



County of Fresno

Deferred Compensation Management Council

August 24, 2017 Agenda

THE MEETING WILL BE HELD AT 10:00 A.M. AT THE FRESNO COUNTY EMPLOYEES' RETIREMENT ASSOCIATION, 1111 H ST., FRESNO, CA 93721

1. Call to Order.
2. Public Comment – At this time, members of the public may comment on any item, within the jurisdiction of the Deferred Compensation Management Council, not appearing on the agenda. Please limit comments to 3 minutes or less.
3. Approve the August 24, 2017 Agenda.
4. Approve Action Summary Minutes from the May 11, 2017 meeting.
5. Receive and File and Approve Actions
 - a. Receive and File 2016-17 Fiscal Year Fourth Quarter Deferred Compensation Plan Budget Report prepared by County staff;
 - b. Approve a pro rata distribution of \$73,729 to current Deferred Compensation Plan participants based on each participant's percentage of Deferred Compensation Plan assets as of June 30, 2017.
6. Receive and File Deferred Compensation Plan Review as of June 30, 2017 prepared by Nationwide Retirement Solutions.
7. Receive and File Reports prepared by Northwest Capital Management and Approve Actions
 - a. Receive and File Deferred Compensation Plan Investment Review as of June 30, 2017;
 - b. Approve maintaining the Great-West Lifetime Target Date collective investment trusts and the Great West Stable Value fund on the Watch List;
 - c. Receive and File Great-West Lifetime Trust Review as of June 30, 2017;
 - d. Receive and File Stable Value Investment Management Services Project Overview.
8. Receive and File a report on Self Directed Brokerage Accounts prepared by Northwest Capital Management and provide direction to staff on bringing a recommendation at a future meeting to add Self Directed Brokerage Accounts as a feature of the Deferred Compensation Plan.



ITEM 4

Deferred Compensation Management Council May 11, 2017 Action Summary Minutes

Meeting was held at 3:00 pm at the Fresno County Employees' Retirement Association, 1111 H St., Fresno, CA 93721

Members Present: Jean Rousseau, Robert Bash, Oscar Garcia, Donald Kendig, Paul Nerland, and Lawrence Seymour

Members Absent: Kari Gilbert

1. Call to Order

ACTION: The meeting was called to order at 3:03 p.m.

2. Public Comment Period

There were no comments from the public.

3. Approve Agenda

ACTION: Unanimously approved as recommended.

4. Approve Action Summary Minutes from the February 23, 2017 meeting.

ACTION: Unanimously approved as recommended.

5. Receive and File 2016-17 Fiscal Year Third Quarter Deferred Compensation Plan Budget Report.

ACTION: Received and Filed.

6. Approve the Fiscal Year 2017-18 Deferred Compensation Plan Budget.

ACTION: The Administrative Fee and Fiscal Year 2017-18 Deferred Compensation Plan Budget were unanimously approved as recommended. The Council selected members Oscar Garcia and Donald Kendig to represent the Deferred Compensation Plan at the 2017 NAGDCA Conference in Milwaukee, WI.

7. Receive Verbal Report on the 2017 Save Today campaign presented by Nationwide Retirement Solutions.

ACTION: Report Received.

8. Receive and File Deferred Compensation Plan Review as of March 31, 2017 prepared by Nationwide Retirement Solutions.

ACTION: Deferred Compensation Plan Review Received and Filed. The Council directed Nationwide Retirement Solutions to include the New Hire Enrollment Rate in future reports.

9. Receive and File Plan Sponsor Fee Disclosure prepared by Nationwide Retirement Solutions.

ACTION: Received and Filed.

10. Receive and File and Approve Actions

- a. Receive and File Deferred Compensation Plan Investment Review as of March 31, 2017; Plan Fee Analysis; and Fiduciary Checklist prepared by Northwest Capital Management.

ACTION: All Items Received and Filed.

- b. Approve the removal of Templeton Global Bond fund from the Watch List.

ACTION: Unanimously approved as recommended.

- c. Provide guidance regarding Great-West Financial's management of the County of Fresno Stable Value Fund.

ACTION: The Council unanimously approved direction to instruct Northwest Capital Management to conduct a stable value fund manager search. The Council also directed Northwest Capital Management to provide notice to Great-West Financial that the Council is reserving the right to remove Great-West Financial as manager of the County of Fresno Deferred Compensation Plan Stable Asset Fund (Separate Account); further Council action to remove Great-West Financial as manager of the Stable Asset Fund to be considered at a future, noticed meeting. The fund will remain on the Watch List during the manager search process.

11. Introduction to Income-for-Life Investments presented by Northwest Capital Management.

ACTION: Presentation received.

The meeting was adjourned at 4:21 p.m.



Inter Office Memo

DEPARTMENT OF
HUMAN RESOURCES

ITEM 5

DATE: August 24, 2017

TO: Deferred Compensation Management Council

FROM: Hollis Magill, Human Resources Manager Hollis Magill

SUBJECT: 2016-17 Fiscal Year-End Budget Report & Distribution of Surplus Funds

Background

Pursuant to Section 9.5 of the County of Fresno 457(B) Deferred Compensation Plan Document, any reasonable expenses related to the operation of the Deferred Compensation Plan (Plan), such as third-party administration, consulting, legal and County staff costs, shall be charged to Plan participants. In order to offset the costs of these Plan-related expenses, the County directs the Plan Record-keeper to charge an administrative fee to each participant. For Fiscal Year 2016-17, that fee was 0.19%.

Year-End Budget Report

Staff has prepared a 2016-17 Fiscal Year-End budget report for the twelve-month period that ended June 30, 2017 (Attachment A); the approved FY 2016-17 budget is detailed in Attachment B. Staff would like to note and explain the revenue and expense discrepancies:

1. **Total revenues were higher than what was projected.** Plan revenues were higher than what was projected due to higher than expected Plan assets; staff based FY 2016-17 revenues on approximately \$195 million in Plan Assets, whereas total assets were in excess of \$227 million as of June 30, 2017.
2. **Expenses were less than what was budgeted.** Staff costs were less than what was budgeted, due primarily to fewer hours spent by staff working on the Plan than what was projected. Plan Document Review Legal Fees were less than projected, as the County was able to procure outside counsel for a lower cost than expected. In addition, the contingency budget has not been needed.
3. **Record-keeping fees were higher than projected.** Record-keeping fees were higher than projected due to higher than expected Plan assets; staff based FY 2016-17 record-keeping fees on approximately \$195 million in Plan Assets, whereas total assets were in excess of \$227 million as of June 30, 2017.

Distribution of Surplus Funds

As your Council is aware, in previous fiscal years where Plan revenues exceeded Plan expenses, your Council has approved a pro rata distribution of funds to participants based on

each participant's percentage of Plan assets. As stated on Attachment A, there was a surplus of approximately \$73,729 in fiscal year 2016-17.

Therefore, staff is recommending that your Council approve a pro rata distribution of these surplus funds to current participants who had a Plan account balance as of June 30, 2017. Each participant's share of the distribution will be based on their June 30, 2017 Plan account balance. As of June 30, 2017, the Plan Expense Account balance was \$143,637.11.

Recommended Action

Approve a pro rata distribution of \$73,729 to current Deferred Compensation Plan participants based on each participant's percentage of Deferred Compensation Plan assets as of June 30, 2017.

Item 5 - Attachment A

County of Fresno Deferred Compensation Plan

Fiscal Year 2016-17 Revenue & Expenses as of June 30, 2017

Revenue	Approved	Year to Date
Administrative Fees	\$ 175,000	\$ 189,842
Excess FY 2013-14 Funds	\$ 25,000	\$ 25,000
Totals:	\$ 200,000	\$ 214,842

Discretionary Expenses	Approved	Year to Date
Staff Costs	\$ 102,000	\$ 79,598
Consultant Fees	\$ 40,000	\$ 40,000
Plan Document Review Legal Fees	\$ 20,000	\$ 6,000
Fiduciary Liability Insurance Policy	\$ 11,000	\$ 10,134
NAGDCA	\$ 7,000	\$ 5,381
Contingencies	\$ 20,000	\$ -
Totals:	\$ 200,000	\$ 141,113

Surplus (Deficit):	\$ 73,729
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Mandatory Expenses	Approved	Year to Date
Record-keeping Fees	\$ 200,000	\$ 214,828

ITEM 5 - ATTACHMENT B

Approved FY 2016-17 Deferred Compensation Plan Budget

Revenue Source	Description	Dollars	% of Revenue
Administrative Fee	0.09% of Plan Assets, based on average of ~\$195,000,000 in assets.	\$175,000	87.5%
Excess Funds from Fiscal Year 2013-14	Excess funds from Fiscal Year 2013-14 to be used in FY 2016-17	\$25,000	12.5%
Total Revenue:		\$200,000	100.0%

Discretionary Expense	Description	Dollars	% of Expenses
Consultant Fees	Pursuant to Agreement # 15-597 with Heintzberger-Payne Advisors, \$40,000 annually.	\$40,000	20.0%
Fiduciary Liability Insurance Premium	Fiduciary Liability Insurance Premium on \$5,000,000 in coverage.	\$11,000	5.5%
Staff Costs	Based on approximately 1,100 County staff hours (includes Personnel and County Counsel staff). Also includes participant communication costs, if necessary	\$102,000	51.0%
Off-Site Training Costs	Send two (2) people to the 2016 NAGDCA conference and pay annual membership fee.	\$7,000	3.5%
Plan Document Legal Review	Cost to have an outside legal firm review the Deferred Compensation Plan Document	\$20,000	10.0%
Contingencies	Any appropriate expense not included in the items in the proposed budget.	\$20,000	10.0%
Total Discretionary Expenses:		\$200,000	100.0%

Mandatory Expense	Description	Dollars
Record-keeping Fees	Pursuant to Agreement # 14-710 with Nationwide, 0.10% of Total Assets per year.	\$200,000
Total Mandatory Expenses:		\$200,000

Total Expenses: \$400,000

ITEM 6

Fresno County 457 Deferred Compensation Plan

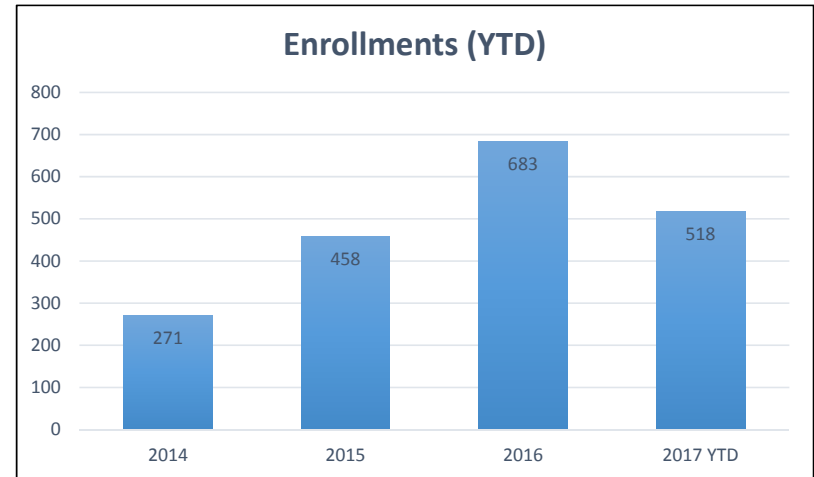
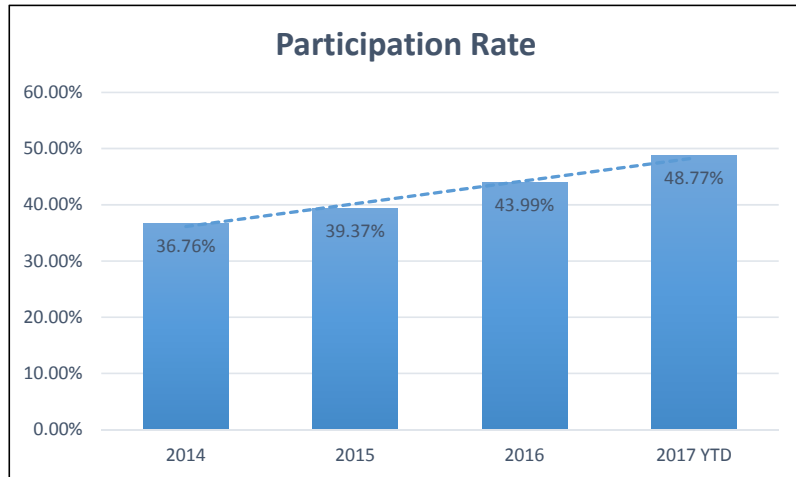
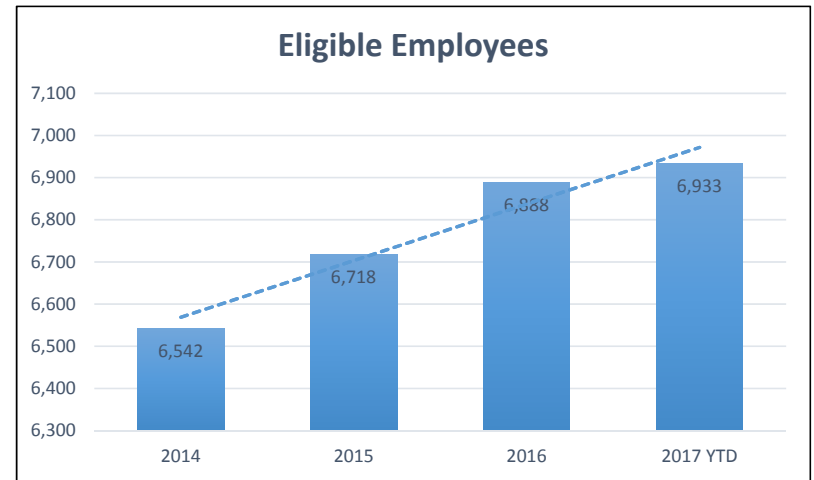
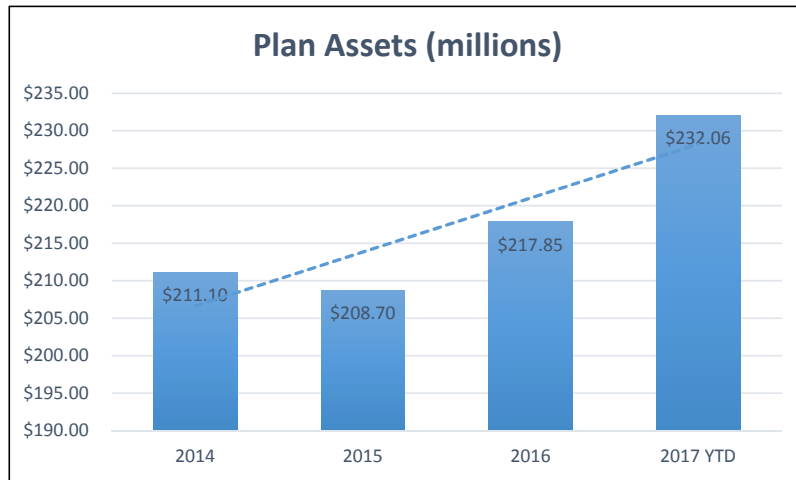
Quarterly Dashboard – June 30, 2017



