### SLEVIN & HART, P.C.

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ALLISON A. MADAN Principal amadan@slevinhart.com WASHINGTON, DC NEW YORK, NY WWW.SLEVINHART.COM

December 22, 2022

#### Via efilingportal.pbgc.gov

Pension Benefit Guaranty Corporation 445 12<sup>th</sup> Street, S.W. Washington, DC 20024-2101 Attention: Karen A. Grisz, CFA

Division Manager, MEPD

Re: Revised Supplemented Application of the Gastronomical Workers Union Local 610 and Metropolitan Hotel Association Pension Fund ("Fund") for additional Special Financial Assistance ("SFA")

Dear Ms. Grisz:

On November 9, 2022, we filed a supplemented application to request additional PBGC special financial assistance on behalf of the above Fund in accordance with ERISA § 4262 and PBGC regulation §§ 4262.6, 4262.7 and 4262.8. We withdrew this application on December 22, 2022.

We are now filing this revised supplemented application on behalf of the above Fund to request \$2,053,663 additional PBGC special financial assistance. This letter serves as the revised SFA cover letter under Section D(1) of Addendum C - Instructions for Supplemented Applications ("Instructions"). The information in the November 9, 2022 cover letter for Sections D and F of the Instructions is not being resubmitted because it is unchanged. The Fund is not a "MPRA plan" within the meaning of \$4262.4(a)(3) of the PBGC's SFA regulation.

As required by the Instructions, we are providing the revised information required to be sent to the PBGC electronically through the PBGC's e-Filing Portal. This includes the following revised documents: (1) this cover letter, (2) the required SFA Application Checklist – Supplemented, (3) Template 4A, (4) Template 9, (5) Actuary's SFA Amount Certification, and (6) Penalties of Perjury Statement. The ACH Vendor Enrollment Form and wiring instructions included in our November 9, 2022 filing are not being resubmitted because they are unchanged.

Pension Benefit Guaranty Corporation December 22, 2022 Page 2

Should you require additional information, please contact David Weingarten or me.

Sincerely,

Allison A. Madan

AAM:DW:ams:4265.001

Enclosures

21127972v1

#### **Section E – Certifications**

#### (5) – SFA Amount Certification

I certify that the following two statements (a) and (e) are accurate as included in this supplemented application.

- (a) The requested amount of SFA under the final rule as of the SFA measurement date of June 30, 2021 (without any offset for SFA already paid to the plan under the interim final rule) is \$31,234,553. This is the total SFA amount to which the plan is entitled under section 4262(j)(1) of ERISA and §4262.4 of PBGC's SFA regulation.
- (e) All assumptions and methods used, sources of participant census data, SFA measurement date, participant census date, and other relevant information are the same as those used in the application that was approved under the interim final rule, with the exception of the non-SFA and SFA interest rates and the application of the new calculation methodology under the final rule.

I am a member of the American Academy of Actuaries and I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion herein. To the best of my knowledge, the information supplied herein is complete and accurate. Each prescribed assumption for the determination of the amount of SFA was applied in accordance with applicable law and regulations. In my opinion, all other assumptions are reasonable taking into account the experience of the plan and reasonable expectations.

Lissette Ortiz, FCA, MAAA

Enrolled Actuary No: 20-07444

12/12/2022 Date

#### Perjury Statement

Under penalties of perjury under the laws of the United States of America, I declare that I am an authorized trustee who is a current member of the board of trustees of the Gastronomical Workers Union Local 610 and Metropolitan Hotel Association Pension Fund and that I have examined this application, including accompanying documents, and, to the best of my knowledge and belief, the application contains all the relevant facts relating to the application, all statements of fact contained in the application are true, correct, and not misleading because of the omission of any material fact; and all accompanying documents are what they purport to be.

Board of Trustees, Gastronomical Workers Union Local 610 and Metropolitan Hotel Association Pension Fund

Ву:
Print Name: <u>Jason Rivera</u>
Title: <u>Union Trustee</u>
Date: 12-22-22
By: 100W.Z
Print Name: <u>David New</u>
Title: Employer Trustee
Date: 12/9/22

### This document goes into effect August 8, 2022. Any applications filed before then would be under the interim final rule.

#### Application Checklist - Supplemented

v20220706p

Instructions for Addendum C, Section E, Item 1 of the Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance (SFA):

The Supplemented Application to PBGC for Approval of Special Financial Assistance Checklist ("Application Checklist - Supplemented") identifies all information required to be filed with a supplemented application if the plan is requesting additional SFA. For a plan not requesting additional SFA, no checklist is required. For other SFA applications, use the SFA Application Checklist.

For a plan required to submit additional information described in Addendum A of the SFA Filing Instructions, also complete and submit the Additional Information for Certain Events section of the SFA Application Checklist.

Supplemented applications (including this Application Checklist - Supplemented), must be submitted to PBGC electronically through PBGC's e-Filing Portal, (https://efilingportal.pbgc.gov/site/). After logging into the e-Filing Portal, go to the Multiemployer Events section and click "Create New ME Filing." Under "Select a filing type," select "Application for Financial Assistance – Special." Note: a new supplemented application submitted after the denial or withdrawal of a previously filed supplemented application must also be submitted by selecting "Create New ME Filing."

Note: If you go to the e-Filing Portal and do not see "Application for Financial Assistance – Special" under the "Select a Filing Type," then the e-Filing Portal is temporarily closed and PBGC is not accepting applications (other than lock-in applications) at the time, unless the plan is eligible to make an emergency filing under § 4262.10(f). PBGC's website, www.pbgc.gov, will be updated when the e-Filing Portal reopens for applications. PBGC maintains information on its website at www.pbgc.gov to inform prospective applicants about the current status of the e-Filing Portal, as well as to provide advance notice of when PBGC expects to open or temporarily close the e-Filing Portal.

General instructions for completing the Application Checklist - Supplemented:

Complete all items that are shaded:

If required information was already filed: (1) through PBGC's e-Filing Portal; or (2) through any means for an insolvent plan, a plan that has received a partition, or a plan that submitted an emergency filing, the filer may either upload the information with the application or include a statement in the Plan Comments section of the Application Checklist indicating the date on which and the submission with which the information was previously filed. For any such items previously provided, enter N/A as the **Plan Response**.

For a new supplemented application submitted after the denial or withdrawal of a previously filed supplemented application, the filer may, but is not required to, submit an entire application. For all Application Checklist - Supplemented items that were previously filed that are not being changed, the filer may include a statement in the Plan Comments section of the Application Checklist - Supplemented to indicate that the other information was previously provided as part of the initial application. For each, enter N/A as the **Plan Response**.

Instructions for specific columns:

**Plan Response:** Provide a response to each item on the Application Checklist - Supplemented, using only the **Response Options** shown for each Checklist Item.

Name(s) of Files Uploaded: Identify the full name of the file or files uploaded that are responsive to the Checklist Item. The column Upload as Document Type provides guidance on the "document type" to select when submitting documents on PBGC's e-Filing Portal.

Page Number Reference(s): For Checklist Items #10 to #10b, submit all information in a single document and identify here the relevant page numbers for each such Checklist Item.

**Plan Comments**: Use this column to provide explanations for any **Plan Response** that is N/A, to respond as may be specifically identified for Checklist Items, and to provide any optional explanatory comments.

