



The Case for Rethinking TDFs as QDIAs



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Overview of QDIA Landscape

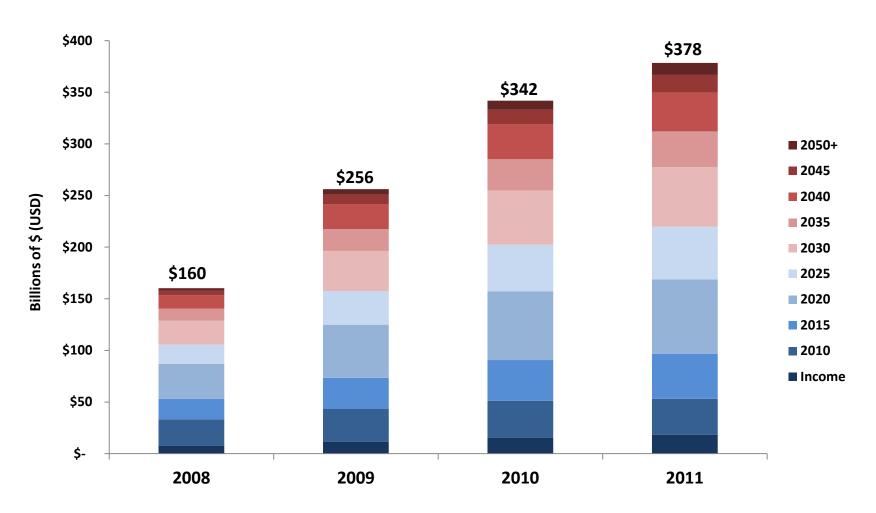
A Quick Look Back

• Pension Protection Act of 2006

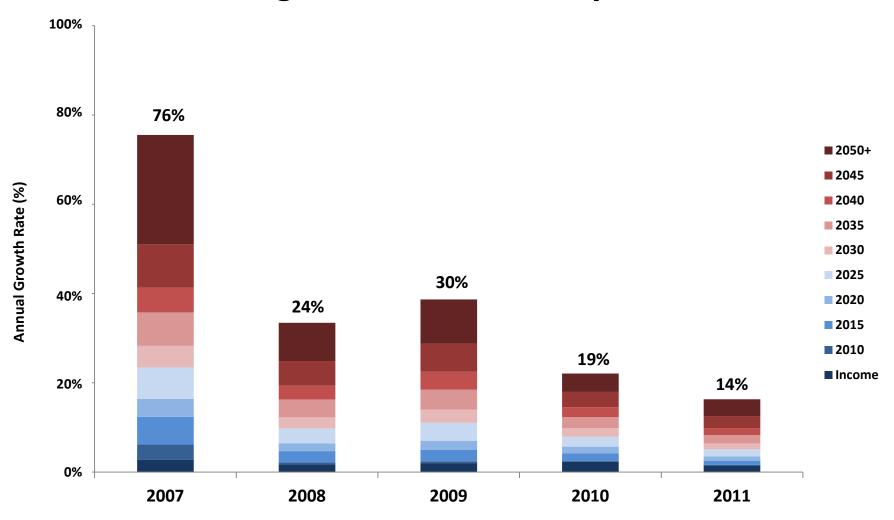
• Importance of QDIAs

• Why TDFs?

