

Disclosure Assist® Reference Guide: Participant notices and documents

Online. On time. On track.

As a plan sponsor, you're required to notify employees about plan changes and other important plan information to comply with Department of Labor regulations. Our web-based tool, Disclosure Assist, can help simplify the notification process and make it easier for you to meet your responsibilities.

With Disclosure Assist, you can:

- View participant notices and documents
- Choose your level of delivery service
- Track delivery for audit purposes
- View history of current and past notices

Inside this guide, you'll find information about:

Click to be
taken to
any section.



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Participant notices and document requirements

In addition to your annual participant fee disclosures, you may need to give your employees or plan participants other notices and documents depending on your plan provisions.

Defining “plan participant”

To help you understand your responsibilities and who needs to receive these other notices and documents, keep these definitions in mind. You’ll see them throughout this reference guide and Disclosure Assist.

- **Eligible participants:** Employees who are actively participating in the plan or eligible, but not participating
- **Terminated participants:** Employees who are no longer employed at your institution but still have account balances in the plan
- **Participants on file with TIAA:** Participants who have an account balance with TIAA; we use the contact information on file with us to deliver the notices and documents
- **Participants not on file with TIAA:** Employees who don’t have an account balance with TIAA so we don’t have their contact information on file

Available notices and documents

Via Disclosure Assist, you can distribute the following notices and documents. Be familiar with their descriptions, recipients and general timing:

Qualified Default Investment Alternative (QDIA) notices

	Description	Recipients	Timing
Initial One-time QDIA Notice	Explains contributions will be invested in the QDIA if the participant doesn’t make an investment election	All eligible participants at the time the QDIA is added to your plan	Generally, 30 days before the effective date of your QDIA
Initial Ongoing QDIA Notice	Same as above	New employees	Generally, 30 days before a new employee becomes eligible to participate or 30 days before his/her first contribution, if the plan has immediate eligibility
Annual QDIA Notice	Same as above	All eligible participants	Generally 30-90 days before the beginning of each plan year

Other participant notices and documents

	Description	Recipients	Timing
Plan-Related Notices	Explains product, service or investment changes to your plan and any actions participants need to take	All eligible participants	As required based upon the communication

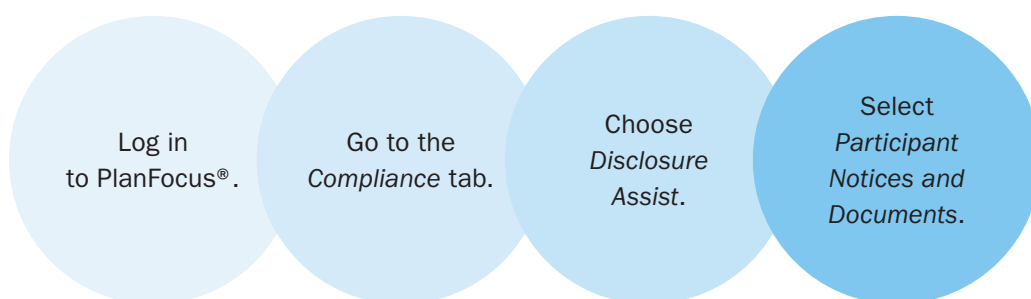
Additional communications may be required for your plan. The timing and recipients for them will vary. Contact your TIAA representative to learn more.

If you don't see the Disclosure Assist option, contact your TIAA representative or call the Administrator Telephone Center at **888-842-7782**, weekdays, 8 a.m. to 8 p.m. (ET).

Getting started with Disclosure Assist

Disclosure Assist is a simple and convenient way for you to distribute your participant notices and documents in a timely manner. You can choose from two delivery options—self-delivery or TIAA delivery assistance—based on your needs. Note: In certain cases, we'll automatically send the notices and documents to participants on file with us. (See **Defining “plan participant”**.)

To access Disclosure Assist, follow these steps:



After accessing Disclosure Assist, you'll first need to decide which delivery option you want to use. The distribution process varies based on the delivery option and the notice you select. Read below carefully and be aware of the different processes.