Additional guidance is provided in the following columns:

**Upload as Document Type:** When uploading documents in PBGC's e-Filing Portal, select the appropriate Document Type for each document that is uploaded. This column provides guidance on the Document Type to select for each Checklist Item. You may upload more than one document using the same Document Type, and there may be Document Types on the e-Filing Portal for which you have no documents to upload.

Required Filenaming (if applicable): For certain Checklist Items, a specified format for naming the file is required.

**SFA Instructions Reference:** Identifies the applicable section and item number in PBGC's Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance.

You must select N/A if a Checklist Item # is not applicable to your application. Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #16 on the Application Checklist. If there has been a plan merger as described in § 4262.4(f)(1)(ii), you also must provide the separate Application Checklist - Certain Events.

If a Checklist Item # asks multiple questions or requests multiple items, the Plan Response should only be Yes if the plan is providing all information requested for that Checklist Item.

Note, a Yes or No response is also required for Checklist Items #a through #c.

Note, in the case of a plan applying for priority consideration, the plan's application must also be submitted to the Treasury Department. If that requirement applies to an application, PBGC will transmit the application to the Treasury Department on behalf of the plan. See IRS Notice [NOTICE] for further information.

All information and documentation, unless covered by the Privacy Act, that is included in an SFA application may be posted on PBGC's website at www.pbgc.gov or otherwise publicly disclosed, without additional notification. Except to the extent required by the Privacy Act, PBGC provides no assurance of confidentiality in any information included in an SFA application.

#### **Version Updates (newest version at top)**

Version Date updated v20220706p 07/06/2022

# Application to PBGC for Approval of Special Financial Assistance (SFA) APPLICATION CHECKLIST - SUPPLEMENTED

	Gastronomical Workers Union Local 610 and Metropolitan Hotel Association Pension Fund
Plan name:	
EIN:	66-0308040
PN:	001
FA Amount Approved Under nterim Final Rule:	\$29,180,890.00
SFA Amount Requested Under Sinal Rule:	\$31,234,553.00
	Your application will be considered incomplete if No is entered as a Plan Response for any of

Checklist Items #1 through #16.

This Application Checklist - Supplemented is only used for a supplemented application. See Application Checklist for all other applications.	
Filers provide responses here for each Checklist Item:	Unless otherwise specified: YYYY = plan year Plan Name = abbreviated plan name

v20220706p

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference	Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
a.	Is this application a new supplemented application, submitted after the denial of a previ supplemented application for SFA?	iously filed Yes	No	N/A	N/A		N/A	N/A
b.	Is this application a new supplemented application, submitted after a plan has withdraw previously filed supplemented application for SFA?	vn its Yes No	No	N/A	N/A		N/A	N/A
c.	Is this plan a MPRA plan as defined under § 4262.4(a)(3) of PBGC's SFA regulation?	Yes No	No	N/A	N/A		N/A	N/A
1.	Section B, Item (10)  Does the application include information required to enable the plan to receive electroni funds if the SFA application is approved, including (if applicable) a notarized payment SFA Instructions, Section B, Item (10).	l l	Yes		N/A	Included in 11/9/2022 Supplemented SFA Application for GWU L610 PF	Other	N/A
2.	Section C, Items (4)a., (4)e., and (4)f. (Also See Addendum C, Section C, Item (4))  Does the application include the information used to determine the amount of SFA for the basic method described in § 4262.4(a)(1) based on a deterministic projection and us actuarial assumptions as described in § 4262.4(e)?  See Template 4A, 4A-4 SFA Details .4(a)(1) sheet, Section C, Item (4) of the SFA Filipports (4) instructions and Addendum C for more details on these requirements.  Does the uploaded file use the required filenaming convention?	sing the No	Yes	Template 4A Supp GWU L610 PF	N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 4A Supp Plan Name
3.a.	Addendum C Section G, Item (1)  If the plan is a MPRA plan, does the application also include the information used to de amount of SFA for the plan using the increasing assets method described in § 4262.4(a) on a deterministic projection and using the actuarial assumptions as described in § 4262. See Template 4A, 4A-5 SFA Details .4(a)(2)(i) sheet and Addendum D for more details requirements.  Enter N/A if the plan is not a MPRA Plan.	)(2)(i) based No 2.4(e)? N/A	N/A	N/A - included as part of Template 4A Plan Name	N/A		N/A	Template 4A Supp Plan Name
3.b.	Addendum C Section G, Item (1)  If the plan is a MPRA plan for which the requested amount of SFA is determined using increasing assets method described in § 4262.4(a)(2)(i), does the application also explication the projected SFA exhaustion year based on the increasing assets method? See Template SFA Details .4(a)(2)(i) sheet and Addendum D.  Enter N/A if the plan is not a MPRA Plan or if the requested amount of SFA is determined using increasing assets method? See Template SFA Details .4(a)(2)(i) sheet and Addendum D.	citly identify e 4A, 4A-5  No N/A	N/A	N/A - included as part of Template 4A Plan Name	N/A		N/A	Template 4A Supp Plan Name
4.	Addendum C Section H, Item (1)  If the plan is a MPRA plan for which the requested amount of SFA is determined using value method described in § 4262.4(a)(2)(ii), does the application also include the infor such plans as shown in Template 4B, including 4B-1 SFA Ben Pmts sheet, 4B-2 SFA L 4(a)(2)(ii) sheet, and 4B-3 SFA Exhaustion sheet? See Addendum D and Template 4B Enter N/A if the plan is not a MPRA Plan or if the requested amount of SFA is determined using value method described in § 4262.4(a)(2)(ii), does the application also include the information such plans as shown in Template 4B, including 4B-1 SFA Ben Pmts sheet, 4B-2 SFA L 4(a)(2)(ii) sheet, and 4B-3 SFA Exhaustion sheet? See Addendum D and Template 4B Enter N/A if the plan is not a MPRA Plan or if the requested amount of SFA is determined using value method described in § 4262.4(a)(2)(ii), does the application also include the information sheet? See Addendum D and Template 4B Enter N/A if the plan is not a MPRA Plan or if the requested amount of SFA is determined using value method described in § 4262.4(a)(2)(ii), does the application also include the information sheet? See Addendum D and Template 4B Enter N/A if the plan is not a MPRA Plan or if the requested amount of SFA is determined to the information sheet?	rmation for No Details N/A 3.	N/A		N/A		N/A	Template 4B Supp Plan Name
5.	Section C, Items (4)b. and (4)c. Does the application include identification of the Non-SFA interest rate and the SFA interest rate and the SFA interest rate and (4)c.  Does the application include identification of the Non-SFA interest rate and the SFA interest rate and the SF		Yes	N/A - included as part of Template 4A Plan Name	N/A		N/A	N/A - included in Template 4A Plan Name
6.	Addendum C Section C, Item (4)e.ii. For each year in the SFA coverage period, does the application include the projected ber payments (excluding make-up payments, if applicable), separately for current retirees are beneficiaries, current terminated vested participants not yet in pay status, current active and new entrants? See Template 4A, 4A-2 SFA Ben Pmts sheet.	nd No participants, N/A	N/A	N/A - included as part of Template 4A Plan Name	N/A		N/A	N/A - included in Template 4A Plan Name
	Enter N/A if the total projected benefit payments are the same as those used in the appli approved under the interim final rule.	ication						

### Application to PBGC for Approval of Special Financial Assistance (SFA) APPLICATION CHECKLIST - SUPPLEMENTED

of special financial rissistance (S111)	
PPLEMENTED	
Gastronomical Workers Union Local 610 and Metropolitan Hotel Association Pension Fu	nd
66-0308040	
001	

Plan name: EIN:

PN: **SFA Amount Approved Under** 

**Interim Final Rule:** SFA Amount Requested Under Final Rule:

66-0308040

\$31,234,553.00

\$29,180,890.00

Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #16.

