

## Plan Review Checklist

Plan Name \_\_\_\_\_ Review Date \_\_\_\_\_

Review performed by (Plan Sponsor) \_\_\_\_\_

and (Advisor) \_\_\_\_\_

### Plan Document and Design

Does your plan have an IRS approved document in place?

Is your Plan document up-to-date for recent law changes?

Is your current plan design meeting the needs of your company? If not, what changes would you make?

Does your plan have an up-to-date summary plan description (SPD)?

Have you distributed the SPD to participants at the times required by law?

If you have any workers (including independent contractors or temporary employees) at who are not covered under the plan, does your plan document specifically exclude them from participation?

If you, your family or your company have ownership rights in any other businesses, have you received advice concerning the possible consequences to your plan?

### Plan Fiduciaries

Are the plan fiduciaries (e.g., plan committee, trustees, officers and owners) aware they are fiduciaries and have they been informed of their responsibilities under ERISA?

Have the plan's investment fiduciaries been appointed in accordance with the plan and trust documents?

Do the plan committee and other fiduciaries meet at least annually?

Is a due diligence file maintained with the notes, minutes, agenda, background information and supporting documentation for plan and investment decisions made at the fiduciary meetings?

Have the plan fiduciaries reviewed the costs associated with the plan? Do they understand the services provided by the following various parties and find their value reasonable and appropriate?

Product provider

Investment professional

Mutual fund companies (regarding the underlying mutual fund expenses)

Third Party Administrator

Other advisors and consultants, as utilized

Do the plan fiduciaries ensure the plan collects and invests the employee deferrals as timely as possible?

Is your plan covered by a fidelity bond of at least 10% of plan assets (up to \$500,000) and does the bond cover plan fiduciaries as well as other employees or third parties that handle or have access to plan assets?

Are the plan fiduciaries covered by fiduciary liability insurance to protect business and personal assets?

## **Plan Investments**

Does your plan have a written investment policy statement?

Does your plan have investments in at least the following investment categories so that participants may invest in a “broad range” of funds?

- Stable value investment, guaranteed investment contract (GIC) or money market fund;
- U.S. government or corporate bonds;
- Large-cap U.S. equities;
- Mid/small-cap U.S. equities;
- International or global equities

Do the plan fiduciaries review the plan’s investments on a periodic basis? (minimum annually)

Was each investment compared to its peer group and the appropriate index for performance?

Was the review conducted in accordance with the investment policy statement?

Was the review documented in a plan fiduciary/investment committee due diligence file, including the materials reviewed by the committee and any other notes or analysis used to determine whether to retain, add or remove investment options?

Does your plan minimize overlap of similar stock holdings among investment options by offering options from more than one investment management company?

Does your plan provide employee enrollment programs explaining the importance of participation in the plan, investing for retirement, and investment basics?

Does your plan provide ongoing employee investment education materials and/or programs?

Does your plan provide lifestyle funds, managed accounts, target maturity funds or asset allocation models for employees who lack the investment knowledge to evaluate and select individual investment options and allocate their accounts among them?

## **ERISA Section 404(c)**

If your plan intends to obtain the fiduciary protections available under ERISA Section 404(c), does the SPD or a written notice to participants provide the following disclosures:

- Participants will be able to direct their investments;
- The plan intends to comply with 404(c) and plan fiduciaries may be relieved of liability for losses; and
- The name, address and phone number of the 404(c) plan fiduciary responsible for providing information upon request and for receiving and complying with participant investment instructions.

Is the Plan’s Form 5500 coded to indicate the Plan is 404(c) compliant? (Code 2F in Part II, Line 8a)

Have all participants received information about each of the options available under the plan?

Have all participants received or had access to information regarding investment concepts (including explanation of the types of investments, risk/return applicable to each, impact of time horizon on investment decisions, etc.), in the last 12 months?