You drive the process

VERY IMPORTANT: Notices and documents cannot be distributed until you select a delivery option and complete the applicable steps.

	Option 1: Self-delivery	Option 2: TIAA delivery assistance
Best option when	You want to manage the distribution process.	You want TIAA to manage the distribution process for you.
Distribution process for specific notice or document:		
QDIA notices	TIAA automatically sends these notices to participants on file with us. You're responsible for sending the information to all eligible participants not on file with TIAA. (See Defining “plan participant”). We will provide you with the notice.	TIAA automatically sends these notices to participants on file with us. We also give you the notice and distribute it on your behalf to all eligible participants not on file with TIAA, based on the participant delivery file you provide. (See Defining “plan participant”).
Other participant notices and documents	You're responsible for sending the information to all eligible participants, both those on file and not on file with TIAA. (See Defining “plan participant”). We will provide you with the notice or document for the selected communication.	We give you the notice and distribute it on your behalf to all eligible participants, both those on file and not on file with TIAA, based on the participant delivery file you provide. (See Defining “plan participant”).

Here's how the two delivery options work:

Self-delivery

Select the notice and plan(s).

Choose self-delivery.

View and download the notice or document.

QDIA notices: You deliver it to eligible participants **not** on file with TIAA. We'll automatically send the notice to participants on file with us.

Other participant notices and documents: You deliver it to all participants on file and eligible participants not on file with TIAA.

Refer to the *History* tab for the status of your request and to view the Delivery Audit Report.

Refer to the *History* tab for the status of your request.

TIAA delivery assistance

Select the notice and plan(s).

Choose TIAA delivery assistance.

Review/edit your return address.

Create your participant delivery file and upload to Disclosure Assist.

Review the notice or document, agree to the Service Agreement and submit your request.

QDIA notices: The notice is sent to anyone you include in your delivery file. The file should only include eligible participants not on file with TIAA. We'll automatically send the notice to participants on file with us.

Other participant notices and documents: The notice is sent to anyone you include in your delivery file. The file should have both participants on file and any eligible participants not on file with TIAA.

Refer to the *History* tab for the status of your request and to view the Delivery Audit Report.

You can collapse and expand each section by selecting – and +. You will be able to view all applicable notices and documents.

Participant Notices tab

The Participant Notices tab is where you'll find the notices and documents that require action on your part. From this one location, you can:

1. Select the notice or document you want to distribute.
 - 1a. Top section is for "QDIA Notices"
 - 1b. Bottom section is for other "Participant Notices and Documents."
2. View due dates for when participants need to receive certain notices and documents. See **page 10** for details.
3. Take action by selecting *Begin*, *Modify* or *Continue*.
 - 3a. Begin: Start the process
 - 3b. Modify: The ability to switch from self-delivery to TIAA delivery assistance
 - 3c. Continue: Proceed with TIAA delivery assistance
4. Access the *History* tab to view a record of your notices and documents, including dates, delivery options and Delivery Audit Report, if available.

The screenshot shows the PlanFocus Disclosure Assist interface. At the top, there is a navigation bar with 'PlanFocus' and several menu items: Home, Administration, Reporting, Compliance (selected), Resources, Document Center, Need Help?, and Notifications. Below the navigation bar is the title 'Plan-Specific Reports: Disclosure Assist'. The main content area is divided into two sections. The first section, labeled '1a', is titled 'QDIA Notices' and contains a sub-section '1a' with a minus sign. It instructs the user to 'Select the notice and its associated plans below.' There are two radio button options: 'Qualified Default Investment Alternative (QDIA): INITIAL NOTICE' and 'Qualified Default Investment Alternative (QDIA): ANNUAL NOTICE'. Each option has two checkboxes for different plans: 'ABC ORGANIZATION 401(K) DEFINED CONTRIBUTION RETIREMENT PLAN (111111)' and 'ABC ORGANIZATION EMPLOYEE VOLUNTARY PLAN (222222)'. A 'Continue' button is located at the bottom right of this section. The second section, labeled '1b', is titled 'Participant Notices and Documents' and contains a sub-section '1b' with a minus sign. It lists three notices. The first is 'FUND MENU CHANGE NOTICE' for 'ABC ORGANIZATION 401(K) DEFINED CONTRIBUTION RETIREMENT PLAN (10276)', with a 'Past Due: 8-24-2017' warning, a '2' notification, and a 'Begin' button (3a). The second is 'PLAN CHANGE NOTICE' for 'ABC ORGANIZATION 401(K) DEFINED CONTRIBUTION RETIREMENT PLAN (10278)', with a 'Self Delivery Selected' status, 'Due Date: 11-2-2017', and a 'Modify' button (3b). The third is 'PLAN CHANGE NOTICE' for 'ABC ORGANIZATION EMPLOYEE VOLUNTARY PLAN (22222)', with a 'Due Date: 11-24-2017' warning and a 'Continue' button (3c).

