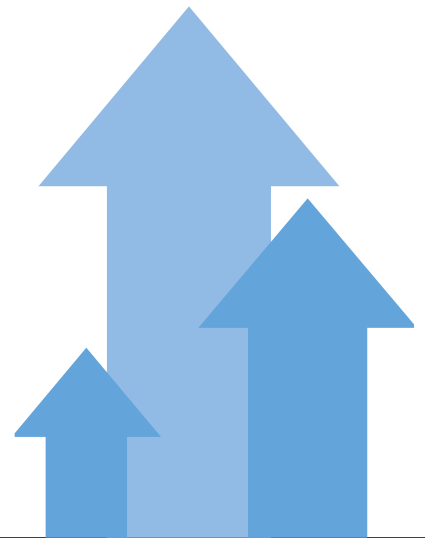


The Advisor's Guide to Group 401(k) Plans: MEPs, PEPs & Aggregation Programs



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What Are Group 401(k) Plans?

Expanding Retirement Savings Opportunities

Group 401(k) Plans share a common bond: they enable businesses to join together to provide retirement plans to their employees with fewer administrative burdens and lessened fiduciary risks — and at lower costs — than offering their own single-employer plans.

Interest is growing in Group 401(k) Plans. From a regulatory standpoint, the ongoing emphasis is on increasing opportunities for more people to save for retirement. And, at the same time, employers want to provide the benefits that will help them attract and retain talented team members, without losing focus on their bottom line.

Against this backdrop, the Setting Every Community Up for Retirement Enhancement (SECURE) Act of 2019 resulted in two important breakthroughs for Group 401(k) Plans by:

- **Eliminating the “one bad apple” rule** — Before the SECURE Act, if one adopting employer didn't

meet the criteria in a Multiple Employer Plan (MEP), the entire plan would be disqualified. Now, only the single adopter that doesn't meet the criteria will have to leave the plan, keeping the MEP intact.

- **Creating a new type of group plan** — The SECURE Act inaugurated a new kind of MEP, known as a Pooled Employer Plan (PEP), which allows companies — regardless of industry — to join together to form a Group 401(k) Plan.

This interactive e-book provides the information you need to know about MEPs and PEPs, as well as another type of Group 401(k) Plan, Aggregation Programs.

As an experienced Third-Party Administrator (TPA) for Group 401(k) Plans, The Retirement Advantage, Inc. (TRA) can assist you whether you are considering adding these plans to your business or if you wish to further enhance your ability to offer Group 401(k) Plans to your clients.

Benefits for Financial Advisors

Incorporating Group 401(k) Plans into your practice enables you to:

- Demonstrate your value by offering solutions that are tailored to your clients' specific needs.
- Increase your access to businesses — and their owners — to generate more leads among new and current clients.
- Expand the opportunity for more people to save for retirement.
- Enhance your ability to expand your 401(k) business.
- Manage your 401(k) business more efficiently.

