

Fiduciary File

Plan sponsors should maintain the documents and information below that are applicable to their retirement plan

Investments	Service Providers	Employee Engagement	Operations + Administration
For all instances in which the plan committee meets, maintain copies of: • Meeting minutes • Investment report • Regulatory and legislative updates			
• Documentation related to share class considerations and selection • Evidence of rationale for investment selection, including Qualified Default Investment Alternative (QDIA) • Investment contracts • Investment monitoring reports • Investment policy statement • Prospectus • Reports reflecting fees and provider for self-directed brokerage window • Reports reflecting managed account fees and usage	• 408(b)(2) disclosures (if separate from agreements) • Benchmarking reports for any service providers • Documentation of RFIs or RFPs for any service providers • Documentation of service provider conflicts, including cross-selling using participant data • Evidence of cybersecurity protocols of vendors with participant data • Fee policy statement or other documentation reflecting payment of fees • Service provider agreements • Small sum distribution procedures	• Missing participant procedures • Participant communications related to investments, including 404(c) compliance • Participant communication plan/strategy • Participant communications related to the plan • Records related to plan participant eligibility • Reports related to outcomes from participant communication plan/strategy	• Asset records • Charter or other delegation documentation • Collective bargaining agreements • Evidence of self-correction under Employee Plans Compliance Resolution System (EPCRS) • Executed and dated plan document (and any amendments)* • Fidelity bond • Fiduciary liability insurance policy • IRS determination letter • Non-discrimination testing • Payroll and contribution records • Plan's practices and procedures • Previously filed Form 5500s and attached audited financials** • Summary annual reports • Summary plan description*** • Trust agreement • Trustee statements

*Including Adoption Agreement, if applicable

**Audit only applicable for plans with > 100 employees

***Including any Summary of Material Modifications, if applicable

