



		Policy Section:	Institutional Support
Policy Number:	5521-18	Policy Title:	Retirement Plan Oversight
Original Effective Date:	5/16/11	Department:	Human Resources
Date Last Revised:	6/21/16		

Policy Statement: Cairn University provides a retirement plan to assist participating employees in preparing to replace some portion of their pre-retirement income during retirement. This is accomplished through tax-deferred and post-tax employee contributions, University contributions, and employee-guided investment of funds. It is also accomplished through the University’s provision and oversight of a plan that provides access to a range of diversified investment options to assist employees in their retirement investment decision making.

Purpose: This policy on Retirement Plan Oversight (RPO) establishes the roles, responsibilities, and guidelines of those with responsibility for management of the University’s employee retirement plan.

1. Plan Information

- Plan Sponsor: Cairn University
- Plan Names: Cairn University Defined Contribution Retirement Plan
- Plan Year: January 1 through December 31
- Plan Inception: October 19, 1987

1.1 Defined Contribution Plan

The Cairn Retirement Plan (the Plan) is a defined contribution plan that is intended to provide eligible employees the opportunity to generate the long-term accumulation of retirement savings through employer and employee contributions to individual participant accounts and the earnings thereon.

1.2 ERISA-Qualified

The Plan is an employee benefit plan intended to comply with applicable federal laws and regulations including the Internal Revenue Code of 1986, as amended, and the Employee Retirement Income Security Act of 1974 (ERISA), as amended. The Plan is managed for the sole interest of providing retirement benefits to Plan participants.

1.3 Section 404(c)

The Plan is intended to comply with the requirements of ERISA Section 404(c) and the related Department of Labor regulations to limit the Plan Managers’ liability with respect to participant-directed investments under the Plan. To do so, the Plan provides participants with a default investment option which maintain their investment diversification in an industry-standard, expected time horizon-based method. Participants may choose to retain this arrangement or make transfers among the Plan’s investment options at least once every three months.

1.4 Plan Investment Objectives

Understanding that Plan participants bear the responsibility of constructing their individual retirement portfolios, and the inherent risk and rewards, Cairn encourages participants to take an active role for their retirement income planning, and provides education and information so informed decisions can be made about their participation and investment option selections. Cairn provides participants with direct access to representatives at Retirement Plan Advisors, an independent advisory firm contracted to assist employees with their investment choices and assist the University in its oversight of the Plan.

The Plan’s investment options are selected and monitored to:

- 1.4.1 Provide returns comparable to the appropriate industry benchmark for the asset categories
- 1.4.2 Provide opportunities to diversify across the risk return spectrum with a range of investment choices within varied asset classes
- 1.4.3 Control administrative, management and participant costs

2. Oversight Roles and Responsibilities

2.1 Plan Sponsor Managers

2.1.1 Managers are responsible for:

- 2.1.1.1 Plan design and administration
- 2.1.1.2 Authorizing changes to Plan documents to comply with laws and regulations
- 2.1.1.3 Selecting and monitoring the Plan Provider
- 2.1.1.4 Establishing the RPO policy for the Plan
- 2.1.1.5 Appointing the Retirement Investment Committee
- 2.1.1.6 Ensuring adequate educational opportunities and communication to Plan participants. These obligations will be carried out in conjunction with the Plan Provider.
- 2.1.1.7 Retaining advisors, consultants, attorneys, and auditors as necessary to ensure the proper administration of the Plan

2.1.2 Managers are the:

- 2.1.2.1 Sr. Vice President of Human Resources – functions as Plan Administrator, overseeing implementing of the plan and interface with employees
- 2.1.2.2 Director of Business Services – oversees plan contribution transmittal, auditing, and preparation of 5500 report

2.2 Retirement Investment Committee (Committee)

2.2.1 The Committee is responsible for:

- 2.2.1.1 Monitoring the performance and appropriateness of the investment options
- 2.2.1.2 Advising Plan Managers on possible changes to investment options
- 2.2.1.3 Assessing the educational opportunities provided to Plan participants
- 2.2.1.4 Periodically reviewing the RPO and recommending changes as deemed necessary

2.2.2 The Committee is comprised of:

- 2.2.2.1 The Plan Sponsor Managers
- 2.2.2.2 At least one faculty member
- 2.2.2.3 At least one staff member

2.3 Plan Provider (also known as the Plan Vendor)

2.3.1 The Plan Provider is responsible for:

- 2.3.1.1 Providing the investment options available to participants under the Plan
- 2.3.1.2 Providing tools and education to assist Plan participants in meeting their retirement planning goals (including web-based and print materials, and counseling services)
- 2.3.1.3 Providing reports, consultation, and guidance adequate to meet the Committee's needs in monitoring the performance and appropriateness of investment options
- 2.3.1.4 Fully disclosing all fees and compensation relative to the Plan
- 2.3.1.5 Monitoring changes at fund management firms

3. Plan Objectives and Guidelines – Criteria for Review and Decision-Making

Cairn University is contracted to work with Retirement Plan Advisors (RPA) to act as the ERISA 3(21) and 3(28) investment fiduciary for the plan. In doing so, the University has adopted an Investment Policy Statement which outlines the criteria for investment selection and ongoing monitoring.

The Investment Policy Statement, a separate document located at <K:\Benefits Information\Benefits Information\Retirement Plan\Investment Policy Statement.pdf> and is updated from time to time.

5. Education and Advice

A significant responsibility of the Committee is to ensure that adequate participant education and communication are provided. The Committee, in collaboration with Retirement Plan Advisors, the Plan Provider, and the Department of Human Resources, shall assess whether the quantity and quality of plan participant education and communication is appropriate. Plan participant education can be achieved through a variety of channels including printed materials, websites, group meetings, and individual counseling.

The Committee shall also assess providing participant investment advice from an investment advice provider to assist participants in saving for retirement which advice shall be available to plan participants. The Committee shall assess the advice providers' qualifications, quality of services offered, and the reasonableness of the fees charged for the service. This process shall avoid self-dealing, conflicts of interest, or other improper influences. In applying these standards to the selection of an investment advisor for plan participants, the process shall take into account the experience and qualifications of the investment advisor, including the advisor's registration in accordance with applicable federal and/or state securities laws, the willingness of the advisor to assume fiduciary status under ERISA, and whether the advice provided will be based upon generally accepted investment theories.

The Committee shall also take into account whether the advice provided complies with the contractual provisions of the engagement, the use of the investment services by participants and beneficiaries, and participant and beneficiary comments and complaints about the quality of the investment advice service.

6. Adoption and Approval

The Plan Managers support the Retirement Investment Committee's recommendation to approve and adopt this Retirement Plan Oversight policy and reserve the right to amend or terminate it.

President's Cabinet Representative

Date