Benefits for Employers

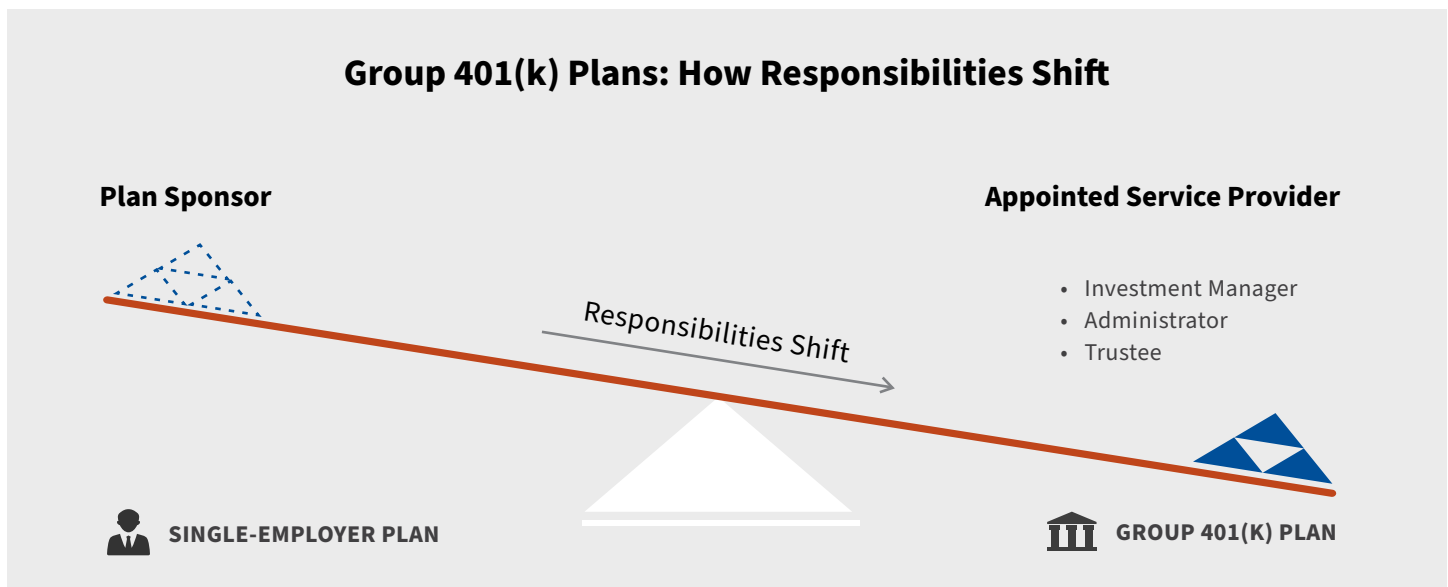
All too often, high costs, significant administrative burdens, and too much fiduciary risk have kept smaller employers from offering retirement plans on their own. These “barriers to entry” can be overcome with a Group 401(k) Plan.

Group 401(k) Plans enable clients to:

- Achieve greater economies of scale than they probably could in a single-employer plan.
- Offer a retirement savings solution to their valued employees.

Group 401(k) Plans offer two more key benefits over single-employer plans. They shift responsibilities from single-plan employers to others involved in the plan, so that plan sponsors can:

- Lessen their administrative burdens.
- Mitigate their fiduciary risks.



Employer Responsibilities Shift

Roles and responsibility assignments move from employers to other appointed fiduciaries across various Group 401(k) Plans.

General Plan Responsibilities	Single Employer Plan	Aggregation Programs	MEP	PEP
Design plan, identify provisions and guidelines for participants	✓	✓	✓	✓
Deposit contributions and upload payroll files on a timely basis	✓	✓	✓	✓
Choose an investment platform meeting ERISA guideline standards	✓			
Hold quarterly investment committee meetings documenting minutes and resolutions	✓			
Maintain individual Plan Document & Adoption Agreements	✓	✓		
Monitor the status of all investments available and remove or replace them as appropriate	✓			
Review platform & service providers to ensure the plan is operating to expectations	✓	✓	✓	✓

Plan Reporting Services	Single Employer Plan	Aggregation Programs	MEP	PEP
Individual filing of ERISA Form 5500 filing requirements	✓	✓		

Operational Plan Administrator and Government Reporting Duties	Single Employer Plan	Aggregation Programs	MEP	PEP
Timely processing and funding of submitted payroll contribution files	✓	✓	✓	✓
Manage overall plan operations to ensure the plan is operating according to the terms of the plan document	✓	✓	✓	✓
Monitor process of contributions submitted and investment changes within plan	✓	✓		
Oversite of all operations of plan to ensure the plan is operating according to the terms in the plan document	✓	✓	✓	
Provide census information for annual compliance testing and reporting	✓	✓	✓	✓
Conduct required annual non-discrimination and compliance testing, including contribution calculations	✓	✓	✓	✓
Operate under a plan document that identifies all fiduciaries of plan and names Department of Treasury registered Pooled Plan Provider				✓
Establish plan year beginning date that coincides with all other plans within group			✓	✓
Review and electronically sign the Form 5500	✓			
Administer and monitor participant loans in compliance with statutory requirements	✓			
Distribute annual required participant notifications received by service providers under section 404(a)	✓	✓	✓	✓
Identify vesting policies & determine loan & force out provision and procedures	✓	✓	✓	