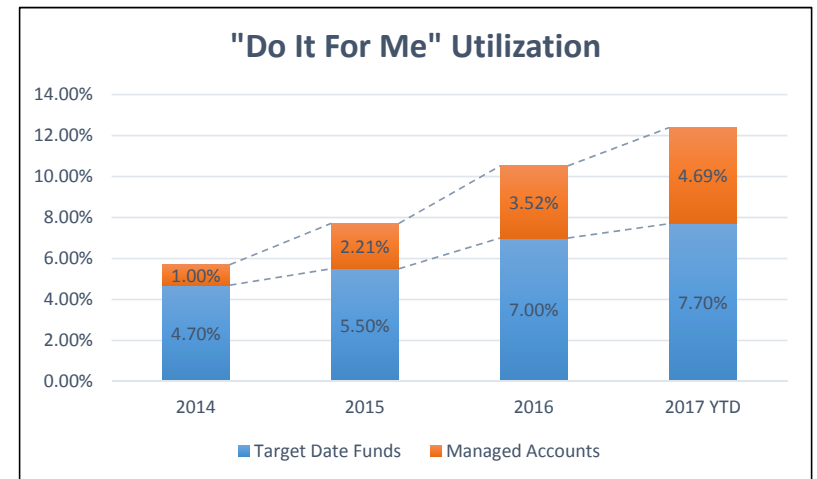
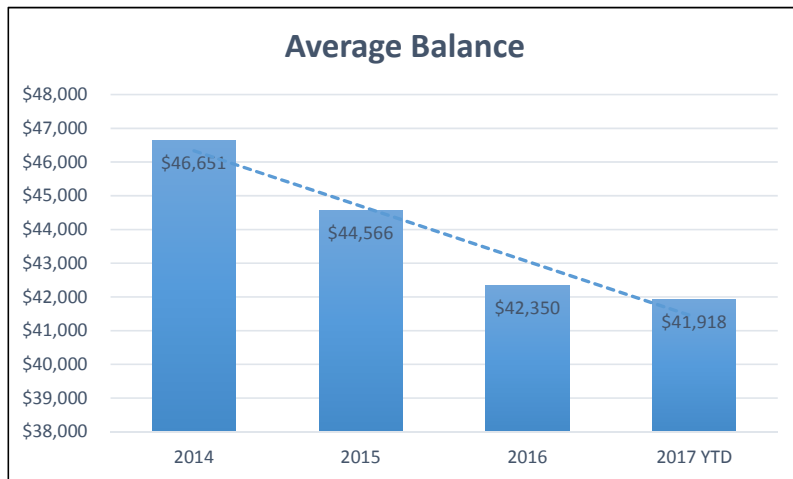
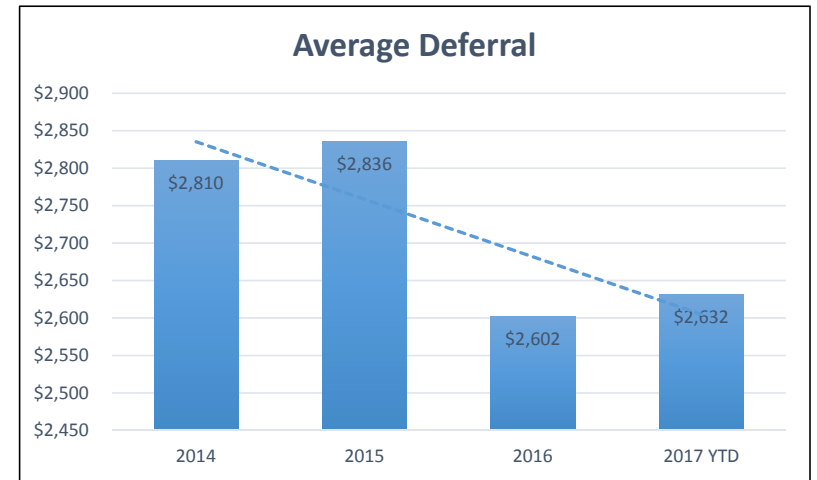
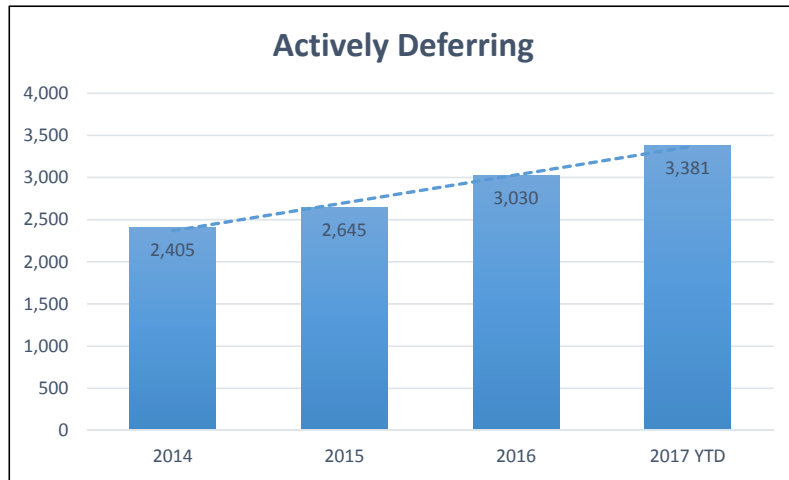
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Section 2	Service Summary
Section 3	Plan Objectives Summary

Section 1 Executive Summary



Section 1 Executive Summary



FRESNO COUNTY SERVICE RECAP

NATIONWIDE RETIREMENT SOLUTIONS

6/30/2017

Quick Plan Facts

	As of 6/30/2017	% Change from 6/30/2016
Total Participant Count	5,536	+13.6%
New Enrollments YTD	518	+79.9%
Total Plan Assets (millions)	\$232.06	+10.2%
Total Deferrals YTD (millions)	\$5.03	+30.5%
Total Rollovers-In (thousands)	\$642.66	+51.3%
ProAccount Assets (millions)	\$10.88	+78.8%
ProAccount Participant Count	330	+52.8%

2017 Education, Workshops and Counseling

Date	Event/Activity	Results
January/July	FCERA Nearing Retirement Workshop	Ongoing
January – June	Bi-weekly New Employee Training	Ongoing
March 20 – 26	Save Today Expo	Provided Previously

Enrollments by Month:

Total 2nd Quarter Enrollments: 313

Total April New Enrollments: 175

Total May New Enrollments: 63

Total June New Enrollments: 75

Education Campaigns

EZ Enrollment – All Fresno County Employees

Outbound Phone Campaign by Phillip Edwards – Account review

Asset Allocation – Fresno County participants with three asset classes or less

Local Nationwide Service Team

Ed Malone – Program Director/614-327-2218/ malonee@nationwide.com

Phillip Edwards – Retirement Specialist/ 559-999-7971/edwarp4@nationwide.com





2017

Communication and Education Plan

Prepared exclusively for:

Fresno County

January 1, 2017 - December 31, 2017



Helping Fresno County employees prepare for and live in retirement



Nationwide[®]
is on your side

Nationwide is your expert partner

With
43
years

in the public sector retirement plans industry and more plans than any other provider, we are committed to helping your employees prepare for and live in retirement.

Many employees look to their employer for guidance and information on retirement savings. In fact, in a recent survey,



said that if their employer provided them with more education, they might contribute more to their plan.¹

You can have piece of mind knowing we are providing education to your employees throughout their lifetime.

We have developed a comprehensive **Communication and Education Plan** for you.

- Our goal is to motivate participants to act and improve their retirement readiness.
- It starts with a tailored approach to service your plan.
- It includes our Participant Engagement Program, targeting the right employees at the right time with the right messaging.
- Then, we support and reinforce those messages through local communications.

¹ 2010 Retirement Confidence Survey, Employee Benefit Research Institute and Matthew Greenwald & Associates

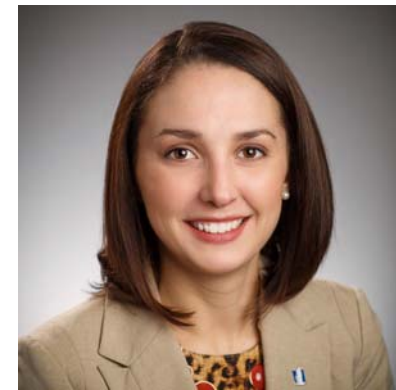
Representing Fresno County



Program Director
Ed Malone



Local Retirement Specialist
Phillip Edwards



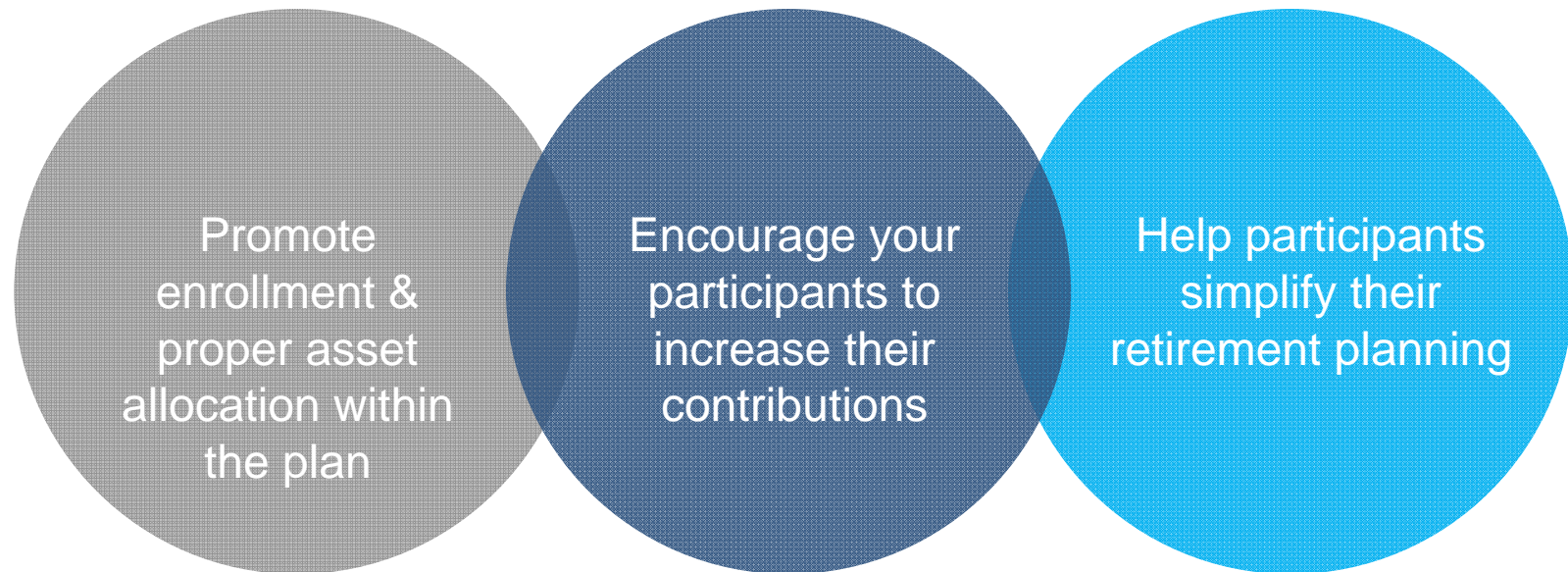
Internal Retirement Specialist
Megan Collins

Fresno County Performance Overview

Business Measure	2015	2016
Plan Assets (millions)	\$208.70	\$217.85
New Enrollments	458	683
Actively Deferring	2,645	3,030
Average Participant Assets	\$44,566	\$42,350
Average Annual Deferral	\$2,836	\$2,602
Average Asset Classes	3.4	3.6
ProAccount Assets (millions)	\$4.62	\$7.66
ProAccount Participant Count	165	256

Your Plan Objectives

Through education, including creative strategies and tactics outlined in the following plan, we can help you achieve and recommend objectives that will benefit your employees, such as:



Fresno County Plan Objectives

Promote Plan Enrollment

1

Strategy: Educate participants on the importance and benefits of proper asset allocation and encourage participating employees to consolidate their accounts.

- Provide print materials – EZ Enrollment Form
 - Fresno County Save Today Expo – March 20-24
 - Communicate directly with participants/individual consultations
 - New Employee Orientation/County Benefits Fairs
-

Encourage your participants to increase their contributions

2

Strategy: Inform plan participants about taking advantage of the opportunities to increase their contributions and explore the long-term benefits of saving more now.

- Provide print materials – EZ Increase Form
 - Fresno County Save Today Expo – March 20-24/Nearing Retirement Seminar Jan-July
 - Communicate directly with key participant segments
 - Participants currently close to the max limit, age 50+ for Catch Up, or those who have not increased in the last year
-

Promote plan diversification and Retirement Readiness

3

Strategy: Educate participants on the importance and benefits of proper asset allocation.

- Print materials – Q2 Asset Allocation Mailer: Participants w/ 3 or fewer classes
 - Conduct group educational presentations, topic: Asset Allocation, Investor Profile
 - Fresno County Save Today Expo – March 20-24, 2017
 - Web based Retirement Readiness Report
-

Communication Grid

1 st Quarter Campaigns	Direct Mail	Email	Workshop	Statement Messaging
EZ Enrollment				
EZ Increase				

2 nd Quarter Campaigns	Direct Mail	Email	Workshop	Statement Messaging
Asset Allocation				
Restart				

Communication Grid

3 rd Quarter Campaigns	Direct Mail	Email	Workshop	Statement Messaging
Account Review				
Online Tools				

4 th Quarter Campaigns	Direct Mail	Email	Workshop	Statement Messaging
Increase Deferrals				
50+ Catch Up				

Ongoing communication materials



Plan Specific Campaigns

Such As: Increase Contributions / Asset Allocation / Consolidation

Helping the Fresno County employees prepare for and live in retirement



Nationwide[®]
is on your side

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NRM-8287AO.6





Item 7

DATE: August 24, 2017

TO: Deferred Compensation Management Council

FROM: Brent Petty, NWCM, Inc.

SUBJECT: Second Quarter Investment Performance Report (Executive Summary)

Capital Markets

Index	YTD (As of 7/31/17)	Q2 2017	1 Year (As of 7/31/17)
S&P 500	11.59	3.09	16.04
S&P 400 MidCap	6.92	1.97	14.69
S&P 600 SmallCap	3.79	1.71	17.66
MSCI EAFE	17.09	6.12	17.77
MSCI Emerging Markets	25.49	6.27	24.84
BBgBarc US Agg Bond	2.71	1.45	-0.51

	7/31/2017	6/30/2017	7/29/2016
10-Year Treasury Yield	2.30%	2.31%	1.46%

Second Quarter (Complete Quarterly Investment Report is provided as Exhibit A)

Equity and fixed income returns were positive around the globe in the second quarter of 2017, with emerging market and international developed market equities continuing to outperform.

All major fixed income sectors ended the quarter with positive returns, except for TIPS, which declined on falling inflation expectations.

