize the use of unobservable inputs.

## ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS  
As of January 1, 2015 and December 31, 2014  
And for the Period Ended January 1, 2015

### NOTE 4 - Fair Value Measurements (cont.)

The tables below present the balances of assets measured at fair value on a recurring basis by level within the hierarchy.

|   | January 1, 2015   |               |              |               |
|---|-------------------|---------------|--------------|---------------|
|   | Total             | Level 1       | Level 2      | Level 3       |
| Total                                   | \$ -              | \$ -          | \$ -         | \$ -          |
|   | December 31, 2014 |               |              |               |
|   | Total             | Level 1       | Level 2      | Level 3       |
| Fixed annuity contract                  | \$ 12,042,405     |               |              | \$ 12,042,405 |
| Money market                            | 450,712           | \$ 450,712    |              |               |
| Mutual funds                            |                   |               |              |               |
| Large cap equity funds                  | 317,501           | 317,501       |              |               |
| Large to mid cap equity funds           | 1,005,603         | 1,005,603     |              |               |
| Small to mid cap equity funds           | 1,661,081         | 1,661,081     |              |               |
| Bond funds                              | 495,239           | 495,239       |              |               |
| Multi asset funds                       | 130,221           | 130,221       |              |               |
| International equity funds              | 1,098,886         | 1,098,886     |              |               |
| Target date funds                       | 3,784,313         | 3,784,313     |              |               |
| Variable annuities - real estate        | 2,257,184         |               | \$ 2,257,184 |               |
| Variable annuities - other              |                   |               |              |               |
| Domestic equity annuities               | 4,130,164         | 4,130,164     |              |               |
| Domestic/International equity annuities | 10,426,888        | 10,426,888    |              |               |
| International equity annuities          | 2,734,981         | 2,734,981     |              |               |
| Fixed-income annuities                  | 2,186,086         | 2,186,086     |              |               |
| Balanced annuities                      | 1,980,371         | 1,980,371     |              |               |
| Total                                   | \$ 44,701,635     | \$ 30,402,046 | \$ 2,257,184 | \$ 12,042,405 |

# ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS  
As of January 1, 2015 and December 31, 2014  
And for the Period Ended January 1, 2015

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## **NOTE 4 - Fair Value Measurements (cont.)**

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The following methods and assumptions were used to estimate the fair value for each class of financial instrument measured at fair value.

### ***Fixed Annuity Contract***

The fixed annuity contract is considered a Level 3 investment held by Teachers Insurance and Annuity Association of America (TIAA) and consists of contracts within the TIAA Traditional Annuity. The TIAA Traditional Annuity is reported at contract value and is not available for sale or transfer on any securities exchange. Accordingly, transactions in similar investment instruments are not observable. For further discussion on how the contract value is determined, see Note 5.

### ***Money Market***

The money market is considered a Level 1 investment and consists of the College Retirement Equities Fund (CREF) Money Market Account. CREF is registered with the Securities and Exchange Commission under the Investment Company Act of 1940 as an open-end management investment company. CREF Money Market Account is a variable annuity that is traded on a regular basis. CREF Money Market Account holdings are generally valued at amortized cost, which approximates fair value, and the unit value is determined each day. Audited financial statements are available.

### ***Mutual Funds***

The mutual funds are Level 1 investments and consist of TIAA-CREF, Eaton Vance, PIMCO, Vanguard, JPMorgan and MFS Funds and other individual mutual funds. During 2014, the plan replaced the non-target date mutual fund selections from TIAA-CREF with fund selections from a variety of other investment companies resulting in different mutual fund equity classifications from the previous years.

Fund holdings are generally valued using market quotations. Each fund determines its share price or net asset value (NAV) daily. The funds invest principally in domestic and international equity securities, fixed-income instruments, real estate securities, asset allocation, other mutual funds and short-term instruments in accordance with each fund's investment objectives.

# ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS  
As of January 1, 2015 and December 31, 2014  
And for the Period Ended January 1, 2015

## **NOTE 4 - Fair Value Measurements (cont.)**

### ***Variable Annuity - Real Estate***

The variable annuity- real estate is a Level 2 investment and consists of the TIAA Real Estate Account (REA). The REA is an insurance company pooled separate account of TIAA investing mainly in real estate properties and real estate-related investments. Audited financial statements are available.

