



# Fourth Quarter 2022 Performance Update

Nevada System  
of Higher Education

February 13, 2023

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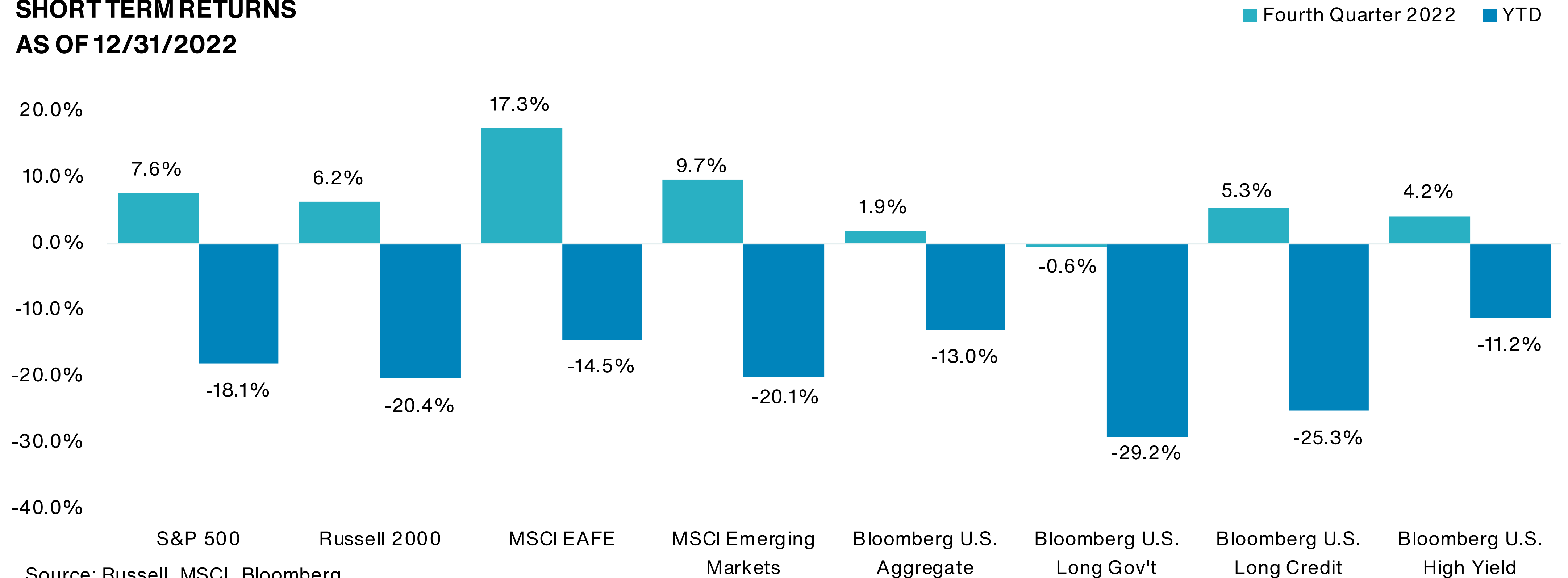
# 1

## Capital Markets Review



# Market Highlights

## SHORT TERM RETURNS AS OF 12/31/2022



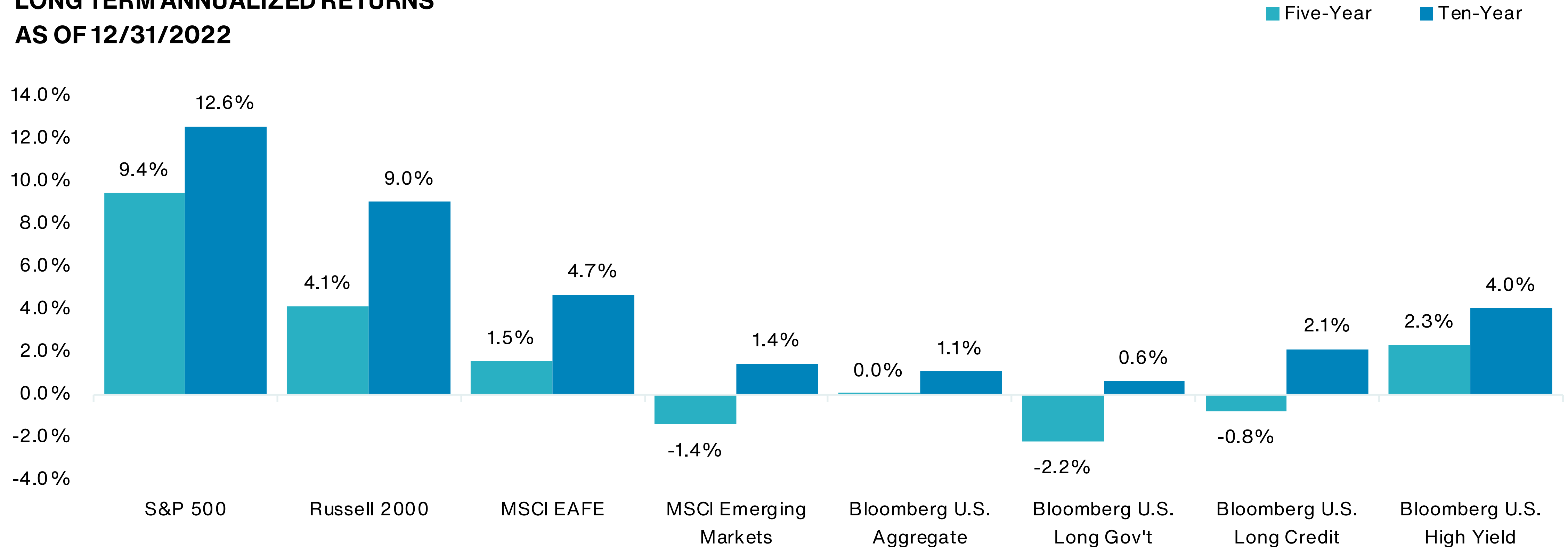
Source: Russell, MSCI, Bloomberg

MSCI Indices show net total returns throughout this report. All other indices show gross total returns.

**Past performance is no guarantee of future results.** Indices cannot be invested in directly. Unmanaged index returns assume reinvestment of any and all distributions and do not reflect fees and expenses. Please see appendix for index definitions and other general disclosures.

# Market Highlights

## LONG TERM ANNUALIZED RETURNS AS OF 12/31/2022

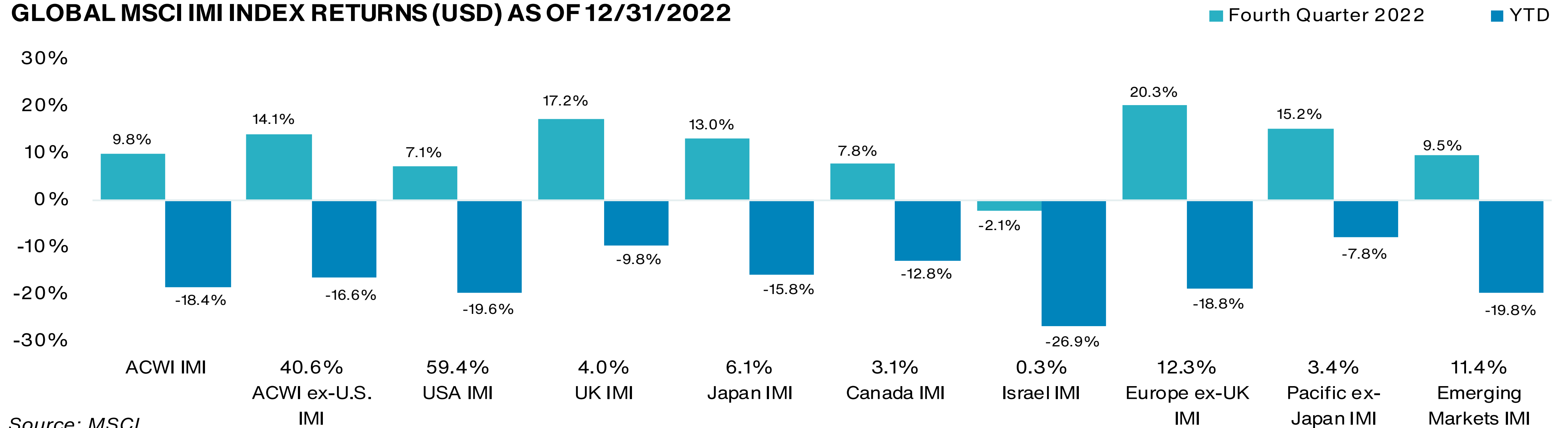


Source: Russell, MSCI, Bloomberg

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# Global Equity Markets

**GLOBAL MSCI IMI INDEX RETURNS (USD) AS OF 12/31/2022**



Source: MSCI

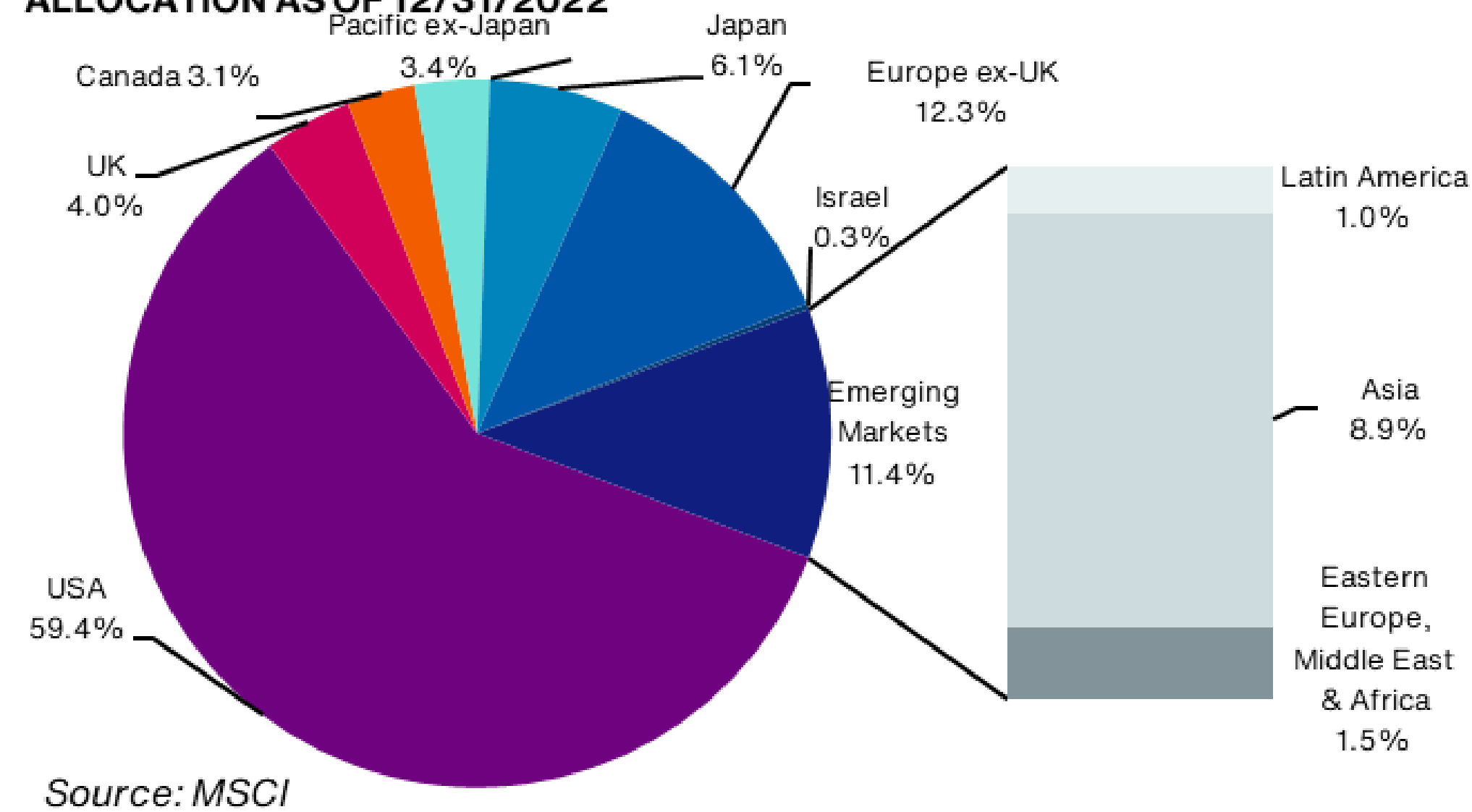
- During the fourth quarter of 2022, equity markets rebounded as concerns regarding high-interest rate abated. Volatility fell throughout the quarter as the CBOE Volatility Index (VIX) fell to 21.7 in December from 31.6 in the previous quarter, staying well above its 20-year average of 19.4. Yields trended higher with major central banks indicating continued support for aggressive monetary policy to control rising inflation. The MSCI All Country World Investable Market Index (ACWI IMI) returned 9.8% for the quarter but was down 18.4% on a year-to-date basis.
- Across international markets, generally all the regions were strong over the quarter. All regions apart from Israel posted a positive return.
- Europe ex-UK equities were the best regional performer with a return of 20.3% in US dollar terms due to sharp euro appreciation against the dollar. Economically sensitive sectors including energy, financials, industrials, and consumer discretionary outperformed.

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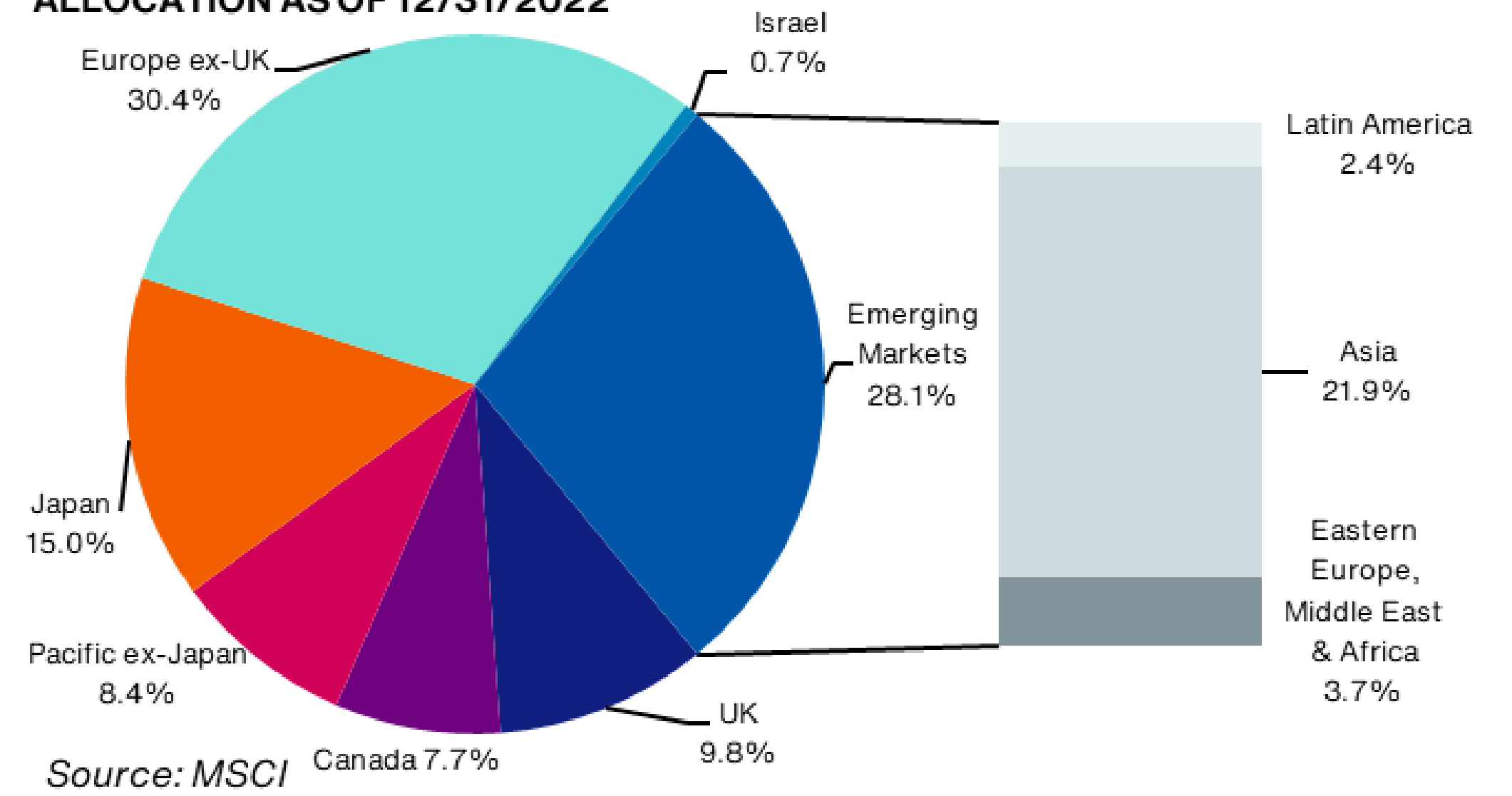
# Global Equity Markets

Below is the country/region breakdown of the global and international equity markets as measured by the MSCI All Country World IMI Index and the MSCI All Country World ex-U.S. IMI Index, respectively.

