# Organizing Your Fiduciary File

As a plan sponsor and fiduciary of your company's retirement plan, keeping an up-to-date fiduciary file is critical. To begin, Rose Street Advisors recommends preparing your file in four key sections: Documents, Administrative, Participant Communication, and Investments. Contents of each section could include the items listed in the table below.

| Complete | N/A | I. Documents Section | Complete | N/A | I. Documents Section continued |
|---|---|---|---|---|---|
| ☐ | ☐ | Plan Document and Amendments. | ☐ | ☐ | Form 5330 (if necessary) |
| ☐ | ☐ | IRS Determination Letter (Opinion Letter if prototype). | ☐ | ☐ | Nondiscrimination Test Results |
| ☐ | ☐ | Summary Plan Description | ☐ | ☐ | Corporate Tax Return copies |
| ☐ | ☐ | Investment Policy Statement | ☐ | ☐ | Corporate Board Resolutions |
| ☐ | ☐ | 404(c) Policy Statement and Notice | ☐ | ☐ | Summary Annual Reports (5 years) |
| ☐ | ☐ | Form 5500 (5 years) | ☐ | ☐ | RFP Results |
| ☐ | ☐ | Service Provider Contracts | ☐ | ☐ | Committee Charter |
| ☐ | ☐ | Salary Deferral Agreement | ☐ | ☐ | ERISA Fidelity Bond |
| ☐ | ☐ | Material Modification | ☐ | ☐ | ADV II and Schedule F (if required) |
| ☐ | ☐ | Plan Loan Documents | ☐ | ☐ | Form 8955-ssa |

| Complete | N/A | II. Administrative Section |
|---|---|---|
| ☐ | ☐ | Evidence of Employer Contributions (5 years) |
| ☐ | ☐ | Distribution Documents |
| ☐ | ☐ | Default Safe Harbor, Automatic Enrollment Notices |
| ☐ | ☐ | Audit Results (IRS, DOL) |
| ☐ | ☐ | Annual Plan Review Executive Summary |
| ☐ | ☐ | Participant Complaints |
| ☐ | ☐ | Significant Business Events (Sale, Purchase, etc.) |
| ☐ | ☐ | Fiduciary Liability Insurance Contract |
| ☐ | ☐ | Correspondence (DOL, IRS, etc.) |

| Complete | N/A | III. Participant Communication Section |
|---|---|---|
| ☐ | ☐ | Enrollment Material |
| ☐ | ☐ | Documentation of all Communication Events (meetings, emails, posting, etc.) |
| ☐ | ☐ | Material to be provided automatically |
| ☐ | ☐ | Material to be provided upon request |

| Complete | N/A | IV. Investment Section |
|---|---|---|
| ☐ | ☐ | Documentation of Investment Activity |
| ☐ | ☐ | Executive Summaries from Committee Meetings |
| ☐ | ☐ | Current Fund Menu and Expenses |