This Application Checklist - Supplemented is only used for a supplemented application. See Application Checklist for all other applications.

---Filers provide responses here for each Checklist Item:-----

Unless otherwise specified: YYYY = plan yearPlan Name = abbreviated plan name

v20220706p

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
7.	Section D	Was the application signed and dated by an authorized trustee who is a current member of the board of trustees or another authorized representative of the plan sponsor and include the printed name and title of the signer?	Yes No	Yes	SFA App Supp GWU L610 PF		Identify here the name of the single document that includes all information requested in Section D of the SFA Filing Instructions (Checklist Items #7 through #10.b.).	Financial Assistance Application	SFA App Supp Plan Name
8.a.		Does the application include a cover letter identifying the date the plan's application was approved under the interim final rule, as well as the approved SFA amount under the interim final rule as of the SFA measurement date?	Yes No	Yes	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
8.b.	Addendum C Section D, Item (1)	For a plan that is a MPRA plan, does the application include a cover letter? Does the cover letter identify the calculation method (basic method, increasing assets method, or present value method) that provides the greatest amount of SFA?  Enter N/A if the plan is not a MPRA plan.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
9.	Section D, Item (2)	Does the application include the name, address, email, and telephone number of the plan sponsor, the plan sponsor's authorized representative, and any other authorized representatives?	Yes No	Yes	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
10.a.	Addendum C Section D, Item (5)a.	If the projected employer contributions are different from those assumed in the application approved under the interim final rule, does the application include a detailed narrative description of the assumed future contributions (including assumed contribution rates) used to calculate the requested SFA amount under the final rule?  Enter N/A if the projected employer contributions are unchanged from those assumed in the application approved under the interim final rule.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
10.b.	Addendum C Section D, Item (5)b.	If the Plan Response to Checklist Item #10.a. is Yes, does the application include documentation described in § 4262.4(c)(3) of PBGC's SFA regulation that substantiates that the contributing rate increases that are excluded were agreed to on or after July 9, 2021?  Enter N/A if the response to Checklist Item #10.a. is N/A.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name		Briefly describe the documentation included.	N/A	N/A - included as part of SFA App Plan Name
11.a.	Section E, Item (1)	Does the application include a fully completed Application Checklist - Supplemented, including the required information at the top of the Application Checklist (plan name, employer identification number (EIN), 3-digit plan number (PN), SFA amount approved under the interim final rule, and SFA amount requested under the final rule)?	Yes No	Yes	App Checklist Supp GWU L610 PF	N/A		Special Financial Assistance Checklist	App Checklist Supp Plan Name
11.b.	Section E, Item (1) - Addendum A	If the plan is required to provide information required by Addendum A of the SFA Filing Instructions (for "certain events"), does the application include the fully completed Additional Information for Certain Events section of the general Application Checklist?  Enter N/A if the plan is not required to submit the additional information described in Addendum A.	Yes No N/A	N/A		N/A		Special Financial Assistance Checklist	App Checklist Certain Events Plan Name

# Application to PBGC for Approval of Special Financial Assistance (SFA) APPLICATION CHECKLIST - SUPPLEMENTED

This Application Checklist - Supplemented is only used for a supplemented application.	See Application Checklist for all other applications.

---Filers provide responses here for each Checklist Item:-----

Unless otherwise specified:
YYYY = plan year
Plan Name = abbreviated plan name

v20220706p

PN:
SFA Amount Approved Under

Plan name:

Final Rule:

EIN:

Interim Final Rule:
SFA Amount Requested Under

\$29,180,890.00

66-0308040

\$31,234,553.00

Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #16.

Gastronomical Workers Union Local 610 and Metropolitan Hotel Association Pension Fund

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instruction Reference	ns — — — — — — — — — — — — — — — — — — —	Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
12.a.	Addendum C Section E, Item (5)	Does the application include the certification by the plan's enrolled actuary that the requested amount of SFA is the amount to which the plan is entitled under section 4262(j)(1) of ERISA and § 4262.4 of PBGC's SFA regulation? Does this certification include:  (i) plan actuary's certification that identifies the requested amount of SFA under the final rule (without any offset for SFA already paid to the plan under the interim final rule) and certifies that this is the amount to which the plan is entitled?  (ii) confirmation that all assumptions and methods used, sources of participant data and census data, SFA measurement date, and other relevant information are the same as in the application that was approved under the interim final rule with the exception of the non-SFA and SFA interest rates, the application of the new calculation methodology under the final rule and a change to the plan's employer contribution assumption to exclude contribution rate increases agreed to on or after July 9, 2021 (if applicable)?  (iii) a statement that the actuary is qualified to render the actuarial opinion?  Is the information in Checklist #12a combined with #12b (if applicable) as a single document, and uploaded using the required filenaming convention?	Yes No	Yes	SFA Amount Cert Supp GWU L610 PF	N/A		Financial Assistance Application	SFA Amount Cert Supp Plan Name
12.b.		If the plan is a MPRA plan, does the certification by the plan's enrolled actuary identify the amount of SFA determined under the basic method described in § 4262.4(a)(1) and the amount determined under the increasing assets method in § 4262.4(a)(2)(i)?  If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is not the greatest amount of SFA under § 4262.4(a)(2), does the certification state as such?  If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is the greatest amount of SFA under § 4262.4(a)(2), does the certification identify that amount?  Enter N/A if the plan is not a MPRA plan.	Yes No N/A	N/A	N/A - included with SFA Amount Cert Plan Name	N/A		N/A - included in SFA Amount Cert Plan Name	N/A - included in SFA Amount Cert Plan Name
13.	Section E, Item (10)	Does the application include one or more copies of the penalties of perjury statement (see Section E, Item (10) of the SFA Filing Instructions) that (a) are signed by an authorized trustee who is a current member of the board of trustees, and (b) includes the trustee's printed name and title.  Is all such information included in a single document and uploaded using the required filenaming convention?	Yes No	Yes	Penalty GWU L610 PF	N/A		Financial Assistance Application	Penalty Plan Name
14.	Addendum C Section F, Item (1)	If the plan is not a MPRA plan, does the application include a reconciliation of the change in the total amount of SFA under the final rule from the total amount of SFA approved under the interim final rule, each as of the SFA measurement date? See Template 9 and its instructions for details on the reconciliation and information to be provided.  Enter N/A if the plan is a MPRA plan.  Does the uploaded document use the required filenaming convention?	Yes No N/A	Yes	Template 9 GWU L610 PF	N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 9 Plan Name
15.	Addendum C Section G, Item (2)	If the plan is a MPRA plan for which the requested amount of SFA is based on the increasing assets method, does the application include a reconciliation of the change in the requested amount of SFA under the final rule from the total amount of SFA approved under the interim final rule, each as of the SFA measurement date? See Template 9 and its instructions for details on the reconciliation and information to be provided.  Enter N/A if the plan is a not a MPRA plan or if the plan is a MPRA plan using the present value method.	No N/A	N/A		N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 9 Plan Name
		Does the uploaded document use the required filenaming convention?							

