



Fee disclosure checklist—tasks to help you prepare and stay on track to meet your annual deadline

As the Plan Sponsor of an ERISA retirement plan, you're required to provide plan participants with an annual Plan and Investment Notice, per the Department of Labor's participant fee disclosure regulations.

Your deadline for delivering annual disclosure notices is at least once in any 14-month period, regardless of whether your plan operates on a calendar or fiscal year basis. For more details and best practices, visit the *Service & Fee Disclosure* page under the *Compliance* tab on PlanFocus.

If you need assistance, please contact your client services manager. If your plan is serviced by the Administrator Telephone Center, you can speak with a consultant at 888-842-7782, weekdays, 8 a.m. to 8 p.m. (ET).

Ongoing—Provide disclosures to newly eligible employees. Provide any plan change notifications to employees.

| Status | Task | Considerations and Helpful Resources |
|--------------------------|--|---|
| <input type="checkbox"/> | 1. Develop delivery strategy. <ul style="list-style-type: none"> Prepare your participant data delivery file of eligible employees and participants. <ul style="list-style-type: none"> Include active participants, eligible nonparticipants, and terminated participants. Provide work email addresses as a best practice; paper disclosures should be sent only to employees without computer access/work email as an integral part of their jobs. Choose a date to deliver your disclosures within the guidelines that makes the most sense for you and your participants and continue within that window each year. | Key considerations: <ul style="list-style-type: none"> Will your institution produce its own disclosures or will you require support? Become familiar with the DOL safe harbor guidelines about delivering notices electronically to work email addresses. Resources: <ul style="list-style-type: none"> Review last year's participant data delivery file. Familiarize yourself with the participant disclosure deadline that allows for your notices to be sent at least once in any 14-month period. |
| <input type="checkbox"/> | 2. Prepare employee communication plan. <ul style="list-style-type: none"> Take a proactive approach to help your participants better understand plan fees and make informed decisions. Leverage TIAA suggested participant communication materials. | Resources: <ul style="list-style-type: none"> PlanFocus®—Select the <i>Compliance</i> tab and then <i>Service & Fee Disclosure</i>. Refer to the Disclosure Assist User Guide for details on developing your participant delivery file. |
| <input type="checkbox"/> | 3. Learn more about Disclosure Assist®. <ul style="list-style-type: none"> Learn how this tool can streamline the creation and delivery of your notices. Learn about customization features available for your Plan and Investment Notice. | Resources: <ul style="list-style-type: none"> View the new tutorial for an overview of your annual fee disclosure responsibility and how Disclosure Assist can help. Register for an upcoming webinar. |
| <input type="checkbox"/> | 4. Reach out to service providers, if applicable. <ul style="list-style-type: none"> Collect plan and investment data from each provider for a consolidated notice. Investment data should be as of most recent quarter-end. | Key considerations: <ul style="list-style-type: none"> Allow adequate time for providers to respond. |
| <input type="checkbox"/> | 5. Prepare your Plan and Investment Notice using Disclosure Assist. <ul style="list-style-type: none"> Create your participant delivery file. Understand the production and timing requirements. Develop a customized Plan and Investment Notice cover letter.¹ Verify and finalize your participant data file. | Key considerations: <ul style="list-style-type: none"> If you used Disclosure Assist last year, your data is available for this year's use. Resources: <ul style="list-style-type: none"> Review the Disclosure Assist User Guide for step-by-step instructions. |
| <input type="checkbox"/> | 6. Execute communication plan and deliver disclosures. <ul style="list-style-type: none"> Distribute any participant education materials to help them make informed plan decisions. Deliver the disclosure notices to your participants. Encourage eDelivery to save time, money and reduce paper. | Key considerations: <ul style="list-style-type: none"> Disclosure notices will be delivered to your participants within 30 calendar days of when you publish them.¹ Resources: <ul style="list-style-type: none"> Share this website with your participants to promote the benefits of eDelivery. |
| <input type="checkbox"/> | 7. Evaluate and fine-tune your strategy for next year. <ul style="list-style-type: none"> Consider expanding email distribution, as appropriate. Consider broadening employee educational efforts. | Resources: <ul style="list-style-type: none"> Login to PlanFocus® for guidance and tools. Select the <i>Compliance</i> tab and then <i>Service & Fee Disclosure</i>. |
| <input type="checkbox"/> | 8. Continue ongoing fee disclosure efforts. <ul style="list-style-type: none"> Review the Delivery Audit Report to make sure that all participants received their disclosures.¹ | |



¹ Only applicable if using Option 3, TIAA's Delivery Assistance

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