**MSCI ALL COUNTRY WORLD IMI INDEX GEOGRAPHIC ALLOCATION AS OF 12/31/2022**



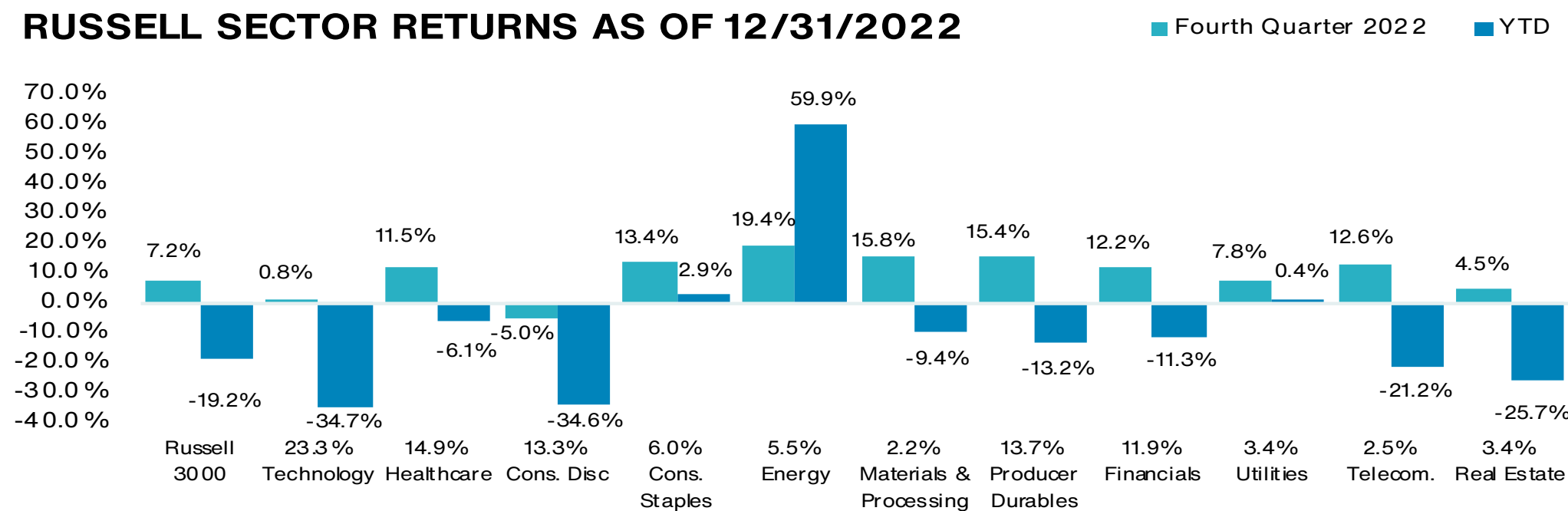
**MSCI ALL COUNTRY WORLD EX-U.S. IMI INDEX GEOGRAPHIC ALLOCATION AS OF 12/31/2022**



# U.S. Equity Markets

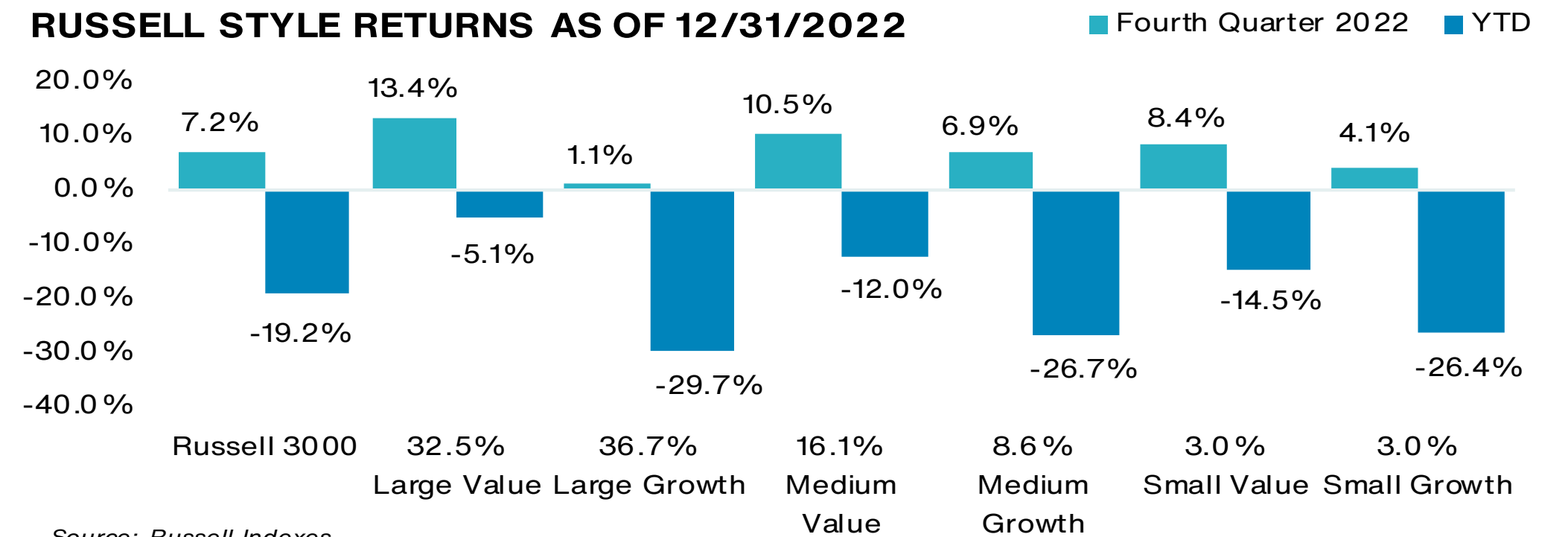
- U.S. equities experienced a strong quarter with the S&P 500 index rising 7.6%.
- In the U.S. mid-term elections, Democrats retained control over the Senate with a 51-seat majority whilst the Republicans won back control of the House of Representatives. The U.S. Congress passed a \$1.7 trillion annual spending bill to fund the U.S. government until September 2023 and avoid a government shutdown. The bill includes \$45 billion in new military and economic aid to Ukraine, nearly \$773 billion in domestic funding, and more than \$850 billion for the U.S. military.
- The U.S. economy rebounded in the third quarter after it contracted in the first half of 2022. Annualized gross domestic product rose by 2.9% during the third quarter 2022, following the 0.6% contraction rate in the previous quarter. A narrowing trade deficit contributed to the U.S. economy's expansion in the third quarter, as softening consumer demand lowered imports while exports rose, particularly in the oil sector.
- The Russell 3000 Index rose 7.2% during the fourth quarter but was down 19.2% on a year-to-date basis. Except for consumer discretionary (-5.0%), all the sectors generated positive returns. Energy (19.4%) and materials & processing (15.8%) were the best performers.
- Large-cap stocks outperformed in value and mid-cap stocks outperformed in growth.
- On a style basis, value outperformed growth across market capitalizations during the quarter and on a year-to-date basis.

**RUSSELL SECTOR RETURNS AS OF 12/31/2022**



Source: Russell Indexes

**RUSSELL STYLE RETURNS AS OF 12/31/2022**



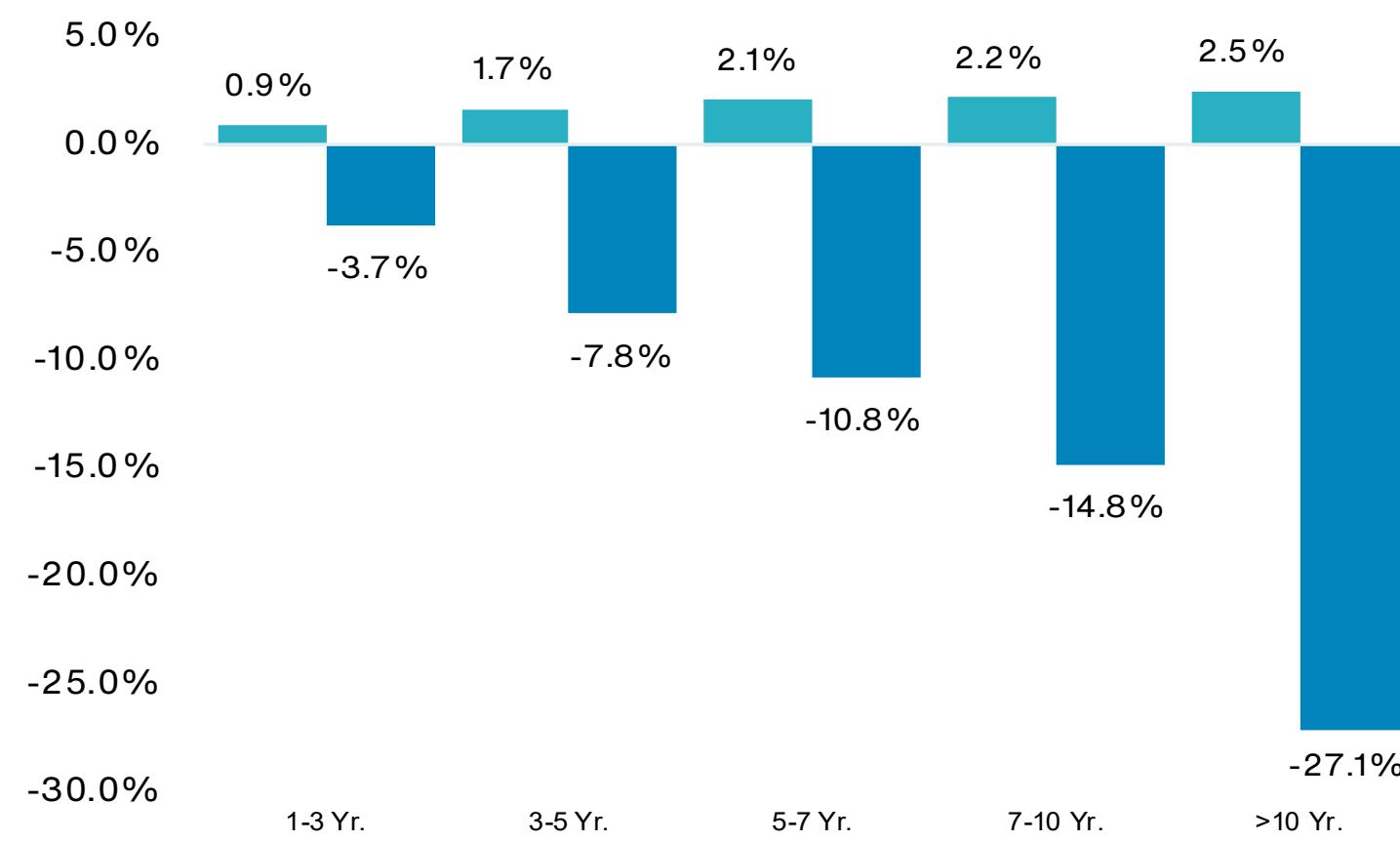
Source: Russell Indexes

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# U.S. Fixed Income Markets

**BLOOMBERG AGGREGATE RETURNS BY MATURITY AS OF 12/31/2022**



Source: FactSet

■ Fourth Quarter 2022 ■ YTD

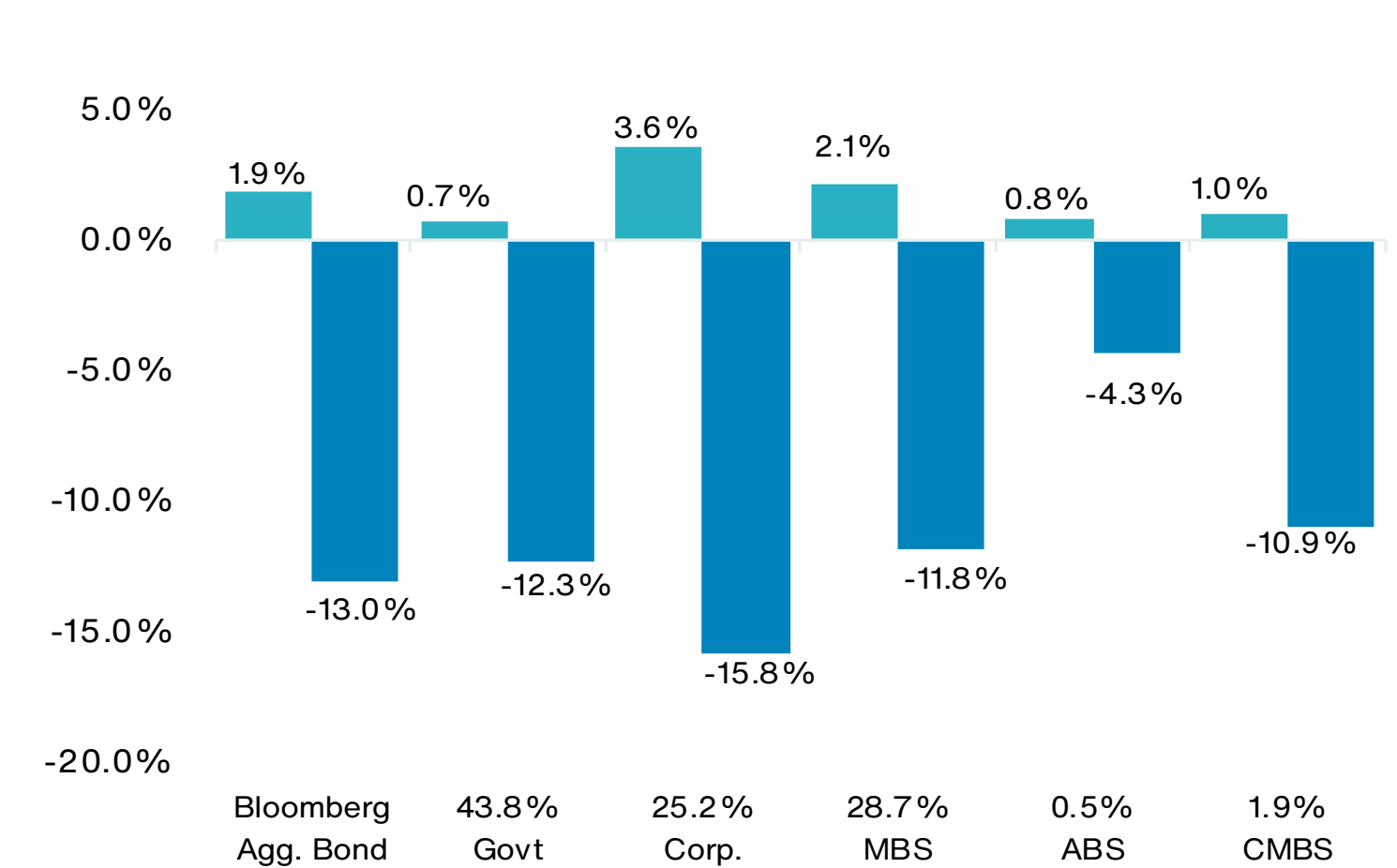
**BLOOMBERG AGGREGATE RETURNS BY QUALITY AND HIGH YIELD RETURNS AS OF 12/31/2022**