APPLICATION CHECKLIST - S	UPPLEMENTED
	Gastronomical Workers Union Local 610 and Metropolitan Hotel Association Pension Fund
lan name:	
ZIN:	66-0308040
N:	001
FA Amount Approved Under	
nterim Final Rule:	\$29,180,890.00
FA Amount Requested Under	
inal Rule·	\$31,234,553,00

Checklist Items #1 through #16.

Your application will be considered incomplete if No is entered as a Plan Response for any of

Application to PBGC for Approval of Special Financial Assistance (SFA)

This Application Checklist - Supplemented is only used for a supplemented application. See Application Checklist for all other applications.	
Filers provide responses here for each Checklist Item:	Unless otherwise specified:  YYYY = plan year  Plan Name = abbreviated plan name

v20220706p

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist S Item #	FA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
16.	Section H, Item (2)	If the plan is a MPRA plan for which the requested amount of SFA is based on the <u>present value method</u> , does the application include a reconciliation of the change in the requested amount of SFA under the final rule from the total amount of SFA approved under the interim final rule, each as of the SFA measurement date? See Template 9 and its instructions for details on the reconciliation and information to be provided.  Enter N/A if the plan is a not a MPRA plan or if the plan is a MPRA plan using the increasing assets method.  Does the uploaded document use the required filenaming convention?	Yes No N/A	N/A		N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 9 Plan Name

### SLEVIN & HART, P.C.

Attorneys at Law 1625 Massachusetts Ave., NW, Suite 450 Washington, DC 20036 (202) 797-8700 (202) 234-8231

ALLISON A. MADAN Principal amadan@slevinhart.com WASHINGTON, DC NEW YORK, NY WWW.SLEVINHART.COM

December 22, 2022

#### Via efilingportal.pbgc.gov

Pension Benefit Guaranty Corporation 445 12<sup>th</sup> Street, S.W. Washington, DC 20024-2101 Attention: Karen A. Grisz, CFA

Division Manager, MEPD

Re: Revised Supplemented Application of the Gastronomical Workers Union Local 610 and Metropolitan Hotel Association Pension Fund ("Fund") for additional Special Financial Assistance ("SFA")

Dear Ms. Grisz:

On November 9, 2022, we filed a supplemented application to request additional PBGC special financial assistance on behalf of the above Fund in accordance with ERISA § 4262 and PBGC regulation §§ 4262.6, 4262.7 and 4262.8. We withdrew this application on December 22, 2022.

We are now filing this revised supplemented application on behalf of the above Fund to request \$2,053,663 additional PBGC special financial assistance. This letter serves as the revised SFA cover letter under Section D(1) of Addendum C - Instructions for Supplemented Applications ("Instructions"). The information in the November 9, 2022 cover letter for Sections D and F of the Instructions is not being resubmitted because it is unchanged. The Fund is not a "MPRA plan" within the meaning of \$4262.4(a)(3) of the PBGC's SFA regulation.

As required by the Instructions, we are providing the revised information required to be sent to the PBGC electronically through the PBGC's e-Filing Portal. This includes the following revised documents: (1) this cover letter, (2) the required SFA Application Checklist – Supplemented, (3) Template 4A, (4) Template 9, (5) Actuary's SFA Amount Certification, and (6) Penalties of Perjury Statement. The ACH Vendor Enrollment Form and wiring instructions included in our November 9, 2022 filing are not being resubmitted because they are unchanged.

Pension Benefit Guaranty Corporation December 22, 2022 Page 2

Should you require additional information, please contact David Weingarten or me.

Sincerely,

Allison A. Madan

AAM:DW:ams:4265.001

Enclosures

21127972v1

### This document goes into effect August 8, 2022. Any applications filed before then would be under t

**TEMPLATE 4A** v20220701p

SFA Determination - under the "basic method" for all plans, and under the "increasing assets method" for MPRA plans

File name: Template 4A Plan Name, where "Plan Name" is an abbreviated version of the plan name.

If submitting additional information due to a merger under § 4262.4(f)(1)(ii): *Template 4A Plan Name Merged*, where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.

If submitting additional information due to certain events with limitations under § 4262.4(f)(1)(i): *Template 4A Plan Name Add*, where "Plan Name" is an abbreviated version of the plan name.

If submitting a supplemented application under § 4262.4(g)(6): *Template 4A Supp Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

Instructions for Section C, Item (4) of the Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance:

IFR filers submitting a supplemented application should see Addendum C for more information.

MPRA plans using the "increasing assets method" should see Addendum D for more information.

For all plans, provide information used to determine the amount of SFA under the "basic method" described in § 4262.4(a)(1).

For MPRA plans, also provide information used to determine the amount of SFA under the "increasing assets method" described in § 4262.4(a)(2)(i).

The information to be provided is:

NOTE: All items below are provided on Sheet '4A-4 SFA Details .4(a)(1)' unless otherwise indicated.

- a. The amount of SFA calculated using the "basic method", determined as a lump sum as of the SFA measurement date.
- b. Non-SFA interest rate required under § 4262.4(e)(1) of PBGC's SFA regulation, including supporting details on how it was determined. [Sheet: 4A-1 Interest Rates]
- c. SFA interest rate required under § 4262.4(e)(2) of PBGC's SFA regulation, including supporting details on how it was determined. [Sheet: 4A-1 Interest Rates]

d. Fair market value of assets as of the SFA measurement date. This amount should include any assets at the SFA measurement date attributable to financial assistance received by the plan under section 4261 of ERISA, but should not reflect a payable for amounts owed to PBGC for all amounts of such financial assistance received by the plan.

- e. For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"):
  - i. Separately identify the projected amount of contributions, projected withdrawal liability payments reflecting a reasonable allowance for amounts considered uncollectible, and other payments expected to be made to the plan (excluding the amount of financial assistance under section 4261 of ERISA and SFA to be received by the plan).
  - ii. Identify the benefit payments described in § 4262.4(b)(1) (including any benefits that were restored under 26 CFR 1.432(e)(9)-(1)(e)(3) and excluding the payments in e.iii. below), separately for current retirees and beneficiaries, current terminated vested participants not yet in pay status, current active participants, and new entrants.

[Sheet: 4A-2 SFA Ben Pmts]

Identify total benefit payments paid and expected to be paid from projected SFA assets separately from total benefit payments paid and expected to be paid from non-SFA assets after the projected SFA assets are fully exhausted.

iii. Separately identify the make-up payments described in § 4262.4(b)(1) attributable to the reinstatement of benefits under § 4262.15 that were previously suspended through the SFA measurement date.

[Also see applicable examples in Section C, Item (4)e.iii. of the SFA instructions.]

iv. Separately identify administrative expenses paid and expected to be paid (excluding the amount owed PBGC under section 4261 of ERISA) for premiums to PBGC and for all other administrative expenses.

[Sheet: 4A-3 SFA Pcount and Admin Exp]

Identify total administrative expenses paid and expected to be paid from projected SFA assets separately from total administrative expenses paid and expected to be paid from non-SFA assets after the projected SFA assets are fully exhausted.

- v. Provide the projected total participant count at the beginning of each year. [Sheet: 4A-3 SFA Pcount and Admin Exp]
- vi. Provide the projected investment income earned by assets not attributable to SFA based on the non-SFA interest rate in b. above and the projected fair market value of non-SFA assets at the end of each plan year.
- vii. Provide the projected investment income earned by assets attributable to SFA based on the SFA interest rate in c. above (excluding investment returns for the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets) and the projected fair market value of SFA assets at the end of each plan year.
- f. The projected SFA exhaustion year. This is the first day of the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets. Note this date is only required for the calculation method under which the requested amount of SFA is determined.