Economic Factors

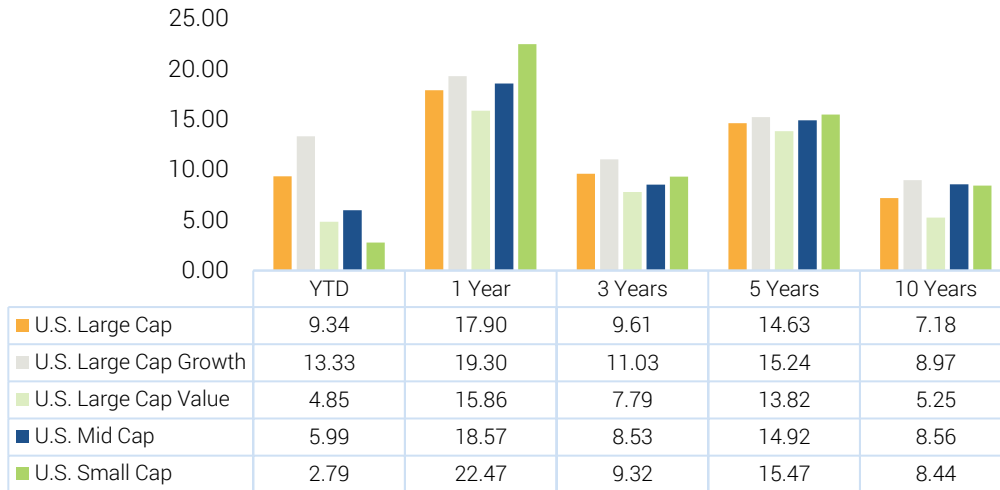
The U.S. economy continues to appear healthy, despite a May jobs report that fell below expectations.

The unemployment rate dipped to its lowest level in 16 years, implying tightness in the labor market.

Housing rebounded in May. Existing home sales were up 1.1 percent, surpassing analyst expectations of a decline.

US Equity

Trailing Returns



International Developed Equity

Trailing Returns



Fixed Income Insights



Investments

All of the County's current investment options comply with investment policy performance criteria.

- Great-West's stable value and target date collective trusts series remain on Watch, due to the departure of manager Cathe Tocher and President of Investments David Musto. If target date collective trusts series continues to perform, NWCM will consider taking target dates off watch by Q4 2017.
- An updated fund watch report has been included as **Exhibit B**.
- A review of the Great West Lifetime Trusts Series has been provided in **Exhibit C**.

RFP for Stable Value Investment Management services

A project overview has been provided for the RFP stable value investment options in **Exhibit D**. NWCM is currently analyzing the vendor RFP responses. We expect a finalist interview and selection in Fall, and transition, if necessary in Q4 2017.

Recommended Actions

1. **Maintain both the Great-West Lifetime Target Date CITs and the Great West Stable Value fund on watch, as additional due-diligence is completed.**

County of Fresno 457 DC Plan



Quarterly Report - June 2017

County of Fresno
457 DC Plan

13333 SW 68th Parkway, Suite 230
Portland, OR 97223
503.597.1616

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Market Overview

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Retirement

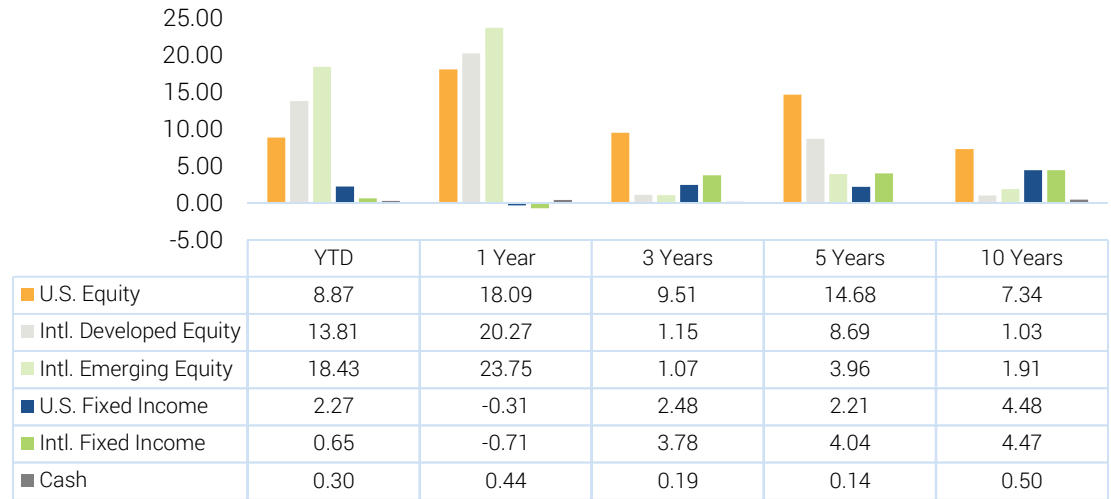
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Market Performance Summary

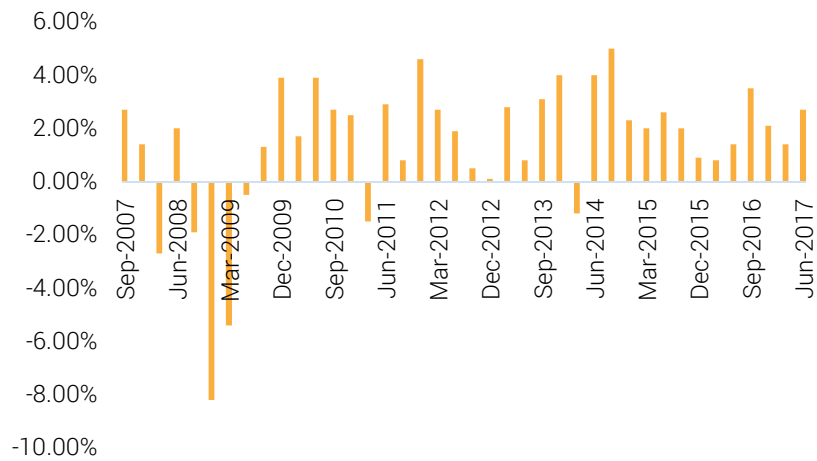
As of 06/30/2017

Equity and fixed income returns were positive in the second quarter, with emerging market and international developed market equities continuing to outperform. International markets have benefited from a recent acceleration in economic growth and compelling valuations. They have been the strongest performing market in 2017, and over the past twelve months. U.S. equity posted solid returns from earnings growth and a healthy looking economy. First quarter GDP was revised upward, which continued to support the stock market. Employment and housing data were solid throughout the quarter, indicating economic growth. Fixed income underperformed equities, but returns were still positive on the backdrop of the yield curve flattening and tightening credit spreads.

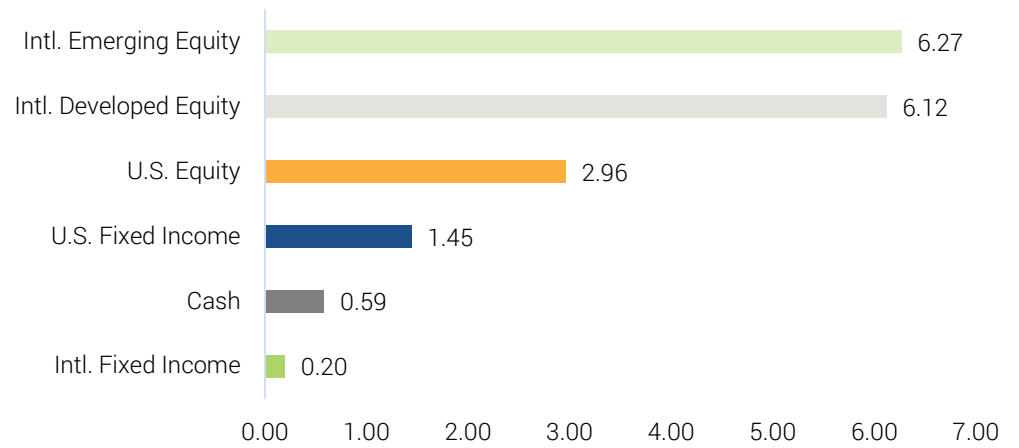
Trailing Returns



1-Q Change in GDP



Quarterly Performance

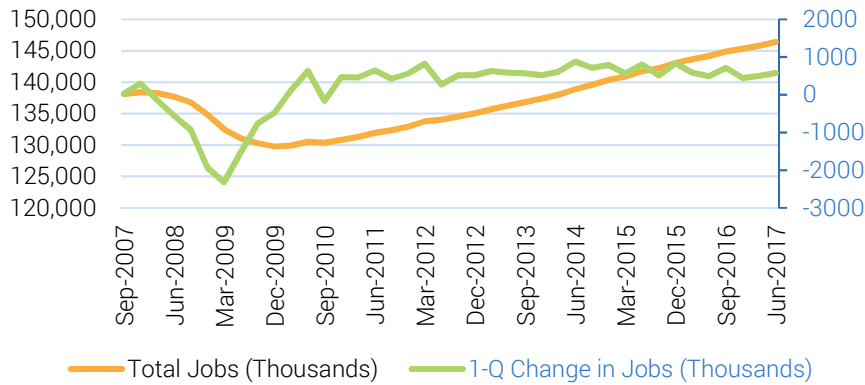


Economic Factors

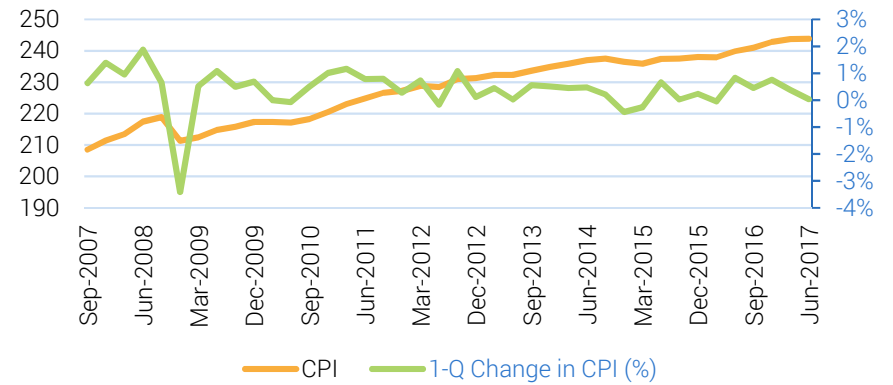
As of 06/30/2017

The U.S. economy continues to appear healthy, despite a May jobs report that fell below expectations, nevertheless the June jobs report was quite positive but was reported after the quarter ended. The unemployment rate still dipped to its lowest level in 16 years, implying tightness in the labor market. Indeed, unemployment is now lower than it has been 96% of the time since 1970. Recent economic data continued to show benign inflation. However, the Fed believes factors weighing on inflation are probably temporary, so it is likely to continue tightening monetary policy. Housing rebounded in May, following a weak April. Existing home sales were up 1.1 percent, surpassing analyst expectations of a decline. Business and consumer sentiment appears to be strong. Data reported in June showed that the ISM Manufacturing Index increased surprisingly, and the Conference Board Consumer Confidence Survey's three-month average is at the highest level since 2001. Oil prices once again finished lower, ending the quarter towards the low end of a recent \$40-\$60 a barrel range.

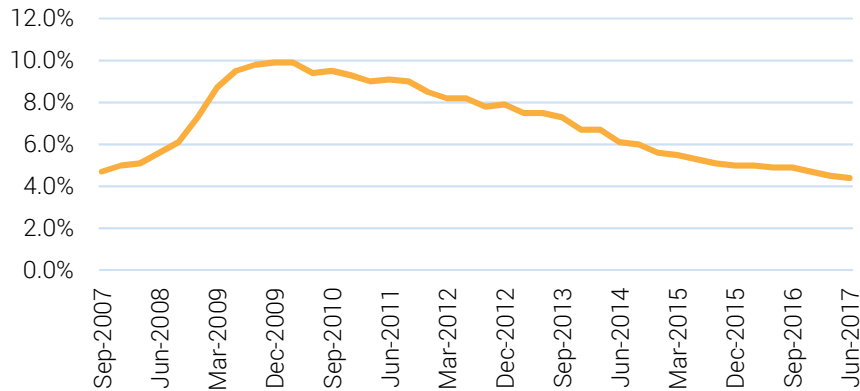
Jobs Market



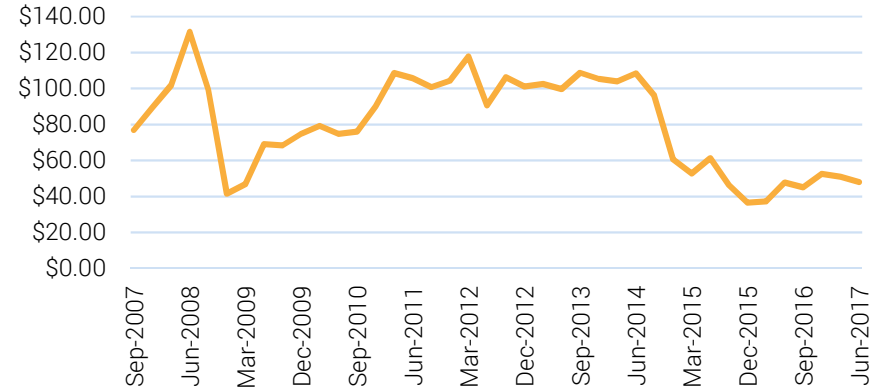
CPI



Unemployment Rate



Crude Oil Price per Barrel

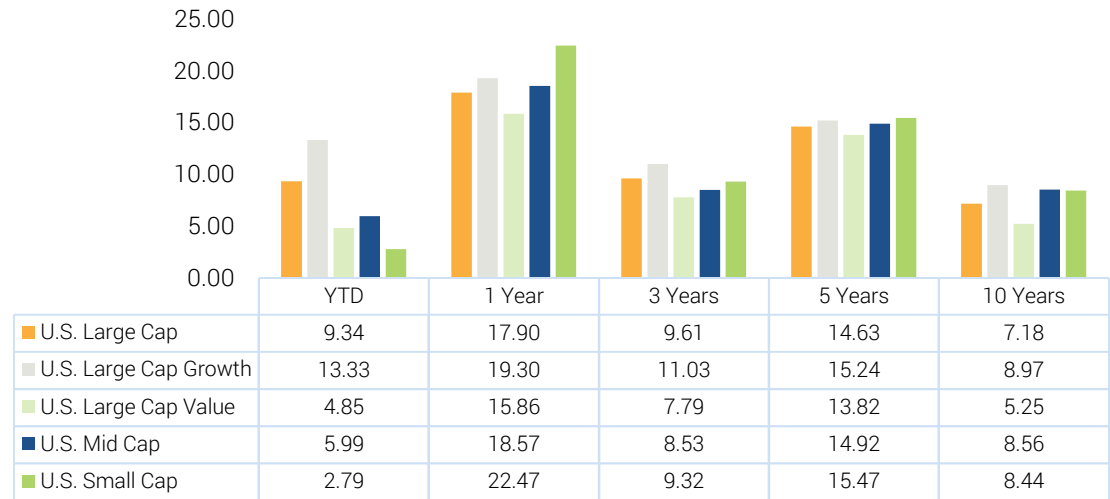


U.S. Equity

As of 06/30/2017

Valuation concerns – and a fluid political landscape – were not enough to dent the advance in U.S. equity markets as strong earnings growth took center stage. The S&P 500 companies reported the strongest quarterly earnings growth since 2011, and many expect the next round of earning releases to also be impressive. High levels of consumer confidence combined with increasing income and spending were also positive for stocks. Despite a small pullback in June, technology stocks have performed well. Growth stocks significantly outperformed value in the first half of the year, partially due to investors' appetite for tech stocks. Meanwhile, the Energy sector weighed on value as oil prices and commodity-related stocks slid during the quarter.