Source: FactSet

■ Fourth Quarter 2022 ■ YTD

**BLOOMBERG AGGREGATE RETURNS BY SECTOR AS OF 12/31/2022**



Source: FactSet

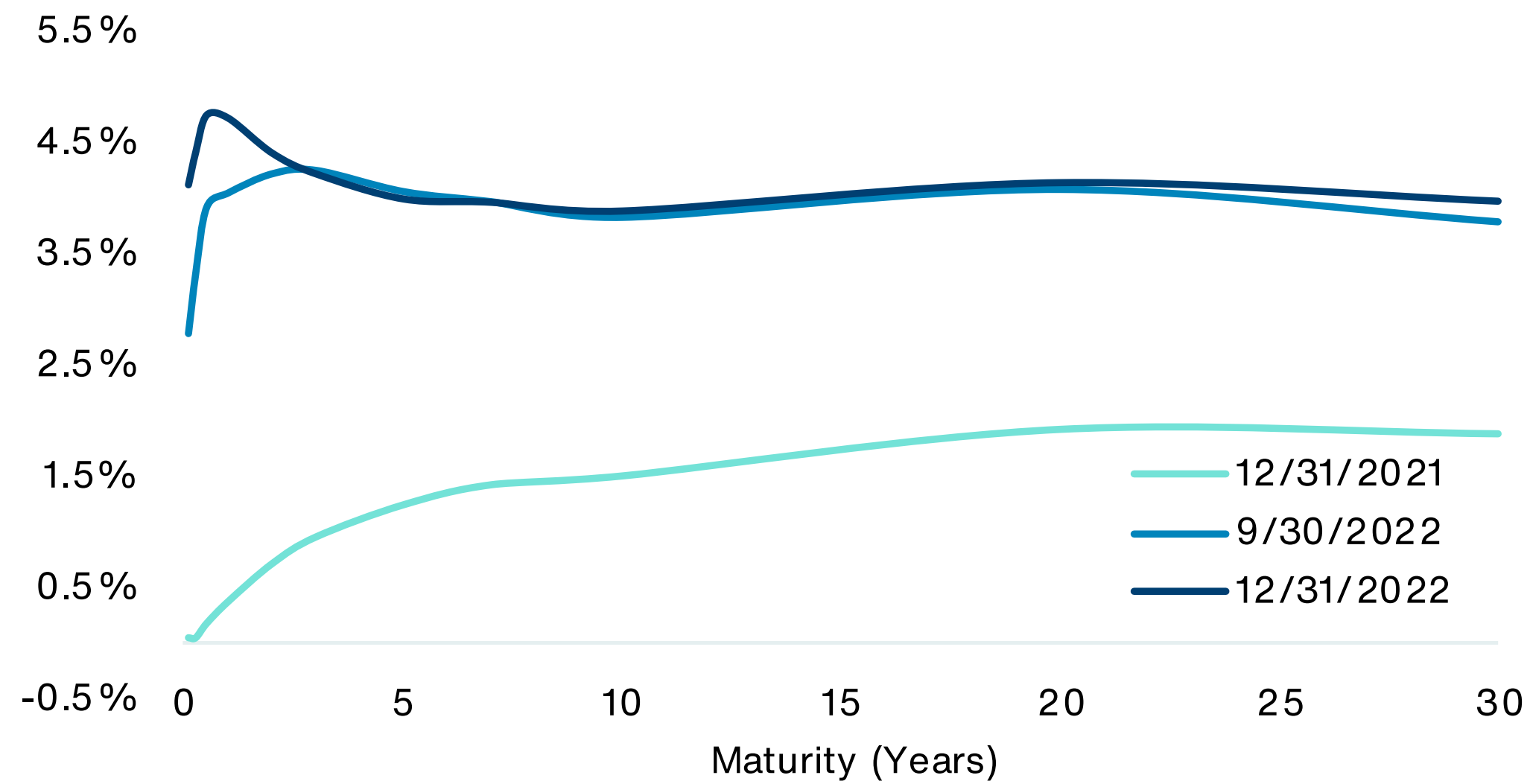
■ Fourth Quarter 2022 ■ YTD

- The U.S. Federal Reserve (Fed) increased its benchmark interest rate by 125 basis points to a range of 4.25%-4.5% during the quarter. Fed chair Jerome Powell reiterated that monetary policy needs to be restrictive enough to bring inflation under control. According to the median estimate on the Fed dot plot, officials expect the policy rate to reach 5.1% by the end of 2023, up from the 4.6% forecasted in September.
- The Bloomberg U.S. Aggregate Bond Index was up 1.9% over the quarter but was down 13.0% on a year-to-date basis.
- Across durations, all maturities finished the quarter in positive territory.
- Within investment-grade bonds, lower-credit quality generally outperformed higher-quality issues, with Baa bonds rising by 4.2%. High-yield bonds also rose by 4.2%.

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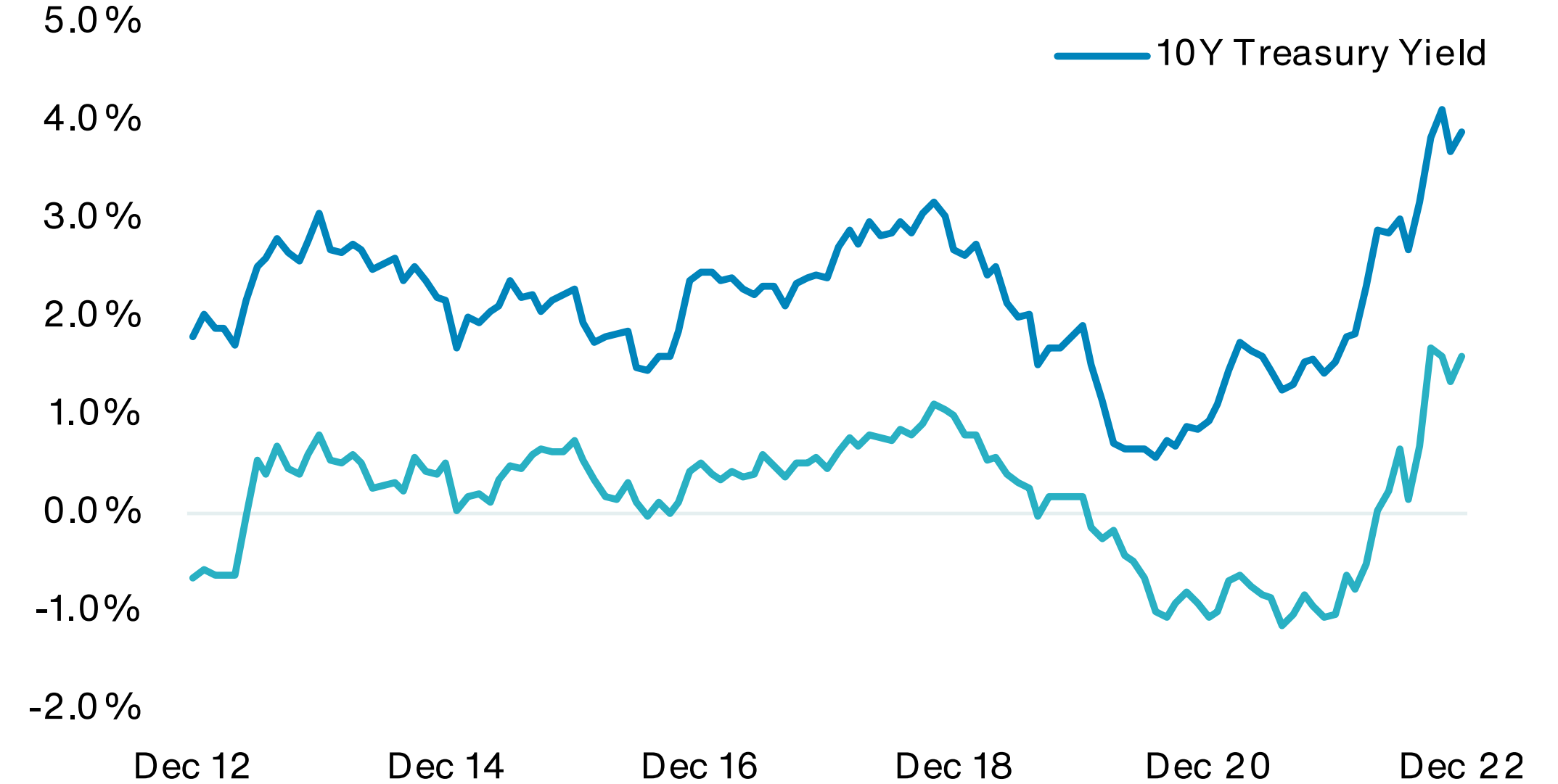
# U.S. Fixed Income Markets

## U.S. TREASURY YIELD CURVE



Source: U.S. Department of Treasury

## U.S. 10-YEAR TREASURY AND TIPS YIELDS



Source: U.S. Department of Treasury

- U.S. Treasury yields saw notable increases at shorter maturities, fell marginally at medium maturities, and rose slightly at the longer end of the curve. The 10-year Treasury yield was up 5 basis points to 3.88%, and the 30-year Treasury yield was up 18 basis points to 3.97% over the quarter.
- Inflation slowed down, driven by a fall in energy prices. The U.S. annual consumer price index (CPI) rose 7.1% year-on-year in November, down from the 7.7% recorded in October and less than economists' expectations of 7.3%.
- The 10-year TIPS yield fell by 10bps over the quarter to 1.58%.

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# Credit Spreads

Spread (bps)	12/31/2022	9/30/2022	6/30/2022	Quarterly Change (bps)	YTD Change (bps)
U.S. Aggregate	51	62	36	-11	15
Long Gov't	2	1	0	1	2
Long Credit	157	196	130	-39	27
Long Gov't/Credit	87	107	74	-20	13
MBS	51	69	31	-18	20
CMBS	120	105	68	15	52
ABS	76	53	38	23	38
Corporate	130	159	92	-29	38
High Yield	469	552	283	-83	186
Global Emerging Markets	332	403	285	-71	47

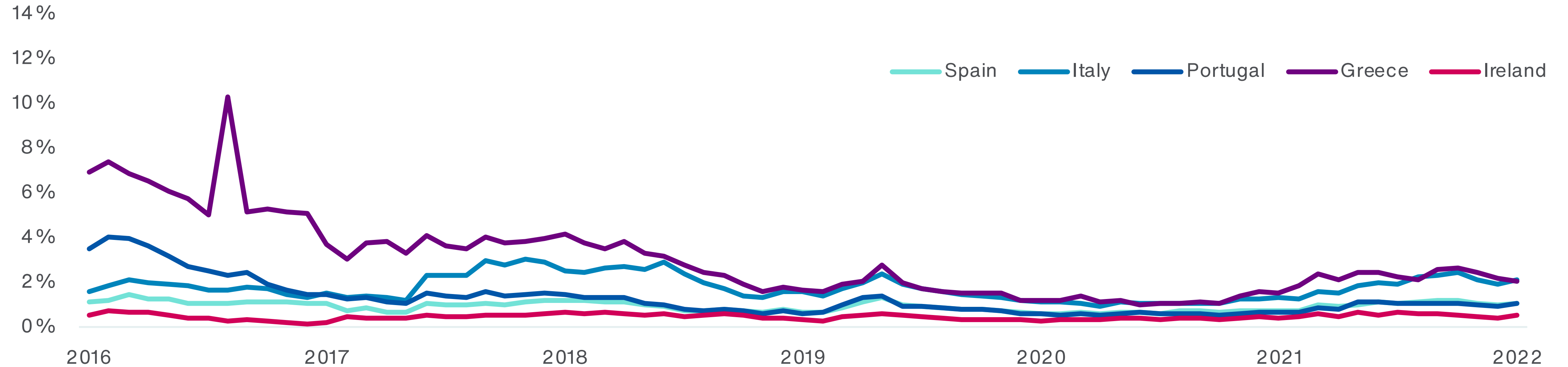
Source: FactSet, Bloomberg

- Credit markets rose amid risk-taking sentiment during the quarter, with spreads generally narrowing.
- High Yield and Global Emerging Markets spreads narrowed by 83 basis points and 71 basis points respectively while ABS and CMBS spreads widened by 23 basis points and 15 basis points , respectively.

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# European Fixed Income Markets

## EUROZONE PERIPHERAL BOND SPREADS (10-YEAR SPREADS OVER GERMAN BUNDS)



- European government bond spreads over 10-year German bunds generally narrowed across the Euro Area. The European Central Bank (ECB) raised its benchmark interest rates by 125 basis points to 2% during the quarter, the highest level in 14 years. The ECB president, Christine Lagarde, indicated further 0.5% rate increases in the next two meetings as the ECB announced plans to start shrinking the €5 trillion of bonds it purchased over the last eight years from March 2023.
- German and Portuguese government bond yields rose sharply, up 41 basis points and 40 basis points to 2.53% and 3.57% respectively over the quarter.
- Greek government bond yields fell by 20 basis points to 4.59% during the quarter.
- Eurozone annual inflation eased more than expected to 10.0% in November.