#### Additional instructions for each individual worksheet:

Sheet

#### 4A-1 SFA Determination - non-SFA Interest Rate and SFA Interest Rate

See instructions on 4A-1 Interest Rates.

#### 4A-2 SFA Determination - Benefit Payments for the "basic method" for all plans, and for the "increasing assets method" for MRPA plans

This sheet is not required for an IFR filer submitting a supplemented application under  $\S$  4262.4(g)(6) if the total projected benefit payments are the same as those used in the application approved under the interim final rule.

On this sheet, you will provide:

- --Basic plan information (plan name, EIN/PN, SFA measurement date), and
- --Year-by-year deterministic projection of benefit payments.

For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"), identify benefit payments described in § 4262.4(b)(1) for current retirees and beneficiaries, current terminated vested participants not yet in pay status, currently active participants, and new entrants. On this Sheet 4A-2, show all benefit payments as positive amounts.

If the plan has suspended benefit payments under sections 305(e)(9) or 4245(a) of ERISA, the benefit payments in this Sheet 4A-2 projection should reflect prospective reinstatement of benefits assuming such reinstatements commence as of the SFA measurement date. If the plan restored or partially restored benefits under 26 CFR 1.432(e)(9)-1(e)(3) before the SFA measurement date, the benefit payments in this Sheet 4A-2 should reflect fully restored prospective benefits.

Make-up payments to be paid to restore previously suspended benefits should not be included in this Sheet 4A-2, and are separately shown in Sheet 4A-4.

Except for the first row in the projection exhibit, each row must include the full plan year of the indicated information up to the plan year ending in 2051. The first row in the projection period is for the period beginning on the SFA measurement date and ending on the last day of the plan year containing the SFA measurement date, so the first row may contain less than a full plan year of information. For all other periods, provide the full plan year of information up to the plan year ending in 2051.

# 4A-3 SFA Determination - Participant Count and Administrative Expenses for the "basic method" for all plans, and for the "increasing assets method" for MPRA plans

This sheet is not required for an IFR filer submitting a supplemented application under  $\S$  4262.4(g)(6).

On this sheet, you will provide:

- --Basic plan information (plan name, EIN/PN, SFA measurement date), and
- --Year-by-year deterministic projection of participant count and administrative expenses.

For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"), identify the projected total participant count at the beginning of each year, as well as administrative expenses, separately for premiums to PBGC and for all other administrative expenses. On this Sheet 4A-3, show all administrative expenses as positive amounts.

Any amounts owed to PBGC for financial assistance under section 4261 of ERISA should not be included in this Sheet 4A-3.

Except for the first row in the projection exhibit, each row must include the full plan year of the indicated information up to the plan year ending in 2051. The first row in the projection period is for the period beginning on the SFA measurement date and ending on the last day of the plan year containing the SFA measurement date, so the first row may contain less than a full plan year of information. For all other periods, provide the full plan year of information up to the plan year ending in 2051.

#### 4A-4 SFA Determination - Details for the "basic method" under § 4262.4(a)(1) for all plans

On this sheet, you will provide:

- --Basic plan information (plan name, EIN/PN, SFA measurement date, non-SFA interest rate, SFA interest rate),
- --MPRA plan status and, if applicable, certain MPRA information,
- --Fair Market Value of Assets as of the SFA measurement date.
- --SFA Amount as of the SFA measurement date calculated under the "basic method",
- --Projected SFA exhaustion year (only if the requested amount of SFA is determined under the "basic method"), and
- --Year-by-year deterministic projection.

For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"), provide each of the items requested in Columns (1) through (12). Show payments INTO the plan as positive amounts and payments OUT of the plan as negative amounts.

If the plan has suspended benefit payments under sections 305(e)(9) or 4245(a) of ERISA, Column (5) should show the make-up payments to be paid to restore the previously suspended benefits. These amounts should be determined as if such make-up payments are paid beginning as of the SFA measurement date. If the plan sponsor elects to pay these amounts as a lump sum, then the lump sum amount is assumed paid as of the SFA measurement date. If the plan sponsor elects to pay equal installments over 60 months, the first monthly payment is assumed paid on the first regular payment date on or after the SFA measurement date. See the examples in the SFA Instructions. If the make-up payments are paid over 60 months, each row in the projection should reflect the monthly payments for that period. The prospective reinstatement of suspended benefits is included in Column (4); Column (5) is only for make-up payments for past benefits that were suspended.

Except for the first row in the projection exhibit, each row must include the full plan year of the indicated information up to the plan year ending in 2051. The first row in the projection period is for the period beginning on the SFA measurement date and ending on the last day of the plan year containing the SFA measurement date, so the first row may contain less than a full plan year of information. For all other periods, provide the full plan year of information up to the plan year ending in 2051.

#### 4A-5 SFA Determination - Details for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans

This sheet is to only be used by MPRA plans. For such plans, this sheet should be completed in addition to Sheet 4A-4.

On this sheet, you will provide:

- --Basic plan information (plan name, EIN/PN, SFA measurement date, non-SFA interest rate, SFA interest rate),
- --MPRA plan status, and if applicable, certain MPRA information,
- --Fair Market Value of Assets as of the SFA measurement date,
- --SFA Amount as of the SFA measurement date calculated under the "increasing assets method",
- --Projected SFA exhaustion year (only if the requested amount of SFA is determined under the "increasing assets method"), and
- --Year-by-year deterministic projection.

This sheet is identical to Sheet 4A-4, and the information in Columns (1) through (6) should be the same as that used in the "basic method" calculation in Sheet 4A-4. The SFA Amount as of the SFA Measurement Date will differ from that calculated in Sheet 4A-4, as it will be calculated in accordance with § 4262.4(a)(2)(i) as the lowest whole dollar amount (not less than \$0) for which, as of the last day of each plan year during the SFA coverage period, projected SFA assets and projected non-SFA assets are both greater than or equal to zero, and, as of the last day of the SFA coverage period, the sum of projected SFA assets and projected non-SFA assets is greater than the amount of such sum as of the last day of the immediately preceding plan year.

#### **Version Updates (newest version at top)**

Version Date updated

v20220701p 07/01/2022

### SFA Determination - non-SFA Interest Rate and SFA Interest Rate

Provide the non-SFA interest rate and SFA interest rate used, including supporting details on how they were determined.

<b>PLAN</b>	INF	<b>ORM</b>	ATI	ON
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Abbreviated Plan Name:	Management-Labor Pens	ion Fund Local 1730 ILA	
EIN:	13-6086163		
PN:	001		
Initial Application Date:	09/23/2021		
SFA Measurement Date:	06/30/2021	of the third calendar month immediately preceding th	hat filed an initial application prior to publication of the final rule), the last day of the calendar quarter
Last day of first plan year ending after the measurement date:	12/31/2021		

Non-SFA Interest Rate Used:	4.00%	Rate used in projection of non-SFA assets.
SFA Interest Rate Used:	3.04%	Rate used in projection of SFA assets.

### Development of non-SFA interest rate and SFA interest rate:

Plan Interest Rate:	4.00%	Interest rate used for the funding standard account projections in the plan's most recently completed certification of plan status before 1/1/2021.
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Corresponding ERISA Section 303(h)(2)(C)(i), (ii), and (iii) rates disregarding modifications made under clause (iv) of such section.