Trailing Returns

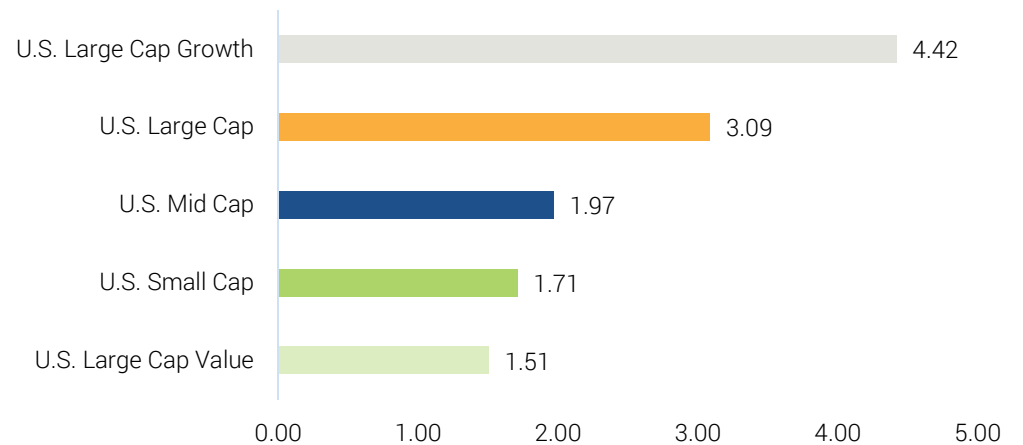


World Equity Market Capitalization



52.5%
U.S. Share of World
Market

Quarterly Performance

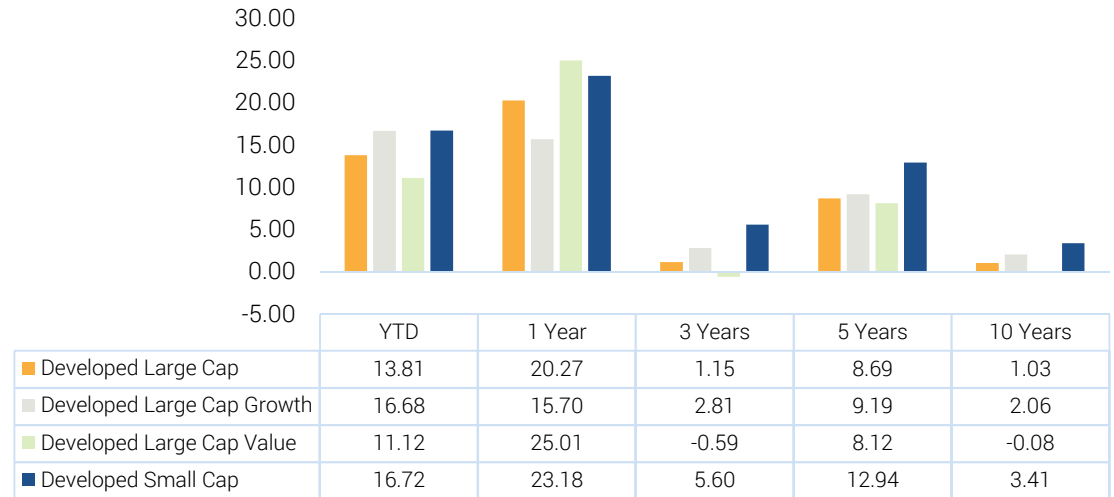


International Developed Equity

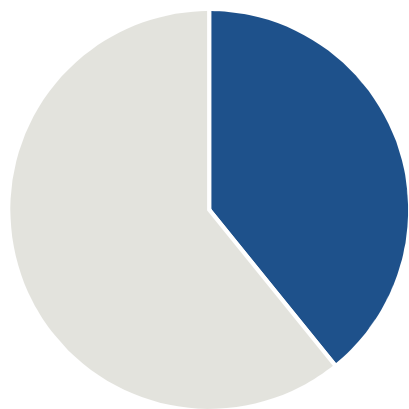
As of 06/30/2017

International developed markets performed strongly and benefited from steadily falling unemployment in the Eurozone, high consumer and business confidence, and a positive outlook for European corporate earnings. Political headwinds appear to be subsiding, with the exception of the U.K., where political uncertainty increased as a result of Theresa May's decision to call an election. Pro-euro and pro-reform candidate Emmanuel Macron was elected president in France. Macron's decisive victory has been largely viewed as a positive development. European equity returns were boosted by a weakening U.S. dollar, while the Japanese yen declined slightly. Nevertheless, Japanese stocks posted solid returns as the labor market improved and domestic demand and consumption strengthened. As was the case in U.S. markets, international developed equity growth stocks outshined value in the second quarter.

Trailing Returns

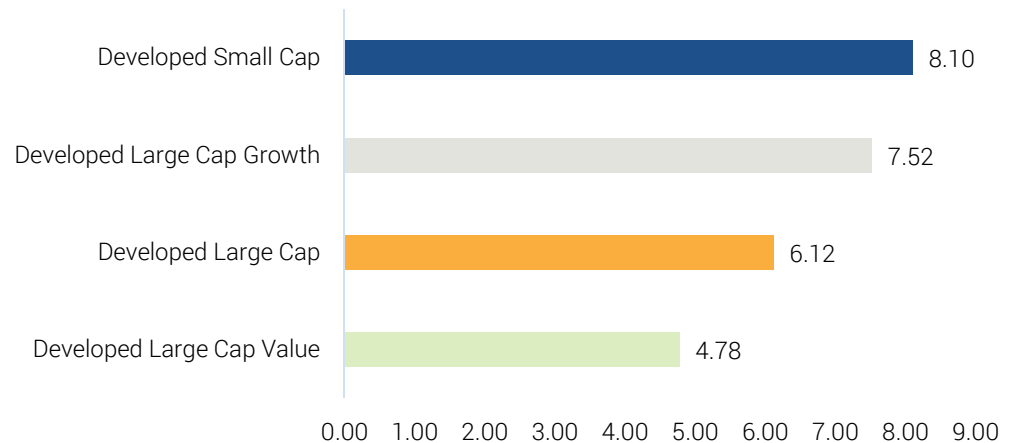


World Equity Market Capitalization



39.2%
Developed International Share of World Market

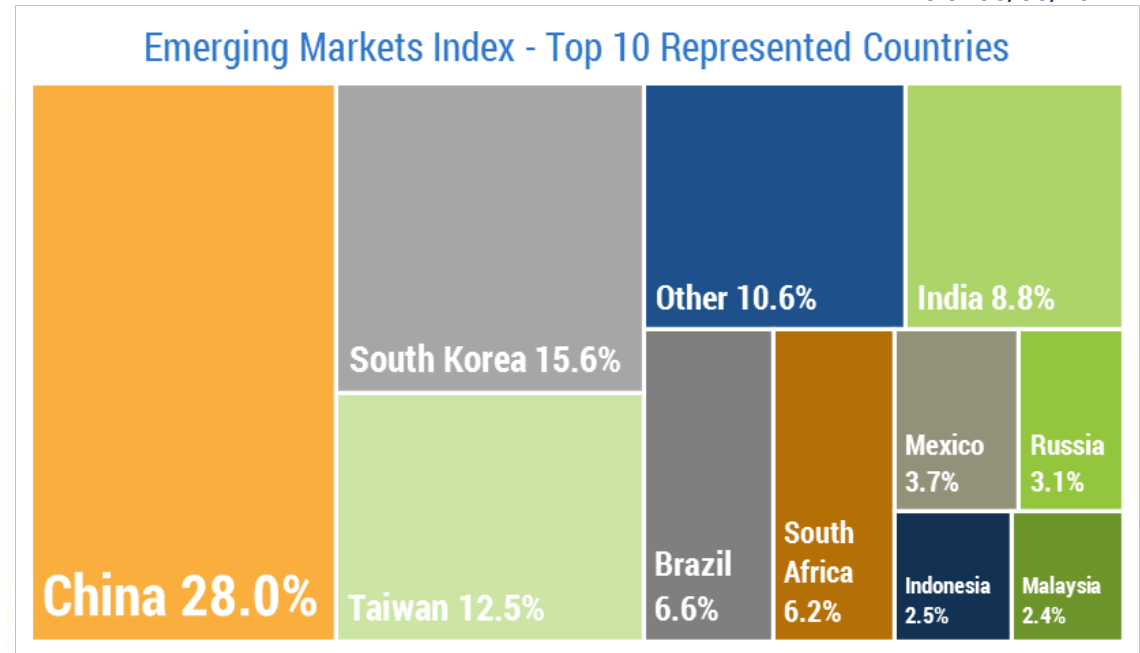
Quarterly Performance



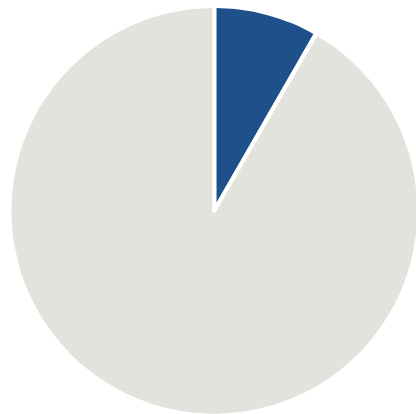
Emerging Markets Equity

Emerging market equities advanced in the second quarter, and have been the best performing equity region in 2017. Stocks in emerging markets have fared well overall due to improving and/or positive micro and macro conditions. Supportive central bank policies have also been seen as a boost to emerging markets, though it appears these may begin to wind down soon. In general, developing market currencies posted mixed results versus the U.S. dollar, and the Chinese renminbi was fairly flat against the greenback. While many emerging market stocks performed well, Brazil was an exception as its currency and stocks have struggled largely due to political and other concerns.

As of 06/30/2017

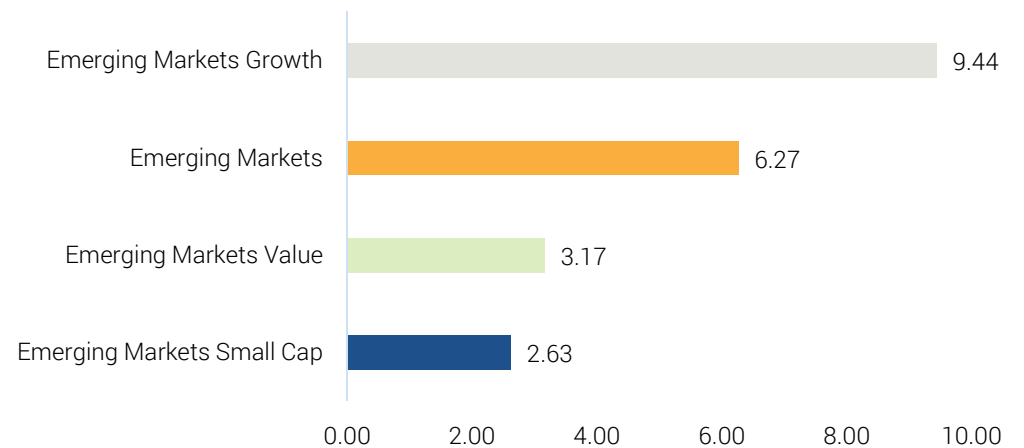


World Equity Market Capitalization



8.3%
Emerging Markets
Share of World
Market

Quarterly Performance

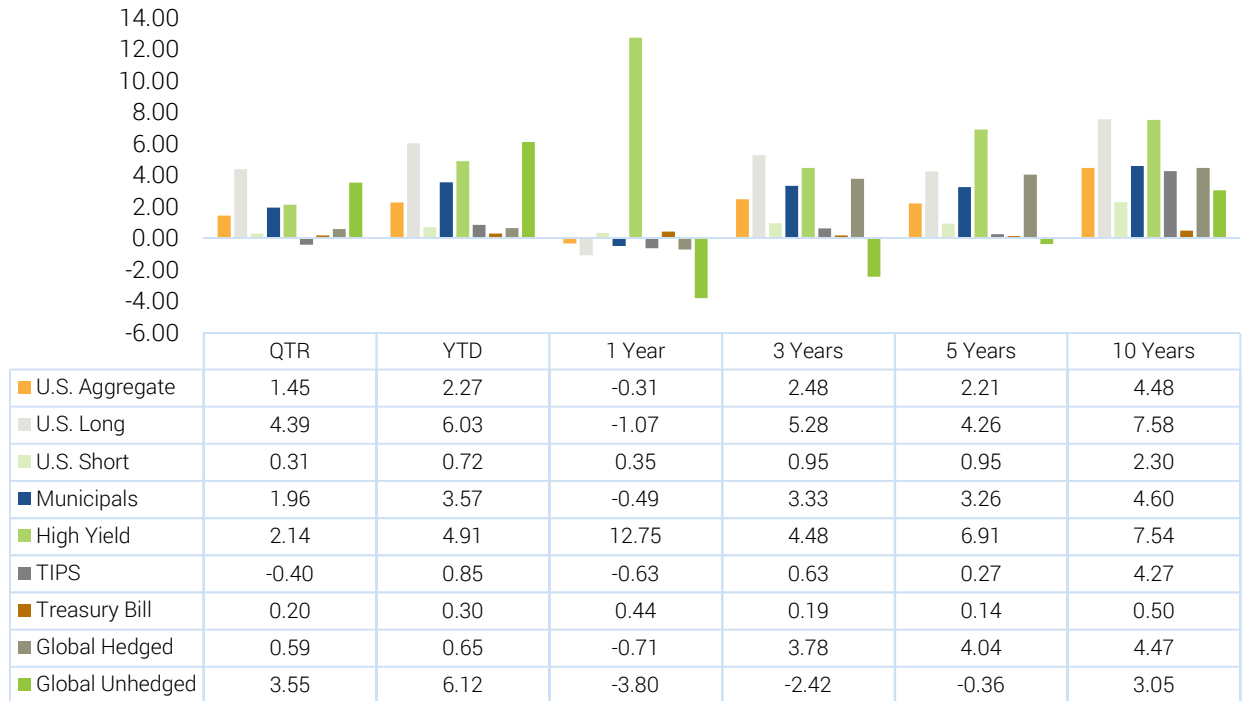


Fixed Income

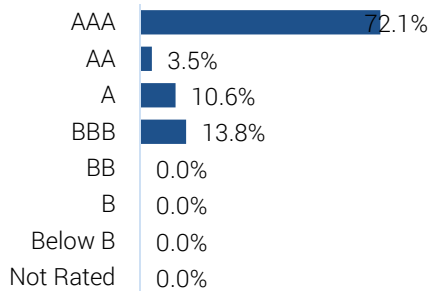
As of 06/30/2017

All major fixed income sectors ended the quarter with positive returns, except for TIPS, which declined on falling inflation expectations. Credit spreads tightened, and the yield curve flattened as intermediate and long Treasury yields ended the quarter lower. The short end of the curve shifted up as the Fed raised interest rates in June for the second time this year. However, strong investor demand pushed the longer end of the curve down. Corporate fundamentals were largely positive. The Fed announced a plan to reduce the size of its balance sheet – tentatively starting before year end – by tapering reinvestment of Treasuries and MBS securities at a predetermined pace. Meanwhile, the European Central Bank and the Bank of Japan continued to expand their respective balance sheets, and now each central bank holds more assets than the Fed’s \$4.4 trillion. However, Mario Draghi suggested the ECB could soon begin reducing its quantitative easing.