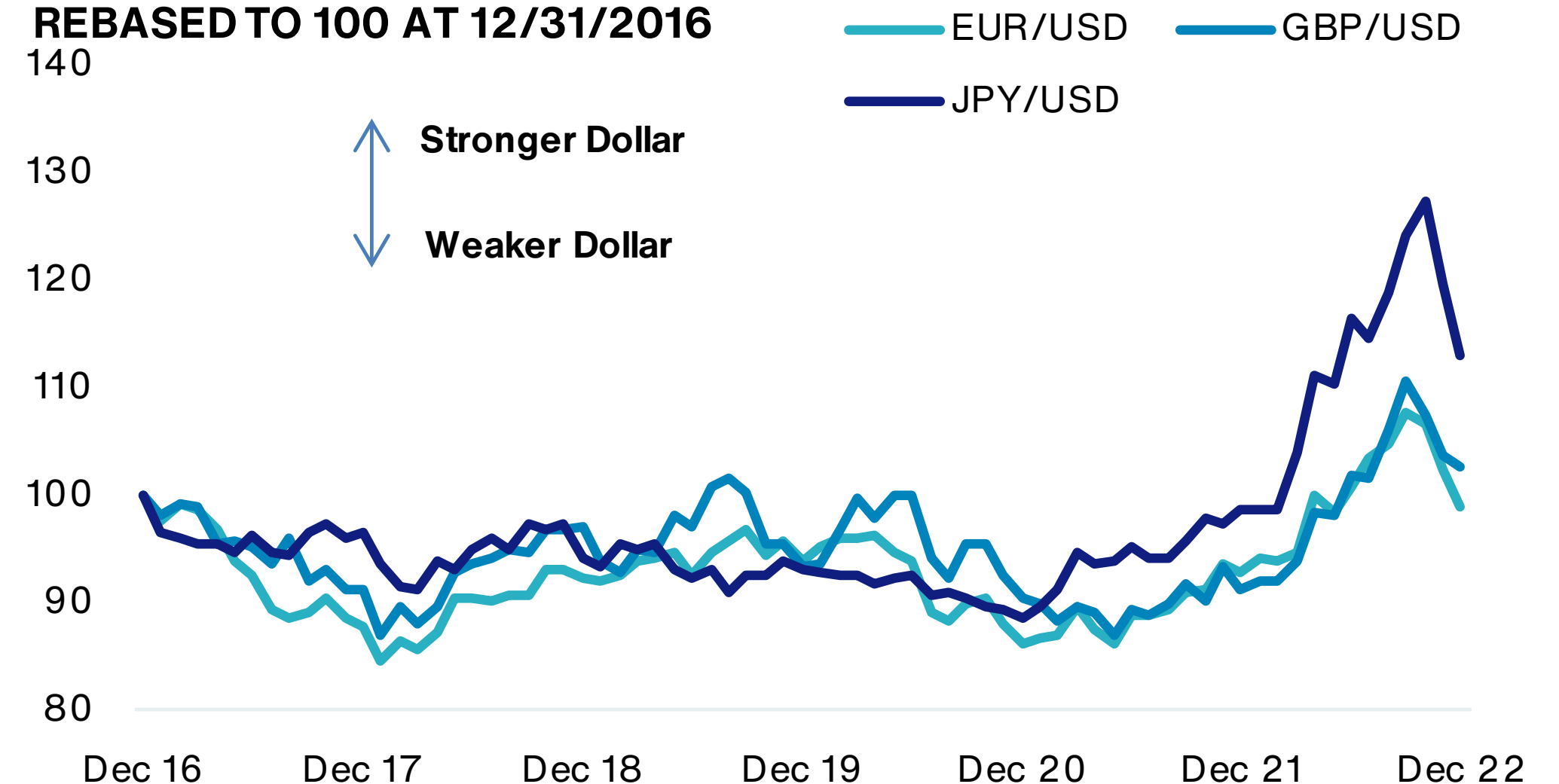
# Currency

**TRADE WEIGHTED U.S. DOLLAR INDEX  
(2006 = 100)**



Source: Federal Reserve

**U.S. DOLLAR RELATIVE TO EUR, GBP AND JPY  
REBASED TO 100 AT 12/31/2016**

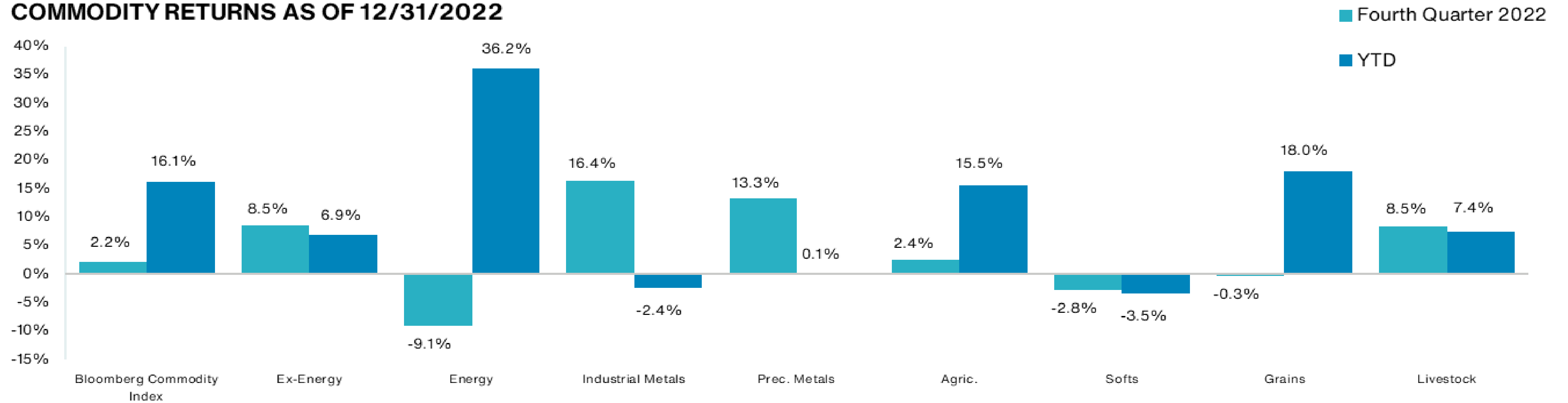


Source: FactSet

- The U.S. Dollar weakened against all major currencies during the quarter as the combination of weakening U.S. growth and falling inflation led to expectations that the Fed would cut policy rates this year faster than previously anticipated. On a trade-weighted basis, the U.S. dollar depreciated by 4.8%.
- Sterling appreciated by 7.2% against the U.S. dollar. The Bank of England (BoE) raised its benchmark interest rate by 125 basis points to 3.5% over the quarter, its highest level since 2008. The central bank expects inflation could touch 10.9% in Q4 2022. The BoE became the first major central bank to actively start to unwind quantitative easing as it sold £750 million of government bonds. The BoE plans to trim its balance sheet by £80 billion over the year.
- The U.S. dollar depreciated by 8.2% against the Euro and by 8.8% against the yen. The Bank of Japan (BoJ) unexpectedly changed its yield curve control policy by increasing the acceptable band of its 10-year government bond yields from plus or minus 0.25% to 0.5% around its target rate of zero. The BoJ made a series of government bond purchases to maintain the target band as yields rose across the curve following the announcement.

# Commodities

## COMMODITY RETURNS AS OF 12/31/2022



Source: Bloomberg Note: Softs and Grains are part of the wider Agriculture sector

- Commodity prices rose over the fourth quarter with the Bloomberg Commodity Index rising by 2.2%.
- The energy sector fell 9.1% over the quarter but has risen by 36.2% on a year-to-date basis. The price of WTI crude oil was up by 1.0% to U.S.\$80/BBL.
- Industrial metals rose the most over the quarter at 16.4%.
- Meanwhile, OPEC+ agreed to cut 2 million barrels a day in oil production to keep oil prices from falling due to weaker global demand. This cut is equivalent to 2% of global supply and threatens to further increase inflationary pressures across the globe.

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# 2

## Performance Review



# Watch List – Tier I(a)

As of December 31, 2022

	1. Underperformed During Trailing 5 Years	2. Underperformed in 3 of 4 Trailing Calendar Quarters	3. Diverged from Strategy and/or Portfolio Characteristics	4. Adverse Change in Portfolio Manager	5. Weak Manager Research Rating	6. Significant Organizational Change	Watch List Status			
							4th Quarter 2022	3rd Quarter 2022	2nd Quarter 2022	1st Quarter 2022
Vanguard Target Retirement Income Trust Plus	No	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2020 Trust Plus	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2025 Trust Plus	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2030 Trust Plus	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2035 Trust Plus	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2040 Trust Plus	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2045 Trust Plus	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2050 Trust Plus	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2055 Trust Plus	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2060 Trust Plus	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2065 Trust Plus	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2070 Trust Plus*	Yes	No	No	No	No (Buy)	No				

**Notes on Table:** Changes in Watch List designations from the previous quarter are highlighted in red.

Negative tracking of greater than 0.2% constitutes underperformance for the Plan's target date retirement funds.

**Yellow-Level Watch List.** An investment fund goes on the Watch List with a yellow designation when two of the above occur, or when item numbers 4, 5, or 6 occur.

**Orange-Level Watch List.** An investment fund goes on the Watch List with an orange designation when it has been on the yellow watch list for two consecutive quarters or when three of the above occur.

**Red-Level Watch List.** An investment fund goes on the Watch List with a red designation when it has been on the orange watchlist for two consecutive quarters or when four of the above occur.

When an investment fund

is placed on the Watch List with a red designation, a formal fund review will be conducted and a recommendation for action will be made.

\* Since-inception returns were used since this fund does not have a trailing five-year return.



# Watch List – Tier I

As of December 31, 2022

	1. Underperformed During Trailing 5 Years	2. Underperformed in 3 of 4 Trailing Calendar Quarters	3. Diverged from Strategy and/or Portfolio Characteristics	4. Adverse Change in Portfolio Manager	5. Weak Manager Research Rating	6. Significant Organizational Change	Watch List Status			
							4th Quarter 2022	3rd Quarter 2022	2nd Quarter 2022	1st Quarter 2022
Vanguard Target Retirement Income - Inv.	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2020 - Inv.	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2025 - Inv.	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2030 - Inv.	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2035 - Inv.	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2040 - Inv.	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2045 - Inv.	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2050 - Inv.	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2055 - Inv.	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2060 - Inv.	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2065 - Inv.	Yes	No	No	No	No (Buy)	No				
Vanguard Target Retirement 2070 - Inv.*	Yes	No	No	No	No (Buy)	No				

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\* Since-inception returns were used since this fund does not have a trailing five-year return.

# Watch List – Tier II

As of December 31, 2022

	1. Underperformed During Trailing 5 Years	2. Underperformed in 3 of 4 Trailing Calendar Quarters	3. Diverged from Strategy and/or Portfolio Characteristics	4. Adverse Change in Portfolio Manager	5. Weak Manager Research Rating	6. Significant Organizational Change	Watch List Status			
							4th Quarter 2022	3rd Quarter 2022	2nd Quarter 2022	1st Quarter 2022
Vanguard Total Bond Market Index Fund	No	No	No	No	No (Buy)	No				
Vanguard Total International Bond Index Fund	Yes	No	No	No	No (Buy)	No				
Vanguard Total Stock Market Index Fund	No	No	No	No	No (Buy)	No				
Vanguard Institutional Index Fund	No	No	No	No	No (Buy)	No				
Vanguard FTSE Social Index Fund	No	No	No	No	No (Buy)	No				
Vanguard Extended Market Index Fund	No	No	No	No	No (Buy)	No				
Vanguard Total International Stock Index Fund	No	No	No	No	No (Buy)	No				
Vanguard Developed Market Index Fund	No	No	No	No	No (Buy)	No				
Vanguard Emerging Markets Stock Index Fund	Yes	No	No	No	No (Buy)	No				
Vanguard Federal Money Market Fund	No	No	No	No	No (Buy)	No				
T. Rowe Price Stable Value Common Trust Fund A	Yes	No	No	No	No (Buy)	No				
TIAA Traditional - RC	No	No	No	No	No (Buy)	No				
TIAA Traditional - RCP	No	No	No	No	No (Buy)	No				
PIMCO Total Return Fund	No	Yes	No	No	No (Buy)	No				
DFA Inflation-Protected Securities	No	No	No	No	No (Buy)	No				
American Century High Income	No	No	No	No	No (Buy)	No				
T. Rowe Price Instl. Large Cap Growth Fund	Yes	Yes	No	No	No (Buy)	No				
Diamond Hill Large Cap	No	Yes	No	No	No (Buy)	No				
William Blair Small/Mid Cap Growth Fund	No	No	No	No	No (Buy)	No				
DFA U.S. Targeted Value	No	No	No	No	No (Buy)	No				
Dodge & Cox Global Stock Fund	No	No	No	No	No (Buy)	No				
GQG International Opportunities Fund	No	No	No	No	No (Buy)	No				
Cohen & Steers Instl Realty Shares	No	Yes	No	No	No (Buy)	No				

**Notes on Table:** Changes in Watch List designations from the previous quarter are highlighted in red.

Negative tracking of greater than 0.1% for domestic equities and fixed income or 0.3% for non-U.S. equities constitutes underperformance for the Plan's index funds.

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When an investment fund

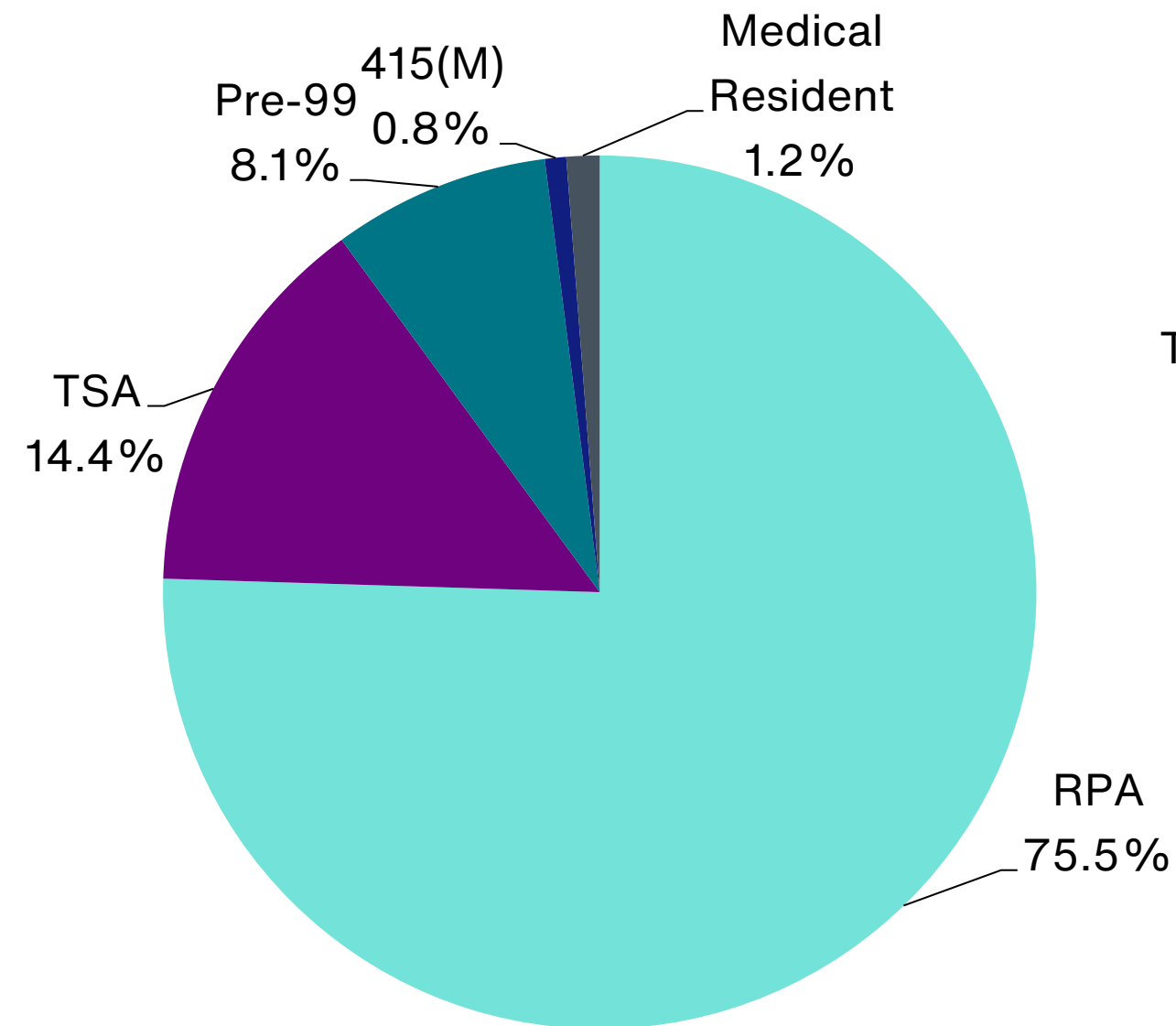
is placed on the Watch List with a red designation, a formal fund review will be conducted and a recommendation for action will be made.



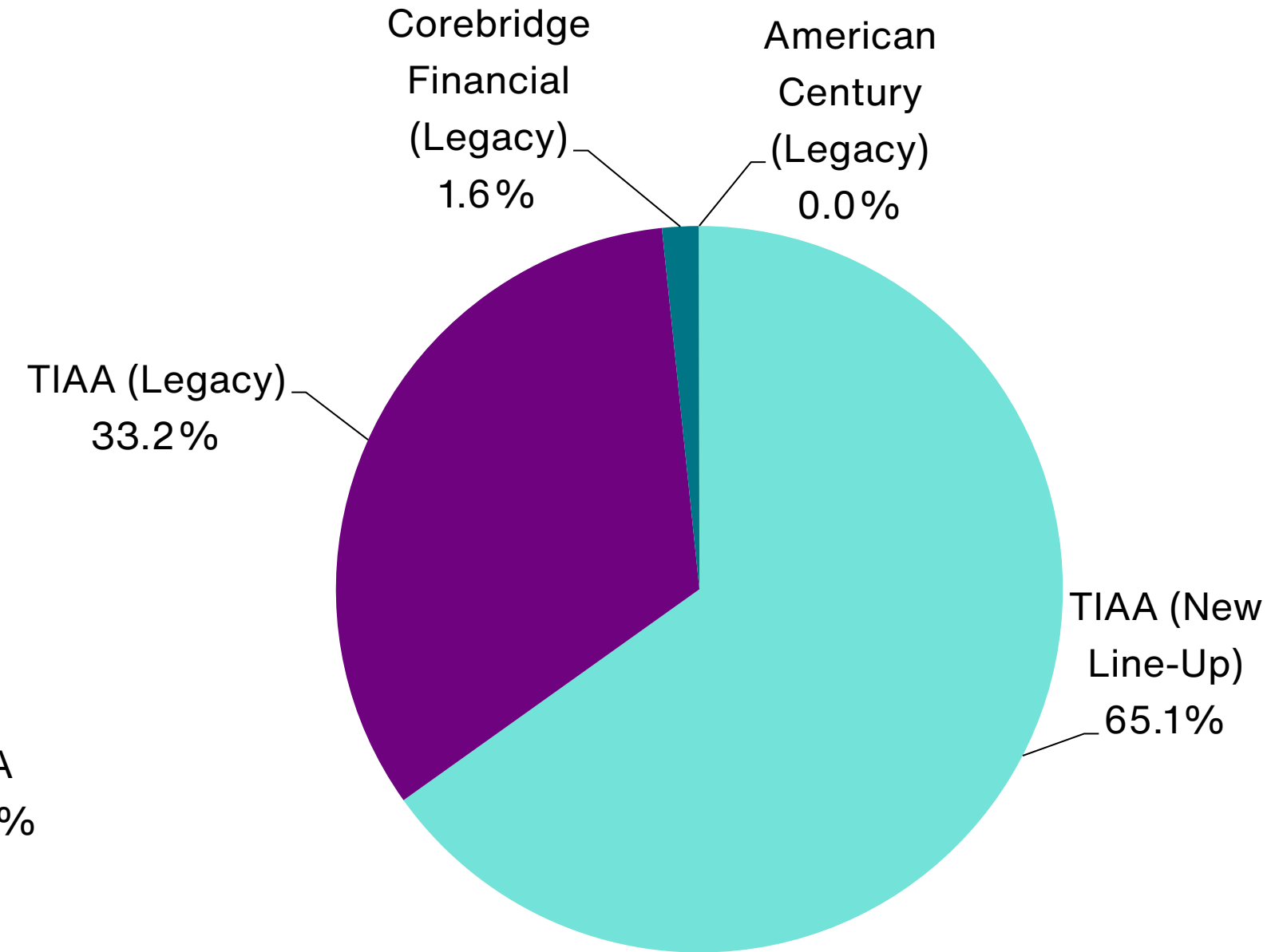
\* Since-inception returns were used since this fund does not have a trailing five-year return.

