

Form 5500-SF

Department of the Treasury Internal Revenue Service

Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation

Short Form Annual Return/Report of Small Employee Benefit Plan

This form is required to be filed under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA), and sections 6057(b) and 6058(a) of the Internal Revenue Code (the Code).

Complete all entries in accordance with the instructions to the Form 5500-SF.

OMB Nos. 1210-0110 1210-0089

2024

This Form is Open to Public Inspection

Part I Annual Report Identification Information

For calendar plan year 2024 or fiscal plan year beginning 01/01/2025 and ending 07/31/2025

- A This return/report is for: [X] a single-employer plan [] a multiple-employer plan (not multiemployer) (Pension Plan filers checking this box must attach Schedule MEP. Other plans must attach a list of participating employer information in accordance with the form instructions.)
B This return/report is [] the first return/report [X] the final return/report [] an amended return/report [X] a short plan year return/report (less than 12 months)
C Check box if filing under: [] Form 5558 [] automatic extension [] DFVC program [] special extension (enter description)
D If the plan is a collectively-bargained plan, check here []
E If this is a retroactively adopted plan permitted by SECURE Act section 201, check here []

Part II Basic Plan Information—enter all requested information

1a Name of plan: JEWISH COMMUNITY CENTER OF GREATER ANN ARBOR 403(B) PLAN
1b Three-digit plan number (PN): 001
1c Effective date of plan: 03/01/2023
2a Plan sponsor's name (employer, if for a single-employer plan): JEWISH COMMUNITY CENTER OF GREATER ANN ARBOR
2b Employer Identification Number (EIN): 38-2648103
2c Sponsor's telephone number: 734-971-0990
2d Business code (see instructions): 624410
3a Plan administrator's name and address: [X] Same as Plan Sponsor.
3b Administrator's EIN
3c Administrator's telephone number
4 If the name and/or EIN of the plan sponsor or the plan name has changed since the last return/report filed for this plan, enter the plan sponsor's name, EIN, the plan name and the plan number from the last return/report.
4b EIN
4d PN
5a Total number of participants at the beginning of the plan year: 40
5b Total number of participants at the end of the plan year: 0
5c(1) Number of participants with account balances as of the beginning of the plan year (only defined contribution plans complete this item): 27
5c(2) Number of participants with account balances as of the end of the plan year (only defined contribution plans complete this item): 0
5d(1) Total number of active participants at the beginning of the plan year: 37
5d(2) Total number of active participants at the end of the plan year: 0
5e Number of participants who terminated employment during the plan year with accrued benefits that were less than 100% vested: 0

Caution: A penalty for the late or incomplete filing of this return/report will be assessed unless reasonable cause is established. Under penalties of perjury and other penalties set forth in the instructions, I declare that I have examined this return/report, including, if applicable, a Schedule SB or Schedule MB completed and signed by an enrolled actuary, as well as the electronic version of this return/report, and to the best of my knowledge and belief, it is true, correct, and complete.

Table with 4 columns: SIGN HERE, Signature of plan administrator, Date, Enter name of individual signing as plan administrator. Row 1: Filed with authorized/valid electronic signature, 12/22/2025, DENISE BENNETT. Row 2: Signature of employer/plan sponsor, Date, Enter name of individual signing as employer or plan sponsor.

- 6a** Were all of the plan's assets during the plan year invested in eligible assets? (See instructions.) Yes No
- b** Are you claiming a waiver of the annual examination and report of an independent qualified public accountant (IQPA) under 29 CFR 2520.104-46? (See instructions on waiver eligibility and conditions.) Yes No
- If you answered "No" to either line 6a or line 6b, the plan cannot use Form 5500-SF and must instead use Form 5500.**
- c** If the plan is a defined benefit plan, is it covered under the PBGC insurance program (see ERISA section 4021)? Yes No Not determined
- If "Yes" is checked, enter the My PAA confirmation number from the PBGC premium filing for this plan year _____ (See instructions.)