The REA's value is principally derived from the market value of the underlying real estate holdings or other real estate-related investments. Real estate holdings are valued principally using external appraisals, which are estimates of property values based on a professional's opinion. The REA sometimes holds securities as well. These are generally priced using values obtained from independent pricing sources. The fair value measurement of REA calculates NAV per share.

|                      | Fair Value         |                      | Unfunded<br>Commitments | Redemption<br>Frequency<br>(if currently<br>eligible)<br><br>Once per<br>calendar<br>quarter | Redemption<br>Notice<br>Period |
|----------------------|--------------------|----------------------|-------------------------|--|--------------------------------|
|                      | January 1,<br>2015 | December 31,<br>2014 |                         |  |                                |
| TIAA Real Estate (a) | \$ -               | \$ 2,257,184         | \$ -                    |  | None                           |

- (a) Accumulation units in the TIAA Real Estate account are available for transactions at the closing accumulation unit value on any day the NYSE is open for business. Although the underlying assets of the TIAA Real Estate account cannot be quickly sold and converted to liquid assets, the TIAA General Account provides the TIAA Real Estate account with a liquidity guarantee- i.e., TIAA ensures that the TIAA Real Estate account has funds available to meet participant redemption, transfer or cash withdrawal requests executed at quoted unit values.

### ***Variable Annuities - Other***

The variable annuity- other accounts are Level 1 investments and the fair market value per share is calculated at NAV on a daily basis. Variable annuity accounts are primarily valued using market quotations or prices obtained from independent pricing sources that may employ various pricing methods to value the investments including matrix pricing. The variable annuity accounts invest principally in equity securities, fixed-income instruments and short-term investments in accordance with each portfolio's investment objectives. Shareholders will be locked out of an account for 90 days if a purchase, sale and repurchase within that account is made within a 60-day period. There are no unfunded commitments related to the investments. Variable annuity accounts consist of seven investment portfolios within CREF. The investment options have audited financial statements.

To the participant, these investments are similar to mutual funds until the participant annuitizes them. The participant has the option to annuitize these investments, but until that time occurs, the variable annuity investments act as mutual funds.

## ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS  
As of January 1, 2015 and December 31, 2014  
And for the Period Ended January 1, 2015

### **NOTE 4 - Fair Value Measurements (cont.)**

The following table presents a reconciliation of financial instruments measured at fair value on a recurring basis using significant unobservable inputs (Level 3) for the period ended January 1, 2015:

|                        | Balance<br>December 31,<br>2014 | Net realized<br>and<br>unrealized<br>gains included<br>in change in<br>net assets | Transfer to St.<br>Olaf College<br>403(b)<br>Retirement<br>Savings Plan | Purchases | Balance<br>January 1,<br>2015 |
|------------------------|---------------------------------|---|---|-----------|-------------------------------|
| Fixed annuity contract | \$ 12,042,405                   | -   | (12,042,405)  | -         | \$ -                          |

The amount of total gains for the period included in change in net assets attributable to the change in unrealized gains or losses relating to Level 3 financial instruments still held at January 1, 2015

\$ -

The following table presents a reconciliation of financial instruments measured at fair value on a recurring basis using significant unobservable inputs (Level 3) for the year ended December 31, 2014:

|                        | Balance<br>December 31,<br>2013 | Net realized<br>and<br>unrealized<br>gains included<br>in change in<br>net assets | Sales,<br>issuances and<br>settlements | Purchases | Balance<br>December 31,<br>2014 |
|------------------------|---------------------------------|---|--|-----------|---------------------------------|
| Fixed annuity contract | \$ 11,537,086                   | 339,916   | (2,652,698)                            | 2,818,101 | \$ 12,042,405                   |

The amount of total gains for the period included in change in net assets attributable to the change in unrealized gains or losses relating to Level 3 financial instruments still held at December 31, 2014

\$ 116,732

# ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS  
As of January 1, 2015 and December 31, 2014  
And for the Period Ended January 1, 2015

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## **NOTE 5 - Investment Contract with Insurance Company**

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The Plan has entered into a fixed annuity contract with TIAA, a New York domiciled non-profit legal reserve life insurance company. Contributions to the TIAA Traditional Annuity purchase a contractual or guaranteed amount of future benefits for the participant that is fully and unconditionally guaranteed by the general assets of TIAA. During the accumulation phase, the TIAA Traditional Annuity provides a guarantee of principal, a guaranteed minimum rate of interest (generally 3%, but in some recent contracts between 1% and 3%), and the potential for additional interest if declared by TIAA. Additional interest, when declared, remains in effect for the "declaration year," which begins each March 1. Additional interest is not guaranteed for future years. When a participant's account in the TIAA Traditional is annuitized based on available options, the present value of the stream of payments is equal to the account balance. The subsequent stream of annuity payments occurs outside of the Plan and does not represent an obligation of the Plan.