# Asset Allocation

**Assets by Plan**  
As of December 31, 2022



**Assets by Vendor**  
As of December 31, 2022



As of 12/31/2022

Plan	RPA		TSA		Pre-99		415(M)		Medical Resident		Total	
	\$	%	\$	%	\$	%	\$	%	\$	%	\$	%
TIAA (New Line-Up)	\$ 2,082,833,930	69.0%	\$ 414,890,353	71.9%	\$ 36,592,196	11.4%	\$ 30,272,359	96.0%	\$ 38,388,473	78.6%	\$ 2,602,977,310	65.1%
TIAA (Legacy)	\$ 895,502,380	29.7%	\$ 145,850,211	25.3%	\$ 284,468,628	88.4%	\$ 1,265,295	4.0%	\$ 166,335	0.3%	\$ 1,327,252,849	33.2%
Corebridge Financial (Legacy)	\$ 38,442,104	1.3%	\$ 16,421,354	2.8%	\$ -	0.0%	\$ -	0.0%	\$ 10,301,245	21.1%	\$ 65,164,703.11	1.6%
American Century (Legacy)	\$ -	0.0%	\$ -	0.0%	\$ 718,712.22	0.2%	\$ -	0.0%	\$ -	0.0%	\$ 718,712	0.0%
<b>Total</b>	<b>\$ 3,016,778,414</b>	<b>100.0%</b>	<b>\$ 577,161,919</b>	<b>100.0%</b>	<b>\$ 321,779,536</b>	<b>100.0%</b>	<b>\$ 31,537,653</b>	<b>100.0%</b>	<b>\$ 48,856,052</b>	<b>100.0%</b>	<b>\$ 3,996,113,574</b>	<b>100.0%</b>
Other Assets*											\$ 8,029,117	0.2%
<b>Grand Total</b>	<b>\$ 3,016,778,414</b>	<b>75.3%</b>	<b>\$ 577,161,919</b>	<b>14.4%</b>	<b>\$ 321,779,536</b>	<b>8.0%</b>	<b>\$ 31,537,653</b>	<b>0.8%</b>	<b>\$ 48,856,052</b>	<b>1.2%</b>	<b>\$ 4,004,142,691</b>	<b>100.0%</b>

\*Other Assets includes Loans.

# Performance Summary

As of December 31, 2022

	Allocation		Performance %							Inception Date
	Market Value \$	%	1 Quarter	1 Year	3 Years	5 Years	10 Years	Since Inception		
<b>Total Plan</b>	<b>4,004,142,691</b>	<b>100.0</b>							<b>03/01/2014</b>	
Tier I (a)	996,918,904	24.9							03/01/2014	
<b>Vanguard Target Retirement Income Trust Plus</b>	<b>49,144,908</b>	<b>1.2</b>	<b>3.8 (74)</b>	<b>-12.7 (47)</b>	<b>0.4 (55)</b>	<b>2.4 (49)</b>	<b>3.7 (65)</b>	<b>4.1 (73)</b>	<b>09/01/2011</b>	
Vanguard Target Income Composite Index			3.9 (66)	-12.4 (42)	0.7 (40)	2.6 (44)	3.9 (56)	4.3 (66)		
Peer Group Median			4.4	-12.8	0.5	2.3	4.0	4.7		
<b>Vanguard Target Retirement 2020 Trust Plus</b>	<b>74,401,025</b>	<b>1.9</b>	<b>5.0 (76)</b>	<b>-14.1 (43)</b>	<b>1.4 (59)</b>	<b>3.3 (53)</b>	<b>5.9 (45)</b>	<b>6.4 (56)</b>	<b>09/01/2011</b>	
Vanguard Target 2020 Composite Index			5.1 (69)	-13.8 (33)	1.8 (35)	3.6 (21)	6.1 (9)	6.6 (16)		
Peer Group Median			5.5	-14.3	1.6	3.3	5.9	6.4		
<b>Vanguard Target Retirement 2025 Trust Plus</b>	<b>103,881,912</b>	<b>2.6</b>	<b>6.1 (44)</b>	<b>-15.4 (57)</b>	<b>1.8 (50)</b>	<b>3.7 (41)</b>	<b>6.5 (35)</b>	<b>7.0 (39)</b>	<b>09/01/2011</b>	
Vanguard Target 2025 Composite Index			6.2 (34)	-15.0 (34)	2.2 (28)	4.0 (15)	6.8 (8)	7.2 (11)		
Peer Group Median			6.0	-15.3	1.8	3.6	6.3	6.8		
<b>Vanguard Target Retirement 2030 Trust Plus</b>	<b>150,467,966</b>	<b>3.8</b>	<b>6.8 (48)</b>	<b>-16.1 (45)</b>	<b>2.2 (61)</b>	<b>4.0 (49)</b>	<b>7.1 (34)</b>	<b>7.5 (36)</b>	<b>09/01/2011</b>	
Vanguard Target 2030 Composite Index			6.9 (38)	-15.7 (37)	2.7 (31)	4.4 (21)	7.3 (8)	7.8 (12)		
Peer Group Median			6.8	-16.3	2.4	4.0	6.7	7.2		
<b>Vanguard Target Retirement 2035 Trust Plus</b>	<b>166,495,569</b>	<b>4.2</b>	<b>7.5 (61)</b>	<b>-16.5 (38)</b>	<b>2.8 (59)</b>	<b>4.5 (47)</b>	<b>7.7 (26)</b>	<b>8.1 (33)</b>	<b>09/01/2011</b>	
Vanguard Target 2035 Composite Index			7.6 (58)	-16.1 (22)	3.2 (33)	4.8 (28)	7.9 (10)	8.3 (19)		
Peer Group Median			7.7	-17.1	2.9	4.4	7.2	7.8		
<b>Vanguard Target Retirement 2040 Trust Plus</b>	<b>161,550,365</b>	<b>4.0</b>	<b>8.2 (67)</b>	<b>-16.9 (35)</b>	<b>3.3 (49)</b>	<b>4.8 (43)</b>	<b>8.2 (19)</b>	<b>8.6 (27)</b>	<b>09/01/2011</b>	
Vanguard Target 2040 Composite Index			8.2 (65)	-16.5 (23)	3.7 (29)	5.1 (23)	8.4 (11)	8.8 (18)		
Peer Group Median			8.5	-17.7	3.2	4.8	7.6	8.1		
<b>Vanguard Target Retirement 2045 Trust Plus</b>	<b>142,519,352</b>	<b>3.6</b>	<b>8.9 (60)</b>	<b>-17.3 (33)</b>	<b>3.8 (43)</b>	<b>5.2 (39)</b>	<b>8.4 (22)</b>	<b>8.8 (34)</b>	<b>09/01/2011</b>	
Vanguard Target 2045 Composite Index			8.9 (62)	-16.9 (24)	4.2 (13)	5.5 (18)	8.7 (13)	9.0 (22)		
Peer Group Median			9.0	-18.1	3.7	5.1	8.1	8.6		
<b>Vanguard Target Retirement 2050 Trust Plus</b>	<b>90,606,333</b>	<b>2.3</b>	<b>9.2 (54)</b>	<b>-17.4 (33)</b>	<b>3.9 (44)</b>	<b>5.3 (39)</b>	<b>8.5 (21)</b>	<b>8.8 (30)</b>	<b>09/01/2011</b>	
Vanguard Target 2050 Composite Index			9.2 (58)	-17.1 (25)	4.3 (13)	5.6 (15)	8.7 (13)	9.1 (22)		
Peer Group Median			9.3	-18.1	3.8	5.2	8.1	8.6		
<b>Vanguard Target Retirement 2055 Trust Plus</b>	<b>41,074,714</b>	<b>1.0</b>	<b>9.3 (62)</b>	<b>-17.4 (26)</b>	<b>3.9 (46)</b>	<b>5.3 (39)</b>	<b>8.4 (37)</b>	<b>8.8 (43)</b>	<b>09/01/2011</b>	
Vanguard Target 2055 Composite Index			9.2 (66)	-17.1 (21)	4.3 (12)	5.6 (15)	8.7 (19)	9.1 (28)		
Peer Group Median			9.3	-18.2	3.8	5.2	8.3	8.7		
<b>Vanguard Target Retirement 2060 Trust Plus</b>	<b>15,063,878</b>	<b>0.4</b>	<b>9.3 (60)</b>	<b>-17.4 (15)</b>	<b>3.9 (39)</b>	<b>5.3 (39)</b>	<b>8.5 (37)</b>	<b>8.3 (43)</b>	<b>04/01/2012</b>	
Vanguard Target 2060 Composite Index			9.2 (66)	-17.1 (14)	4.3 (17)	5.6	8.7	8.5		
Peer Group Median			9.3	-18.4	3.9					

Note: Trust II through October 31, 2017; Trust I through October 25, 2018; Trust Plus thereafter.



# Performance Summary (cont'd.)

As of December 31, 2022

	Allocation		Performance %							Inception Date
	Market Value \$	%	1 Quarter	1 Year	3 Years	5 Years	10 Years	Since Inception		
<b>Vanguard Target Retirement 2065 Trust Plus</b>	1,712,884	0.0	9.3 (58)	-17.4 (15)	3.9 (40)	5.3		6.3	08/01/2017	
Vanguard Target 2065 Composite Index			9.2 (66)	-17.1 (14)	4.3 (17)	5.6		6.6		
Peer Group Median			9.3	-18.4	3.9					
<b>Vanguard Target Retirement 2070 Trust Plus</b>	0	0.0	9.3 (47)					-11.2 (3)	04/01/2022	
Vanguard Target 2070 Composite Index			9.2 (66)					-10.5 (1)		
Peer Group Median			9.3					-13.0		
<b>Tier I</b>	156,082,449	3.9							02/01/2014	
<b>Vanguard Target Retirement Income - Inv.</b>	18,368,117	0.5	3.7 (89)	-12.7 (49)	0.3 (53)	2.3 (40)	3.6 (75)	4.5	11/01/2003	
Vanguard Target Income Composite Index			3.9 (87)	-12.4 (38)	0.7 (37)	2.6 (29)	3.9 (70)	4.7		
Peer Group Median			5.8	-12.8	0.4	2.2	4.7			
<b>Vanguard Target Retirement 2020 - Inv.</b>	16,114,373	0.4	5.0 (78)	-14.2 (46)	1.3 (65)	3.2 (64)	5.8 (63)	5.5	07/01/2006	
Vanguard Target 2020 Composite Index			5.1 (69)	-13.8 (33)	1.8 (35)	3.6 (21)	6.1 (9)	5.7		
Peer Group Median			5.5	-14.3	1.6	3.3	5.9			
<b>Vanguard Target Retirement 2025 - Inv.</b>	24,395,412	0.6	6.0 (47)	-15.5 (62)	1.7 (54)	3.6 (61)	6.4 (42)	6.1	11/01/2003	
Vanguard Target 2025 Composite Index			6.2 (34)	-15.0 (34)	2.2 (28)	4.0 (15)	6.8 (8)	6.3		
Peer Group Median			6.0	-15.3	1.8	3.6	6.3			
<b>Vanguard Target Retirement 2030 - Inv.</b>	21,624,102	0.5	6.8 (48)	-16.3 (48)	2.1 (66)	3.9 (57)	7.0 (39)	5.9	07/01/2006	
Vanguard Target 2030 Composite Index			6.9 (38)	-15.7 (37)	2.7 (31)	4.4 (21)	7.3 (8)	6.2		
Peer Group Median			6.8	-16.3	2.4	4.0	6.7			
<b>Vanguard Target Retirement 2035 - Inv.</b>	15,909,619	0.4	7.4 (71)	-16.6 (41)	2.6 (64)	4.3 (64)	7.6 (42)	6.8	11/01/2003	
Vanguard Target 2035 Composite Index			7.6 (58)	-16.1 (22)	3.2 (33)	4.8 (28)	7.9 (10)	7.0		
Peer Group Median			7.7	-17.1	2.9	4.4	7.2			
<b>Vanguard Target Retirement 2040 - Inv.</b>	16,163,742	0.4	8.2 (67)	-17.0 (38)	3.2 (59)	4.7 (57)	8.1 (24)	6.5	07/01/2006	
Vanguard Target 2040 Composite Index			8.2 (65)	-16.5 (23)	3.7 (29)	5.1 (23)	8.4 (11)	6.8		
Peer Group Median			8.5	-17.7	3.2	4.8	7.6			
<b>Vanguard Target Retirement 2045 - Inv.</b>	15,161,149	0.4	8.9 (61)	-17.4 (35)	3.7 (47)	5.1 (45)	8.3 (28)	7.3	11/01/2003	
Vanguard Target 2045 Composite Index			8.9 (62)	-16.9 (24)	4.2 (13)	5.5 (18)	8.7 (13)	7.5		
Peer Group Median			9.0	-18.1	3.7	5.1	8.1			
<b>Vanguard Target Retirement 2050 - Inv.</b>	15,841,020	0.4	9.2 (55)	-17.5 (33)	3.8 (49)	5.2 (47)	8.4 (25)	6.7	07/01/2006	
Vanguard Target 2050 Composite Index			9.2 (58)	-17.1 (25)	4.3 (13)	5.6 (15)	8.7 (13)	6.9		
Peer Group Median			9.3	-18.1	3.8	5.2	8.1			

Note: Trust II through October 31, 2017; Trust I through October 25, 2018; Trust Plus thereafter.



# Performance Summary (cont'd.)

As of December 31, 2022

	Allocation		Performance %							
	Market Value \$	%	1 Quarter	1 Year	3 Years	5 Years	10 Years	Since Inception	Inception Date	
<b>Vanguard Target Retirement 2055 - Inv.</b>	10,600,009	0.3	9.2 (64)	-17.5 (29)	3.8 (53)	5.2 (56)	8.3 (45)	9.3	09/01/2010	
Vanguard Target 2055 Composite Index			9.2 (66)	-17.1 (21)	4.3 (12)	5.6 (15)	8.7 (19)	9.6		
Peer Group Median			9.3	-18.2	3.8	5.2	8.3			
<b>Vanguard Target Retirement 2060 - Inv.</b>	1,662,896	0.0	9.2 (64)	-17.5 (17)	3.8 (66)	5.2	8.3	8.6	02/01/2012	
Vanguard Target 2060 Composite Index			9.2 (66)	-17.1 (14)	4.3 (17)	5.6	8.7	8.9		
Peer Group Median			9.3	-18.4	3.9					
<b>Vanguard Target Retirement 2065 - Inv.</b>	242,010	0.0	9.2 (62)	-17.4 (15)	3.8 (70)	5.2		6.2	08/01/2017	
Vanguard Target 2065 Composite Index			9.2 (66)	-17.1 (14)	4.3 (17)	5.6		6.6		
Peer Group Median			9.3	-18.4	3.9					
<b>Vanguard Target Retirement 2070 - Inv.</b>	0	0.0	9.2 (66)					2.0 (67)	07/01/2022	
Vanguard Target 2070 Composite Index			9.2 (66)					2.4 (42)		
Peer Group Median			9.3					2.4		
<b>Tier II</b>	1,422,630,998	35.5							03/01/2014	
<b>Vanguard Total Bond Market Index Fund - Inst.</b>	61,796,105	1.5	1.7 (64)	-13.1 (37)	-2.7 (60)	0.0 (58)	1.0 (70)	4.2 (30)	10/01/1995	
Performance Benchmark			1.9 (41)	-13.1 (32)	-2.7 (57)	0.1 (52)	1.1 (61)	4.3 (13)		
<b>Vanguard Total International Bond Index Fund - Adm.</b>	4,029,350	0.1	0.0 (90)	-12.9 (50)	-3.8 (42)	-0.2 (28)		1.6 (8)	06/01/2013	
Blmbg. Global Agg ex-USD Fit Adj RIC Cpd (H)			0.1 (89)	-12.7 (47)	-3.6 (36)	0.0 (25)	1.9	1.8 (5)		
<b>Vanguard Total Stock Market Index Fund - Inst.</b>	71,423,113	1.8	7.2 (56)	-19.5 (51)	7.0 (46)	8.7 (52)	12.1 (41)	7.8 (25)	08/01/1997	
Performance Benchmark			7.1 (56)	-19.5 (51)	7.0 (46)	8.7 (52)	12.1 (41)	7.8 (25)		
<b>Vanguard Institutional Index Fund - Inst. Plus</b>	220,123,965	5.5	7.6 (25)	-18.1 (22)	7.6 (15)	9.4 (7)	12.6 (1)	7.6 (1)	08/01/1997	
S&P 500 Index			7.6 (17)	-18.1 (7)	7.7 (10)	9.4 (1)	12.6 (1)	7.6 (3)		
<b>Vanguard FTSE Social Index Fund - Inst.</b>	8,488,308	0.2	5.2 (69)	-24.1 (66)	6.0 (64)	9.0 (45)	12.9 (19)	5.5 (74)	06/01/2000	
FTSE 4Good U.S. Select Index			5.2 (69)	-24.1 (66)	6.0 (64)	9.1 (43)	13.1 (14)			
S&P 500 Index			7.6 (50)	-18.1 (41)	7.7 (30)	9.4 (33)	12.6 (25)	6.5 (35)		
<b>Vanguard Extended Market Index Fund - Inst.</b>	72,467,019	1.8	5.1 (63)	-26.5 (44)	3.0 (74)	4.9 (83)	9.6 (80)	7.9	08/01/1997	
Performance Benchmark			5.1 (63)	-26.5 (44)	2.9 (76)	4.8 (83)	9.5 (82)			
<b>Vanguard Total International Stock Index Fund - Inst.</b>	13,218,382	0.3	14.7 (67)	-16.0 (42)	0.5 (65)	1.1 (75)	4.1 (70)	4.2 (71)	12/01/2010	
Performance Benchmark			14.1 (73)	-16.1 (44)	0.5 (65)	1.1 (75)	4.2 (66)	4.2 (70)		