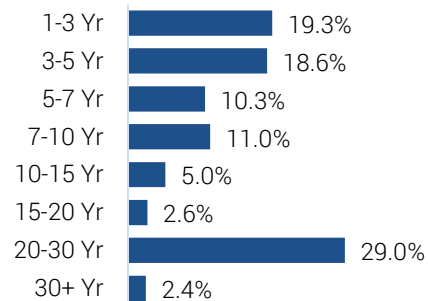
Trailing Returns



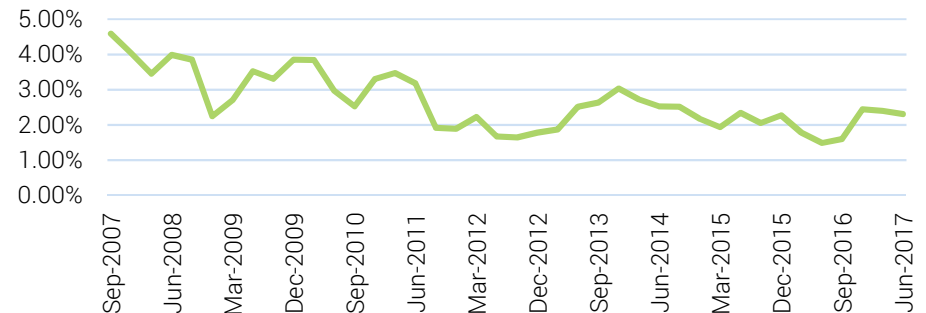
U.S. Aggregate Quality Distribution



U.S. Aggregate Maturity Distribution



10-Year Treasury Yield



Legislative and Regulatory Update

Fiduciary Rule Updates

- › On May 22nd, Labor Secretary Alexander Acosta confirmed that the DOL found no further legal basis to delay the fiduciary rule past June 9th.
 - Two provisions providing an expanded definition of who is considered a fiduciary and establishing conduct standards became applicable on June 9th with the final implementation date being January 1st, 2018 for other provisions.

State-Run Plans

- › Last quarter, the House voted in favor of two resolutions to overturn Labor Department rules promoting the creation of state- and city-run retirement plans for workers who otherwise didn't have access to one through their employer. The Senate has now voted likewise.
 - President Trump also signed off on executive orders to rollback both city- and state-run auto-IRA legislation.
- › The DOL's Employee Benefit Security Administration (EBSA) has likewise removed ERISA safe harbors for government-run plans for private workers.
- › Programs may continue to develop despite the removal of ERISA exemptions; Oregon and California plans are both moving forward.

Foreign Affairs

- › To ensure a smooth exit from the EU, U.K. Prime Minister Theresa May called for an early general election to be held on June 8th ahead of the already scheduled election in 2020 – just after the deadline for exit deals with the EU. She hoped the early election might allow her to garner the support she needs to create a smooth transition with a united goal. The results did not go in her favor.
 - The Conservative Party, led by PM May, remains the largest single party though does not hold a majority of parliamentary seats (13 seats were lost; the party now holds 48.8% of total seats at 317). The Labour Party, led by Jeremy Corbyn, gained 30 seats, up to 262 or 40.3%.
- › Emmanuel Macron was victorious in the French presidential election on May 7th over Marine Le Pen, garnering over 60% of the votes. His victory assuages fears of France exiting the European Union ("Frexit") and the larger dissolution of the EU.
- › Impeachment complaints against Philippine President Rodrigo Duterte were rejected by the House Justice Committee on May 15th.

Financial Choice Act

- › The Financial Choice Act relaxes several provisions of key protectionist acts including Dodd-Frank and the Consumer Protection Act. The bill passed the House Financial Services Committee with a vote of 34-26; the bill was subsequently approved by the full House with a vote of 233-186.
- › Similar independent bills have been introduced in both the House (Affordable Retirement Advice for Savers Act) and the Senate (Affordable Retirement Advice Protection Act), both aimed at stopping the DOL fiduciary rule and establishing their own best-interest standards.
 - Gaining support from the Senate for any of these three pieces of legislation is currently seen as unlikely.

The Fed & SEC

- › The central bank rose rates by 0.25% to a target range of 1.00%-1.25%, citing the strengthening labor market and a stabilized inflationary environment at their June 14th meeting. Of the three projected rate hikes for 2017, two have now occurred (with each being a +0.25% increase) across the first four meetings with four additional meetings scheduled for later this year.
- › The FOMC expects to start winding down its \$4.5 trillion balance sheet later this year assuming the economy continues its advancement.

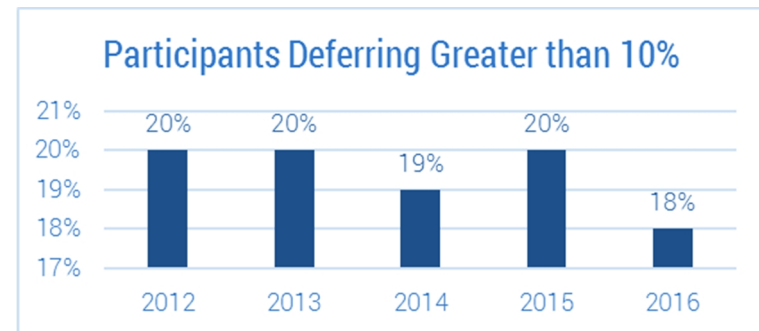
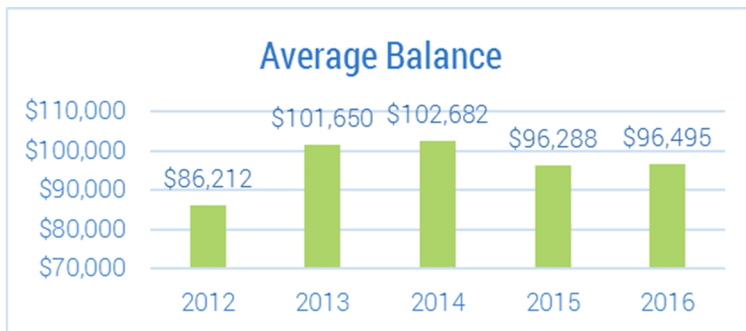
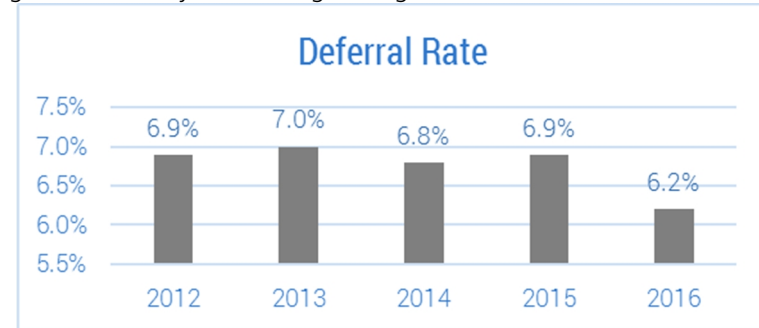
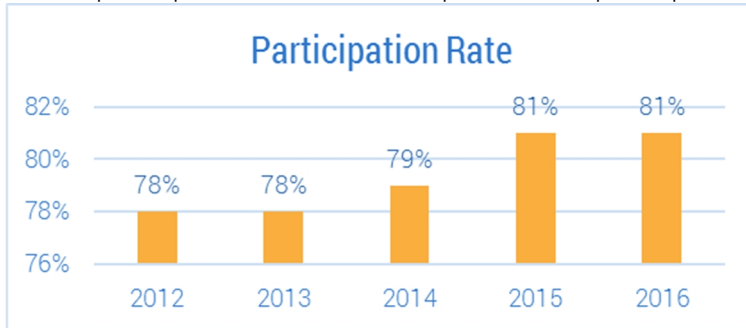
2018 HSA Limits

- › The IRS announced annual limits for calendar year 2018 contributions into health savings accounts for individuals with self-only coverage in high-deductible plans of \$3,450 and individuals with family coverage in high-deductible plans of \$6,900.
 - High-deductible plans are defined as having annual deductibles of no less than \$1,350 (self-only) or \$2,700 (family) with out-of-pocket expenses not exceeding \$6,650 (self-only) or \$13,300 (family).

Plan Considerations

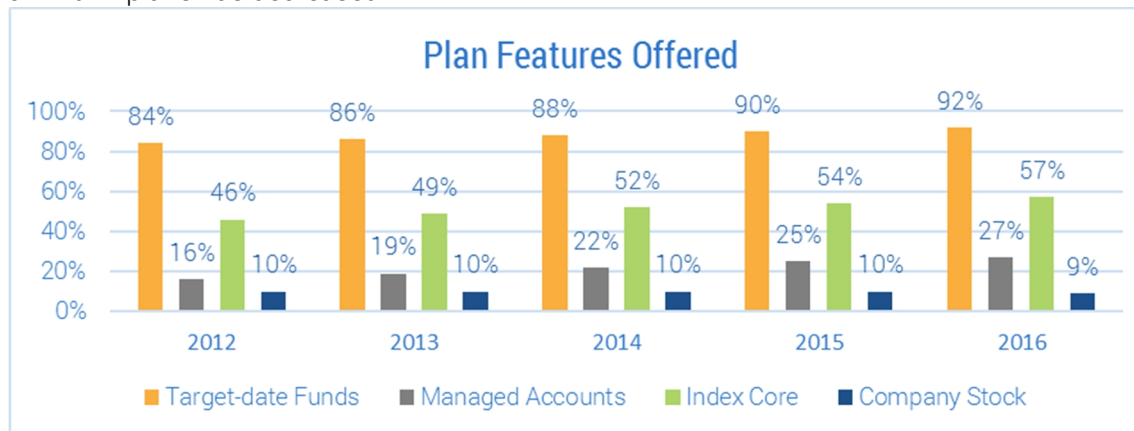
> Plan Health Metrics

- While participation rates have risen steadily over the past five years, an opposite trend has been seen in deferrals and ultimately average participant balances. It is important that participants are not only saving, but that they are saving enough.



> Plan Feature Adoption

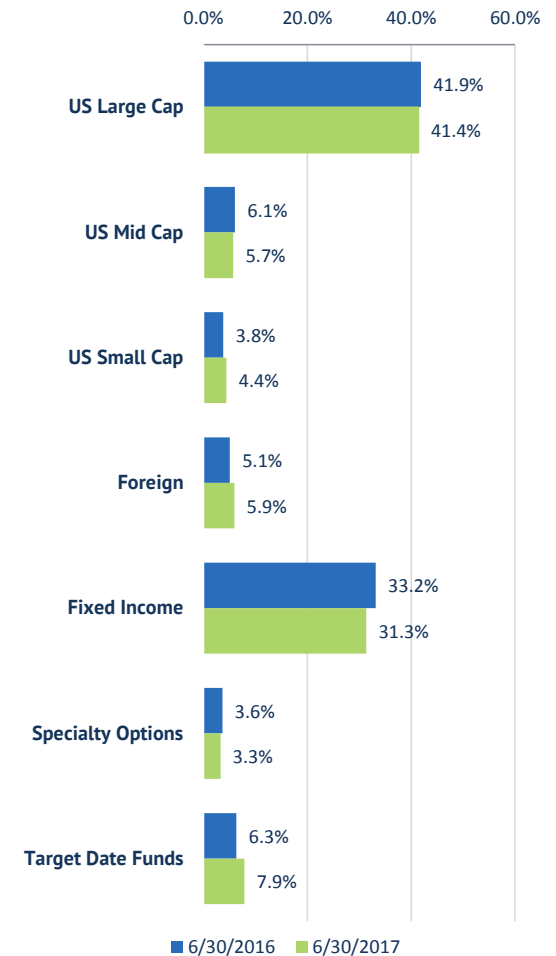
- Target-date funds continue to increase in popularity, serving as the QDIA option in an increasing number of plans. Other features on the rise include managed accounts as well as passive investment options to compliment active managers. On the other hand, the use of company stock as an option within plans has decreased.



Summary of County of Fresno 457 DC Plan - Trailing Year

Data as of 6/30/2017

Asset Class	Ticker	%	6/30/2016	Net Increases/Decreases	6/30/2017	%
US Large Cap		41.9%	\$86,328,627	7,794,567	\$94,123,193	41.4%
Alger Spectra Z	ASPZX	17.5%	36,061,275	2,083,362	38,144,637	16.8%
Columbia Dividend Income Y	CDDYX	5.2%	10,692,937	1,649,552	12,342,489	5.4%
BlackRock Equity Index - Collective F2	02CFF1	19.2%	39,574,414	4,061,653	43,636,067	19.2%
US Mid Cap		6.1%	\$12,511,152	503,905	\$13,015,057	5.7%
Hennessy Focus Fund	HFCIX	2.7%	5,577,937	(608,374)	4,969,563	2.2%
BlackRock Mid Cap Index - Collective F	03CFF2	3.4%	6,933,215	1,112,279	8,045,494	3.5%
US Small Cap		3.8%	\$7,839,563	2,191,890	\$10,031,452	4.4%
Nicholas Limited Edition I	NCLEX	2.5%	5,163,310	415,185	5,578,495	2.5%
Perkins Small Cap Value N	JDSNX	0.4%	792,461	1,045,460	1,837,922	0.8%
BlackRock Russell 2000 Index - Collective F	03CFF3	0.9%	1,883,792	731,244	2,615,036	1.2%
Foreign		5.1%	\$10,467,711	3,048,447	\$13,516,158	5.9%
Ivy International Core Equity R6	IINCX	4.3%	8,841,493	1,206,602	10,048,095	4.4%
Oppenheimer Developing Markets I	ODVIX	0.3%	522,283	703,977	1,226,261	0.5%
BlackRock EAFE Equity Index - Collective F	10CFF5	0.5%	1,103,934	1,137,868	2,241,802	1.0%
Fixed Income		33.2%	\$68,367,243	2,857,264	\$71,224,508	31.3%
RidgeWorth Seix Total Return Bond IS	SAMZX	1.4%	2,927,832	300,180	3,228,011	1.4%
BlackRock US Debt Index Fund - Coll F	04CFF4	1.2%	2,528,297	662,509	3,190,806	1.4%
Templeton Global Bond R6	FBNRX	0.3%	596,550	490,348	1,086,899	0.5%
County of Fresno Stable Value Fund	FRESSV	30.2%	62,314,564	1,404,227	63,718,791	28.0%
Specialty Options		3.6%	\$7,517,634	(97,535)	\$7,420,099	3.3%
Oakmark Equity & Income I	OAKBX	1.0%	2,076,724	189,577	2,266,301	1.0%
Fidelity Advisor Real Estate Income Inst	FRIRX	0.5%	1,040,915	119,088	1,160,004	0.5%
Franklin Utilities R6	FUFRX	2.1%	4,399,994	(406,200)	3,993,794	1.8%
Target Date Funds		6.3%	\$13,047,111	4,898,066	\$17,945,177	7.9%
Great-West Lifetime 2015 Trust II	C15MZR	1.2%	2,533,491	130,410	2,663,901	1.2%
Great-West Lifetime 2025 Trust II	C25MZR	2.2%	4,597,146	1,609,942	6,207,088	2.7%
Great-West Lifetime 2035 Trust II	C35MZR	1.4%	2,826,251	1,507,601	4,333,852	1.9%
Great-West Lifetime 2045 Trust II	C45MZR	1.1%	2,310,051	1,142,858	3,452,909	1.5%
Great-West Lifetime 2055 Trust II	C55MZR	0.4%	780,172	507,256	1,287,428	0.6%
Total		100%	\$206,079,040	\$21,196,604	\$227,275,643	100%