Other Plan Responsibilities	Single Employer Plan	Aggregation Programs	MEP	PEP
Maintain a centralized fund lineup across all employers		✓	✓	✓
Remit portion of asset fee to ERISA Expense Budget Account (EBA) for plan services			✓	✓
Replace existing broker of record with financial advisor appointed on group plan			✓	✓
Review and authorize loan and distribution requests	✓			
Maintain same plan year start date as all other adopter employers in group				✓
Pay for outside CPA audit, only when adopting employer triggers audit requirements	✓	✓		
Meet & maintain eligible adopter requirements/conditions necessary to establish or merge into plan			✓	✓
Exit group plan without successor spin-off plan establishment requirements	✓	✓		

Understand the Plans

Multiple Employer Plans (MEPs)

Definition

- A qualified retirement plan sponsored by an association, such as a trade association, or professional employer organization (PEO), a MEP allows a group of employers with a common business nexus to band together to create one large 401(k) Plan. Given the business nexus that adopting employers must share — and the fact that only one Form 5500 is filed for all adopting plans — these plans are sometimes referred to as “closed MEPs.”

Key Characteristics

- Defined by ERISA Section 4(13).
- Unrelated employer members co-adopt a single qualified trust.
- There is a single Plan Sponsor and Trustee, as well as one 3(21) Investment Advisor and/or 3(38) Investment Fiduciary, and one 3(16) Plan Administrator for all adopting employers.
- Auditable when the total number of eligible participants across all adopters of the MEP is above 100.

- Generally, each member adopter:
 - Selects their own plan provisions, such as match provisions, eligibility requirements, and profit sharing.
 - Is tested as a separate entity.
- A 401(k) Plan inside of a MEP can be combined with a Defined Benefit or Cash Balance Plan for an adopting employer.
- One Form 5500 is filed for the entire plan.

Documents

- Plan Document — retained by the MEP sponsor.
- Adoption Agreement — Provides the provisions available in the MEP and retained by the MEP sponsor.
- Participation Agreement — Created for and signed by each adopting member to include the specific provisions of their retirement offering.

Limitations

- **Fixed fund lineup** — All adopting employers share one common fund lineup. Generally, the Plan Sponsor or Investment Fiduciary make additions to or removals from the lineup; notification must be provided to all eligible individual MEP participants.
- **Audit possibility** — A MEP is subject to group audit when it reaches more than 100 participants.
- **Self-directed brokerage accounts** — Generally, these are not permitted in MEPs.
- **Accessibility** — Only employers of a bona fide trade association and/or a sponsoring PEO arrangement have access to a MEP. If an adopting employer terminates its association membership or client services with a MEP Plan Sponsor, their plan may be removed from the MEP.

- **Limited choices** — If a MEP Plan Sponsor decides to make a change to the plan, the change applies to all plans within the MEP, including changes in service providers. For example, if the Plan Sponsor selects a different Recordkeeper or 3(21) fiduciary for the MEP, the change is made to all plans inside the MEP.

Benefits Compared to Single-Employer Plans

- Significantly fewer administrative duties.
- Lower costs through greater plan asset totals.
- Mitigation of fiduciary responsibilities and liabilities.
- One plan audit for all adopting employers.



Pooled Employer Plans (PEPs)

Definition

- Designed to benefit employees of two or more adopting employers, PEPs are qualified retirement plans that can be sponsored and offered only by a Pooled Plan Provider (PPP). Employers that adopt a PEP need not share a business nexus to form this group 401(k) Plan; thus PEPs are sometimes referred to as “open MEPs” and, as they increase in number, will likely be more readily available than MEPs.

Key Characteristics

- Defined by ERISA Section 3(43).
- PPPs must meet the requirements outlined in ERISA Section 3(43) as well as other requirements outlined by the US Treasury Department.
- In addition to the PPP, there is a centralized 3(21) Investment Advisor and/or 3(38) Investment Fiduciary, as well as a 3(16) Plan Administrator.
- A PPP must register with the US Secretary of Labor 30 days before beginning operations, using EBSA Form PR (Pooled Plan Provider Registration). Filing this form also satisfies the SECURE Act requirement that the PPP must register with the Treasury Department. Registration requirements may evolve as PEPs gain more traction in the marketplace.
- Auditable only if the PEP falls outside the audit exemption rules of no more than 1,000 eligible participants or no single adopting employer with more than 100 employees.
- Employers adopting a PEP plan for their 401(k) may have challenges combining the 401(k) with a Defined Benefit or Cash Balance Plan, depending upon the flexibilities the PEP will permit.
- One Form 5500 is filed for the entire plan.