Part III Financial Information			
7 Plan Assets and Liabilities		(a) Beginning of Year	(b) End of Year
a Total plan assets	7a	246126	0
b Total plan liabilities	7b	0	
c Net plan assets (subtract line 7b from line 7a)	7c	246126	0
8 Income, Expenses, and Transfers for this Plan Year		(a) Amount	(b) Total
a Contributions received or receivable from:			
(1) Employers	8a(1)	44554	
(2) Participants	8a(2)	62735	
(3) Others (including rollovers)	8a(3)	0	
b Other income (loss)	8b	-342110	
c Total income (add lines 8a(1), 8a(2), 8a(3), and 8b)	8c		-234821
d Benefits paid (including direct rollovers and insurance premiums to provide benefits)	8d	7128	
e Certain deemed and/or corrective distributions (see instructions) .	8e	0	
f Administrative service providers (salaries, fees, commissions)	8f	4177	
g Other expenses	8g	0	
h Total expenses (add lines 8d, 8e, 8f, and 8g)	8h		11305
i Net income (loss) (subtract line 8h from line 8c)	8i		-246126
j Transfers to (from) the plan (see instructions)	8j		

Part IV Plan Characteristics	
9a	If the plan provides pension benefits, enter the applicable pension feature codes from the List of Plan Characteristic Codes in the instructions: 2G 2F 3D 2J 2K 2S 2T
b	If the plan provides welfare benefits, enter the applicable welfare feature codes from the List of Plan Characteristic Codes in the instructions:

Part V Compliance Questions				
10 During the plan year:		Yes	No	Amount
a Was there a failure to transmit to the plan any participant contributions within the time period described in 29 CFR 2510.3-102? Continue to answer "Yes" for any prior year failures until fully corrected. (See instructions and DOL's Voluntary Fiduciary Correction Program)	10a		X	
b Were there any nonexempt transactions with any party-in-interest? (Do not include transactions reported on line 10a.)	10b		X	
c Was the plan covered by a fidelity bond?	10c		X	
d Did the plan have a loss, whether or not reimbursed by the plan's fidelity bond, that was caused by fraud or dishonesty?	10d		X	
e Were any fees or commissions paid to any brokers, agents, or other persons by an insurance carrier, insurance service, or other organization that provides some or all of the benefits under the plan? (See instructions.)	10e		X	
f Has the plan failed to provide any benefit when due under the plan?	10f		X	
g Did the plan have any participant loans? (If "Yes," enter amount as of year-end.)	10g		X	
h If this is an individual account plan, was there a blackout period? (See instructions and 29 CFR 2520.101-3.)	10h		X	
i If 10h was answered "Yes," check the box if you either provided the required notice or one of the exceptions to providing the notice applied under 29 CFR 2520.101-3	10i			

Part VI Pension Funding Compliance

11 Is this a defined benefit plan subject to minimum funding requirements? (If "Yes," see instructions and complete Schedule SB (Form 5500) and lines 11a and b below.) If this is a defined contribution pension plan, leave line 11 blank and complete line 12 below. Yes No

a Enter the unpaid minimum required contributions for all years from Schedule SB (Form 5500) line 40 **11a**

b PBGC missed contribution reporting requirements. If the plan is covered by PBGC and the amount reported on line 11a is greater than \$0, has PBGC been notified as required by ERISA sections 4043(c)(5) and/or 303(k)(4)? Check the applicable box:

Yes.

No. Reporting was waived under 29 CFR 4043.25(c)(2) because contributions equal to or exceeding the unpaid minimum required contribution were made by the 30th day after the due date.

No. The 30-day period referenced in 29 CFR 4043.25(c)(2) has not yet ended, and the sponsor intends to make a contribution equal to or exceeding the unpaid minimum required contribution by the 30th day after the due date.

No. Other. Provide explanation _____

12 Is this a defined contribution plan subject to the minimum funding requirements of section 412 of the Code or section 302 of ERISA? (If "Yes," complete line 12a or lines 12b, 12c, 12d, and 12e below, as applicable.) If this is a defined benefit pension plan, leave line 12 blank and complete line 11 above. Yes No

a If a waiver of the minimum funding standard for a prior year is being amortized in this plan year, see instructions, and enter the date of the letter ruling granting the waiver. Month _____ Day _____ Year _____

If you completed line 12a, complete lines 3, 9, and 10 of Schedule MB (Form 5500), and skip to line 13.

b Enter the minimum required contribution for this plan year **12b**

c Enter the amount contributed by the employer to the plan for this plan year **12c**

d Subtract the amount in line 12c from the amount in line 12b. Enter the result (enter a minus sign to the left of a negative amount) **12d**

e Will the minimum funding amount reported on line 12d be met by the funding deadline? Yes No N/A

Part VII Plan Terminations and Transfers of Assets

13a Has a resolution to terminate the plan been adopted in any plan year? Yes No

a If "Yes," enter the amount of any plan assets that reverted to the employer this year. **13a**

b Were all the plan assets distributed to participants or beneficiaries, transferred to another plan, or brought under the control of the PBGC? Yes No

c If, during this plan year, any assets or liabilities were transferred from this plan to another plan(s), identify the plan(s) to which assets or liabilities were transferred. (See instructions.)

