408(b)(2) DISCLOSURE MANAGEMENT WORKSHEET

PRI PENSION RESOURCE INSTITUTE

OPTIONS KEY

A: BILLED TO PLAN
B: DEDUCTED FROM ACCOUNTS
C: DEDUCTED FROM INVESTMENTS

Y: YES
N: NO

$: DOLLAR AMOUNT
%: PERCENTAGE

INSTRUCTIONS

Use this framework to evaluate disclosures received from covered service providers (CSPs) and to determine whether all elements of the disclosure are met under ERISA Section 408(b)(2). Use the Options Key to fill in the columns for each CSP after receipt and review of the CSP's disclosure.

REQUIRED DATA	OPTIONS	COVERED SERVICE PROVIDERS: BD	RIA	RK	TPA	OTHER*
DISCLOSED IN ADVANCE OF HIRING (OR SELECTION OF INVESTMENTS IF LATER)**	Y/N					
DESCRIPTION OF SERVICES	Y/N					
ACKNOWLEDGEMENT OF STATUS (ERISA FIDUCIARY AND/OR RIA)	Y/N	--		--		
DIRECT COMPENSATION (AGGREGATE OR BROKEN DOWN BY SERVICE)	$/%	$ ______ / ____ %	$ ______ / ____ %	$ ______ / ____ %	$ ______ / ____ %	$ ______ / ____ %
METHOD OF RECEIPT	A/B/C					
INDIRECT COMPENSATION (E.G., COMMISSION, 12B-1, SUBTA, ETC.)	$/%	$ ______ / ____ %	$ ______ / ____ %	$ ______ / ____ %	$ ______ / ____ %	$ ______ / ____ %
IDENTIFICATION OF SERVICES PAID FOR BY INDIRECT COMPENSATION	Y/N					
IDENTIFICATION OF PAYER OF INDIRECT COMPENSATION AND DESCRIPTION OF ARRANGEMENT	Y/N					
METHOD OF RECEIPT	A/B/C					
FEES SHARED AMONG RELATED PARTIES - IF CHARGED ON A TRANSACTION BASIS (COMMISSIONS/FINDER'S FEES) OR AGAINST INVESTMENTS (12B-1/SUBTA)	Y/N					
IDENTIFICATION OF SERVICES PAID FOR BY RELATED PARTY	Y/N					
IDENTIFICATION OF THE PAYERS AND RECIPIENTS (INCLUDING STATUS OF PAYER OR RECIPIENT AS AFFILIATE OR SUBCONTRACTOR) AND COMPENSATION TO BE PAID	Y/N					
METHOD OF RECEIPT	A/B/C					

* Disclosure required only if Indirect Compensation will be received.
** Transaction-based may be disclosed after the service provider is hired if the plan's investment menu has not yet been chosen.
*** If explicit compensation is not disclosed, an estimate of the cost of recordkeeping services should be disclosed.

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REQUIRED DATA	OPTIONS	COVERED SERVICE PROVIDERS BD	RIA	RK	TPA	OTHER*
FEES FOR TERMINATION OF SERVICES	$/%	$ ______ / ___%	$ ______ / ___%	$ ______ / ___%	$ ______ / ___%	$ ______ / ___%
DESCRIPTION OF HOW PREPAID AMOUNTS WILL BE CALCULATED AND REFUNDED	Y/N					
METHOD OF RECEIPT	A/B/C					
COST OF RECORDKEEPING SERVICES* **	$/%	–	–	$ ______ / ___%	–	–
METHOD OF RECEIPT	A/B/C					
RECORDKEEPING/BROKERAGE SERVICES - FOR PARTICIPANT-DIRECTED PLANS WITH DESIGNATED INVESTMENT ALTERNATIVES (DIAS)	Y/N		–		–	–
COMPENSATION CHARGED DIRECTLY AGAINST ANY DIA NOT INCLUDED IN OPERATING EXPENSE (COMMISSIONS, SALES LOADS, REDEMPTION FEES, ETC.)	$/%	$ ______ / ___%	$ ______ / ___%	$ ______ / ___%	$ ______ / ___%	$ ______ / ___%
ANNUAL OPERATING EXPENSE (VARIABLE RETURN DIAS ONLY) AND ONGOING EXPENSES (WRAP/MORTALITY AND EXPENSE FEES)	$/%	$ ______ / ___%	$ ______ / ___%	$ ______ / ___%	$ ______ / ___%	$ ______ / ___%
INVESTMENT PERFORMANCE INFORMATION ABOUT THE DIAS REQUIRED UNDER 404(A)	Y/N					
INFORMATION CONCERNING THE USE OF AND CHARGES FOR BROKERAGE WINDOWS OR SELF-DIRECTED BROKERAGE ACCOUNTS	Y/N					

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AFFILIATE:

A person or entity that directly or indirectly (through one or more intermediaries) controls, is controlled by, or is under common control with another person or entity; or is an officer, director, or employee of, or partner in, such person or entity.

COMPENSATION:

Anything of monetary value (for example, money, gifts, awards, and trips), but does not include non-monetary compensation valued at $250 or less, in the aggregate, during the term of the contract or arrangement.

COVERED PLAN:

Any plan that is subject to Title I of ERISA. This includes 401(k) plans, profit-sharing plans, pension plans and 403(b) plans subject to ERISA. It does not include government plans, church plans (unless they elect to be covered by ERISA), top-hat deferred compensation plans or individual retirement accounts (IRAs).

COVERED SERVICE PROVIDER:

A service provider that enters into a contract or an arrangement with the covered plan and reasonably expects $1,000 or more in compensation, to be received, over the period of the contract, in connection with providing fiduciary, investment advisory, recordkeeping, investment platform or other services, regardless of whether such services will be performed, or such compensation received, by the covered service provider, an affiliate, or a subcontractor. A provider of other services, such as legal, accounting, appraisal, third party administration, custodial or consulting services, is a covered service provider only if they receive indirect compensation. A service provider who provides fiduciary services to certain collective investment vehicles is also a covered service provider. These vehicles include group trusts, collective or common trust funds, certain pooled separate accounts and other investment vehicles in which plans own more than 25% of the interests.

DESIGNATED INVESTMENT ALTERNATIVE OR DIA:

Any investment alternative designated by the covered plan into which participants and beneficiaries may direct the investment of assets held in, or contributed to, their individual accounts. The term “designated investment alternative” does not include brokerage windows, self-directed brokerage accounts, or similar plan arrangements that enable participants and beneficiaries to select investments beyond those designated by the covered plan. A model portfolio is generally not a DIA unless the plan acquires an equity interest in the portfolio.

DIRECT COMPENSATION:

Compensation received directly from the plan.

INDIRECT COMPENSATION:

Compensation received from any source other than the plan, the plan sponsor, the covered service provider, or an affiliate. Compensation received from a subcontractor is indirect compensation, unless it is received in connection with services performed under the subcontractor's contract or arrangement.

RELATED PARTY:

An affiliate or subcontractor.

SUBCONTRACTOR:

Any person or entity (or an affiliate) that is not an “Affiliate” and that, pursuant to a contract or arrangement with the covered service provider or an “Affiliate,” reasonably expects to receive $1,000 or more in compensation, over the period of the contract for performing one or more services provided by the contract or arrangement with the covered plan.