# Performance Summary (cont'd.)

As of December 31, 2022

	Allocation		Performance %							
	Market Value \$	%	1 Quarter	1 Year	3 Years	5 Years	10 Years	Since Inception	Inception Date	
<b>Vanguard Developed Market Index Fund - Inst.</b>	94,115,105	2.4	17.1 (30)	-15.3 (39)	1.3 (44)	1.7 (64)	4.9 (35)	5.2 (35)	02/01/2010	
Performance Benchmark			16.3 (43)	-15.6 (41)	1.2 (48)	1.6 (66)	5.0 (35)	5.0 (41)		
<b>Vanguard Emerging Markets Stock Index Fund - Inst.</b>	49,974,532	1.2	8.2 (75)	-17.7 (34)	-1.5 (40)	-0.3 (31)	1.6 (46)	6.2 (48)	07/01/2000	
Performance Benchmark			8.2 (76)	-17.6 (33)	-1.1 (35)	-0.2 (28)	1.8 (38)	6.3 (46)		
<b>Vanguard Federal Money Market Fund - Inv.</b>	51,212,118	1.3	0.9 (42)	1.6 (38)	0.7 (31)	1.2 (26)	0.7 (24)	2.7 (29)	11/01/1989	
FTSE 3 Month T-Bill			0.9 (43)	1.5 (51)	0.7 (23)	1.2 (20)	0.7 (20)	2.6 (41)		
<b>T. Rowe Price Stable Value Common Trust Fund A</b>	19,951,304	0.5	0.5 (56)	1.7 (31)	1.8 (23)	2.0 (32)	1.9 (20)	4.4	10/01/1988	
Morningstar Stable Value Index			0.6 (29)	1.9 (14)	2.0 (12)	2.1 (12)	2.0 (19)	4.6		
<b>TIAA Traditional - RC</b>	211,042,411	5.3	1.1 (6)	4.2 (1)	3.9 (1)	4.0 (1)	4.1 (1)	4.3 (1)	08/01/2005	
Morningstar Stable Value Index			0.6 (29)	1.9 (14)	2.0 (12)	2.1 (12)	2.0 (19)	2.7 (9)		
<b>TIAA Traditional - RCP</b>	105,513,811	2.6	0.9 (10)	3.4 (1)	3.2 (1)	3.2 (1)	3.4 (1)	3.6 (1)	06/01/2006	
Morningstar Stable Value Index			0.6 (29)	1.9 (14)	2.0 (12)	2.1 (12)	2.0 (19)	2.6 (10)		
<b>PIMCO Total Return Fund - Inst.</b>	24,728,791	0.6	1.8 (49)	-14.1 (77)	-2.5 (43)	0.0 (56)	1.1 (56)	6.3	06/01/1987	
Blmbg. U.S. Aggregate			1.9 (40)	-13.0 (30)	-2.7 (59)	0.0 (57)	1.1 (64)	5.5		
<b>DFA Inflation-Protected Securities Portfolio - I</b>	38,805,899	1.0	2.0 (45)	-12.2 (75)	1.1 (51)	2.1 (49)	1.0 (46)	3.5 (38)	10/01/2006	
Blmbg. Global Inflation-Linked: U.S. TIPS			2.0 (40)	-11.8 (53)	1.2 (50)	2.1 (46)	1.1 (32)	3.4 (55)		
<b>American Century High Income - Y</b>	41,370,296	1.0	4.4 (30)	-11.2 (62)	0.7 (29)	2.4 (29)	4.4 (12)	4.4 (12)	01/01/2013	
ICE BofAML US High Yield Master II Constrained			4.0 (57)	-11.2 (63)	-0.3 (57)	2.1 (42)	3.9 (27)	3.9 (27)		
<b>T. Rowe Price Instl. Large Cap Growth Fund</b>	42,273,853	1.1	-0.2 (82)	-35.2 (79)	3.7 (74)	8.4 (65)	13.9 (12)	9.9 (3)	11/01/2001	
Russell 1000 Growth Index			2.2 (58)	-29.1 (37)	7.8 (15)	11.0 (15)	14.1 (8)	8.9 (17)		
<b>Diamond Hill Large Cap - Y</b>	59,116,042	1.5	11.0 (88)	-13.3 (90)	6.0 (73)	7.4 (62)	11.5 (22)	11.6 (29)	01/01/2012	
Russell 1000 Value Index			12.4 (65)	-7.5 (62)	6.0 (73)	6.7 (75)	10.3 (66)	10.9 (57)		
<b>William Blair Small/Mid Cap Growth Fund - I</b>	30,523,795	0.8	9.0 (11)	-22.9 (37)	3.5 (61)	7.2 (28)	12.2 (5)	10.0 (7)	01/01/2004	
Russell 2500 Growth Index			4.7 (66)	-26.2 (56)	2.9 (66)	6.0 (49)	10.6 (37)	9.0 (37)		
<b>DFA U.S. Targeted Value - I</b>	60,316,015	1.5	12.6 (56)	-4.6 (34)	11.2 (23)	7.0 (38)	10.5	10.8	03/01/2000	
Russell 2500 Value Index			9.2 (80)	-13.1 (68)	5.2 (90)	4.8 (89)	8.9	9.3		

# Performance Summary (cont'd.)

As of December 31, 2022

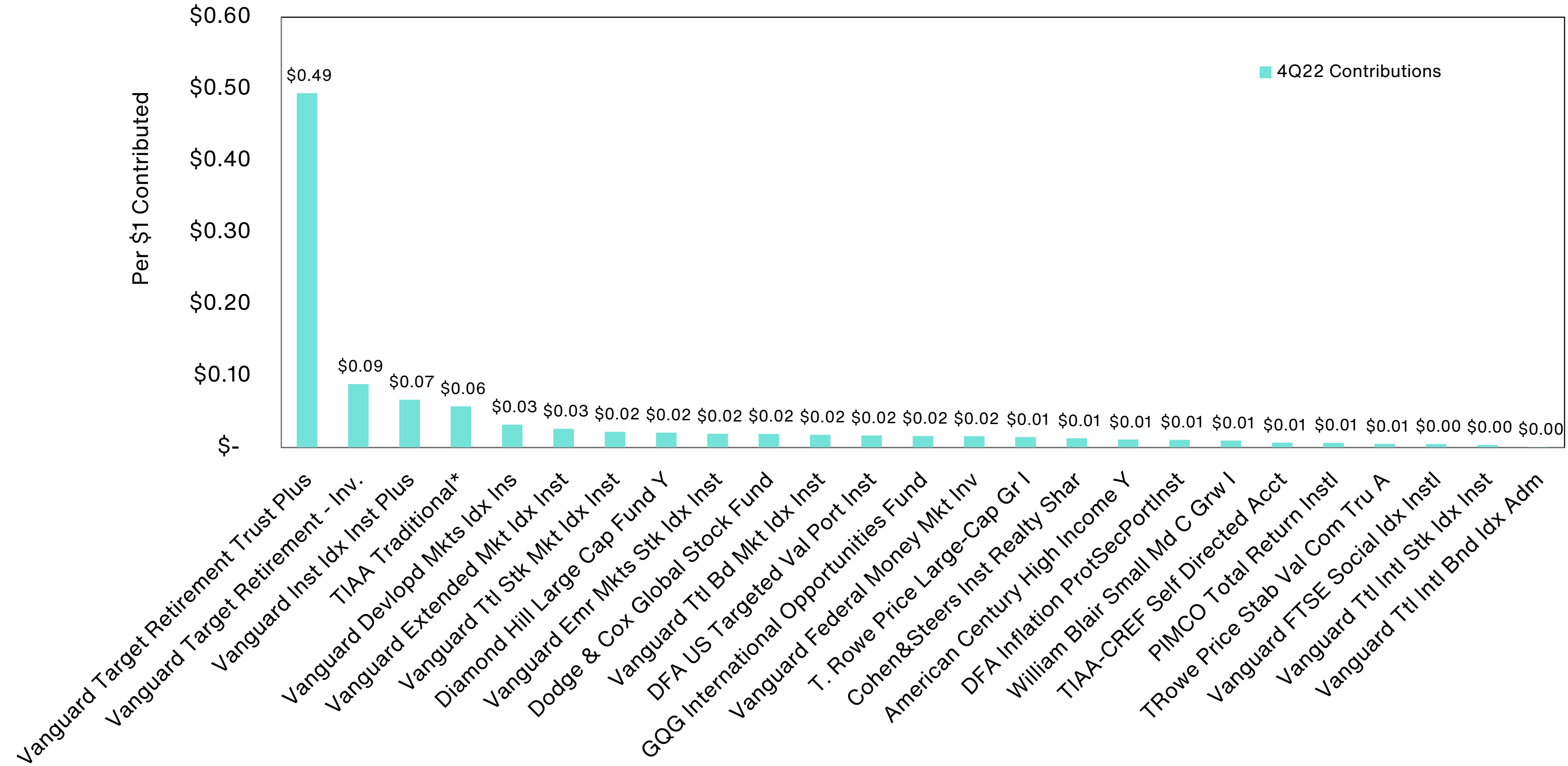
	Allocation		Performance %							Inception Date
	Market Value \$	%	1 Quarter	1 Year	3 Years	5 Years	10 Years	Since Inception		
Dodge & Cox Global Stock Fund - X	54,161,076	1.4	13.2 (24)	-5.7 (15)	6.5 (20)	5.5 (37)	9.3 (18)	7.1 (21)	07/01/2008	
MSCI AC World Index (Net)			9.8 (58)	-18.4 (49)	4.0 (47)	5.2 (42)	8.0 (44)	5.8 (51)		
GQG International Opportunities Fund	51,368,443	1.3	13.8 (79)	-11.0 (20)	5.0 (5)	6.8 (1)		9.9 (1)	06/01/2016	
MSCI AC World ex USA Index (Net)			14.3 (75)	-16.0 (53)	0.1 (67)	0.9 (62)	3.8	5.0 (46)		
Cohen and Steers Instl. Realty Shares	36,611,265	0.9	3.7 (62)	-24.7 (26)	1.5 (17)	5.9 (4)	8.0 (6)	10.8 (1)	03/01/2000	
FTSE NAREIT Equity REIT Index			5.2 (11)	-24.4 (19)	-0.1 (51)	3.7 (57)	6.5 (32)	9.8 (39)		
Tier III	27,344,959	0.7							03/01/2014	
Mutual Fund Window	27,344,959	0.7								
Orphan Accounts	1,393,136,264	34.8								
TIAA Orphan Accounts	1,327,252,849	33.1								
Corebridge Financial (AIG) Orphan Accounts	65,164,703	1.6								
American Century Orphan Accounts	718,712	0.0								
Other Assets	8,029,117	0.2							03/01/2014	
Loans	6,149,694	0.2								
Loans Deemed Distributed	529,590	0.0								
Plan Loan Default Fund	1,349,833	0.0								



# Total Plan Contributions

As of December 31, 2022

Contributed Funds



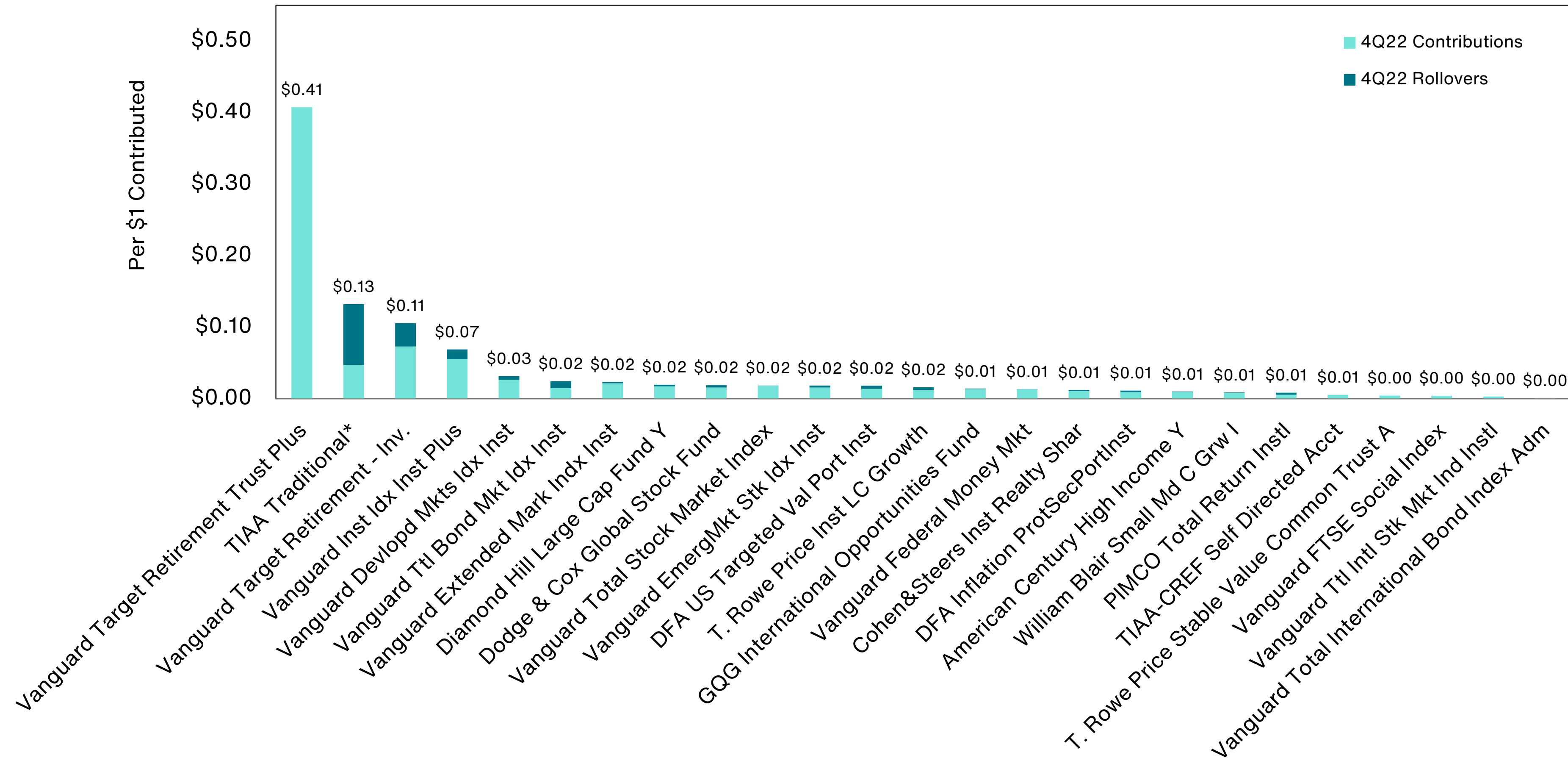
\*TIAA RC 82% / TIAA RCP 18% Contribution Split



# Total Plan Contributions (Including Rollovers)

As of December 31, 2022

Contributed Funds (Including Rollovers)



\*TIAA RC 29% / TIAA RCP 71% Contribution Split  
Note: Includes Contributions and Rollovers