Passively-Managed and Cash Funds

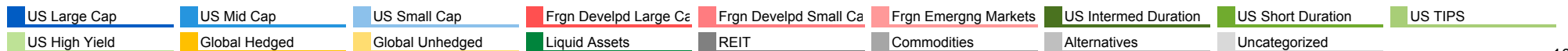
Investment	Ticker	Equities										Liquid	Other				Exp	Qtr	YTD	1 Yr	2 Yr	3 Yr	4 Yr	5 Yr	10 Yr						
		US			Foreign			Fixed Income					R	C	A	U															
		L	M	S	L	S	E	I	S	T	Y															H	U				
BlackRock Equity Index - Collective M	02cff1	100																					0.02	3.10	9.36	17.94	10.77	9.67	13.25	14.69	
BlackRock MidCap Idx - Collective M	03cff2		100																				0.03	1.86	5.73	18.02	9.12	8.22	12.28	14.77	8.52
BlackRock Russell 2000 Index Coll M	03cff3			100																			0.03	2.52	5.11	24.85	8.10	7.64	11.52	13.99	
BlackRock EAFE Equity Index Coll T	10cff5				100																		0.10	6.28	14.08	20.67	4.31	1.44	6.65	8.95	
BlackRock US Debt Index Fund Coll W	04cff4							100															0.04	1.49	2.35	-0.22	2.89	2.66	3.13	2.39	

Actively-Managed Funds

Style	Investment	Ticker	L	M	S	L	S	E	I	S	T	Y	H	U	C	R	C	A	U	Exp	Qtr	YTD	1 Yr	2 Yr	3 Yr	4 Yr	5 Yr	10 Yr
Income	Columbia Dividend Income Y	CDDYX	85	7		2		1							5					0.59	3.08	8.31	14.63	12.01	9.62	11.86	13.26	7.50
Growth	Alger Spectra Z	ASPZX	77	11	1	3		3							5					0.89	4.98	16.61	21.31	8.18	10.05	14.75	15.38	10.49
Utilities	Franklin Utilities R6	FUFRX	55	30	5	6									4					0.47	1.58	8.03	3.11	14.35	7.88	11.35	10.98	7.74
Growth	Hennessy Focus Institutional	HFCIX	42	24	11	5									18					1.13	3.22	7.97	14.27	6.80	9.00	11.65	14.80	8.77
Balanced	Oakmark Equity And Income Investor	OAKBX	35	18	2	5			11	5		2	1		16				5	0.79	1.70	5.90	17.10	5.37	4.51	8.56	9.30	6.49
Stable Value	Fresno County Stable Value	fressv													100					0.50	0.50	1.00	2.03	2.08	2.12	2.13	2.17	
Blend	Janus Henderson Small Cap Value N	JDSNX		19	73		1								7					0.89	2.26	4.10	22.67	11.79	9.53	12.40	13.65	8.78
Growth	Nicholas Limited Edition I	NCLEX	1	27	53	2	3	2							12					0.86	5.25	11.74	22.25	8.37	8.75	11.08	12.74	8.92
Global Blend	Ivy International Core Equity N	IINCX	6			79		9							3				3	0.82	5.79	14.31	22.64	3.79	2.71	8.64	10.30	3.71
Emerging Growth	Oppenheimer Developing Markets I	ODVIX				25		66							6				3	0.88	6.99	18.83	22.81	5.15	-0.24	4.46	5.17	4.58
Intermediate	RidgeWorth Seix Total Return Bond IS	SAMZX							76	7		4	5		8				0.31	1.34	2.49	0.26	3.07	2.54	3.05	2.31	5.06	
Real Estate	Fidelity Advisor Real Estate Income I	FRIRX	3	11	16				10	1		26			12				21	0.77	2.60	5.47	7.54	8.91	6.79	7.56	8.46	6.82
Global Bond	Templeton Global Bond R6	FBNRX											69		30				1	0.52	-1.26	3.37	10.59	2.98	1.47	2.95	3.88	6.47







Target-Date Funds

Style	Investment	Ticker	L	M	S	L	S	E	I	S	T	Y	H	U	C	R	C	A	U	Exp	Qtr	YTD	1 Yr	2 Yr	3 Yr	4 Yr	5 Yr	10 Yr
Target Date	Great-West Lifetime 2045 Trust	gw2045	36	13	7	23		8	6			1	1			5				0.57	4.57	11.08	18.23	8.79	7.10	10.30	11.50	
Target Date	Great-West Lifetime 2035 Trust	gw2035	34	13	6	20		6	10	1	1	2	2			5				0.57	4.17	10.09	16.54	8.30	6.78	9.76	10.88	
Target Date	Great-West Lifetime 2055 Trust	gw2055	33	13	8	24		10	5			1	1			5				0.57	4.57	11.30	18.50	8.62	6.94	10.23	11.40	
Target Date	Great-West Lifetime 2025 Trust	gw2025	25	10	4	14		4	17	3	5	5	5		2	6				0.57	3.35	8.22	12.83	7.21	5.88	8.14	8.89	
Target	Great-West Lifetime 2015 Trust	gw2015	19	7	3	9		2	20	6	11	6	7		4	6				0.57	2.76	6.65	9.57	6.28	5.01	6.65	6.96	



Fund Compliance Methodology

CALCULATION METHODOLOGY OF OVERALL FUND¹ (Worst) — 10 (Best)

Factor	Weight	Explanation	Score Calculation
<p>RETURNS</p> <p>Summary compliance report shows the average peer group quartile rank for all time periods (no credit for bottom quartile performance)</p>	 <p>40% Overall</p>	<p>Absolute Returns</p> <p>Peer Group Percentile Rankings: 3,5,10 Year Periods</p>	<p>Proportional Score No Score</p> <p>Ranks in the top 75% of Peer Group Ranks in the bottom 25% of Peer Group</p>
<p>RISK ADJUSTED RETURNS</p> <p>Summary compliance report shows the average peer group quartile rank for all time periods (no credit for bottom quartile performance)</p>	 <p>20% Overall</p>	<p>Sharpe Ratio</p> <p>Peer Group Percentile Rankings: 3,5,10 Year Periods</p>	<p>Proportional Score No Score</p> <p>Ranks in top 75% of Peer Group Ranks in bottom 25% of Peer Group</p>
<p>RISK</p> <p>Summary compliance report shows the average peer group quartile rank for all time periods (no credit for bottom quartile performance)</p>	 <p>30% Overall</p>	 <p>10% Overall</p> <p>Standard Deviation</p> <p>Peer Group Percentile Rankings: 3,5,10 Year Periods</p>	<p>Proportional Score No Score</p> <p>Ranks in top 75% of Peer Group Ranks in bottom 25% of Peer Group</p>
		 <p>20% Overall</p> <p>Upside/Downside Capture</p> <p>Peer Group Percentile Rankings: 3,5,10 Year Periods</p>	<p>Proportional Score No Score</p> <p>Ranks in top 75% of Peer Group Ranks in bottom 25% of Peer Group</p>
<p>OTHER</p> <p>Fund expense quartile rank</p> <p>Manager tenure is greater than 3 years</p>	 <p>10% Overall</p>	 <p>5% Overall</p> <p>Expense Ratio</p> <p>For current period</p>	<p>Proportional Score No Score</p> <p>Ranks in top 75% of Peer Group Ranks in bottom 25% of Peer Group</p>
		 <p>5% Overall</p> <p>Average Tenure</p> <p>Number of years</p>	<p>Full Score No Score</p> <p>Manager Tenure more than 3 years Manager Tenure less than 3 years</p>

For peer group rankings, a rank of 1-50 indicates the manager performed favorably and ranked in the top half of its peer group for that metric. For example: when measuring risk, a rank of 1 would mean the manager had a very low standard deviation compared to its peer group, whereas when measuring return, a rank of 1 would mean the manager had a very high return compared to its peer group.

Summary of Fund Compliance

Passively-Managed and Cash Funds

Type	Assets %	Fund Name	Ticker
LC Index	19.20%	BlackRock Equity Index - Collective M	02cff1
MC Index	3.54%	BlackRock MidCap Idx - Collective M	03cff2
SC Index	1.15%	BlackRock Russell 2000 Index Coll M	03cff3
Global	0.99%	BlackRock EAFE Equity Index Coll T	10cff5
US Debt	1.40%	BlackRock US Debt Index Fund Coll W	04cff4

Actively-Managed Funds

Status	Assets %	Fund Name	Ticker	Return (40%)	Risk Adjusted Return (20%)	Risk (30%)	Expense (5%)	Tenure (5%)
Pass	5.43%	Columbia Dividend Income Y	CDDYX	●	●	●	●	●
Pass	16.78%	Alger Spectra Z	ASPZX	●	●	○	●	●
Pass	1.76%	Franklin Utilities R6	FUFRX	●	●	●	●	●
Pass	2.19%	Hennessy Focus Institutional	HFCIX	●	●	●	●	●
Pass	1.00%	Oakmark Equity And Income Investor	OAKBX	●	●	○	●	●
Pass	0.81%	Janus Henderson Small Cap Value N	JDSNX	●	●	●	●	●
Pass	2.45%	Nicholas Limited Edition I	NCLEX	●	●	●	●	●
Pass	4.42%	Ivy International Core Equity N	IINCX	●	●	●	●	●
Pass	0.54%	Oppenheimer Developing Markets I	ODVIX	●	●	●	●	●
Pass	1.42%	RidgeWorth Seix Total Return Bond IS	SAMZX	●	●	●	●	●
Pass	0.51%	Fidelity Advisor Real Estate Income I	FRIRX	●	●	●	●	●
Pass	0.48%	Templeton Global Bond R6	FBNRX	●	●	○	●	●
Watch	28.04%	Fresno County Stable Value	fressv	●	●	●	○	●

Underperforming ◀ ● ○ ● ● ▶ Outperforming

Underperforming ◀ ● ○ ● ● ▶ Outperforming

Target-Date Funds

Status	Assets %	Fund Name	Ticker	Return (40%)	Risk Adjusted Return (20%)	Risk (30%)	Expense (5%)	Tenure (5%)
Watch	n/a	Great-West Lifetime 2055 Trust	gw2055	●	●	●	●	●
Watch	n/a	Great-West Lifetime 2045 Trust	gw2045	●	●	●	●	●
Watch	n/a	Great-West Lifetime 2035 Trust	gw2035	●	●	●	●	●
Watch	n/a	Great-West Lifetime 2025 Trust	gw2025	●	●	●	●	●
Watch	n/a	Great-West Lifetime 2015 Trust	gw2015	●	●	●	●	●

Passively-Managed and Cash Funds

Type of Fund	Assets %	Ticker	Fund Name	Return vs Peer Group (40%)			Risk Adjusted Return Sharpe (20%)			Standard Deviation			Risk (30%) Up Capture			Down Capture			Other (10%) Expense Tenure	
				3Y	5Y	10Y	3Y	5Y	10Y	3Y	5Y	10Y	3Y	5Y	10Y	3Y	5Y	10Y	Peer Rank %	Avg Yrs
				LC Index	19.20%	02cff1	BlackRock Equity Index - Collective M	8	16		7	5		37	28		20	27		23
MC Index	3.54%	03cff2	BlackRock MidCap Idx - Collective M	11	12	4	16	22	11	55	55	59	10	14	11	62	69	47	1	5
SC Index	1.15%	03cff3	BlackRock Russell 2000 Index Coll M	23	34		31	44		85	81		4	5		79	85		1	5
Global	0.99%	10cff5	BlackRock EAFE Equity Index Coll T	41	21		43	30		77	76		38	17		51	48		4	5
US Debt	1.40%	04cff4	BlackRock US Debt Index Fund Coll W	1	2		16	7		83	85		8	6		52	52		1	5

Actively-Managed Funds

Overall Fund Score	Assets %	Ticker	Fund Name	Return vs Peer Group (40%)			Risk Adjusted Return Sharpe (20%)			Standard Deviation			Risk (30%) Up Capture			Down Capture			Other (10%) Expense Tenure	
				3Y	5Y	10Y	3Y	5Y	10Y	3Y	5Y	10Y	3Y	5Y	10Y	3Y	5Y	10Y	Peer Rank %	Avg Yrs
				8	5.43%	CDDYX	Columbia Dividend Income Y	2	34	4	2	6	1	12	11	8	61	76	85	7
7	16.78%	ASPZX	Alger Spectra Z	32	21	2	38	25	3	69	56	78	21	21	4	62	52	78	37	6
8	1.76%	FUFRX	Franklin Utilities R6	17	26	6	20	28	5	71	61	19	15	20	71	52	54	11	15	12
8	2.19%	HFCIX	Hennessy Focus Institutional	17	16	13	17	8	10	22	10	21	54	65	90	9	2	3	48	7
6	1.00%	OAKBX	Oakmark Equity And Income Investor	49	23	13	67	62	9	91	91	20	16	18	69	87	59	8	26	7
8	0.81%	JDSNX	Janus Henderson Small Cap Value N	2	34	1	1	2	1	5	5	6	71	80	83	3	6	3	15	14
7	2.45%	NCLEX	Nicholas Limited Edition I	25	54	8	16	23	4	13	7	4	64	84	91	16	19	5	14	23
8	4.42%	IINCX	Ivy International Core Equity N	18	7	7	19	6	6	57	32	33	18	11	10	40	20	18	27	10
7	0.54%	ODVIX	Oppenheimer Developing Markets I	68	28	3	68	29	3	50	46	22	61	50	56	46	38	15	13	5
6	1.42%	SAMZX	RidgeWorth Seix Total Return Bond IS	31	59	22	40	59	12	78	52	34	27	59	44	53	52	17	8	7
7	0.51%	FRIRX	Fidelity Advisor Real Estate Income I	64	50	8	1	1	1	2	2	3	97	97	97	2	1	1	19	13
7	0.48%	FBNRX	Templeton Global Bond R6	29	13	2	35	33	23	77	75	71	79	53	64	4	6	2	11	10
9	28.04%	fressv	Fresno County Stable Value	1	1		1	1		26	52		1	1		1	1		58	6

Target-Date Funds

Overall Fund Score	Assets %	Ticker	Fund Name	Return vs Peer Group (40%)			Risk Adjusted Return Sharpe (20%)			Standard Deviation			Risk (30%) Up Capture			Down Capture			Other (10%) Expense Tenure	
				3Y	5Y	10Y	3Y	5Y	10Y	3Y	5Y	10Y	3Y	5Y	10Y	3Y	5Y	10Y	Peer Rank %	Avg Yrs
				8	n/a	gw2055	Great-West Lifetime 2055 Trust	1	18		3	21		55	56		1	12		31
9	n/a	gw2045	Great-West Lifetime 2045 Trust	1	7		1	12		54	51		1	15		28	29		21	5
8	n/a	gw2035	Great-West Lifetime 2035 Trust	1	10		1	14		72	63		7	22		37	42		22	5
8	n/a	gw2025	Great-West Lifetime 2025 Trust	1	26		1	16		66	41		4	37		29	34		27	5
8	n/a	gw2015	Great-West Lifetime 2015 Trust	1	43		1	23		46	20		14	49		10	40		30	5

All data except for 'Tenure - Average Years' are listed as a peer rank percentage

All Funds remain in compliance with Investment Policy and no action need be taken other than indicated in the Fund Compliance Commentary section of this report.