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	Month Year	(i)	(ii)	(iii)	
Month in which plan's initial application is filed, and corresponding segment rates (leave (i), (ii), and (iii) blank if the IRS Notice for this month has not yet been issued):	September 2021	1.07%	2.68%	3.36%	24-month average segment rates without regard to interest rate stabilization rules. These rates are issued by IRS each month. For example, the
1 month preceding month in which plan's initial application is filed, and corresponding segment rates:	August 2021	1.13%	2.70%	3.38%	applicable segment rates for August 2021 are 1.13%, 2.70%, and 3.38%. Those rates were issued in <u>IRS Notice 21-50</u> on August 16, 2021 (see page 2 of notice under the heading "24-
2 months preceding month in which plan's initial application is filed, and corresponding segment rates:	July 2021	1.20%	2.73%	3.42%	Month Average Segment Rates Without 25-Year Average Adjustment").  They are also available on IRS' Funding Yield
3 months preceding month in which plan's initial application is filed, and corresponding segment rates:	June 2021	1.27%	2.77%	3.45%	Curve Segment Rate Tables web page (See Funding Table 3 under the heading "24-Month Average Segment Rates Not Adjusted").
Non-SFA Interest Rate Limit (lowest 3rd segment i	rate plus 200 basis points	·):		5.36%	This amount is calculated based on the other information entered above.
Non-SFA Interest Rate Calculation (lesser of Plan Interest Rate and Non-SFA Interest Rate Limit):	4.00%	This amount is calculated	l based on the other inform	nation entered above.	
Non-SFA Interest Rate Match Check:	Match	If the non-SFA Interest F	Rate Calculation is not equ	al to the non-SFA Inte	erest Rate Used, provide explanation below.

gment rates plus 67 basi	3.04%	This amount is calculated based on the other information entered.	
3.04%	This amount is calculated based on the other inform		
Match	If the SFA Interest Rate Calculation is not equal to	ed, provide explanation below.	
	3.04%		3.04% This amount is calculated based on the other information entered above.

**TEMPLATE 4A - Sheet 4A-2** 

SFA Determination - Benefit Payments for the "basic method" for all plans, and for the "increasing assets method" for MRPA plans

See Templ	ate 4A Instructions for Ac	dditional Instructions for S	Sheet 4A-2.			
PLAN INFORMATION Abbreviated Plan Name:	N					
EIN:						
PN:						
SFA Measurement Date:						
			On this Sheet, show al	l benefit payment amoun	ts as positive amounts.	
				TED BENEFIT PAYM		
SFA Measurement Date / Plan Year Start Date	Plan Year End Date	Current Retirees and Beneficiaries in Pay Status	Current Terminated Vested Participants	Current Active Participants	New Entrants	Total

**TEMPLATE 4A - Sheet 4A-3** 

SFA Determination - Participant Count and Administrative Expenses for the "basic method" for all plans, and for the "increasing assets method" for MPRA plans

See Temple	ate 4A Instructions for Ac	lditional Instructions for S	Sheet 4A-3.		
PLAN INFORMATION	I			•	
Abbreviated Plan Name:					
EIN:				•	
PN:					
SFA Measurement Date:					
			On this Sheet, show all ac	dministrative expense amo	ounts as positive amount
		Total Participant Count	PROJECTED	ADMINISTRATIVE E	XPENSES for:
SFA Measurement Date / Plan Year Start Date	Plan Year End Date	at Beginning of Plan Year	PBGC Premiums	Other	Total
		N/A			

SFA Determination - Details for the "basic method" under § 4262.4(a)(1) for all plans

See Template 4A Instructions for Additional Instructions for Sheet 4A-4.

<b>PLAN</b>	INFORMAT	ION
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Abbreviated Plan Name:	GWU L610 PF	
EIN:	66-0308040	
PN:	001	
MPRA Plan?	No	Meets the definition of a MPRA plan described in § 4262.4(a)(3)?
If a MPRA Plan, which method yields the greatest amount of SFA?		MPRA increasing assets method described in § 4262.4(a)(2)(i). MPRA present value method described in § 4262.4(a)(2)(ii).
SFA Measurement Date:	06/30/2021	
Fair Market Value of Assets as of the SFA Measurement Date:	\$552,422	
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$31,234,553	Per § 4262.4(a)(1), the lowest whole dollar amount (not less than \$0) for which, as of the last day of each plan year during the SFA coverage period, projected SFA assets and projected non-SFA assets are both greater than or equal to zero.
Projected SFA exhaustion year:	06/01/2047	Only required on this sheet if the requested amount of SFA is based on the "basic method".  Plan Year Start Date of the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets.
Non-SFA Interest Rate:	4.00%	
SFA Interest Rate:	3.04%	

		(1)	(2)	(3)	(4)	(5) Make-up Payments Attributable to Reinstatement of	(excluding amount owed	· / / //	(8)	(9) Projected SFA Assets at		(11)	(12) Projected Non-SFA Assets at End of Plan Year
SFA Measurement Date			Withdrawal Liability	Other Payments to Plan (excluding financial	Benefit Payments (should match total from	Benefits Suspended through the SFA	PBGC under 4261 of ERISA; should match	Administrative Expenses (from (6)) Paid from	SFA Investment Income Based on SFA Interest	End of Plan Year (prior year assets +	Administrative Expenses (from (6)) Paid from	Non-SFA Investment Income Based on Non-	(prior year assets + $(1) + (2) + (3) +$
/ Plan Year Start Date	Plan Year End Date	Contributions	Payments	assistance and SFA)	Sheet 4A-2)	Measurement Date	total from Sheet 4A-3)	SFA Assets	Rate	(7) + (8))	Non-SFA Assets	SFA Interest Rate	(10) + (11))
06/30/2021	05/21/2022	\$2,134	\$41,327	\$0	-\$1,952,231	-\$115,816	-\$488,609	-\$2,556,656	\$830,426		\$0	\$20,940	\$616,8
06/01/2022	05/31/2023	\$2,328	\$45,084	\$0	-\$2,079,121	\$0		-\$2,494,945	\$857,211	\$27,870,588		\$25,536	\$689,7
06/01/2023	05/31/2024	\$2,328	\$45,084	\$0	-\$2,017,958	\$0		-\$2,421,550	\$808,596	\$26,257,635		\$28,454	\$765,6
06/01/2024	05/31/2025	\$2,328	\$1,438	\$0		\$0			\$760,726				\$800,0
06/01/2025	05/31/2026	\$2,328		\$0		\$0		-\$2,230,012	\$714,348				\$834,4
06/01/2026	05/31/2027	\$2,328		\$0		\$0		-\$2,151,614	\$669,524				\$870,2
06/01/2027	05/31/2028	\$2,328		\$0		\$0		-\$2,066,261	\$625,831				\$907,4
06/01/2028	05/31/2029	\$2,328		\$0	4-,00-,,,,,	\$0			\$583,328				\$946,0
06/01/2029	05/31/2030	\$2,328		\$0		\$0			\$542,040				\$986,2
06/01/2030	05/31/2031	\$2,328		\$0	+ //	\$0		-\$1,816,637	\$502,067				\$1,028,1
06/01/2031	05/31/2032	\$2,328		\$0		\$0			\$463,295			\$41,166	\$1,071,5
06/01/2032	05/31/2033	\$2,328		\$0	+ ) )	\$0		-\$1,660,022	\$425,716			\$42,906	\$1,116,8
06/01/2033	05/31/2034	\$2,328		\$0		\$0			\$389,380			\$44,716	\$1,163,8
06/01/2034	05/31/2035	\$2,328		\$0		\$0		-\$1,506,813	\$354,272			\$46,597	\$1,212,7
06/01/2035	05/31/2036	\$2,328		\$0		\$0			\$320,442			\$48,554	\$1,263,6
06/01/2036	05/31/2037	\$2,328		\$0	4-,,	\$0		-\$1,358,989	\$287,828				\$1,316,5
06/01/2037	05/31/2038	\$2,328		\$0		\$0		-\$1,286,494	\$256,421			\$52,706	\$1,371,6
06/01/2038	05/31/2039	\$2,328		\$0	+ ,,	\$0			\$226,273				\$1,428,8
06/01/2039	05/31/2040	\$2,328		\$0	+ )	\$0			\$197,287				\$1,488,3
06/01/2040	05/31/2041	\$2,328		\$0	Ψ> 0 0, . , ,	\$0		-\$1,084,867	\$169,374		\$0		\$1,550,2
06/01/2041	05/31/2042	\$2,328		\$0	\$ 00 <b>-</b> ,019	\$0	· · · /- ·		\$142,470			\$62,054	\$1,614,6
06/01/2042	05/31/2043	\$2,328		\$0		\$0		-\$967,175	\$116,537			\$64,630	\$1,681,6
06/01/2043	05/31/2044	\$2,328		\$0		\$0		-\$910,990	\$91,574			\$67,308	\$1,751,2
06/01/2044	05/31/2045	\$2,328		\$0		\$0		-\$860,010				\$70,093	\$1,823,6
06/01/2045	05/31/2046	\$2,328		\$0		\$0			\$44,206			\$72,990	\$1,899,0
06/01/2046	05/31/2047	\$2,328		\$0	+	\$0			\$21,747		\$0	\$76,003	\$1,977,3
06/01/2047	05/31/2048	\$2,328		\$0		\$0					-\$332,446	\$72,165	\$1,719,3
06/01/2048	05/31/2049	\$2,328		\$0		\$0					-\$656,124	\$55,059	\$1,120,
06/01/2049	05/31/2050	\$2,328		\$0		\$0		\$0			-\$607,658		\$547,
06/01/2050 06/01/2051	05/31/2051 05/31/2052	\$2,328		\$0	-\$464,800	\$0	-\$95,177	\$0	\$0	\$0	-\$559,977	\$10,198	