History tab

The History tab is where you'll find the status of a request and a record of your activity that helps you document that you fulfilled your responsibilities. Within the tab, you can:

1. Click the name of a notice to see a proof document.
2. View the plan name and number associated with the notice or document.
Note: For QDIA notices where you have selected multiple plans, each plan will be listed separately.
3. See the selected delivery option. **Note:** *None Selected* means no action was taken within 30 days after the past due date. This description doesn't apply to QDIA notices.
4. View the date you selected your delivery option or submitted your participant delivery file to TIAA. **Note:** *No Action Taken* means the necessary steps weren't completed within 30 days after the past due date. This description doesn't apply to QDIA notices.
5. Access the Delivery Audit Report, which shows the delivery status (successful or unsuccessful) for each participant. **Note:** This report is only available if you use TIAA delivery assistance and for QDIA notices that TIAA automatically sends to participants on file with us.

Participant Notices		History		
NOTICE NAME	PLAN NAME/NUMBER	DELIVERY OPTION	DATE SELECTED/SUBMITTED	DELIVERY AUDIT REPORT
1 Investment/Fund Update: PLAN CHANGE NOTICE	ABC ORGANIZATION 403 (B) DEFINED CONTRIBUTION RETIREMENT PLAN - 111111	None Selected	No Action Taken	N/A
Qualified Default Investment Alternative (QDIA): INITIAL NOTICE	ABC ORGANIZATION 403 (B) DEFINED CONTRIBUTION RETIREMENT PLAN - 111111			N/A
Qualified Default Investment Alternative (QDIA): INITIAL ONGOING NOTICE	ABC ORGANIZATION 403 (B) DEFINED CONTRIBUTION RETIREMENT PLAN - 111111	Self-Delivery	11/28/2017	N/A
Investment/Fund Menu Update: PLAN CHANGE NOTICE	ABC ORGANIZATION 403 (B) DEFINED CONTRIBUTION RETIREMENT PLAN - 111111	TIAA Delivery Assistance	11/27/2017	Download PDF / Download CSV

IMPORTANT: Be familiar with the file specifications that are listed on **page 9** and follow them carefully before uploading your participant delivery file.

Participant delivery file instructions

If you're using TIAA delivery assistance, we need current contact information for your recipients to help ensure successful delivery of your notices and documents. Below are the instructions for creating your participant delivery file. **IMPORTANT:** The instructions are slightly different when sending QDIA notices versus other types of notices or documents. Follow them carefully.

Important

Email is the preferred delivery method. It's the most efficient, cost-effective option. To deliver your documents electronically, you need to follow the **DOL's safe harbor guidelines**, which allow you to use "work emails" if employees have access to a computer and email as an integral part of their jobs.

