Documents for Your Fiduciary File

This list provides suggestions regarding documentation that should be kept on file. Each plan is different; some of the items listed below may not be needed by some sponsors; other sponsors may need documentation that we haven't included here.

CORE DOCUMENTS

- Plan Document (and amendments)
- Adoption Agreement (if a prototype plan)
- Trust Agreement (if separate from plan document)
- Bargaining Agreements
- IRS Letter of Determination
- Summary Plan Description
- Summary Annual Reports

FORM 5500

- IRS Form 5500
- Audited Financial Statements

PROVIDER CONTRACTS

- Investment Consulting Agreement
- Plan Recordkeeping Agreements
- Fiduciary Advisory (Managed Accounts) Agreement
- Custodial Agreements

BONDING AND FIDUCIARY LIABILITY INSURANCE

- Fidelity Bond
- Fiduciary Liability Insurance Policy

PROCEDURES & MINUTES

- Fiduciary Committee Charter
- Plan Procedure Manual
- Investment Committee Meeting Minutes
- Administrative Committee Meeting Minutes

KEY DECISION SUMMARIES

- Provider Selection Summaries
- QDIA Selection Summary
- Principal Preservation Selection Summary

- Documentation regarding Investment Option Mapping
- Documentation regarding Use of Proprietary Investments

PARTICIPANT NOTICES AND COMMUNICATIONS

- Samples of Required Participant Disclosures (404(c))
- Participant Descriptions of Investment Options (404(c))
- Participant Investment (404(c)) and Other Communications
- Summaries of Material Modification
- Notices to Interested Parties (IRS determination application)

INVESTMENT POLICY

- Investment Policy Statement

INVESTMENT MANAGEMENT

- Investment Contracts and Participation Agreements

INVESTMENT AND MONITORING

- Performance and Expense Reports
- Investment Reviews and other Presentations
- Managed Account Provider Reviews

MISCELLANEOUS

- Non-Discrimination Testing Records
- Records Regarding the Determination of Eligibility and Contributions
- Records Regarding Participant Hardship Withdrawals and Loans

20210524TLDTLD0027