

How To Add Value And Protect Your Clients From Missing Participant Challenges



**RETIREMENT
PLAN** / **MANAGEMENT**
A Division of RCP

The image shows a close-up of several chess pieces on a chessboard. The pieces are white and black, including a knight, a king, a queen, a rook, and a pawn. The lighting is dramatic, highlighting the textures of the pieces.

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November 2018

OVERVIEW

- What is the latest on the DOL and IRS initiatives?
- Why should you care about helping your clients mitigate this fiduciary risk for them?
- Is there a way to simplify fixing this issue that isn't burdensome and time consuming for you and your clients?
- What are the current best practices being followed?

Who We Are

- Since 1949
 - “de-risking” populations
 - Cutting costs for clients
 - Providing seamless solutions
 - Leverage core products to build new service
 - Reuniting and maintaining connection between people and assets for years in multiple industries
 - Pain-point support
 - Discuss client needs and build solutions

Who We Are

- Areas of Practice
 - Risk Mitigation
 - ERISA
 - DOL Audit Support
 - Client Centered solutions
 - Client Communications
 - Call Center Services

Who We Help

- Providers
 - Record Keepers
 - Third Party Administrators
 - Custodians
 - Consultants
- Plan Sponsors
- Benefit Exchanges
- Outplacement Firms

Risks We Address

- Missing Participants
- Stale Check Resolution
- Beneficiary Location
- DC Plan Terminations
- Participant Data Quality Analysis
- Mortality Audits
- Participant Mailings (i.e. Fee Disclosure, Annual Notice, etc.)

What is the latest on DOL, IRS and PBGC initiatives?

DOL: FAB 2014 – 01 Missing Participants
in Terminating DC Plans

IRS: October 19, 2017 Memo

PBGC: December 21, 2017 Expanded
Missing Participant Program to
include DC Plan Terminations
effective January 1, 2018



Risk Compliance Performance
SOLUTIONS

Why you should care about helping your clients mitigate this fiduciary risk?

- If you are a fiduciary is this your problem?
- If you are not a fiduciary who's problem is it?
- If your client is audited will they come to you for assistance?
- How would you assist them with the issues that the IRS, DOL and PBGC are addressing?
- If you are not assisting your clients WHEN issues arise what happens if you are not part of the solution?

Why you should care about helping your clients mitigate this fiduciary risk?

- Protect your clients from their fiduciary responsibilities that they may/may not be aware of
- Provide value added services for your clients to keep you at or ahead of your competitors
- Provide an opportunity for additional revenue

Is there a way to simplify fixing this issue that isn't burdensome and time consuming for you and your clients?

- Discuss your issues with people who address missing participants
- Understand who are the missing participants
- Set up processes that address your issues and are participant focused
- Set up processes that if audited your client does not have any conflict of interest
- Run any process through your ERISA counsel

Example: Mandatory Mailing

- Your client creates notice/has notice created, mails notice and receives their own undeliverable mail
- RK (your firm) creates notice, client mails the notice and receives their own undeliverable mail
- RK (your firm) creates and mails the notice with undeliverable mail going back to your client
- RK (your firm) creates and mails the notice with undeliverable mail being sent back to the RK (your firm)

Internal Issues to Addressing the Missing Participant Problem

- System Limitations
- Are you taking on your Clients Exposure?
- Cost to Implement

What are the Current Best Practices being followed?

- Search and confirm the known Missing Participants Annually
- Search for all Terminated/Retiree Participants at specific ages
- Certified Mail – when should it be done?
- Search for Beneficiaries should the Participant be deceased



Risk Compliance Performance
SOLUTIONS

Q & A

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