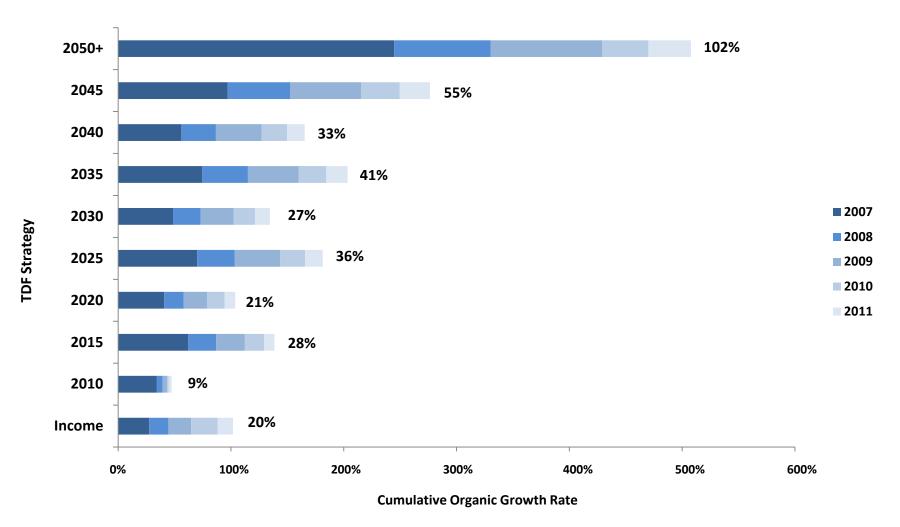
Total Net Assets



Organic Growth Rate by Year



Organic Growth Rate by Strategy



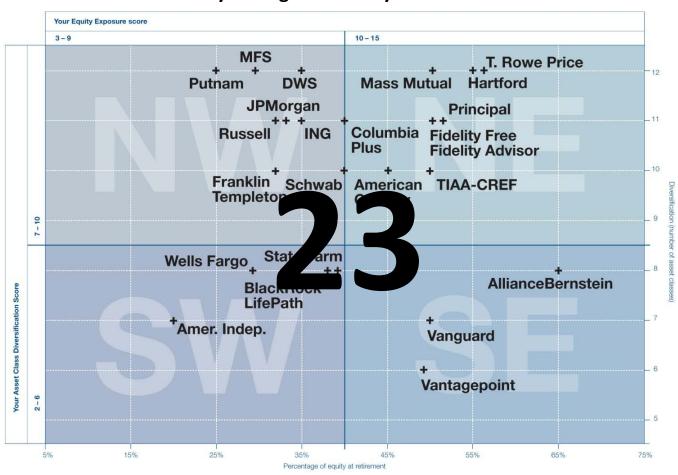
Proliferation of Product

Available 5 years ago with a 3-year track record



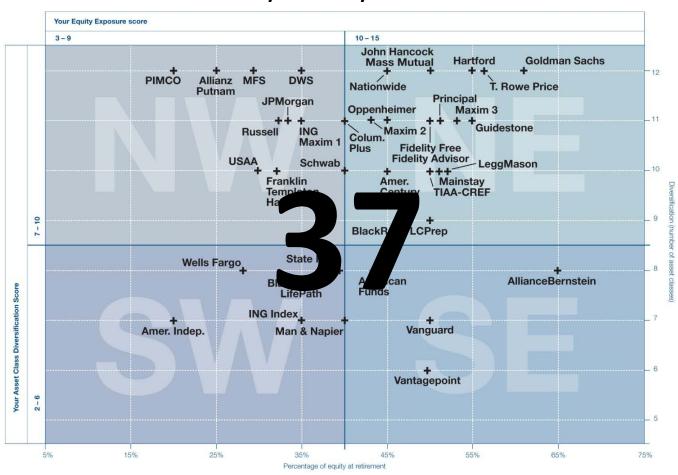
Proliferation of Product

Available 3 years ago with a 3-year track record

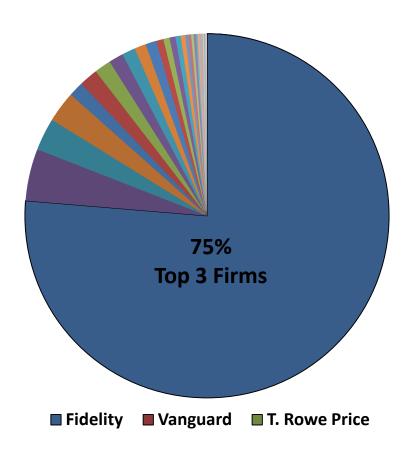


Proliferation of Product

Available today with a 3-year track record



Market Dominance



Where Are We Today?

Current Trends Key Drivers Outcome - Fee Compression 408(b)(2) & 404(a)(5) - Fee & Service Justification **Fee Awareness Index Funds & ETFs** - Open Architecture Platforms Transparency - Benchmarking - Fund Bias Exposure **Lost Decade Market Returns** - Participant Advice **Fund Choice Share Class Litigation** - Unrestricted Fund Choice **Emerging CIT & ETF Solutions** - Low Cost Alternative Options - RIA Involvement 408(b)(2) Fiduciary Status

