

# Fiserv and the Department of Labor (DOL) Fiduciary Rule

Assisting Your Firm to Meet its Department of Labor (DOL) Fiduciary Standard Challenges

Managed account technology and capabilities from Fiserv are trusted by the largest firms in the managed account industry.

Fiserv can assist your firm in meeting its Department of Labor Fiduciary standard challenges by leveraging our managed account technology and Unified Wealth Platform portal.

# What the Proposed DOL Ruling Means for the Wealth Management Industry

Industry experts believe the recently enacted DOL fiduciary requirements will drive additional accounts to advisory-based solutions.

Firms will most likely utilize the various exemptions defined in the rule and existing fiduciary law. The best known exemption, the Best Interest Contract exemption (BIC) will assist firms to attest that they are compliant with DOL regulations both in fact and intent, and have acted in their clients' best interest, in areas as broad as client suitability, fees, and investment alternatives.

Other exemptions likely to be used include a "level fee fiduciary," whereby a firm would be required to flatten its fees and become largely compliant by 2017.

The DOL regulations will likely to accelerate the movement by firms to leverage selfdirected and digital advice solutions for low balance accounts. This will allow firms to provide the required fiduciary services in a more cost-effective manner.

# **How Fiserv Can Help**

Fiserv can help firms comply by leveraging our core managed account technology and Unified Wealth Platform portal to:

• Support new recordkeeping requirements to demonstrate DOL compliance

- Track BIC information for additional audit and compliance capabilities
- Gain visibility to risk profile drift within the universe of qualified accounts
- View trading activity/inactivity to address potential issues such as "reverse churning"
- Provide insight into investment fees

# The Account Framework to Support DOL

# Non-Managed Fiduciary Program

The lowest cost option for smaller accounts is a program that supports centralized fiduciary oversight by moving accounts to a unique program on Unified Wealth Platform from Fiserv. Firms may seek to use this program for self-directed fiduciary retirement accounts (where applicable), or they may seek to use this program to monitor accounts that have not moved to a traditional managed account program.

# Low Balance Managed Account Program

For smaller accounts, Fiserv can provide a simplified, model-based mutual fund/ exchange traded fund program as a lowercost alternative to a traditional managed account program. This option can limit the universe of eligible security vehicles, scheduled trading events and provides limited reporting capabilities while leveraging an existing managed account structure at a reduced cost.

#### Traditional Managed Account Program

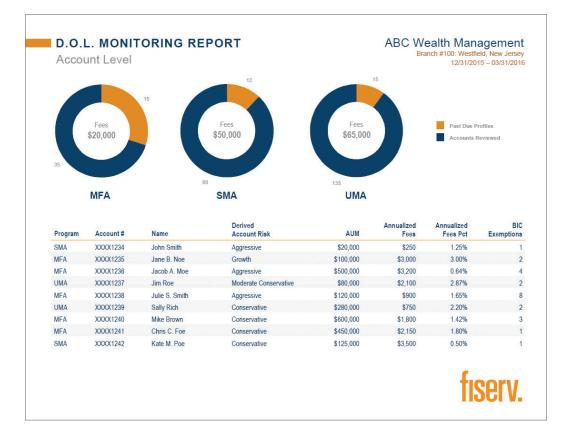
Accounts can be converted individually, weekly, or monthly and mapped to an existing, full-service managed account program. Retirement accounts can be converted individually through business-as-usual processing, or in a weekly or monthly bulk conversion. Existing program attributes would apply automatically to create efficiencies. This approach could be a likely solution for accounts \$25,000 or larger.

# The Benefit of a Managed Account Platform From Fiserv

By converting appropriate accounts to managed programs, firms receive the added benefit of managed account technology from Fiserv. Program and account restrictions, alerts and monitoring can be applied without sacrificing the advisor's flexibility to build, implement and manage custom investor portfolios. The platform comes with robust advisor planning, proposal-generation, portfolio management and trading tools. Firms can consolidate their business onto a single, scalable platform to streamline operations and reduce technology costs, while leveraging the security and reliability of the largest and most trusted platform in the managed account industry. Unified Wealth Platform can accommodate growth of any magnitude.

# The Added Value of Advanced Reporting and Analytics for Your Firm to Demonstrate DOL Compliance

With the new regulations, firms will be required to demonstrate their DOL compliance. This means the ability to identify both at the account and reporting program levels, that the account is in a managed program, has been risk profiled, is in a level fee program and has the necessary best interest contract (BIC) exemptions in place. Fiserv reports (see the examples that follow) allow firms to effectively monitor accounts and disclose this data to better comply with the DOL fiduciary rule. These reports can also help



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#### ABC Wealth Management TRANSACTIONS REPORT Branch #100; Westfield, New Je **Trades Executed** 12/31/2015 - 03/31/2016 4Q2015 102016 Number of Accounts 100 Total # of Accounts 100 Total # of Trades 30 60 \$500 000 00 **Total Transaction Value** \$200 000 00 \$500 000 00 \$725 000 00 Ending Market Value Turnover Ratio 40 00% 69 87%

#### **Trade Activity**

Program	Account #	Name	Portfolio Profile	Market Value	# of Trades	Last Trade Date
UMA	XXXX1234	John Smith	Moderate Conservative	\$9,800.00	7	01/05/2016
SMA	XXXX1235	Jane B. Noe	Growth	\$6,500.00	3	01/11/2016
JMA	XXXX1236	Jacob A. Moe	Aggressive	\$8,500.00	5	02/10/2016
MFA	XXXX1237	Jim Roe	Moderate	\$7,600.00	3	02/17/2016
UMA	XXXX1238	Julie S. Smith	Conservative	\$9,500.00	5	02/24/2016
MFA	XXXX1239	Sally Rich	Conservative	\$5,600.00	7	03/02/2016
MFA	XXXX1240	Mike Brown	Moderate Conservative	\$4,400.00	1	03/14/2016
UMA	XXXX1241	Chris C. Foe	Aggressive	\$3,200.00	6	03/18/2016
SMA	XXXX1242	Kate M. Poe	Conservative	\$500.00	5	03/21/2016
SMA	XXXX1243	Josh Poe	Conservative	\$700.00	4	03/24/2016

firms align individual investor risk profiles to a specific managed account program, as well as track trades within a given account.

# **DOL Monitoring Report**

The DOL Monitoring Report can provide firms and their advisors a holistic view of their accounts subject to DOL monitoring, based on their managed account program. This report displays investment management fees and exceptions applied to the account including BIC exemptions for each account.

# **Transactions Report**

The Transactions Report provides information about the number of trades within a given account, along with that account's investment risk profile and date of the last trade. Similarly, firms can generate a report for accounts that have not been traded and view their last trade data.

#### **Recommended Next Steps**

Firms should be proactive with their approach to compliance with the Department of Labor's fiduciary standard. Contact Fiserv and request a DOL Common Module overview to get an early start at defining a solution for your firm. It is recommended that firms set up their environment before September 2016, particularly for customized solutions, to allow for sufficient testing and review and to ensure an implementation in time for the April 2017 deadline.

# **Connect With Us**

For more information, call 800-872-7882, email getsolutions@fiserv.com or visit www.fiserv.com.

# fiserv.

**Fiserv Inc.** 255 Fiserv Drive Brookfield, WI 53045

800-872-7882 262-879-5322 getsolutions@fiserv.com www.fiserv.com

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