13c(1) Name of plan(s):	13c(2) EIN(s)	13c(3) PN(s)

Part VIII IRS Compliance Questions

14a Does the plan satisfy the coverage and nondiscrimination tests of Code sections 410(b) and 401(a)(4) by combining this plan with any other plans under the permissive aggregation rules? Yes No

14b If this is a Code section 401(k) plan, check all boxes that apply to indicate how the plan is intended to satisfy the nondiscrimination requirements for employee deferrals and employer matching contributions (as applicable) under Code sections 401(k)(3) and 401(m)(2).

Design-based safe harbor method

"Prior year" ADP test

"Current year" ADP test

N/A

15 If the plan sponsor is an adopter of a pre-approved plan that received a favorable IRS Opinion Letter, enter the date of the Opinion Letter 03 / 02 / 2020 (MM/DD/YYYY) and the Opinion Letter serial number J502244A.

July 11, 2025

By Electronic Mail to denisebennett@jccannarbor.org

Denise R. Bennett
Chief Financial Officer
Jewish Community Center of Greater Ann Arbor
2935 Birch Hollow Drive
Ann Arbor, MI 48108

Re: Church Plan Status of 403(b) Plan

Dear Denise:

As requested by the Board of Directors of the Jewish Community Center of Greater Ann Arbor (the “Center”), this letter documents our March 3, 2025 conversation regarding the church plan status of the Jewish Community Center of Greater Ann Arbor 403(b) Plan (the “403(b) Plan”) and the 403(b) Plan’s related exemption from automatic enrollment requirements and Form 5500 filing requirements.

Background

In February 2025, you questioned whether the automatic enrollment requirements under the SECURE 2.0 Act of 2022 applied to the 403(b) Plan. Under SECURE 2.0, Internal Revenue Code (“Code”) Section 403(b) plans initially adopted after December 29, 2022 were required to automatically enroll newly eligible employees beginning not later than January 1, 2025.

Because the 403(b) Plan was adopted effective March 1, 2023, the 403(b) Plan would generally be subject to the automatic enrollment requirement. It is our understanding that automatic enrollment provisions were not implemented for the 403(b) Plan effective January 1, 2025.

However, the SECURE 2.0 automatic enrollment requirement does not apply to a “church plan.” We therefore researched whether the 403(b) Plan qualifies as a “church plan” so that the automatic enrollment requirement would not apply to the 403(b) Plan.

Church Plan Exemption

Code Section 414A requires plans first adopted after December 22, 2022 to automatically enroll newly eligible participants beginning no later than January 31, 2025. However, Code Section 414A(c)(3) exempts from this requirement any plan that is a church plan under Code Section 414(e).

Code Section 414(e)(1) defines a “church plan” as “a plan established and maintained ... for its employees (or their beneficiaries) by a church or by a convention or association of churches which is exempt from tax under section 501.” While this definition does not initially appear to include the 403(b) Plan, additional definitions under Code Section 414(e)(1) operate to include the 403(b) Plan under the “church plan” definition.

The first question is whether the individuals covered by the 403(b) Plan are considered “employees” of a church. Code Section 414(e)(3)(B)(ii) defines the term “employee of a church or a convention or association of churches” to include “an employee of an organization, whether a civil law corporation or otherwise, which is exempt from tax under section 501 and which is controlled by or associated with a church or a convention or association of churches.”

The Center satisfies the first requirement, because it is exempt from federal income tax under Code Section 501(c)(3) as a charitable organization. It then must be determined if the Center is “controlled by or associated with a church or a convention or association of churches.”