Documents

- Plan Document — retained by the PEP Sponsor.
- Adoption Agreement — Provides the provisions available in the PEP and retained by the PEP Sponsor.
- Participation Agreement — Created for and signed by each adopting member to include the specific provisions of their retirement offering.

Limitations

- **Fixed fund lineup** — All adopting employers share one common fund lineup. Generally, the Plan Sponsor or Investment Fiduciary makes additions to or removals from the lineup; notification must be provided to all eligible individual participants.
- **Audit possibility** — Although PEPs have a more lenient policy on audit requirements than MEPs, a PEP could still combine enough small plans and eligible participants to become auditable in a short span of time, which would impact costs adversely.
- **PPP fiduciary liability** — Each adopting employer within a PEP retains fiduciary liability for the selection and monitoring of the PPP.
- **Accessibility** — Any adopting employers, service providers and fiduciaries with a PEP can be removed from the plan by the PPP.

Benefits Compared to Single-Employer Plans

- Significantly fewer administrative duties.
- Lower costs through greater plan asset totals.
- Mitigation of fiduciary responsibilities and liabilities.

Aggregation Programs

Definition

- An Aggregation Program provides a qualified Group Plan 401(k) to an organization's members or clients; the adopting employers do not have to share a business nexus. An Aggregation Program gathers and centralizes each adopting plan's administrative, recordkeeping and investment services, although each adopting employer retains their role as Plan Sponsor.

Key Characteristics

- There is a centralized 3(21) Investment Advisor and/or 3(38) Investment Fiduciary, as well as a 3(16) Plan Administrator.
- Individual Form 5500s are filed for each adopter.
- No group audit.
- Simplicity of fixed pricing matrix (can be tiered based on assets), advisory compensation, investment options, and fiduciary assignments.
- Avoids aggregated plan audit fees and payments into an Expense Budget Account (EBA). In contrast, in MEPs and PEPs, adopters pay a small percentage of assets into an account to pay for shared expenses incurred by the plan. The most common shared expense is the plan audit. However, because adopting employers of an Aggregation Program operate independently of one another, there are no shared expenses across adopters.
- Can have combined Aggregation Program/Defined Benefit or combined Aggregation Program/Cash Balance plans.
- Multiple broker-of-record arrangements available for plan adopters so that each adopting employer can select their preferred advisor.

Documents

- Plan Document — Retained by each adopting employer as a Plan Sponsor.
- Adoption Agreement — Retained by each adopting employer as a Plan Sponsor.

Limitations

- **Fixed fund lineup** — All adopting employers share one common fund lineup. When the Investment Fiduciary makes additions to, or removals from, the fund lineup, notification must be provided to all eligible individual Aggregation Program participants, as changes are made across all adopting employers.
- **Economies of scale** — While smaller plans will see pricing benefits if they become part of an Aggregation Program, the economies of scale will be less than they would be for a MEP or a PEP, which are considered as one plan for reporting purposes.
- **Plan Sponsor fiduciary liability** — Adopting employers generally retain their fiduciary role as Plan Sponsor.

Benefits Compared to Single-Employer Plans

- Significantly fewer administrative duties.
- Lower costs through greater plan asset totals.
- Mitigation of fiduciary responsibilities and liabilities.