Northwest Capital Management, Inc. Date

Northwest Capital Management, Inc.

This report, along with more detailed performance data on Plan Investment Options, was reviewed by the Plan's Trustee and/or Investment Committee.

Trustee / Committee Member Date

County of Fresno 457 DC Plan

Fund Comments

Data as of: 06/30/2017

BlackRock Equity Index - Collective M (02cff1)

Fund Type: LC Index

US Large Cap

The fund seeks to replicate the performance of U.S. Large Cap Stocks

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
02cff1	3.10%	17.94%	9.67%	14.69%	
S&P 500 TR USD	3.09%	17.91%	9.62%	14.63%	7.18%
Out/(Under) Performing	0.01%	0.02%	0.05%	0.06%	
Peer Group Ranking	37	40	8	16	

BlackRock MidCap Idx - Collective M (03cff2)

Fund Type: MC Index

US Mid Cap

The fund seeks to replicate the performance of U.S. Mid Cap Stocks

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
03cff2	1.86%	18.02%	8.22%	14.77%	8.52%
S&P MidCap 400 TR	1.97%	18.56%	8.53%	14.92%	8.56%
Out/(Under) Performing	-0.11%	-0.55%	-0.31%	-0.15%	-0.04%
Peer Group Ranking	54	38	11	12	4

BlackRock Russell 2000 Index Coll M (03cff3)

Fund Type: SC Index

US Small Cap

The fund seeks to replicate the performance of U.S. Small Cap Stocks

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
03cff3	2.52%	24.85%	7.64%	13.99%	
Russell 2000 TR USD	2.47%	24.61%	7.36%	13.70%	6.92%
Out/(Under) Performing	0.04%	0.25%	0.28%	0.29%	
Peer Group Ranking	23	11	23	34	

BlackRock EAFE Equity Index Coll T (10cff5)

Fund Type: Global

Frgn Developd Large Cap

The fund seeks to replicate performance of Foreign stock represented by the MSCI EAFE Index

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
10cff5	6.28%	20.67%	1.44%	8.95%	
MSCI ACWI Ex USA NR USD	5.78%	20.44%	0.80%	7.22%	1.13%
Out/(Under) Performing	0.50%	0.22%	0.64%	1.73%	
Peer Group Ranking	50	27	41	21	

BlackRock US Debt Index Fund Coll W (04cff4)

Fund Type: US Debt

US Intermed Duration

The fund seeks to replicate the performance of the U.S. Bond Market

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
04cff4	1.49%	-0.22%	2.66%	2.39%	
BBgBarc US Govt Intermed TR USD	0.65%	-1.25%	1.47%	1.07%	3.39%
Out/(Under) Performing	0.85%	1.03%	1.19%	1.32%	
Peer Group Ranking	1	17	1	2	

Columbia Dividend Income Y (CDDYX)

Fund Score: 8 (Status: Pass)

US Large Cap

The investment seeks total return, consisting of current income and capital appreciation.

The fund invests at least 80% of its net assets (including the amount of any borrowings for investment purposes) in a diversified portfolio of income-producing (dividend-paying) equity securities, which will consist primarily of common stocks but also may include preferred stocks and convertible securities. It invests principally in securities of companies believed to be undervalued but also may invest in securities of companies believed to have the potential for long-term growth. The fund may invest in companies that have market capitalizations of any size.

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
CDDYX	3.08%	14.63%	9.62%	13.26%	7.50%
S&P 500 Value TR USD	1.50%	15.87%	7.79%	13.82%	5.25%
Out/(Under) Performing	1.58%	-1.24%	1.83%	-0.56%	2.25%
Peer Group Ranking	8	69	2	34	4

Alger Spectra Z (ASPZX)

Fund Score: 7 (Status: Pass)

US Large Cap

The investment seeks long-term capital appreciation.

The fund invests primarily in the equity securities of companies of any size that Fred Alger Management, Inc. believes demonstrate promising growth potential. It can leverage, that is, borrow money to purchase additional securities. The fund can invest in foreign securities.

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
ASPZX	4.98%	21.31%	10.05%	15.38%	10.49%
S&P 500 Growth TR USD	4.43%	19.29%	11.03%	15.24%	8.97%
Out/(Under) Performing	0.56%	2.02%	-0.99%	0.14%	1.52%
Peer Group Ranking	47	32	32	21	2

The Alger Spectra fund outperform the S&P 500 Growth Index by ~50 bps in the second quarter of 2017. NWCM had an opportunity to do a site visit with fund management during the quarter. They noted that they had made some changes after the disappointing 2016 where they were overweight sectors such as Healthcare and there was a focus on yield. Post the election, the fund added to Financials, and Consumer related names. They believed that the easing regulatory environment and the prospects of tax reform would help the consumer. The fund bought names such as Alibaba and benefitted from their overweight position in Amazon.com. Additionally, Alphabet (Google) was another outperformer. Detractors in the quarter were names such as Anardarko Petroleum and CBS. While the fund remains overweight Information Technology and Consumer Cyclical, they are looking at some defensive names as well. Recently, the fund added Philip Morris to its portfolio on the prospects of a new heated versus lighted cigarette which is supposed to remove a significant portion of the carcinogens of a cigarette. The fund continues to score a 7 under our scoring methodology but ranks in the second-quartile of its peer group on a risk adjusted returns basis in the trailing three- and five-year periods.

Franklin Utilities R6 (FUFRR)

Fund Score: 8 (Status: Pass)

US Large Cap

The investment seeks capital appreciation and current income.

The fund normally invests at least 80% of its net assets in the securities of public utilities companies. These are companies that provide electricity, natural gas, water, and communications services to the public and companies that provide services to public utilities companies. It concentrates (invests more than 25% of its total assets) in companies operating in the utilities industry. The fund invests primarily in equity securities, which consist mainly of common stocks.

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
FUFRR	1.58%	3.11%	7.88%	10.98%	7.74%
MSCI World/Utilities NR USD	4.11%	3.57%	2.91%	7.31%	1.51%
Out/(Under) Performing	-2.53%	-0.46%	4.97%	3.67%	6.22%
Peer Group Ranking	70	53	17	26	6

Hennessy Focus Institutional (HFCIX)

Fund Score: 8 (Status: Pass)

US Mid Cap

The investment seeks capital appreciation.

The fund invests primarily in U.S. securities, but may also invest in foreign companies traded in the U.S. on a national securities exchange or national securities association, including American Depositary Receipts, and foreign companies traded on a foreign exchange. Investments will consist primarily of common stocks, but may include preferred stocks, warrants, options, equity-like instruments and debt instruments. The Portfolio Managers invest in the stocks of companies of any size without regard to market capitalization. The fund is non-diversified.

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
HFCIX	3.22%	14.27%	9.00%	14.80%	8.77%
S&P MidCap 400 Growth TR USD	3.28%	17.92%	9.17%	14.62%	9.25%
Out/(Under) Performing	-0.06%	-3.65%	-0.17%	0.18%	-0.48%
Peer Group Ranking	77	85	17	16	13

Oakmark Equity And Income Investor (OAKBX)

Fund Score: 6 (Status: Pass)

Uncategorized

The investment seeks income and preservation and growth of capital.

The fund invests primarily in a diversified portfolio of U.S. equity and debt securities (although the fund may invest up to 35% of its total assets in equity and debt securities of non-U.S. issuers). It is intended to present a balanced investment program between growth and income by investing approximately 40-75% of its total assets in common stock, including securities convertible into common stock, and up to 60% of its total assets in debt securities issued by U.S. or non-U.S. governments and corporate entities rated at the time of purchase within the two highest grades.

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
OAKBX	1.70%	17.10%	4.51%	9.30%	6.49%
DJ Moderate TR USD	2.71%	10.35%	4.36%	7.87%	5.22%
Out/(Under) Performing	-1.01%	6.75%	0.15%	1.43%	1.27%
Peer Group Ranking	85	3	49	23	13

Oakmark Equity and Income Fund returned 1.8% over the last quarter, underperforming their benchmark (60% S&P 500, and 40% BBG Barclays US Gov't/Credit) by ~76 bps. Oakmark's biggest bets have been lower average credit quality, and higher exposure to US than their peers. The equity portion of the fund focused on large-cap and mega-cap companies, with more weight towards large cap. Much of the underperformance in Equities can be attributed to their overweight of value, and underweight of growth. During this period, growth has far outperformed value. Much of the positive performance in equities comes from the Banking industry, and Health industry. In the Fixed Income side of the fund, Oakmark holds a bit more Corporate bonds than their benchmark; with the majority of the securities being either AA rated, or BBB rated. The average credit quality had been hovering around BBB, but has trended up. A negative attribute to performance has been the low duration that Oakmark maintains on the fund. The positive performance in Fixed Income can be attributed to the lower average credit quality. Their largest industry allocations were Financials, Health, and Auto; at 22.5%, 9%, and 8.5% respectively. The ranking of the fund on 1-Year, 3-Year, and 5-Year horizons were; 3rd, 45th, and 22nd, respectively.

Janus Henderson Small Cap Value N (JDSNX)

Fund Score: 8 (Status: Pass)

US Small Cap

The investment seeks capital appreciation.

The fund pursues its investment objective by investing primarily in the common stocks of small companies whose stock prices are believed to be undervalued by the fund's portfolio managers. It invests, under normal circumstances, at least 80% of its net assets (plus any borrowings for investment purposes) in equity securities of small companies whose market capitalization, at the time of initial purchase, is less than the 12-month average of the maximum market capitalization for companies included in the Russell 2000 Value Index. The fund may invest up to 20% of its net assets in cash or similar investments.

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
JDSNX	2.26%	22.67%	9.53%	13.65%	8.78%
Russell 2000 Value TR USD	0.67%	24.87%	7.02%	13.39%	5.92%
Out/(Under) Performing	1.58%	-2.20%	2.51%	0.26%	2.86%
Peer Group Ranking	8	25	2	34	1

Nicholas Limited Edition I (NCLEX)

Fund Score: 7 (Status: Pass)

US Small Cap

The investment seeks to increase the value of the investment over the long-term.

The fund primarily invests in common stocks of domestic corporations with small- and medium-sized market capitalizations believed to have growth potential. The advisor believes a company's annual sales volume and market capitalization are the factors most illustrative of a company's size. The fund generally considers companies with market capitalizations up to \$3 billion as "small", between \$3 billion and \$25 billion as "medium," and greater than \$25 billion as "large."

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
NCLEX	5.25%	22.25%	8.75%	12.74%	8.92%
Russell 2000 Growth TR USD	4.38%	24.39%	7.64%	13.98%	7.82%
Out/(Under) Performing	0.86%	-2.14%	1.11%	-1.23%	1.10%
Peer Group Ranking	32	55	25	54	8

Ivy International Core Equity N (IINCX)

Fund Score: 8 (Status: Pass)

Frgn Developd Large Cap

The investment seeks to provide capital growth and appreciation.

The fund invests, under normal circumstances, at least 80% of its net assets in equity securities of companies located in, or principally traded largely in, developed European and Asian/Pacific Basin markets. In seeking to enhance potential return, it also may invest in issuers located or doing business in emerging market countries. The fund may invest up to 100% of its total assets in foreign securities.

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
IINCX	5.79%	22.64%	2.71%	10.30%	3.71%
MSCI ACWI Ex USA NR USD	5.78%	20.44%	0.80%	7.22%	1.13%
Out/(Under) Performing	0.01%	2.20%	1.91%	3.08%	2.59%
Peer Group Ranking	75	11	18	7	7

Oppenheimer Developing Markets I (ODVIX)

Fund Score: 7 (Status: Pass)

Frgn Emergng Markets

The investment seeks capital appreciation.

The fund mainly invests in common stocks of issuers in developing and emerging markets throughout the world and at times it may invest up to 100% of its total assets in foreign securities. Under normal market conditions, it will invest at least 80% of its net assets, plus borrowings for investment purposes, in equity securities of issuers whose principal activities are in a developing market, i.e. are in a developing market or are economically tied to a developing market country. The fund will invest in at least three developing markets.

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
ODVIX	6.99%	22.81%	-0.24%	5.17%	4.58%
MSCI EM NR USD	6.28%	23.76%	1.08%	3.96%	1.92%
Out/(Under) Performing	0.71%	-0.95%	-1.32%	1.21%	2.66%
Peer Group Ranking	26	39	68	28	3

RidgeWorth Seix Total Return Bond IS (SAMZX)

Fund Score: 6 (Status: Pass)

US Intermed Duration

The investment seeks to maximize long term total return through a combination of current income and capital appreciation, consistent with capital preservation.

The fund invests in various types of income-producing debt securities including mortgage- and asset-backed securities, government and agency obligations, corporate obligations and floating rate loans. It normally invests at least 80% of its net assets (plus any borrowings for investment purposes) in fixed income securities. The fund may invest up to 20% of its net assets in below investment grade, high yield debt obligations.

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
SAMZX	1.34%	0.26%	2.54%	2.31%	5.06%
BBgBarc US Agg Bond TR USD	1.44%	-0.31%	2.48%	2.21%	4.48%
Out/(Under) Performing	-0.10%	0.57%	0.06%	0.10%	0.58%
Peer Group Ranking	66	65	31	59	22

Fidelity Advisor Real Estate Income I (FRIRX)

Fund Score: 7 (Status: Pass)

REIT

The investment seeks higher than average income; and capital growth is the secondary objective.

The fund normally invests primarily in preferred and common stocks of REITs; debt securities of real estate entities; and commercial and other mortgage-backed securities, with an emphasis on lower-quality debt securities (those of less than investment-grade quality, also referred to as high yield debt securities or junk bonds). It invests at least 80% of assets in securities of companies principally engaged in the real estate industry and other real estate related investments. The fund invests in domestic and foreign issuers.