3(21) & 3(38) Services

Regulatory Enforcement

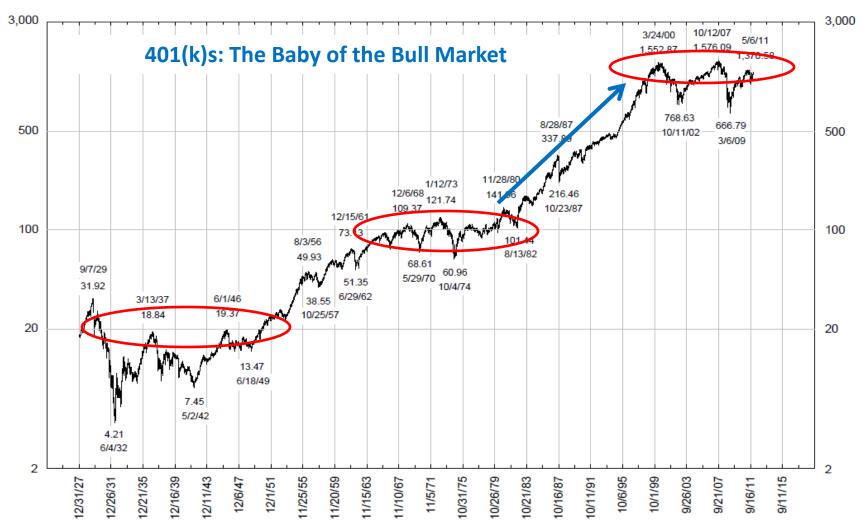
Fiduciary Oversight

- MEP Solutions

- Expanding Role of the Expert

Investment Challenges of TDFs

Retirement Roulette

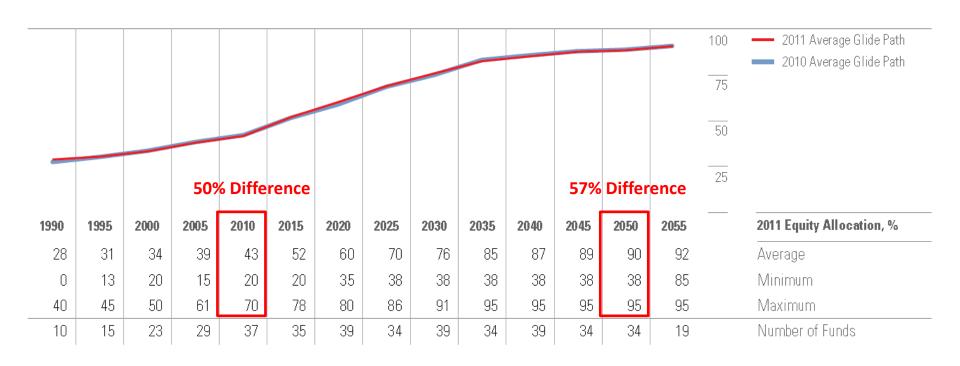


Investment Challenges of TDFs

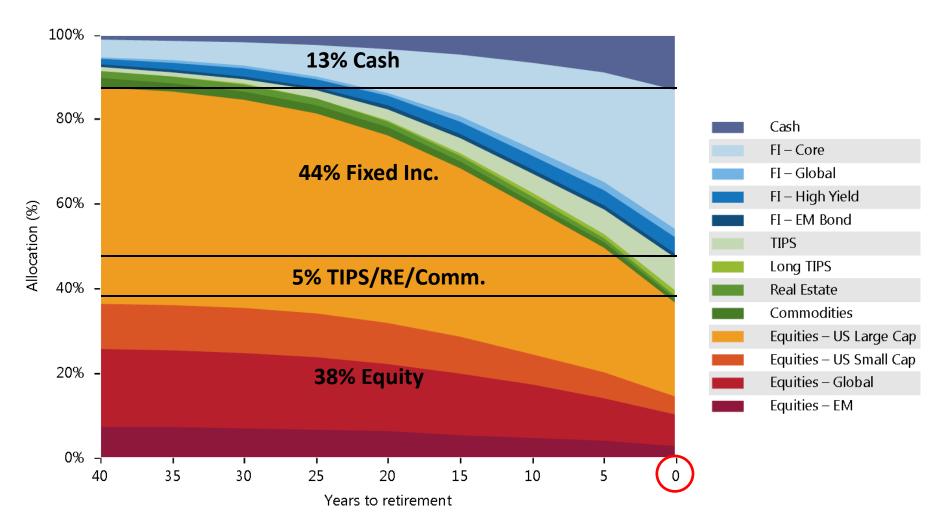
- Loss Potential > Loss Capacity
- Conflicting Definitions of Success
- TDFs Are Not Created Equal
- Glide Paths

Due Diligence

What's Normal about Glide Paths?



MarketGlide: Average Glide Path



Source: PIMCO 19

Investment Due Diligence Process

- Documented Due Diligence of:
 - Asset classes and sub-asset classes
 - Underlying holdings (and attribution)
 - Withdrawal and/or reinvestment assumptions of TDF
 - Glide Path
 - Investment rationale for Glide Path
 - Analysis of Glide Path stability
 - Degree of tactical asset allocation