QDIA notices

Step	Action	Quick tip
1	Download the blank file template.	Select <i>Download File Template</i> .
2	Save the template or data file to your computer.	<ul style="list-style-type: none"> Use this suggested file format: Plan#_NoticeName_MMDDYY.xls For example, 12345_QDIAInitial_041519.xls
3	Add all eligible participants not on file with TIAA to the blank template.	<ul style="list-style-type: none"> If an employee meets the guidelines for eDelivery, provide his/her work email address. Otherwise, provide a home address. TIAA will automatically send the notices to participants on file with us.
4	Save your participant delivery file to your computer.	<p>Make sure your file:</p> <ul style="list-style-type: none"> Is saved as an ".xls" file; other file extensions are not compatible. Meets the required file specifications on page 9. Has the correct 9-digit SSN format in Column C.* Doesn't contain number signs, hyphens, symbols, periods, etc. in any "alphanumeric" data fields. See page 9 for details. Contains only one worksheet.
5	Upload your participant delivery file. You'll receive a confirmation message that it was received.	If there's an issue with your file, you'll receive a message with the location of the error(s) to be corrected.

*To format the SSN column, use the Excel "format cells" feature. Select *Column C*, press Ctrl+1 and go to the *Number* tab in the dialog box. Select the *custom* category and enter the format as 000000000. Click *OK* to set the format.

IMPORTANT: Be familiar with the file specifications that are listed on **page 9** and follow them carefully before uploading your participant delivery file.

Other participant notices and documents

Step	Action	Quick tip
1	Download the participant data file (census file).	<ul style="list-style-type: none"> ▪ Select <i>Download File Template</i>. ▪ The participant data file, also known as census file, contains the contact information for participants on file with TIAA.
2	Save the template or data file to your computer.	<ul style="list-style-type: none"> ▪ Use this suggested file format: Plan#_NoticeName_MMDDYY.xls ▪ For example, 12345_QDIAInitial_041519.xls
3	Add all eligible participants not on file with TIAA to the data file.	<ul style="list-style-type: none"> ▪ If an employee meets the guidelines for eDelivery, provide his/her work email address. Otherwise, provide a home address. ▪ Your census file that you downloaded in Step 1 above, already includes the contact information for participants on file with TIAA.
4	Save your participant delivery file to your computer.	<p>Make sure your file:</p> <ul style="list-style-type: none"> ▪ Is saved as an ".xls" file; other file extensions are not compatible. ▪ Meets the required file specifications on the next page. ▪ Has the correct 9-digit SSN format in Column C.* ▪ Doesn't contain number signs, hyphens, symbols, periods, etc. in any "alphanumeric" data fields. See next page for details. ▪ Contains only one worksheet.
5	Upload your participant delivery file. You'll receive a confirmation message that it was received.	If there's an issue with your file, you'll receive a message with the location of the error(s) to be corrected.

*To format the SSN column, use the Excel "format cells" feature. Select *Column C*, press Ctrl+1 and go to the *Number* tab in the dialog box. Select the *custom* category and enter the format as 000000000. Click *OK* to set the format.

Participant delivery file specifications

Very Important: For QDIA notices only

If you have multiple plans, you need to include all the contact information in one delivery file. **Within the file, participants need to be listed separately for each plan they are enrolled in or eligible for.** For example, an individual enrolled in two plans would be listed twice. Each record also needs to include the applicable plan number.

Column	Column name	Max length	Data type	Example	Required/Optional	Comments
A	Employer name	64	Alphanumeric	ABC Nonprofit	Required	Name of the employer
B	Employer Plan ID	6	Alphanumeric	123456	Required	Employer Plan ID that identifies the Plan on TIAA's recordkeeping system
C	Employee SSN	9	Numeric	123456789	Optional	Participant's SSN to be used to identify the participant
D	Employee first name	35	Text	John	Required	Employee first name to be used for notices/documents or other purposes as agreed by TIAA and employer
E	Employee middle name	35	Text	B	Optional	
F	Employee last name	35	Text	Sample	Required	Employee last name to be used for notices/documents or other purposes as agreed by TIAA and employer
G	Address 1	50	Alphanumeric	123 Central St	Required	Employee home address
H	Address 2	50	Alphanumeric	Apartment 34	Optional	
I	Address 3	50	Alphanumeric		Optional	
J	City	32	Alphanumeric	Somewhere	Conditional, required for employees in U.S.	For foreign addresses, no city is required.
K	State	2	Alphanumeric	AZ	Conditional, required for employees in U.S.	For foreign addresses, enter "FN" for the state. For APO addresses, enter "AA", "AE", or "AP" for the state.
L	Zip code	9	Numeric	76543 or 65431234	Conditional, required for employees in U.S.	For foreign addresses, no zip code is required.
M	Work email address	255	Alphanumeric	Jsample@ABS.edu	Conditional/Required	If the employee has access to a computer and it's part of their integral job duties (refer to safe harbor details).