# Quarterly Participant Transfers

As of December 31, 2022

Investment	Transfers In	Transfers Out	Net Transfers	Ending Balance (12/31/2022)	Number of Participants
Vanguard Target Retirement Trust Plus Funds	\$2,290,580	(\$13,557,846)	(\$11,267,265)	\$996,918,904	3,973
Vanguard Target Retirement Mutual Funds	\$175,979	(\$3,002,478)	(\$2,826,499)	\$156,082,449	1,670
Vanguard Total Bond Market Index Inst	\$2,351,624	(\$944,590)	\$1,407,034	\$61,796,105	1,179
Vanguard Total Int'l Bond Index Fund Adm	\$397,751	(\$282,154)	\$115,597	\$4,029,350	159
Vanguard Total Stock Market Index Inst	\$3,105,989	(\$816,969)	\$2,289,021	\$71,423,113	375
Vanguard Institutional Index Inst	\$6,062,416	(\$3,466,301)	\$2,596,114	\$220,123,965	1,957
Vanguard FTSE Social Index Fund Inst	\$163,739	(\$234,290)	(\$70,552)	\$8,488,308	97
Vanguard Extended Market Index Inst	\$998,168	(\$1,555,475)	(\$557,306)	\$72,467,019	1,630
Vanguard Total International Stock Index Inst	\$266,119	(\$91,780)	\$174,339	\$13,218,382	138
Vanguard Developed Markets Index Ins	\$4,229,289	(\$453,796)	\$3,775,494	\$94,115,105	1,630
Vanguard Emerging Markets Stock Index Inst	\$1,690,238	(\$365,067)	\$1,325,172	\$49,974,532	1,705
Vanguard Federal Money Market Inv	\$5,351,856	(\$3,644,914)	\$1,706,942	\$51,212,118	206
T. Rowe Price Stable Value Common Trust A	\$836,048	(\$210,651)	\$625,397	\$19,951,304	497
TIAA Traditional	\$5,716,828	(\$4,519,405)	\$1,197,424	\$316,556,222	1,733
PIMCO Total Return Instl	\$242,524	(\$499,705)	(\$257,181)	\$24,728,791	512
DFA Inflation Protected Securities Portfolio Inst	\$1,049,667	(\$1,781,733)	(\$732,066)	\$38,805,899	1,094
American Century High Income	\$638,850	(\$1,150,159)	(\$511,309)	\$41,370,296	927
T. Rowe Price Inst LC Growth	\$267,460	(\$1,146,073)	(\$878,613)	\$42,273,853	344
Diamond Hill Large Cap Fund Y	\$2,459,845	(\$920,181)	\$1,539,665	\$59,116,042	1,492
William Blair Small Md C Grw I	\$716,563	(\$722,175)	(\$5,612)	\$30,523,795	899
DFA US Targeted Val Port Inst	\$2,023,833	(\$549,381)	\$1,474,452	\$60,316,015	1,565
Dodge & Cox Global Stock Fund	\$54,854,342	(\$54,447,150)	\$407,193	\$54,161,076	1,289
GQG International Opportunities Fund	\$397,091	(\$1,605,955)	(\$1,208,864)	\$51,368,443	1,343
Cohen & Steers Inst Realty Shares	\$576,890	(\$369,546)	\$207,345	\$36,611,265	1,734
Mutual Fund Window	\$667,191	(\$1,193,111)	(\$525,920)	\$27,344,959	49
<b>Total</b>	<b>\$97,530,883</b>	<b>(\$97,530,883)</b>	<b>\$0</b>	<b>\$2,602,977,310</b>	

Source: TIAA



# Historical Quarterly Participant Transfers

As of December 31, 2022

Investment	1Q21		2Q21		3Q21		4Q21		1Q22		2Q22		3Q22		4Q22	
	Net Transfers (\$M)	# of Part.	Net Transfers (\$M)	# of Part.	Net Transfers (\$M)	# of Part.	Net Transfers (\$M)	# of Part.	Net Transfers (\$M)	# of Part.	Net Transfers (\$M)	# of Part.	Net Transfers (\$M)	# of Part.	Net Transfers (\$M)	# of Part.
Vanguard Target Retirement Trust Plus	-\$16.52	4,157	-\$17.27	4,009	-\$9.74	4,210	-\$14.20	4,030	-\$20.77	4,134	-\$19.99	3,977	-\$14.26	4,273	-\$11.27	3,973
Vanguard Target Retirement Mutual Funds	-\$4.57	1,623	-\$2.10	1,596	-\$2.80	1,815	-\$1.77	1,771	-\$4.10	1,508	-\$2.90	1,596	-\$2.14	1,774	-\$2.83	1,670
Vanguard Total Bond Market Index Inst	-\$0.47	1,073	\$0.38	1,059	\$0.24	1,066	\$0.57	1,043	\$1.67	1,082	\$1.08	1,137	\$1.32	1,190	\$1.41	1,179
Vanguard Total Int'l Bond Index Fund Adm	\$1.51	120	\$0.46	152	\$0.42	169	\$0.28	196	\$0.49	201	-\$0.60	192	-\$0.30	168	\$0.12	159
Vanguard Total Stock Market Index Inst	\$0.93	460	-\$0.08	440	\$0.06	444	-\$0.45	424	-\$0.45	425	\$0.17	409	-\$0.36	398	\$2.29	375
Vanguard Institutional Index Inst	-\$2.49	1,701	-\$0.73	1,724	-\$4.97	1,775	\$0.33	1,755	-\$0.90	1,852	\$3.60	1,918	\$2.12	1,992	\$2.60	1,957
Vanguard FTSE Social Index Fund	\$0.61	69	\$0.52	71	\$0.36	88	\$1.51	93	\$0.51	105	-\$0.32	105	-\$0.34	100	-\$0.07	97
Vanguard Extended Market Index Inst	\$6.72	1,309	\$2.54	1,361	\$1.76	1,416	\$2.36	1,424	\$2.06	1,506	\$0.02	1,570	\$0.01	1,641	-\$0.56	1,630
Vanguard Total International Stock Index Inst	-\$0.12	160	\$0.09	151	\$0.09	157	\$0.15	145	\$0.29	145	\$0.02	145	-\$0.10	148	\$0.17	138
Vanguard Developed Markets Index Ins	\$0.15	1,317	\$0.38	1,342	\$1.13	1,394	\$3.19	1,407	\$4.23	1,499	\$6.38	1,573	\$4.66	1,653	\$3.78	1,630
Vanguard Emerging Markets Stock Index Inst	\$1.11	1,447	\$0.15	1,482	\$0.13	1,524	\$0.54	1,520	\$1.19	1,604	\$1.56	1,663	\$1.15	1,729	\$1.33	1,705
Vanguard Federal Money Market Inv	-\$4.26	213	-\$1.57	185	\$1.81	188	-\$1.69	185	\$3.52	176	\$2.36	177	\$2.37	193	\$1.71	206
T. Rowe Price Stable Value Common Trust A	\$0.74	389	\$1.10	396	\$0.59	416	\$0.81	396	\$1.16	448	\$2.04	481	\$1.28	511	\$0.63	497
TIAA Traditional	\$4.75	1,663	\$3.92	1,667	\$4.86	1,657	\$2.98	1,625	\$8.03	1,691	\$8.91	1,743	\$6.40	1,770	\$1.20	1,733
PIMCO Total Return Instl	\$0.78	568	\$0.14	557	\$0.84	566	\$0.26	551	\$0.99	543	\$0.07	540	-\$0.33	540	-\$0.26	512
DFA Inflation Protected Securities Portfolio Inst	\$1.40	1,034	\$2.36	1,053	\$1.32	1,075	\$2.16	1,072	\$1.37	1,130	-\$0.18	1,148	-\$0.48	1,150	-\$0.73	1,094
American Century High Income	\$2.29	885	\$3.40	880	\$1.44	898	\$1.71	879	\$1.87	927	\$0.37	947	\$0.33	965	-\$0.51	927
T. Rowe Price Inst LC Growth	-\$0.41	418	\$0.29	425	-\$0.15	448	\$0.04	428	-\$1.36	421	-\$2.08	391	-\$0.02	373	-\$0.88	344
Diamond Hill Large Cap Fund Y	\$3.62	1,089	\$4.94	1,155	\$2.94	1,216	\$3.33	1,246	\$3.84	1,353	-\$0.48	1,419	\$0.20	1,489	\$1.54	1,492
William Blair Small Md C Grw I	-\$1.33	1,086	-\$1.92	988	-\$0.78	992	-\$1.07	926	-\$1.48	923	-\$0.86	898	-\$0.43	901	-\$0.01	899
DFA US Targeted Val Port Inst	-\$0.47	1,266	-\$0.79	1,264	-\$0.86	1,307	-\$0.17	1,299	\$0.39	1,410	\$1.14	1,497	\$0.65	1,578	\$1.47	1,565
Dodge & Cox Global Stock Fund	\$0.79	738	\$0.97	828	\$2.88	911	\$3.88	970	\$4.33	1,098	\$2.03	1,212	\$0.58	1,296	\$0.41	1,289
Harding International Equit Inst	\$1.97	735	\$1.17	817	\$0.42	880	-\$0.62	871	-\$18.75	--	--	--	--	--	\$0.00	--
MFS International Value R6	\$1.72	1,334	\$0.48	1,326	-\$0.69	1,332	-\$1.49	1,254	-\$44.46	--	--	--	--	--	\$0.00	--
GQG International Opportunities Fund	--	--	--	--	--	--	--	--	\$60.60	2,165	-\$3.38	1,462	-\$2.21	1,413	-\$1.21	1,343
Cohen & Steers Inst Realty Shares	\$0.79	1,467	\$1.49	1,501	\$0.10	1,548	\$0.45	1,546	-\$0.03	1,624	\$0.23	1,689	-\$0.54	1,757	\$0.21	1,734
Mutual Fund Window	\$0.77	57	-\$0.31	56	-\$1.38	55	-\$3.08	53	-\$4.26	51	\$0.81	48	\$0.43	49	-\$0.53	49
<b>Total</b>	<b>\$0.00</b>		<b>\$0.00</b>		<b>\$0.00</b>		<b>\$0.00</b>		<b>\$0.00</b>		<b>\$0.00</b>		<b>\$0.00</b>		<b>\$0.00</b>	

Source: TIAA



# Annual Fee Monitoring

As of December 31, 2022

Investment Option	Market Value	Total Expense (%)	Total Expense (\$)	Revenue Sharing (%)	Revenue Sharing (\$)	Mgmt. Fee (%)	Mgmt. Fee (\$)	Administrative Fee (%)	Administrative Fee (\$)	Total Fee (%)	Total Fee (\$)
Vanguard Target Retirement Income Trust Plus	\$49,144,908	0.055%	\$27,030	0.00%	\$0	0.055%	\$27,030	0.023%	\$11,303	0.08%	\$38,333
Vanguard Target Retirement 2020 Trust Plus	\$74,401,025	0.055%	\$40,921	0.00%	\$0	0.055%	\$40,921	0.023%	\$17,112	0.08%	\$58,033
Vanguard Target Retirement 2025 Trust Plus	\$103,881,912	0.055%	\$57,135	0.00%	\$0	0.055%	\$57,135	0.023%	\$23,893	0.08%	\$81,028
Vanguard Target Retirement 2030 Trust Plus	\$150,467,966	0.055%	\$82,757	0.00%	\$0	0.055%	\$82,757	0.023%	\$34,608	0.08%	\$117,365
Vanguard Target Retirement 2035 Trust Plus	\$166,495,569	0.055%	\$91,573	0.00%	\$0	0.055%	\$91,573	0.023%	\$38,294	0.08%	\$129,867
Vanguard Target Retirement 2040 Trust Plus	\$161,550,365	0.055%	\$88,853	0.00%	\$0	0.055%	\$88,853	0.023%	\$37,157	0.08%	\$126,009
Vanguard Target Retirement 2045 Trust Plus	\$142,519,352	0.055%	\$78,386	0.00%	\$0	0.055%	\$78,386	0.023%	\$32,779	0.08%	\$111,165
Vanguard Target Retirement 2050 Trust Plus	\$90,606,333	0.055%	\$49,833	0.00%	\$0	0.055%	\$49,833	0.023%	\$20,839	0.08%	\$70,673
Vanguard Target Retirement 2055 Trust Plus	\$41,074,714	0.055%	\$22,591	0.00%	\$0	0.055%	\$22,591	0.023%	\$9,447	0.08%	\$32,038
Vanguard Target Retirement 2060 Trust Plus	\$15,063,878	0.055%	\$8,285	0.00%	\$0	0.055%	\$8,285	0.023%	\$3,465	0.08%	\$11,750
Vanguard Target Retirement 2065 Trust Plus	\$1,712,884	0.055%	\$942	0.00%	\$0	0.055%	\$942	0.023%	\$394	0.08%	\$1,336
Vanguard Target Retirement 2070 Trust Plus	\$0	0.055%	\$0	0.00%	\$0	0.055%	\$0	0.023%	\$0	--	\$0
Vanguard Target Retirement Income - Inv.	\$18,368,117	0.08%	\$14,694	0.00%	\$0	0.080%	\$14,694	0.023%	\$4,225	0.10%	\$18,919
Vanguard Target Retirement 2020 - Inv.	\$16,114,373	0.08%	\$12,891	0.00%	\$0	0.080%	\$12,891	0.023%	\$3,706	0.10%	\$16,598
Vanguard Target Retirement 2025 - Inv.	\$24,395,412	0.08%	\$19,516	0.00%	\$0	0.080%	\$19,516	0.023%	\$5,611	0.10%	\$25,127
Vanguard Target Retirement 2030 - Inv.	\$21,624,102	0.08%	\$17,299	0.00%	\$0	0.080%	\$17,299	0.023%	\$4,974	0.10%	\$22,273
Vanguard Target Retirement 2035 - Inv.	\$15,909,619	0.08%	\$12,728	0.00%	\$0	0.080%	\$12,728	0.023%	\$3,659	0.10%	\$16,387
Vanguard Target Retirement 2040 - Inv.	\$16,163,742	0.08%	\$12,931	0.00%	\$0	0.080%	\$12,931	0.023%	\$3,718	0.10%	\$16,649
Vanguard Target Retirement 2045 - Inv.	\$15,161,149	0.08%	\$12,129	0.00%	\$0	0.080%	\$12,129	0.023%	\$3,487	0.10%	\$15,616
Vanguard Target Retirement 2050 - Inv.	\$15,841,020	0.08%	\$12,673	0.00%	\$0	0.080%	\$12,673	0.023%	\$3,643	0.10%	\$16,316
Vanguard Target Retirement 2055 - Inv.	\$10,600,009	0.08%	\$8,480	0.00%	\$0	0.080%	\$8,480	0.023%	\$2,438	0.10%	\$10,918
Vanguard Target Retirement 2060 - Inv.	\$1,662,896	0.08%	\$1,330	0.00%	\$0	0.080%	\$1,330	0.023%	\$382	0.10%	\$1,713
Vanguard Target Retirement 2065 - Inv.	\$242,010	0.08%	\$194	0.00%	\$0	0.080%	\$194	0.023%	\$56	0.10%	\$249
Vanguard Target Retirement 2070 - Inv.	\$0	0.08%	\$0	0.00%	\$0	0.080%	\$0	0.023%	\$0	--	\$0
Vanguard Total Bond Market Index Fund	\$61,796,105	0.035%	\$21,629	0.00%	\$0	0.035%	\$21,629	0.023%	\$14,213	0.06%	\$35,842
Vanguard Total International Bond Index Fund - Adm.	\$4,029,350	0.11%	\$4,432	0.00%	\$0	0.110%	\$4,432	0.023%	\$927	0.13%	\$5,359
Vanguard Total Stock Market Index Fund	\$71,423,113	0.03%	\$21,427	0.00%	\$0	0.030%	\$21,427	0.023%	\$16,427	0.05%	\$37,854
Vanguard Institutional Index Fund - Instl. Plus	\$220,123,965	0.02%	\$44,025	0.00%	\$0	0.020%	\$44,025	0.023%	\$50,629	0.04%	\$94,653
Vanguard FTSE Social Index Fund - Instl.	\$8,488,308	0.12%	\$10,186	0.00%	\$0	0.120%	\$10,186	0.023%	\$1,952	0.14%	\$12,138
Vanguard Extended Market Index Fund - Instl.	\$72,467,019	0.05%	\$36,234	0.00%	\$0	0.050%	\$36,234	0.023%	\$16,667	0.07%	\$52,901
Vanguard Total International Stock Index Fund	\$13,218,382	0.08%	\$10,575	0.00%	\$0	0.080%	\$10,575	0.023%	\$3,040	0.10%	\$13,615
Vanguard Developed Market Index Fund	\$94,115,105	0.05%	\$47,058	0.00%	\$0	0.050%	\$47,058	0.023%	\$21,646	0.07%	\$68,704
Vanguard Emerging Markets Stock Index Fund - Instl.	\$49,974,532	0.10%	\$49,975	0.00%	\$0	0.100%	\$49,975	0.023%	\$11,494	0.12%	\$61,469
Vanguard Federal Money Market Fund	\$51,212,118	0.11%	\$56,333	0.00%	\$0	0.110%	\$56,333	0.023%	\$11,779	0.13%	\$68,112
T. Rowe Price Stable Value Common Trust Fund A	\$19,951,304	0.44%	\$87,786	0.00%	\$0	0.440%	\$87,786	0.023%	\$4,589	0.46%	\$92,375
TIAA Traditional - RC & RCP	\$316,556,222	0.45%	\$1,424,503	0.15%	(\$474,834)	0.300%	\$949,669	0.023%	\$72,808	0.32%	\$1,022,477
PIMCO Total Return Fund	\$24,728,791	0.46%	\$113,752	0.00%	\$0	0.460%	\$113,752	0.023%	\$5,688	0.48%	\$119,440
DFA Inflation-Protected Securities Portfolio	\$38,805,899	0.11%	\$42,686	0.00%	\$0	0.110%	\$42,686	0.023%	\$8,925	0.13%	\$51,612
American Century High Income	\$41,370,296	0.58%	\$239,948	0.00%	\$0	0.580%	\$239,948	0.023%	\$9,515	0.60%	\$249,463
T. Rowe Price Instl. Large Cap Growth Fund	\$42,273,853	0.55%	\$232,506	0.00%	\$0	0.550%	\$232,506	0.023%	\$9,723	0.57%	\$242,229
Diamond Hill Large Cap	\$59,116,042	0.55%	\$325,138	0.00%	\$0	0.550%	\$325,138	0.023%	\$13,597	0.57%	\$338,735
William Blair Small/Mid Cap Growth Fund	\$30,523,795	1.10%	\$335,762	0.15%	(\$45,786)	0.950%	\$289,976	0.023%	\$7,020	0.97%	\$296,997
DFA U.S. Targeted Value	\$60,316,015	0.29%	\$174,916	0.00%	\$0	0.290%	\$174,916	0.023%	\$13,873	0.31%	\$188,789
Dodge & Cox Global Stock Fund	\$54,161,076	0.52%	\$281,638	0.00%	\$0	0.520%	\$281,638	0.023%	\$12,457	0.54%	\$294,095
GQG International Opportunities Fund	\$51,368,443	0.75%	\$385,263	0.00%	\$0	0.750%	\$385,263	0.023%	\$11,815	0.77%	\$397,078
Cohen and Steers Instl. Realty Shares	\$36,611,265	0.75%	\$274,584	0.00%	\$0	0.750%	\$274,584	0.023%	\$8,421	0.77%	\$283,005
Mutual Fund Window	\$27,344,959	0.00%	\$0	0.00%	\$0	0.000%	\$0	0.023%	\$6,289	0.02%	\$6,289
<b>Total</b>	<b>\$2,602,977,310</b>	<b>0.19%</b>	<b>\$4,893,527</b>	<b>-0.02%</b>	<b>(\$520,620)</b>	<b>0.17%</b>	<b>\$4,372,907</b>	<b>0.02300%</b>	<b>\$598,685</b>	<b>0.19%</b>	<b>\$4,971,592</b>
<b>Without Brokerage</b>	<b>\$2,575,632,351</b>	<b>0.19%</b>	<b>\$4,893,527</b>	<b>-0.02%</b>	<b>(\$520,620)</b>	<b>0.17%</b>	<b>\$4,372,907</b>	<b>0.02300%</b>	<b>\$592,395</b>	<b>0.19%</b>	<b>\$4,965,302</b>