It is our understanding that the Center is not controlled by any specific Jewish congregation or synagogue, so the Center must be “associated with a church” in order for the Center’s employees to be considered as “employees of a church” and for the 403(b) Plan to be a church plan. Code Section 414(e)(3)(D) states that “an organization, whether a civil law corporation or otherwise, is associated with a church or a convention or association of churches if it shares common religious bonds and convictions with that church or convention or association of churches.”

Sharing common religious bonds and convictions with Judaism is demonstrated through significant integration of Judaism in the Center’s purpose and activities. In the Center’s case, the By-Laws of the Center incorporate Jewish identity and values directly into the Center’s legal purpose and functions. The By-Laws state the Center’s mission is “to enhance Jewish identity and perpetuate Jewish values through excellence in cultural, educational, social, and recreational programming and resources that embrace and involve the entire community.” Similarly, the By-Laws state the Directors are “expected to serve as ambassadors in the local Jewish community.” Under additional guidelines adopted by the Center, one of the stated qualifications required to be a Board Member of

the Center is the “ability to represent a major segment of the Jewish community and interpret Jewish community needs and views.”

The Center’s Mission Statement and Vision Statement reinforce the commitment stated in the By-Laws. The Center’s Mission Statement is to “enhance Jewish identity, culture, and values for the community, through a wide range of resources and excellent programming.” The Center’s Vision Statement is to “build an authentic, vibrant and welcoming Jewish neighborhood.” The Center’s Code of Ethics/Conflict of Interest Policy states that the Center’s values include “commitment to supporting a concept of Judaism based on Jewish ethics, morals, culture, history, tradition and values.”

The specific activities and services the Center provides to the Jewish community also demonstrate the integration of Judaism. The mission of the Center’s Early Childhood Center is a “safe, warm, child-centered Jewish learning community.” Attendees at the Center’s Camp Raanana “explore aspects of Jewish life that we weave through the daily camp experience by celebrating Jewish themes in music, games, art, and our core camp values.” The PJ Library® sends enrolled families a book or CD each month “selected by top Jewish educators and kid-tested,” with the books representing “the best Jewish children’s literature available today.” The Arts and Culture offerings from the Center all focus on Jewish artists and Jewish themes.

The governance documents and operations of the Center as outlined above all support the position that the Center’s activities are centered around common religious bonds and convictions with Judaism, which makes the Center “associated with” Judaism.

Based on the Center satisfying the two requirements under Code Section 414(e)(3)(B)(ii) – being a tax-exempt entity and being associated with a church – the Center’s employees should be treated as employees of a church and the 403(b) Plan should be treated as a church plan under Code Section 414(e).

We note that the above position is consistent with the position taken by the Jewish Federations of Baltimore, Cleveland, Detroit, and Philadelphia, which all claim church plan status for their employee benefit plans, based on the organizations being “associated with” Judaism.

Form 5500 Filing Obligation

Because the 403(b) Plan qualifies as a “church plan” under Code Section 414(e), the 403(b) Plan is generally exempt from most requirements under the Code and the Employee Retirement Income Security Act of 1974, as amended (“ERISA”), unless the Center affirmatively elects under Code Section 410(d) to have those Code and ERISA requirements apply to the 403(b) Plan. Annually filing a version of Form 5500 is one of the

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requirements that would not apply to the 403(b) Plan without this affirmative election to apply Code Section 410(d) to the 403(b) Plan.

An election under Code Section 410(d) would be made by attaching an affirmative statement to a Form 5500 filed for the 403(b) Plan, which clearly states that an election is being made under Code Section 410(d) and the first plan year to which the election applies.

It is our understanding that the Center filed Form 5500-SF, "Short Form Annual Return/Report of Small Employee Benefit Plan," for the 403(b) Plan's initial plan year ending December 31, 2023. Based on information available in the U.S. Department of Labor's online Form 5500 database, it appears an affirmative election under Code Section 410(d) was **not** included with the Form 5500-SF filed for the 403(b) Plan for 2023. Presuming our understanding is correct, the 403(b) Plan is **not** subject to the requirements under the Code and ERISA listed in Code Section 410(d) and its related Treasury Regulations.

Because the Center did not make an election under Code Section 410(d) for the 403(b) Plan, the Center is not required to file Form 5500 for the 403(b) Plan for 2024 or any later year.

If any additional information or documentation is required, please let me know.

Very truly yours,



Antoinette M. Pilzner