SFA Determination - Details for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans

See Template 4A	Instructions for A	Additional Instru	actions for Sheet	t 4A-5.

PLAN INFORMATION	
Abbreviated Plan Name:	
EIN:	
PN:	
MPRA Plan?	Meets the definition of a MPRA plan described in §
If a MPRA Plan, which method yields the greatest amount of SFA?	MPRA increasing assets method described in § 4262 MPRA present value method described in § 4262.4(a
SFA Measurement Date:	
Fair Market Value of Assets as of the SFA Measurement Date:	
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	Per § 4262.4(a)(2)(i), the lowest whole dollar amount SFA coverage period, projected SFA assets and projected assets and projected states are described by the sum of the last day of the immediately preceded.
Projected SFA exhaustion year:	Only required on this sheet if the requested amount of Plan Year Start Date of the plan year in which the su year exceeds the beginning-of-year projected SFA as
Non-SFA Interest Rate:	
SFA Interest Rate:	

					On this	Sheet, show payments I	NTO the plan as positive ar	mounts, and payments OU	$\Gamma$ of the plan as negative a	amounts.			
		(1)	(2)	(3)	(4)	(5) Make-up Payments Attributable to	(6) Administrative Expenses	(7) Benefit Payments (from	(8)	(9)	(10) Benefit Payments (from	(11)	(12) Projected Non-SFA Assets at End of Plan
SFA Measurement Date / Plan Year Start Date	Plan Year End Date	Contributions	Withdrawal Liability Payments	Other Payments to Plan (excluding financial assistance and SFA)	Benefit Payments (should match total from Sheet 4A-2)	Reinstatement of Benefits Suspended through the SFA Measurement Date	(excluding amount owed			Projected SFA Assets at End of Plan Year		Non-SFA Investment Income Based on Non- SFA Interest Rate	Year (prior year assets + $(1) + (2) + (3) + (10) + (11)$ )
			,		= = /					(-) (-))			( - , ( ))

## This document goes into effect August 8, 2022. Any applications filed before then would be under

**TEMPLATE 9** v20220701p

#### Reconciliation and Assumption Change for SFA Amount from Interim Final Rule Application

File name: Template 9 Plan Name, where "Plan Name" is an abbreviated version of the plan name.

#### Instructions for Addendum C for Supplemented Applications, Sections F, G and H

Provide a reconciliation of the change in the requested amount of SFA under the final rule as shown in Template 4A or Template 4B (whichever is applicable) from the total amount of SFA approved under the interim final rule as shown in Template 4 of the application approved under the interim final rule.

If the filer is proposing a change to the plan's employer contribution assumption to exclude contribution rate increases agreed to on or after July 9, 2021, as permitted under § 4262.4(c)(3) of PBGC's SFA regulation, provide a deterministic projection using the "basic method" of determining the SFA amount described in § 4262.4(a)(1) without reflecting the changed assumption, in the same format as sheet 4A-4 SFA Details .4(a)(1) of Template 4A.

#### Additional instructions for each individual worksheet:

Complete sheet 9-1A, 9-1B, 9-1C, 9-1D, 9-1E, or 9-1F depending on the method used to calculate the requested SFA amount under the final rule, and depending on whether the filer is proposing a change to the plan's employer contribution assumption. See below for more explanation of which sheet is required.

Sheet

9-1A Section F, Item (1): Reconciliation - Summary for non-MPRA plans using the "basic method" under § 4262.4(a)(1) with no contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

# 9-1B Section F, Item (1): Reconciliation - Summary for non-MPRA plans using the "basic method" under § 4262.4(a)(1) with contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, and include the deterministic projection in Sheet 9-2 Recon Details.

For Item number 3, show the SFA amount determined under the final rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

# 9-1C Section G, Item (2): Reconciliation - Summary for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method" described in § 4262.4(a)(2)(i) with no contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

For Item number 3, show the SFA amount determined under the final rule using the "increasing assets method" with no assumption changes other than using the non-SFA and SFA interest rates, as shown in Sheet '4A-5 SFA Details .4(a)(2)(i)' of Template 4A.

# 9-1D Section G, Item (2): Reconciliation - Summary for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method" described in § 4262.4(a)(2)(i) with contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, and include the deterministic projection in Sheet 9-2 Recon Details.

For Item number 3, show the SFA amount determined under the final rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

For Item number 4, show the SFA amount determined under the final rule using the "increasing assets method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021, as shown in Sheet '4A-5 SFA Details .4(a)(2)(i)' of Template 4A.

# 9-1E Section H, Item (2): Reconciliation - Summary for MPRA plans for which the requested amount of SFA is determined under the "present value method" described in § 4262.4(a)(2)(ii) with no contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

For Item number 3, show the SFA amount determined under the final rule using the "alternative present value method" with no assumption changes other than using the non-SFA and SFA interest rates, as shown in Template 4B.

# 9-1F Section H, Item (2): Reconciliation - Summary for MPRA plans for which the requested amount of SFA is determined under the "present value method" described in § 4262.4(a)(2)(ii) with contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, and include the deterministic projection in Sheet 9-2 Recon Details.