Group 401(k) Plans Quick Reference Guide

	MEPs	PEPs	AGGREGATION PROGRAMS
DEFINITION	• Qualified plan • Sponsored by an association or professional employer organization (PEO) • Adopters must share a common business nexus • Sometimes referred to as “closed MEPs”	• Qualified plan of two or more adopting employers • Sponsored and offered by a Pooled Plan Provider (PPP) • No business nexus required	• Qualified plan made available to an organization’s members or clients • Gathers and centralizes each adopting plan’s administrative, recordkeeping, and investment services • No business nexus required • Each adopting employer retains Plan Sponsor role
KEY CHARACTERISTICS	• Defined by ERISA Section 4(13) • Employers sharing a common nexus co-adopt a single qualified trust • One Plan Sponsor, Trustee, 3(21) and/or 3(38) Investment Fiduciary, and 3(16) Plan Administrator • Each adopter: - Selects own plan provisions - Is tested as a separate entity • Auditable when the total number of eligible participants (across all adopters of the MEP) is above 100 • One Form 5500 filed for entire plan	• Defined by ERISA Section 3(43) • Must meet requirements of ERISA Section 3(43), as well as other US Treasury Department requirements • Centralized 3(21) and/or 3(38) Investment Fiduciary, and 3(16) Plan Administrator • PPP must register with US Secretary of Labor 30 days before beginning operations using EBSA Form; also fulfills registration with US Treasury Department • Auditable only if more than 1,000 eligible plan participants or a single adopting employer has more than 100 employees • One Form 5500 filed for entire plan	• Centralized 3(21) and/or 3(38) Investment Fiduciary, and 3(16) Plan Administrator • Simplicity of fixed pricing matrix (tiered based on assets), advisory compensation, investment options, and fiduciary assignments • No group audit • No adopter restrictions on combining DB or Cash Balance plans • Individual Form 5500s filed for each adopting employer • Capable of multiple brokers of record across contracts in program
DOCUMENTS	• Plan Document • Adoption Agreement • Participation Agreement	• Plan Document • Adoption Agreement • Participation Agreement	• Plan Document • Adoption Agreement
LIMITATIONS	• Fixed fund lineup • Generally, no self-directed brokerage accounts • Relatively limited accessibility • Changes made by Plan Sponsor apply to all plans in MEP	• Fixed fund lineup • Possibility of audit • Adopting employers have fiduciary liability in selecting and monitoring PPP • PPP can remove any adopting employers, service providers, and fiduciaries within the PEP	• Fixed fund lineup • Economies of scale not as great as MEPs or PEPs • Adopting employers retain their fiduciary role as Plan Sponsors

Circle of Protection

When participating employers “merge” their current plan into a Group 401(k), they outsource their obligations as Plan Administrator and Investment Fiduciary to appointed entities inside of the new group plan. However, employers retain their due diligence responsibilities in choosing fiduciary services providers and must provide ongoing oversight of the plan.



Who's Who

Investment Manager Fiduciaries

- **3(38) Investment Fiduciary** – A person with discretionary authority to manage the plan investment options or its assets, or a person who provides investment advice to the plan for a fee.
- **3(21) Investment Advisor** – An Investment Advisor (RIA) registered under the Investment Advisors of 1940 who exercises discretionary authority to manage plan assets and who acknowledges their fiduciary status in writing.

3(16) Plan Administrator/TPA – The 3(16) Plan Administrator is responsible for the overall operation of the plan according to the terms of the plan document and completes all required annual testing and filing of Form 5500.

Recordkeeper – The Investment Custodian who purchases and sells the mutual funds in the plan as directed by participants or an elected Investment Fiduciary. The Recordkeeper also maintains the investment options and securely allocates participants' contributions to their accounts for tracking and monitoring purposes.

Another Potential Role

- **Endorsers** – Support and market a 401(k) program made available to their clients or members. Endorsers do not provide recommendations or consulting services as a named fiduciary in plan documents but do provide support between its clients or members and the service providers.

Three Steps to Determine Client Suitability

Step One: Identify Prospects

Look at your book of business and prospects to see which single-employer plans might be better candidates for one type of Group 401(k) Plan versus another because of their type of business, association, or the Professional Employer Organization (PEO) they are part of.

At this stage, you won't be able to determine which type of plan is the right fit for a particular client. But you will be able to narrow the field of possibilities before taking the second step in the client suitability selection process.

Plan Type	Sample Prospect Businesses, Associations & Organizations
MEPs	• Industry or professional associations • PEOs, such as an employee benefits organization or a recruitment firm • Common ownerships, such as a parent company with multiple subsidiaries • Associations based in a specific locality, such as a Chamber of Commerce
PEPs	• National associations • Franchise organizations • Broker-Dealer firms • Recordkeeping and Administration firms
Aggregation Programs	• All groups listed for MEPs/PEPs • Payroll companies • Banks or credit unions • CPAs • Larger advisory practices • Property & Casualty insurance firms

Step Two: Ask These Key Questions

Second, take the employers you've identified as likely candidates for a Group 401(k) Plan and ask yourself the questions that we've outlined here. If you don't know the answers, you'll have to have a conversation with your prospect(s) so you can better understand which plan best meets their needs and goals.

Note that these questions aren't sequential; however, at the end of this step, you should have answers to all the questions.