Investment Due Diligence Process

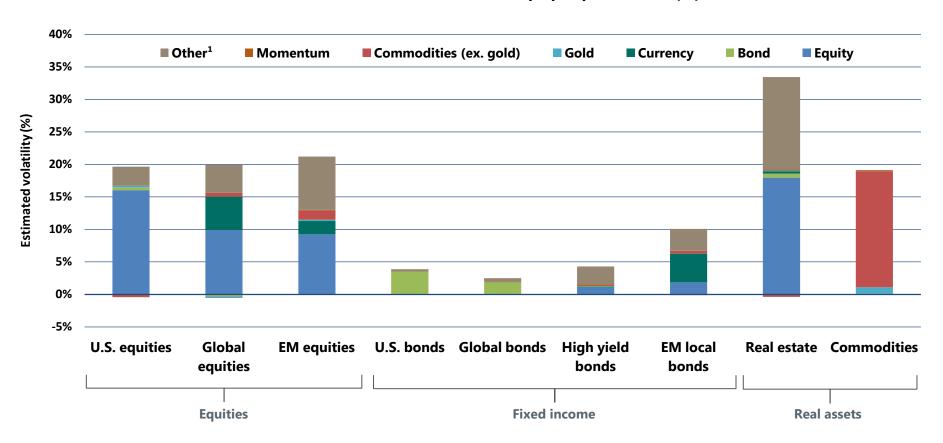
- Documented Due Diligence of:
 - Stress Testing
 - If proprietary, evaluation of underlying funds/mgrs.
 - Understanding what drives returns
 - Manager Compensation

Rewarding Performance

Short-Term	Long-Term	Gathering Assets
12	7	3

Risk Factor Analysis

Breakdown of total volatility by key risk factor (%)



Source: PIMCO

Conviction in Their Own Ideas?

- Do Fund Managers Actually Invest in Their Own Funds?
 - Per the Morningstar study...
 - "In two separate 2011 studies, Morningstar found a correlation between managers who
 invested substantial sums in their funds and superior relative fund performance."
 - "Of the 38 series...managers of 18 have zero dollars invested... Most fund managers don't invest a dime in the mutual funds they run. But given the importance and growing prominence of target-date funds...this low co-investment is disappointing."
 - "Across the industry, just one manager...meets the highest industry standard...owning shares
 worth more than \$1 million. One other manager... owns shares in two of [his] funds, with one
 investment valued between \$500,000 and \$1 million while the other is worth between \$10,000
 and \$50,000."

Fiduciary Challenges of TDFs

Plan Sponsor Awareness

- Prudence Still Reigns
 - "[N]othing in [the regulation relieving fiduciaries of liability for losses resulting from a participant's investment in a QDIA] shall relieve a fiduciary from his or her duties under part 4 of title I of ERISA to prudently select and monitor any qualified default investment alternative..."
- Fiduciary Disconnect

• Balancing QDIAs with Participant Education/Communication

Fiduciary Challenges

- Alignment with Plan Goals
 - Risk tolerance of participants
 - Retirement readiness and needs of participants
- Decision Making
 - How do I choose?
 - How do I monitor? What things do I even look for?
- Additional attention for QDIAs
- Direct competition with fund lineup

What Are You Paying For?

Active vs. Passive

- Active Share
- Is it a 'closet indexer'?

Active Share

100-85%	84-70%	69-55%	54-0%
26	5	6	8

Open vs. Closed

- Proprietary (closed) platforms
- Mixed platforms
- Open-architecture platforms

Closed	Mixed	Open
24	10	7

How Much Are You Paying?

• What's normal? What's high? What's low?

Net Expense Ratio¹

Average	High	Low
0.83%	1.31%	0.18%

Asset Class Comparisons²

	Average	High	Low
Large Cap Core	1.26%	2.05%	0.10%
Intermediate Bond	0.90%	1.72%	0.10%
Balanced Allocation	1.38%	2.15%	0.25%

DOL: TDF Tips for ERISA Fiduciaries

- Establish a process for comparing and selecting investments.
- Establish a process for the periodic review of selected TDFs.
- Understand the fund's investments the allocation in different asset classes, individual investments, and how these will change over time.
- Review the fund's fees and investment expenses.
- Inquire about whether a custom or non-proprietary target date fund would be a better fit for your plan.
- Develop effective employee communications.
- Take advantage of available sources of information to evaluate the TDF and recommendations you
 received regarding the TDF selection.
- Document the process.

Source: DOL 29

Trickle-Down Effect

• Shift of Burden

- Depends on your fiduciary status
 - Non-fiduciary
 - -3(21)
 - -3(38)
- Opportunity or Threat

Where Do We Go From Here

Rethinking QDIAs

- Redefining "Success"
- Drivers of QDIAs
- Solution rather than Product

• Manage Risk Exposure

Prudent, Conflict-Free, Transparent

Best Practices for Sponsors & Advisors

- Back to Basics (mostly)
- QDIAs Are Different
- Justification of Fees
- Process over Outcomes

	Good Outcome	Bad Outcome
Good Process	Deserved Success	Bad Break
Bad Process	Dumb Luck	Poetic Justice

Sources: Russo & Shoemaker, Winning Decisions.

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