

# Nollenberger Capital Partners Retirement Plan Services



Alex Hargrave, EVP & Partner

## FIDUCIARY MANAGEMENT PROGRAM

### Initial Evaluation

#### **Documents:**

- Review of existing plan documents
- Examine plan for consistency with plan document and actual operations

#### **Investments:**

- Analyze the diversity of investment options
- Assess the mix of asset classes
- Evaluate the current Investment Policy Statement
- Appraise the investments against the Investment Policy Statement

#### **Fiduciaries:**

- Identify all fiduciaries
- Review the composition of the investment committee
- Look for any conflicts of interest

#### **Plan Costs:**

- Determine actual annual fees paid by the company and the participants

#### **Operations:**

- Review current operations processes

#### **Deliverable: Written executive report**

To assist you in achieving your ERISA compliance goals, our annual services include the following:

*The Plan Sponsor is required to adhere to the “Prudent Person” standard.*

#### *We help you to:*

- Make choices based upon independent information.
- Compare the plan’s investments’ performance against peer groups and appropriate unmanaged benchmarks.
- Document the rationale behind “why” investment choices were made.
- Document the decision processes.
- Verify that selected funds meet the requirements of the Investment Policy Statement.
- Retain a set of all meeting minutes relevant to your plan fiduciary decision-making.

*The plan must be regularly monitored for investment performance and reviewed for diversity of investments.*

#### *We will:*

- Monitor fund performance for compliance with the Investment Policy Statement.
- Provide monthly performance reports.
- Identify potential investment changes when appropriate.
- Hold regular fund review and trustee meetings.
- Document the decision process behind any fund changes.



***The Plan Sponsor must fully understand all plan costs and control the expenses of administration.***

*We will:*

- Analyze hard dollar and soft dollar plan costs.
- Analyze participants' costs.
- Benchmark your costs against other plans similar in size and design to your plan.
- Determine if fees generated by your plan can be used to offset its costs.

***The Plan Sponsor must act in the exclusive interest of participants and beneficiaries.***

*We will:*

- Serve as consultant for the plan.
- Review and evaluate whether participants receive adequate plan and investment documents.
- Provide on-site educational seminars to participants.

***Plan operations must follow specified, documented processes and Plan Sponsors must be able to provide proof that “procedural due diligence” was employed.***

*We help you to:*

- Define a consistent, due diligence process for the plan.
- Defend your decisions and present appropriate documentation if needed.
- Operate the plan according to the Investment Policy Statement.
- Document the communication processes to participants regarding fund and plan design changes.
- Show proof of distribution of required materials to employees.

***The Plan Sponsor must understand who has fiduciary responsibilities.***

*We will:*

- Determine who in the group is considered a fiduciary according to current ERISA definitions.
- Educate plan fiduciaries on their responsibilities.
- Review general requirements needed for compliance with section 404(c).

***Plans must be in compliance with legal and regulatory requirements.***

*We will deliver to you:*

- Regular updates on changes to fiduciary guidelines and how those changes may impact your organization.

***The Plan Sponsor must retain current copies of key documents.***

*We review existing records for completion including:*

- Summary of Plan Features
- Adoption Agreement
- Summary Plan Description
- Plan Document
- Form 5500
- Non-Discrimination Test
- Data Worksheet for Non-Discrimination Test
- Investment Policy Statement
- Minutes from Plan Trustee Meetings

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CAPITAL PARTNERS**