The TIAA Traditional Annuity is reported at contract value, which approximates fair value. The contract value of the TIAA Traditional Annuity equals the accumulated cash contributions and interest credited to the Plan's contracts, less any withdrawals and adjusted for transfers, if any. The TIAA Traditional Annuity is not available for sale or transfer on any securities exchange. Accordingly, transactions in similar investment instruments are not observable.

While transactions involving the purchases/sales of individual TIAA Traditional Annuity contracts are not observable in a public marketplace, contract value has historically provided a good approximation of fair value. The plan has provided no reserves against such contract value for credit risk of the contract issuer.

The TIAA Traditional Annuity investment contract is 99% benefit responsive as of December 31, 2014. The average yield of the TIAA Traditional benefit responsive investment contract was 3.31% for the year ended December 31, 2014.

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## **NOTE 6 - Parties-In-Interest**

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Plan investments are fixed and variable annuity contracts, shares of mutual funds and money market funds managed by the Custodian, as defined by the Plan and, therefore, these transactions qualify as party-in-interest transactions. Fees paid by the Plan for the investment management services, net of revenue credit, amounted to \$217,071 for the year ended December 31, 2014, and are party-in-interest transactions. These fees were netted against investment income.

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## **NOTE 7 - Tax Status**

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The Internal Revenue Service (IRS) had provided 403(b) plans relief from obtaining a determination letter until the revenue procedures were finalized and the IRS announced the date that it would start accepting applications. Revenue Procedure 2013-22 was issued with an effective date of April 29, 2013 and the IRS will accept applications for opinion and advisory letters regarding the acceptability under section 403(b) of the form of prototype plans and volume submitter plans, starting June 28, 2013. The IRS has not established a determination letter program for individually designed 403(b) plans at this time. Revenue Procedure 2013-22 also describes procedures for the retroactive remedial amendment of plans to satisfy the requirements of IRC Section 403(b) and the regulations. A written 403(b) plan adopted prior to December 31, 2009, that is intended to satisfy the requirements of Section 403(b) and the regulations, will have a remedial amendment period in which to amend the plan to correct any form defects retroactive to January 1, 2010, provided that the plan sponsor timely adopts a pre-approved 403(b) plan with an opinion letter or timely applies for an individual determination letter.

# ST. OLAF COLLEGE SALARY REDUCTION SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS  
As of January 1, 2015 and December 31, 2014  
And for the Period Ended January 1, 2015

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## **NOTE 7 - Tax Status (cont.)**

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The College is not aware of any events that have occurred that might adversely affect the Plan from obtaining a qualified status. The Plan is required to operate in conformity with Section 403(b) of the Internal Revenue Code to obtain its qualification.

U.S. GAAP requires Plan management to evaluate tax positions taken by the Plan and recognize a tax liability (or asset) if the plan has taken an uncertain position that more likely than not would not be sustained upon examination by the IRS. The Plan administrator has analyzed the tax positions taken by the Plan, and has concluded that as of January 1, 2015 and December 31, 2014, there are no uncertain positions taken. The Plan is subject to routine audits by taxing jurisdictions; however, there are currently no audits for any tax periods in progress. The Plan administrator believes it is no longer subject to income tax examinations for years prior to 2012.

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## **NOTE 8 - Orphan Contracts**

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The Department of Labor's Field Assistance Bulletin No. 2009-02, Annual Reporting Requirements for 403(b) Plans (as clarified by Field Assistance Bulletin No. 2010-01) allows a plan administrator of a 403(b) plan to exclude certain contracts and accounts (Orphan Contracts) from plan assets for purposes of ERISA's annual reporting and audit requirements under specified conditions. Accordingly, the Plan has excluded from investments in the accompanying statements of net assets available for benefits certain annuity and custodial accounts issued to current and former employees prior to January 1, 2009. The related investment income and distributions have also been excluded in the accompanying statement of changes in net assets available for benefits. These amounts relate to vendors other than TIAA-CREF to whom contributions were made prior to January 1, 2009. No contributions were made or allowed to vendors other than TIAA-CREF after January 1, 2009. The amount of these excluded annuity and custodial accounts and the related income and distributions has not been determined, but management estimates that they may be material to the financial statements. U.S. GAAP requires that these excluded annuity and custodial accounts and the related income and distributions be included in the accompanying financial statements.

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## **NOTE 9 - Subsequent Events**

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The Plan has evaluated subsequent events through November 13, 2015 which is the date that the financial statements were approved and available to be issued.