

EXECUTIVE OFFICE OF THE PRESIDENT

04-Sep-1996 03:36pm

TO: Elena Kagan
TO: Ingrid M. Schroeder

FROM: Ellen S. Seidman
National Economic Council

CC: Kathleen M. Wallman

SUBJECT: Conference call on church plans

The conference call tomorrow on the DOJ church plan/securities laws exemption letter will be at 3:30. Call 456-6777, code 5792. Don't call early, and don't hang up once you call. If you want others on the call, please put them on a speaker. We'll have Randy Moss from DOJ, Nell Hennessey from PBGC, and Barry Barbash or some similarly knowledgeable person from the SEC.

The object of the game is to make certain any DOJ letter (i) doesn't call existing law (primarily the ERISA church plan rules) into question and (ii) takes the structure of ERISA and, in particular, the different treatment in that statute of churches, non-profits and businesses, into account.

Ellen

Randy -
Don't have to send to Cong.

OMB signing letter.

when says of why not last issue
then - bill will fly.

Anal in the calls into 2 ERISA rules

<u>ERISA</u>	rules for priv cos	rules for non-profits	st + local	churches
	has to have assets in trust			not trusted

exception -
putting on
same level
as st + local
plans -
which is what
they've most
treated like under
ERISA - NOT
private non-profits