For Item number 3, show the SFA amount determined under the final rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

For Item number 4, show the SFA amount determined under the final rule using the "alternative present value method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021, as shown in Template 4B.

# 9-2 Section F, Item (1): Reconciliation - Details for SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates

Sheet 9-2 is not required if all the assumptions used in determining the requested SFA amount under the final rule are the same as those used in the application that was approved under the interim final rule (except for the non-SFA and SFA interest rates).

See Template 4A instructions for Sheet 4A-4, except provide the projection used to determine the intermediate Item number 2 SFA amount from Sheets 9-1B, 9-1D, or 9-1F (whichever applies), under the "basic method" described in § 4262.4(a)(1) and before any assumption change related to excluded contribution increases agreed to on or after July 9, 2021. Unlike Sheet 4A-4, it is not necessary to explicitly identify the projected SFA exhaustion year in Sheet 9-2.

#### **Version Updates (newest version at top)**

Version Date updated

v20220701p 07/01/2022

Reconciliation - Summary for non-MPRA plans using the "basic method" under § 4262.4(a)(1) with no contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1A.

#### PLAN INFORMATION

Abbreviated Plan Name:	GWU L610 PF	
EIN:	66-0308040	
PN:	001	
SFA Measurement Date:	06/30/2021	
MPRA Plan?	No	
If a MPRA Plan, which method yields the greatest amount of SFA?		

Item numbe	Basis for Assumptions/Methods. For each Item, briefly describe the incremental change reflected in the SFA amount.	Change in SFA Amount (from prior Item number)	SFA Amount	NOTE: No Recon Details sheets are required for any of the Item numbers.
1	SFA amount under the Interim Final Rule	N/A	\$29,180,890	From Template 4 of the application that was approved under the Interim Final Rule provisions.
2	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$2,053,663	\$31,234,553	From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

Reconciliation - Summary for non-MPRA plans using the "basic method" under § 4262.4(a)(1) with contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1B.

PLAN INFORMATION	V	
Abbreviated Plan Name:		
EIN:		
PN:		
SFA Measurement Date:		
MPRA Plan?		
If a MPRA Plan, which method yields the greatest amount of SFA?		

Item number	Basis for Assumptions/Methods. For each Item, briefly describe the incremental change reflected in the SFA amount.	Change in SFA Amount (from prior Item number)	SFA Amount	NOTE: A sheet with Recon Details is only required for Item number 2.
1	SFA amount under the Interim Final Rule	N/A		From Template 4 of the application that was approved under the Interim Final Rule provisions.
2	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0		Show details supporting the SFA amount on Sheet 9-2.
3	SFA amount under the Final Rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021	\$0		From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

Reconciliation - Summary for MPRA plans using the "increasing assets method" under § 4262.4(a)(2)(i) with no contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1C.

PLAN INFORMATION	Į .	
Abbreviated Plan Name:		
EIN:		
PN:		
SFA Measurement Date:		
MPRA Plan?		
If a MPRA Plan, which method yields the greatest amount of SFA?		

Item number	Basis for Assumptions/Methods. For each Item, briefly describe the incremental change reflected in the SFA amount.	Change in SFA Amount (from prior Item number)	SFA Amount	NOTE: No Recon Details sheets are required for any of the Item numbers.
1	SFA amount under the Interim Final Rule	N/A		From Template 4 of the application that was approved under the Interim Final Rule provisions.
2	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0		From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.
3	SFA amount under the Final Rule using the "increasing assets method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0		From Sheet '4A-5 SFA Details .4(a)(2)(i)' of Template 4A.

Reconciliation - Summary for MPRA plans using the "increasing assets method" under § 4262.4(a)(2)(i) with contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1D.

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Item number	Basis for Assumptions/Methods. For each Item, briefly describe the incremental change reflected in the SFA amount.	Change in SFA Amount (from prior Item number)	SFA Amount	NOTE: A sheet with Recon Details is only required for Item 2.
1	SFA amount under the Interim Final Rule	N/A		From Template 4 of the application that was approved under the Interim Final Rule provisions.
2	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0		Show details supporting the SFA amount on Sheet 9-2.
3	SFA amount under the Final Rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021	\$0		From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.
4	SFA amount under the Final Rule using the "increasing assets method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021	\$0		From Sheet '4A-5 SFA Details .4(a)(2)(i)' of Template 4A.

Reconciliation - Summary for MPRA plans using the "alternative present value method" under § 4262.4(a)(2)(ii) with no contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1E.

PLAN INFORMATION	V	
Abbreviated		
Plan Name:		
EIN:		
PN:		
SFA Measurement Date:		
MPRA Plan?		
If a MPRA Plan, which method yields the greatest amount of SFA?		

Item nu	umber	Basis for Assumptions/Methods. For each Item, briefly describe the incremental change reflected in the SFA amount.	Change in SFA Amount (from prior Item number)	SFA Amount	NOTE: No Recon Details sheets are required for any of the Item number		
1		SFA amount under the Interim Final Rule	N/A		From Template 4 of the application that was approved under the Interim Final Rule provisions.		
2	:	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0		From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.		
3		SFA amount under the Final Rule using the "alternative present value method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0		From Template 4B.		

Reconciliation - Summary for MPRA plans using the "alternative present value method" under § 4262.4(a)(2)(ii) with contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1F.

PLAN INFORMATION							
Abbreviated Plan Name:							
EIN:							
PN:							
SFA Measurement Date:							
MPRA Plan?							
If a MPRA Plan, which method yields the greatest amount of SFA?							

Item number	Basis for Assumptions/Methods. For each Item, briefly describe the incremental change reflected in the SFA amount.	Change in SFA Amount (from prior Item number)	SFA Amount	NOTE: A sheet with Recon Details is only required for Item 2.		
1	SFA amount under the Interim Final Rule	N/A		From Template 4 of the application that was approved under the Interim Final Rule provisions.		
2	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0		Show details supporting the SFA amount on Sheet 9-2.		
3	SFA amount under the Final Rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021	\$0		From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.		
4	SFA amount under the Final Rule using the "alternative present value method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021	\$0		From Template 4B.		

Reconciliation - Details for SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates

See Template 4A instructions for Sheet 4A-4, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION	1	
Abbreviated Plan Name:		
EIN:		
PN:		
MPRA Plan?		
If a MPRA Plan, which method yields the greatest amount of SFA?		
SFA Measurement Date:		
Fair Market Value of Assets as of the SFA Measurement Date:		
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:		
Non-SFA Interest Rate:		
SFA Interest Rate:		

	On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.											
	(1)	(2)	(3)	(4)	(5) Make-up Payments Attributable to Reinstatement of	(6) Administrative Expenses			(9) Projected SFA Assets at			(12) Projected Non-SFA Assets at End of Plan Year
SFA Measurement Date / Plan Year Start Date Plan Year End Date	Contributions	Withdrawal Liability Payments	Other Payments to Plan (excluding financial assistance and SFA)	Benefit Payments	Benefits Suspended through the SFA Measurement Date	(excluding amount owed PBGC under 4261 of ERISA)	Administrative Expenses (from (6)) Paid from SFA Assets	SFA Investment Income Based on SFA Interest Rate		Administrative Expenses (from (6)) Paid from Non-SFA Assets	Non-SFA Investment Income Based on Non- SFA Interest Rate	(prior year assets + $(1) + (2) + (3) + (10) + (11)$ )