TIAA delivery schedules and deadlines

Below is a general overview of the participant delivery file deadlines for TIAA delivery assistance and our delivery schedules. Refer to **page 9** or more details about the notice and document requirements. Contact your client services manager or the Administrator Telephone Center to discuss the schedule for your specific notices/documents or implementation effective date.

Important

It's essential that you upload your participant delivery file by the due dates/file deadline listed below to allow enough time for processing and delivery by the regulatory time frames.

QDIA notices

	File deadline	TIAA delivery schedule (When recipients will receive the notice)
Initial QDIA Notice	Approximately 50 days before your implementation effective date For example, if your implementation effective date is July 15 TIAA needs to receive the file by the preceding January 24.	Approximately 45 days before the implementation effective date
Initial ongoing QDIA Notice	N/A	7-10 days after you upload your participant delivery file
Annual QDIA Notice	Approximately 65 days before the beginning of each plan year For example, if your plan year begins January 1, TIAA needs to receive the file by the preceding October 28.	Approximately 45 days before the beginning of the plan year Note: Timing may vary based on your plan-specific deadline. See page 2 for timing details.

Other participant notices and documents

	File deadline	TIAA delivery schedule (When recipients will receive the notice)
Plan Change Notice	Approximately 35 days before the implementation date	Approximately 30 days before the effective date of the change
Other communications	Generally, 35 days before the due date, but can vary based on the particular notice	Approximately 5-10 business days after you “publish” the document for TIAA delivery assistance, but can vary based on the particular notice

Helpful tips for distributing your notices

Here are some things to keep in mind to help you move smoothly through the process.

QDIA notices

- If you have multiple plans and need to send the same notice to eligible employees and participants in each plan, you can select all of the plans and upload one participant delivery file. You can complete the process in one request.
- If you have multiple plans, the default return mailing address is the one shown for the first plan in the list. To use different return addresses, you'll need to select each plan and edit the address.
- TIAA automatically delivers these notices to participants who are currently on file with us. (See **Defining "plan participant."**) You don't need to provide contact information for these individuals.
- Any undeliverable QDIA notices that TIAA automatically mailed to participants will be sent either to you or a TIAA P.O. box, based on your plan provisions.

Other participant notices and documents

- If you have multiple plans and have to send the same notice to eligible employees and participants in each plan, you'll need to complete the process for each one separately and upload plan participant delivery file for each plan.
- Required participant notices are moved from the Participant Notice tab to the History tab if you don't take action within 30 days after the past due date. You'll be able to see a draft notice, but you won't be able to distribute it. Call your client services manager or the Administrator Telephone Center for further assistance.
- If you're using TIAA delivery assistance, your participant data file (also known as census file) is a good starting point for creating your participant delivery file. It includes contact information for all participants, including terminated, that TIAA has on file. (See **Defining "plan participant."**)

eDelivery and returned mail

- If you receive any returned mail, you should make a good faith effort to redeliver it and document your actions as part of your fiduciary process. The DOL suggests a number of options in its **Field Assistance Bulletin** to help locate missing participants. You can also try:
 - Sending the notice via certified mail
 - Checking the records of related plans that aren't precluded by privacy requirements
 - Checking with the designated plan beneficiary
 - Using free electronic search tools
- To successfully deliver your notice to work email addresses, your system must recognize the "From" email and IP addresses that TIAA uses when delivering the notices. Make sure your IT department has the current information to ensure emails are not blocked from TIAA. Refer to the **TIAA Email Delivery Alert** for more information.



We're here for you

If you have any questions or need help using Disclosure Assist, contact your TIAA representative or call the Administrator Telephone Center at 888-842-7782, weekdays, 8 a.m. to 8 p.m. (ET).



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