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
FRIRX	2.60%	7.54%	6.79%	8.46%	6.82%
FTSE NAREIT Equity REITs TR USD	1.52%	-1.72%	8.35%	9.52%	6.00%
Out/(Under) Performing	1.08%	9.26%	-1.56%	-1.06%	0.82%
Peer Group Ranking	17	8	64	50	8

Templeton Global Bond R6 (FBNRX)

Fund Score: 7 (Status: Pass)

Global Hedged

The investment seeks current income with capital appreciation and growth of income.

Under normal market conditions, the fund invests at least 80% of its net assets in "bonds." Bonds include debt obligations of any maturity, such as bonds, notes, bills and debentures. It invests predominantly in bonds issued by governments, government-related entities and government agencies located around the world. The fund may invest up to 25% of its total assets in bonds that are rated below investment grade or, if unrated determined by the investment manager to be of comparable quality. It is non-diversified.

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
FBNRX	-1.26%	10.59%	1.47%	3.88%	6.47%
BBgBarc Global Aggregate TR Hdg USD	0.98%	-0.41%	3.26%	3.32%	4.49%
Out/(Under) Performing	-2.24%	11.00%	-1.79%	0.56%	1.98%
Peer Group Ranking	98	2	29	13	2

Fresno County Stable Value (fressv)

Fund Score: 9 (Status: Watch)

Liquid Assets

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
fressv	0.50%	2.03%	2.12%	2.17%	
BofAML US Treasury Bills 0-3 Mon TR USD	0.19%	0.44%	0.20%	0.14%	0.50%
Out/(Under) Performing	0.31%	1.59%	1.93%	2.03%	
Peer Group Ranking	1	1	1	1	

Due to the departure of long time fixed-income manager Cathe Tocher and President of Investments David Musto, the Great-West Lifetime funds have been placed on Watch pending further review.

Great-West Lifetime 2055 Trust (gw2055)

Fund Score: 8 (Status: Watch)

Uncategorized

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
gw2055	4.57%	18.50%	6.94%	11.40%	
DJ Target 2055 TR USD	3.26%	17.24%	5.64%	10.99%	5.56%
Out/(Under) Performing	1.31%	1.25%	1.30%	0.40%	
Peer Group Ranking	5	10	1	18	

Due to the departure of long time fixed-income manager Cathe Tocher and President of Investments David Musto, the Great-West Lifetime funds have been placed on Watch pending further review.

Great-West Lifetime 2045 Trust (gw2045)

Fund Score: 9 (Status: Watch)

Uncategorized

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
gw2045	4.57%	18.23%	7.10%	11.50%	
DJ Target 2045 TR USD	3.21%	16.54%	5.49%	10.86%	5.50%
Out/(Under) Performing	1.36%	1.69%	1.61%	0.64%	
Peer Group Ranking	3	11	1	7	

Due to the departure of long time fixed-income manager Cathe Tocher and President of Investments David Musto, the Great-West Lifetime funds have been placed on Watch pending further review.

Great-West Lifetime 2035 Trust (gw2035)

Fund Score: 8 (Status: Watch)

Uncategorized

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
gw2035	4.17%	16.54%	6.78%	10.88%	
DJ Target 2035 TR USD	2.91%	12.76%	4.79%	9.50%	5.01%
Out/(Under) Performing	1.27%	3.78%	1.99%	1.37%	
Peer Group Ranking	3	13	1	10	

Due to the departure of long time fixed-income manager Cathe Tocher and President of Investments David Musto, the Great-West Lifetime funds have been placed on Watch pending further review.

Great-West Lifetime 2025 Trust (gw2025)

Fund Score: 8 (Status: Watch)

Uncategorized

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
gw2025	3.35%	12.83%	5.88%	8.89%	
DJ Target 2025 TR USD	2.44%	7.01%	3.55%	6.98%	4.47%
Out/(Under) Performing	0.92%	5.82%	2.33%	1.91%	
Peer Group Ranking	6	21	1	26	

Due to the departure of long time fixed-income manager Cathe Tocher and President of Investments David Musto, the Great-West Lifetime funds have been placed on Watch pending further review.

Great-West Lifetime 2015 Trust (gw2015)

Fund Score: 8 (Status: Watch)

Uncategorized

Trailing Returns	1 Qtr	1 Yr	3 Yr	5 Yr	10 Yr
gw2015	2.76%	9.57%	5.01%	6.96%	
DJ Target 2015 TR USD	1.78%	2.38%	2.31%	4.32%	4.03%
Out/(Under) Performing	0.98%	7.19%	2.70%	2.64%	
Peer Group Ranking	11	27	1	43	

Due to the departure of long time fixed-income manager Cathe Tocher and President of Investments David Musto, the Great-West Lifetime funds have been placed on Watch pending further review.

County of Fresno 457 DC Plan Watch List

As of: 6/30/2017

Current Lineup Status

Asset Class		Current Status	Placed On Watch
US Large Cap			
aspzx	Alger Spectra Z	Pass	-
cddyx	Columbia Dividend Income Y	Pass	-
02cff1	Blackrock Equity Index Fund	Index	-
US Mid Cap			
hfcix	Hennessy Focus Funds Institutional	Pass	-
03cff2	Blackrock Mid Cap Equity Index Fund	Index	-
US Small Cap			
nclex	Nicholas Limited Edition I	Pass	-
jdsnx	Perkins Small Cap Value N	Pass	-
03cff3	Blackrock Russell 2000 Index Fund	Index	-
Foreign Stocks			
iincx	Ivy International Core Equity R6	Pass	-
odvix	Oppenheimer Developing Markets I	Pass	-
10cff5	Blackrock Eafe Equity Index Fund	Index	-
Fixed Income			
samzx	RidgeWorth Seix Total Return Bond IS	Pass	-
fbrnx	Templeton Global Bond R6	Pass	-
04cff4	Blackrock US Debt Index Fund	Index	-
Specialty Options			
frirx	Fidelity AdvisorReal Estate Income I	Pass	-
fufrx	Franklin Utilities R6	Pass	-
oakbx	Oakmark Equity & Income I	Pass	-
fressv	County Of Fresno Stable Value Fund	Watch	2017 - Q1
Target Date			
c15mzr	Great-West Lifetime 2015 Trust	Watch	2017 - Q1
c25mzr	Great-West Lifetime 2025 Trust	Watch	2017 - Q1
c35mzr	Great-West Lifetime 2035 Trust	Watch	2017 - Q1
c45mzr	Great-West Lifetime 2045 Trust	Watch	2017 - Q1
c55mzr	Great-West Lifetime 2055 Trust	Watch	2017 - Q1

Watch List History

		Current Status	Placed On Watch	Removed From Watch
All Investments				
fressv	County Of Fresno Stable Value Fund	In Plan	2017 - Q1	
c15mzr	Great-West Lifetime 2015 Trust	In Plan	2017 - Q1	
c25mzr	Great-West Lifetime 2025 Trust	In Plan	2017 - Q1	
c35mzr	Great-West Lifetime 2035 Trust	In Plan	2017 - Q1	
c45mzr	Great-West Lifetime 2045 Trust	In Plan	2017 - Q1	
c55mzr	Great-West Lifetime 2055 Trust	In Plan	2017 - Q1	
fbrnx	Templeton Global Bond R6	In Plan	2016 - Q2	2017 - Q1
scblx	RidgeWorth Seix Total Return Bond R	In Plan	2013 - Q4	2015 - Q2
nnlex	Nicholas Limited Edition N	In Plan	2013 - Q4	2015 - Q2
gsftx	Columbia Dividend Income Z	In Plan	2013 - Q4	2014 - Q4
oakbx	Oakmark Equity And Income Investor	In Plan	2012 - Q1	2012 - Q3
segsx	Sentinel Government Securities A	Removed	2014 - Q2	2015 - Q2
jmcvx	Perkins Mid Cap Value T	Removed	2013 - Q4	2015 - Q2
msiix	MainStay International Equity I	Removed	2012 - Q4	2015 - Q2
paxix	Pax Balanced Institutional	Removed	2012 - Q4	2013 - Q2
gtavx	Invesco Mid Cap Core Equity R5	Removed	2012 - Q1	2013 - Q2
jmvox	Perkins Mid Cap Value I	Removed	2012 - Q1	2012 - Q3
nbgnx	Neuberger Berman Genesis Inv	Removed	2012 - Q1	2012 - Q3
sdgtx	Deutsche Capital Growth I	Removed	2012 - Q1	2012 - Q3
chtvx	Invesco Charter Fund R5	Removed	2012 - Q1	2012 - Q3

County of Fresno Target Date Review

Q2 2017 Performance Comparison

County of Fresno						
Investment Funds Performance Report		For the period ending 06/30/2017				
Retirement Date	Investment	3-Mon	1 Year	3 Years*	5 Years*	Expense Ratio
2015						
	Great-West Lifetime 2015 Trust	2.76	9.57	5.01	6.96	0.57
	Morningstar Lifetime Mod 2015 TR USD	2.06	6.76	3.27	6.40	
	Benchmark +/-	0.70	2.81	1.74	0.56	
2025						
	Great-West Lifetime 2025 Trust	3.35	12.83	5.88	8.89	0.57
	Morningstar Lifetime Mod 2025 TR USD	2.61	9.75	4.01	8.35	
	Benchmark +/-	0.74	3.08	1.87	0.54	
2035						
	Great-West Lifetime 2035 Trust	4.17	16.54	6.78	10.88	0.57
	Morningstar Lifetime Mod 2035 TR USD	3.13	14.13	4.75	10.19	
	Benchmark +/-	1.04	2.41	2.03	0.69	
2045						
	Great-West Lifetime 2045 Trust	4.57	18.23	7.10	11.50	0.57
	Morningstar Lifetime Mod 2045 TR USD	3.36	16.22	4.90	10.57	
	Benchmark +/-	1.21	2.01	2.20	0.93	
2055						
	Great-West Lifetime 2055 Trust	4.57	18.50	6.94	11.40	0.57
	Morningstar Lifetime Mod 2055 TR USD	3.44	16.50	4.71	10.40	
	Benchmark +/-	1.13	2.00	2.23	1.00	

*Returns are annualized after 1 year

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August 24, 2017

Project Overview

Stable Value Investment Management Services

County of Fresno 457 DC Plan

Introduction

On July 21, 2017, Northwest Capital Management released an RFP for Stable Value Investment Management services on the behalf of the County of Fresno 457 DC Plan, with the intent to evaluate the services provided by the incumbent provider Great West, after the departure of long time fixed income manager Cathe Tocher and President of Investments David Musto. Stable value RFPs typically review the following aspect of the investment management services:

- Organizational Information
- Investment Experience
- Investment Approach and Process
- Investment Performance
- Portfolio Transition
- Administrative and Performance Reporting
- Fees

The goal of the RFP project is to ensure the County's deferred compensation plan is receiving stable value investment management services consistent with the current marketplace.

Project Overview

Phase I: Project Committee Strategy Session (Complete)

Phase II: RFP Design (Complete)

Phase III: RFP Release (Complete)

Phase IV: Vendor RFP Response Analysis (August 14)

Phase V: Finalist Interview and Selection (Fall)

Phase VII: Transition, if necessary (Q4 2017)

The following vendors directly received the RFP:

- Columbia Thread Needle
- T. Rowe Price
- Morley
- Lincoln Financial Group
- Galliard
- Fidelity
- New York Life
- Mass Mutual
- ICMA
- Great West
- Met Life
- Nationwide
- Transamerica
- Putnam
- Goldman Sachs
- Invesco
- Bank of NY Mellon
- Federated Investors
- Prudential
- TIAA CREF
- Voya
- Principal

Process Summary

The process will result in the retention of Great West or the selection of another vendor. Regardless of who is selected, the following initiatives will take place:

1. Comprehensive review of the current stable value option
 - a. Suitability after departure of fixed income manager Cathe Tocher and President of Investments David Musto
2. Comprehensive review of available Stable Value products
 - a. Investment strategy and performance
 - b. Underlying wrap contracts and risk controls
 - c. Administrative services and fees.
3. Validation of current service provider or determination of a more compelling solution.
 - a. Validate current Stable Value provider is maintaining the optimal level of services since the departure of key personnel.
 - b. Determine that another vendor offers a more compelling solution, than prudence would dictate the plan sponsor make a change.
4. NWCM will present the DCMC with a summary analysis of the vendor responses.

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Plan Sponsor Consideration for Offering a Self-Directed Brokerage Window

The purpose of this memo is to summarize the considerations a plan sponsor should take into account when deciding to offer a self-directed brokerage account with their defined contribution retirement plan.

Plan Sponsor Considerations

Fiduciary Roles and Responsibilities

Offering a brokerage window is a fiduciary decision. Plan sponsors are exercising their discretion concerning how to implement the plan provisions giving participants the right to direct their accounts. Plan sponsors must use a prudent process in determining if a brokerage window is appropriate.

There is no guidance on the fiduciary duty to offer a brokerage window. That said, the decision is not fundamentally different from any other decisions made by fiduciaries in that they must engage in a prudent process and reach an informed and reasonable decision. A few examples a fiduciary may want to consider include:

- The investment sophistication of the entire employee population.
- Sponsors should communicate to participants that the investments in the brokerage window are not selected or monitored by the DCMC or its advisor and they should consider their unique risk tolerance and sophistication level.
- Would the population benefit from being able to build portfolios from offering an expanded number of investments?

Other considerations:

Does offering a brokerage window continue to afford plan sponsors protection under ERISA 404(c)– protection against losses incurred by plan participants? The answer is yes, as long as the plans “core” options meet the criteria and all disclosure obligations are met. Additionally, the following disclosures need to be made:

- Explanation of any fee and expenses that may be charged against the individual account:
 - Any fee or expense necessary for the participant to open or close the window.
 - Any ongoing fee or expenses to maintain the window.
 - Commissions or fees per trade.
 - A reconciliation with statement of the dollar amount of fees and expenses that were charged during the preceding quarter.

Regarding disclosures, in Field Assistant Bulletin 2012-02R, the DOL explained that the plan sponsor or plan committee must provide a general description that gives “sufficient information to tenable participants and beneficiaries to understand how the window, account, or arrangement works.”

Selection of the Provider

Once a decision has been made to offer a brokerage window, the fiduciaries have a second decision to make– selecting the provider. This review process should include the following:

- Is the provider qualified to offer a brokerage window service?
- What is the quality of the service provider’s services?
- Do they have a track record of providing prompt, efficient and accurate responses?
- Are confirmations provided in a prompt manner?
- Are the fees reasonable relative to other window providers?

Monitoring of Provider Selection

Plan sponsors should periodically review that the service provider originally selected continue to offer services and pricing competitive with the marketplace.

Conclusion

Offering a self-directed brokerage window can provide participants with additional investment options beyond those offered in the plan’s core investment line-up. This additional flexibility does come with additional selection, monitoring and disclosure requirements for the plan fiduciaries.

If a plan sponsor is receiving numerous requests to invest in securities not offered in the plan, then investigating the merits of the brokerage window makes sense. Absent this demand, taking on the additional fiduciary responsibilities may be something a plan sponsor looks to avoid.

** Information included in this memo was compiled from various public whitepapers. It should, by no means, be considered legal advice.*