



# Missing participants

## OVERVIEW

Plan sponsors have a responsibility consistent with their fiduciary obligations to the plan and its participants to implement and monitor plan processes reasonably designed to maintain complete and accurate census information, communicate with participants and beneficiaries about their eligibility for benefits, and implement effective policies and procedures to locate missing participants and beneficiaries so the plan can pay any promised benefits.

### Sample action steps for the plan sponsor to consider

The following outlines certain steps and resources that may be helpful to plan sponsors in designing and monitoring processes to maintain accurate plan records, communicate with participants regarding plan-related matters and identify and locate missing or unresponsive participants:

- 1. Maintain current address and other contact information in the plan's records**

Plan sponsors should consider designing and maintaining a process to periodically reach out to participants and beneficiaries obtain updated address and other contact information, including at the point an employee terminates service. Plan sponsors may need to search company records and the records of other benefit plans maintained by the Employer for a participant's address or their emergency contact information. In addition, plan sponsors may wish to review personnel applications, beneficiary forms, or W-2's for updated contact information.

- 2. Ask former colleagues and beneficiaries**

Check with the participant's former co-workers, beneficiaries and/or emergency contacts. Former employees may have provided updated contact information to fellow colleagues for networking purposes or in case of emergency.

- 3. Attempt to contact via the U.S. postal service or through alternate contact information**

Mail a registered letter, return receipt requested, to the last known address of the participant. Clearly mark envelopes and correspondence with the original plan or plan sponsor name which may be helpful for participants who separated before the plan or plan sponsor name changed. For example, during a corporate merger. Plan sponsors should indicate that the communication relates to pension benefit rights. In addition, plan sponsors should consider attempting to contact the lost or unresponsive participant via another available means including email addresses, telephone and text numbers and/or social media.

- 4. Use a commercial locator service, credit-reporting agency or an internet search tool**

Investigative commercial locator service firms that will assist the plan sponsor with searching for missing and unresponsive individuals. In addition, plan sponsors may consider hiring a credit-reporting agency or utilizing a proprietary interest search tool to locate missing individuals. The DOL also suggests that plan sponsors consider, as a best practice the use of free online search engines, public record databases such as those for licenses, mortgages and real estate taxes, obituaries, and social media to locate individuals.

**NOTE:** Empower conducts a LexisNexis People Locator search for any uncashed checks returned undeliverable by the U.S. Post Office. See [Uncashed Checks](#) for additional information.

---

**5. Documenting procedures:**

Plan sponsors should document their policies and procedures and key decisions in writing. Plan sponsors should conduct searches on a regular basis and consistent with the plan's operating procedures using some or all of the above search methods.

**6. DOL's missing participants - Best Practices for Pension Plans**

For more information about maintaining accurate census information, implementing effective communication strategies and conducting missing participant searches, plan fiduciaries should review [the DOL's Missing Participants Guidance](#), which includes a publication entitled, "Missing Participants - Best Practices for Pension Plans" with their plan's legal and tax advisors. A copy of the [Best Practices](#) is available on the DOL's website.

The non-discretionary recordkeeping and administrative services described in this Service Overview are general in nature and reflect the standard service offering. Service descriptions are not specific to any plan provision or administration practice. The recordkeeper may agree to provide an alternate service arrangement, as applicable, if separately requested by the Plan Sponsor.