- **Is the organization willing to maintain a Plan Sponsor role and the responsibilities associated with being a named fiduciary? Or would they prefer an endorser role?** Of the three types of Group 401(k) Plans detailed in this e-book, single employers retain the role of Plan Sponsor only in Aggregation Programs. In MEPs and PEPs, adopting employers have lessened fiduciary responsibilities compared to a Plan Sponsor in an Aggregation Program.
- **How does the organization hope to benefit from offering a Group 401(k) Plan to its members/clients?** For example, an adopting organization may simply want to achieve economies of scale in offering a retirement plan to its members or clients. Looking beyond the basics, clients may be driven by other goals. For example, a trade association may want to offer an Aggregation Program as a way to retain membership or attract new members. Aggregation Programs also offer the potential for additional revenue for the association through a program service fee, which the association can charge for the plan oversight provided. Of course, the organization that endorses an Aggregation Program cannot collect a fee on their own plan within the Program, since they retain the Plan Sponsor role for their in-house plan.
- **Will the new Group 401(k) fall below the required audit threshold? If not, what impact will the audit have on the pricing of the plan?** If the majority of adopting employers do not require an audit on their individual plans, triggering a required group audit by combining these employers' participants into one MEP or PEP may be an undesired result. An Aggregation Program may be the best choice for these situations since adopters are not subject to group audit. MEPs require an audit when the total number of eligible participants across all adopters of the MEP is above 100. PEPs require an audit if there are more than 1,000 eligible participants across the plan or a single adopting employer has more than 100 eligible participants.
- **What level of flexibility or autonomy do adopting employers want in their Group 401(k) Plan?** Naturally, there are tradeoffs between flexibility/autonomy and simplicity/cost. For example, since adopting employers retain their individual roles as Plan Sponsors in Aggregation Programs, they retain a greater degree of autonomy than they would in a MEP or PEP. However, because MEPs have a single Plan Sponsor and PEPs have one single PPP, they have fewer complexities and may achieve greater economies of scale than Aggregation Plans.

Step Three: Match the Client to the Plan

The final step in the process is to match one or more single-employer clients to the Group 401(k) Plan most likely to work best for them.

Sample Scenarios

Here are some sample scenarios to provide context for the variables to consider in this step. These scenarios are for illustration purposes only and are not intended to replace a consultation with TRA to determine which plan(s) would be best to recommend.



Scenario 1

Several owners of different businesses based in your city are losing top talent to larger employers who offer a retirement plan benefit. All the business owners want to make a retirement plan available to their employees but they are all concerned about the costs and administrative and fiduciary responsibilities that they will be taking on. Could a Group 401(k) Plan be the answer?

Plan(s) to Consider: MEP, PEP or Aggregation Program

Rationale: Potentially, all three Group 401(k) Plans could work in this scenario. Since the businesses are based in the same location they have a common business nexus, even though their businesses are different, so a MEP could work. (PEPs don't need to share a business nexus). One determining factor could be whether it's desirable to avoid combining the participants across all of the employers triggering an annual audit and added expense to the plan. If so, only the Aggregation Program would work.



Scenario 2

The head of a CPA firm has a number of small employer clients who want to offer retirement plans to their employees but can't — or don't want to — take on the costs, administrative burdens, and fiduciary responsibilities of offering their own plans. The CPA firm would also like to receive some compensation for making the plan available.

Plan to Consider: Aggregation Program

Rationale: Since it's important that the CPA be compensated for the Group 401(k) Plan, an Aggregation Program is the best choice, which permits the CPA firm as the Plan Endorser to charge a minimal servicing fee to adopting plans. However, if the CPA firm itself adopts the Aggregation Program, it would not be able to charge this fee to its own plan because it would be that Plan's Sponsor.



Scenario 3

Five individual clients own different local fast-food franchises. None have more than 100 employees; overall, it's unlikely that the employers will reach 1,000 employees in total. They would like to offer their employees a retirement plan but definitely do not want to take on more than the lowest level of administrative and fiduciary responsibilities.

Plan to Consider: PEP

Rationale: In a PEP, the PPP takes on the role of Plan Sponsor and offers the PEP. This, along with the shifting of fiduciary responsibilities that comes with Group 401(k) Plans, means that it will provide minimal administrative burdens and greatly limited fiduciary responsibilities for adopting employers. The adopting employers probably will also welcome that the PPP is responsible for service provider hiring and firing decisions within the plan. At the same time, the size of the adopting employers makes it unlikely that the PEP will be subject to an annual audit.



