

The Locate and Notify Standard

Finding a retirement plan participant pays nothing. No fee, no asset, no product. That is why the work goes undone, and why it cannot be left to goodwill. This is the standard we are asking for.

1. Make the federal registry complete.

Convert voluntary submission to the Retirement Savings Lost and Found into mandatory annual reporting tied to Form 5500. Extend eligibility below age 65. Include state and local plans.

2. A locate and notify standard before any balance moves.

No balance should be escheated, terminated by force-out, or transferred to a default IRA until the fiduciary has documented a prescribed search sequence. Set the trigger at five years without contact and require the search record to be retained and auditable.

3. Stop premature state seizure.

Support the SAFER Act of 2026, which would require confirmed death or extended verified no contact before escheatment and bar inactivity alone as a trigger. Oppose shortening dormancy periods to three years. Require states to report back to the plan when a claim is paid.

4. Fix the tax treatment.

Direct the IRS to issue withholding and reporting guidance when a balance is transferred to a state unclaimed property fund, the gap the Government Accountability Office identified in 2019 and which is still open.

5. Pay for the work.

Confirm that participant location services are a reasonable and payable plan expense, so the cost comes from plan assets rather than an advisor's unpaid hours. Require participant location activity to be disclosed in plan reporting so it is visible.

6. Data standards.

Set minimum census data standards: address verification at defined intervals, Social Security number validation, and reconciliation between payroll, human resources, and recordkeeper systems.

7. Beneficiary designations.

Require plans to confirm beneficiary designations at enrollment, at separation from service, and on a recurring cycle, and to tell the participant who is currently named. Courts have held that a plan's documents and recorded designations control.

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