Scenario 4

A parent company has multiple subsidiaries and wants to offer one retirement plan to them all. The subsidiaries don't want to take on the responsibilities associated with being Plan Sponsors, but want plan design flexibility.

Plan to Consider: MEP

Rationale: In a MEP, each adopting employer can choose their own plan provisions, which may satisfy the need for each subsidiary to tailor provisions to their individual circumstances, which isn't possible in a PEP. Since cost-saving is a priority, a MEP would probably be preferable to an Aggregation Program. In addition, since none of the subsidiaries want to assume the Plan Sponsor role, an Aggregation Program wouldn't be a good choice.



TRA: Your Trusted Partner for Group 401(k) Plans

Our Expertise

When it comes to Group 401(k) Plans, you need expert, conflict-free guidance to deliver the optimal retirement solutions to your clients, especially in today's complex — and evolving — regulatory environment. Equally important, you need a TPA who has deep experience in creating and administering Group 401(k) Plans.

For the past 25 years, TRA has partnered with plan advisors, sponsors and service providers throughout the U.S. to deliver exceptional retirement solutions through our integrated service offering. In addition to your dedicated Regional Sales Consultant, you and your clients will benefit from the expertise of our dedicated Group 401(k) Plan team, supported by our commitment to outstanding client service.

TRA designs and administers Group 401(k) Plans that meet your clients' unique needs, eases their administrative burdens, and lessens their fiduciary risks — as cost-effectively as possible.

As the delegated 3(16) Plan Administrator for Group 401(k) Plans, TRA relieves your clients of many of the day-to-day administrative burdens associated with sponsoring, offering, or endorsing a plan, while providing:

- Time savings
- Reduced liability
- Increased HR capacity
- Reduced audit risk



Three Ways It Pays to Work with TRA

- **We specialize in customized plans** — We consult with financial advisors and employers to create innovative plan designs.
- **Audit discount available** — We have established relationships with several major nationwide CPAs, which automatically provide your clients with a discount on audit services.
- **We administer combination plans** — For Group 401(k) Plans combined with either Defined Benefit or Cash Balance Plans, you've got to be sure that your TPA can provide the proper administration so that your clients avoid added fees and proper file transfers. TRA provides this administration.

Group 401(k) Plan Pricing

Because of the high degree of customization and the many variables associated with Group 401(k) Plans, each one is priced individually.

These are the parameters you'll have to define to determine the pricing of a Group 401(k) Plan:

- Total assets across the entire plan
- Assets of each adopting plan
- Total dollar contributions into the plan on an annualized basis (flow)
- Total participants:
 - Active
 - Eligible

At TRA, we use this information and work with you so that you can offer the most cost-effective Group 401(k) Plan solutions to your clients.

We Work with the Top Recordkeepers

Here is a sample of top recordkeepers TRA works with on various Group 401(k) Plans.



Complimentary Group 401(k) Plan Assessment

Contact Us

Do you have clients or prospects now in single-employer plans - or considering a retirement plan - who might benefit from adopting a Group 401(k) Plan?

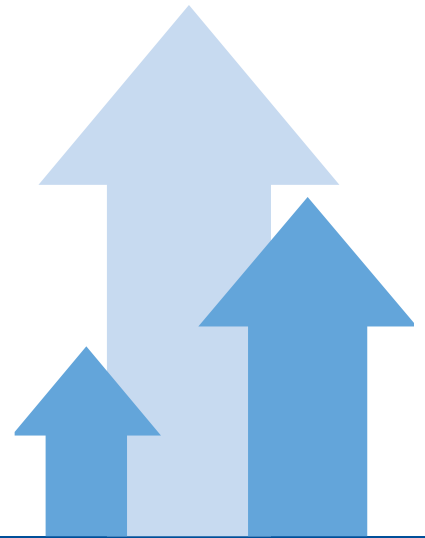
Let us help you assess which clients might be the best fit for a Group 401(k) Plan with a complimentary Plan Assessment. Contact us today!

Connect with the experts.

tra401k.com/group-experts

Thank You!

For more resources,
please visit our website
www.tra401k.com



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