# 3

## Noteworthy Items

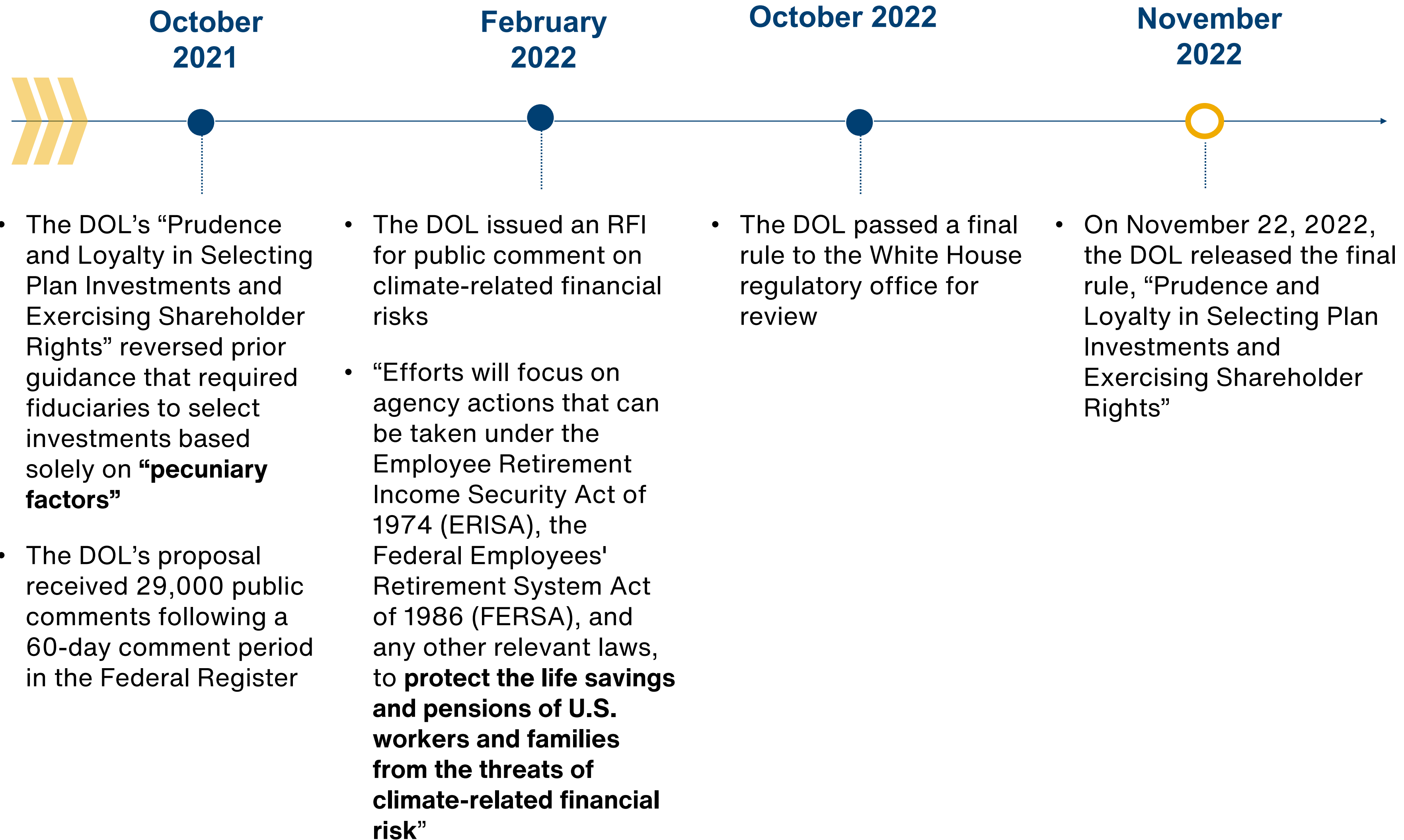


# T. Rowe Price Inst. Large Cap Growth Fund

As of December 31, 2022

- The Fund continued to register “Orange” on the Watch List during the fourth quarter
  - Due to the manager’s historical underperformance relative to its benchmark over the trailing five-year period and in three of the four most recent trailing calendar quarters
- The Fund underperformed its benchmark, the Russell 1000 Growth Index, by 2.4 percentage points during the fourth quarter
- The Fund’s relative underperformance was primarily attributable to:
  - An underweight allocation to the industrials and business services sectors
  - An overweight allocation to the communication services sector
- For the twelve months ended December 31, 2022, the Fund generated a return of -35.2% versus the benchmark’s return of -29.1%
  - The Fund’s relative underperformance was primarily attributable to negative stock selection within the consumer discretionary, information technology, and communication services sectors
- Longer-term annualized performance (trailing 3-, 5-, and 10-year) remained mixed relative to the Fund’s benchmark and peer group median
- The strategy remains “Buy” rated by our Global Investment Management Research Team
- As an important part of the ongoing due diligence process, we recommend the Committee initiate a “competitive review” to compare the Fund’s positioning, historical performance, fees, etc. to other viable candidates

# Changes to Federal ESG Regulations 2021 - 2022





# What's New from the DOL?

**“A plan fiduciary may not sacrifice investment return or take on additional investment risk to promote benefits or goals unrelated to the interests of participants and beneficiaries in their retirement income or financial benefits under the plan”**

## Removes Hurdles for Weighing ESG Factors

- Prior rulemaking “unnecessarily restrained plan fiduciaries’ ability to weigh ESG factors when choosing investments, even when those factors would benefit plan participants financially.”
- “Risk and return factors may include the economic effects of climate change and other environmental, social, or governance factors...” but does not require the consideration of these factors.

## Retention and Simplification of “Tiebreaker” Test

- If a fiduciary prudently concludes that competing investments “equally serve the financial interests of the plan over the appropriate time horizon, the fiduciary is not prohibited from selecting the investment based on collateral benefits other than investment returns.”
- Removes existing special regulatory documentation requirement in favor of statutory duty to document plan affairs.

## Consideration for Participant Preferences

- “Plan fiduciaries do not violate the duty of loyalty solely because they take participant preferences into account.”
- Greater participation or higher deferral rates could lead to greater retirement security.
- “Fiduciaries may not add imprudent investment options to menus based on participant preferences or requests because that would violate ERISA’s duty of prudence.”

## Strengthens Proxy Voting Oversight

- Duty to manage plan assets includes proxy voting.
- Proxies should be voted unless prudent not to do so.
- Fiduciaries need to exercise prudence and diligence in monitoring proxy voting approach.

Source for all quotes: U.S. Department of Labor 29 CFR Part 2550, “Prudence and Loyalty in Selecting Plan Investments and Exercising Shareholder Rights.” Underlines added by Aon for emphasis.

# What Questions Remain?

1   Is the Rule Final?	2   Will Litigation Affect Plan Sponsor Behavior?	3   How will Practical Aspects of Oversight be Handled?
<ul style="list-style-type: none"><li>▪ The new rule becomes effective 60 days from publication in the Federal Register (January 30, 2023)</li><li>▪ "Applicability Dates" relating to proxy voting rules will take effect after one year so fiduciaries and managers will have time to prepare</li><li>▪ Changes in administration (e.g., Congress or White House) may seek to delay or reverse the Rule</li></ul>	<ul style="list-style-type: none"><li>▪ Litigation may challenge the DOL's guidance arguing it goes beyond ERISA statute</li><li>▪ DOL notes that ESG factors are not the only collateral factors relevant to risk/return analysis – litigation issues may exist as to what additional factors should have been considered</li></ul>	<ul style="list-style-type: none"><li>▪ What other collateral factors (in addition to climate change and other ESG factors) are relevant with respect to the risk/return analysis of a particular investment?</li><li>▪ Uncertainty regarding how the "tiebreaker" for considering collateral benefits other than investment returns should be applied</li></ul>

# 4

## Self-Directed Window Follow-Ups



# Self-Directed Brokerage Window Review

Follow-Up From December 9, 2022 Meeting

Members requested additional information regarding the following topics during the December 9, 2022 meeting:

- **Exposure to Cryptocurrency**

- TIAA Brokerage does not allow direct investment in cryptocurrency (e.g., Bitcoin)
- Participants may obtain indirect cryptocurrency exposure through mutual funds in TIAA’s self-directed mutual fund window (e.g., BTCLX)
- Pershing, TIAA’s clearing firm, is currently unable to identify crypto related investments in the self-directed window

- **Load Funds (front or back-end)**

- Participants do not incur load fees as TIAA does not allow Class A purchases if there is no load waived agreement

- **Summarization of the revenue collected by TIAA from the self-directed widow over the last twelve months:**

MONTH	COMMISSION(\$)	SALES CREDIT(\$)	12B-1/FINDER FEE(\$)	ADDITIONAL FEE(\$)	TOTAL REVENUES(\$)
December 2022	\$ -	\$ -	\$ 214.25	\$ 2.85	\$ 217.10
November 2022	\$ -	\$ -	\$ 408.83	\$ 3.21	\$ 412.04
October 2022	\$ -	\$ -	\$ 364.19	\$ 152.06	\$ 516.25
September 2022	\$ -	\$ -	\$ 474.96	\$ 3.44	\$ 478.40
August 2022	\$ -	\$ -	\$ 421.53	\$ 150.29	\$ 571.82
July 2022	\$ -	\$ -	\$ 438.39	\$ 5.16	\$ 443.55
June 2022	\$ -	\$ -	\$ 461.67	\$ 6.75	\$ 468.42
May 2022	\$ -	\$ -	\$ 492.44	\$ 4.10	\$ 496.54
April 2022	\$ -	\$ -	\$ 496.12	\$ 157.40	\$ 653.52
March 2022	\$ -	\$ -	\$ 465.57	\$ 3.51	\$ 469.08
February 2022	\$ -	\$ -	\$ 517.60	\$ 3.79	\$ 521.39
January 2022	\$ -	\$ -	\$ 546.69	\$ 162.87	\$ 709.56
December 2021	\$ -	\$ -	\$ 606.99	\$ 4.41	\$ 611.40
<b>TOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>5,909.23</b>	<b>659.84</b>	<b>6,569.07</b>

# Self-Directed Brokerage Window Follow-Ups (cont'd.)

## • Holdings in self-directed widow by fund:

Fund	Ticker	Market Value	%
FIDELITY SELECT TECHNOLOGY PORTFOLIO	FSPTX	1,470,622	6.3%
FIDELITY OTC PORTFOLIO	FOCPX	1,258,545	5.4%
AMANA GROWTH FUND INVESTOR CLASS	AMAGX	1,122,713	4.8%
VANGUARD GROWTH INDEX FUND ADMIRAL SHARES	VIGAX	941,691	4.1%
PROFUND ULTRA NASDAQ 100 FUND INVESTOR CLASS	UOPIX	849,633	3.7%
FIDELITY LOW PRICED STOCK FUND	FLPSX	673,206	2.9%
FIDELITY SELECT HEALTH CARE PORTFOLIO	FSPHX	662,801	2.9%
FIDELITY CONTRA FUND	FCNTX	653,770	2.8%
VANGUARD 500 INDEX FUND ADMIRAL SHARES	VFIAX	526,364	2.3%
FIRST EAGLE GOLD FUND CLASS A	SGGDY	417,943	1.8%
VANGUARD REIT INDEX FUND ADMIRAL SHARES	VGSLX	400,298	1.7%
FIDELITY SELECT SEMICONDUCTORS PORTFOLIO	FSELX	390,370	1.7%
DODGE & COX STOCK FUND CLASS I	DODGX	364,818	1.6%
VANGUARD HEALTH CARE FUND	VGHCX	362,388	1.6%
RYDEX MONTHLY REBALANCE NASDAQ 100 2X STRATEGY FUND CLASS H	RMQHX	360,062	1.5%
VANGUARD SHORT-TERM TREASURY FUND ADMIRAL SHARES	VFIRX	293,398	1.3%
VANGUARD HIGH DIVIDEND YIELD INDEX FUND ADMIRAL SHARES	VHYAX	287,567	1.2%
AKRE FOCUS FUND RETAIL CLASS	AKREX	287,457	1.2%
FIDELITY BLUE CHIP GROWTH FUND	FBGRX	280,991	1.2%
FIDELITY SELECT ENERGY PORTFOLIO	FSENX	269,521	1.2%
VANGUARD U.S. GROWTH FUND	VWUSX	264,324	1.1%
AMERICAN CENTURY GLOBAL GOLD FUND INVESTOR CLASS	BGEIX	241,285	1.0%
FIDELITY SELECT SOFTWARE AND IT SERVICES PORTFOLIO	FSCSX	232,676	1.0%
FIDELITY ADVISOR CONSUMER DISCRETIONARY FUND CLASS I	FCNIX	226,322	1.0%
VANGUARD TOTAL STOCK MARKET INDEX FUND ADMIRAL SHARES	VTSAX	221,809	1.0%
TIAA-CREF SOCIAL CHOICE EQUITY FUND INSTITUTIONAL CLASS	TISCX	206,853	0.9%
TIAA-CREF SOCIAL CHOICE EQUITY FUND RETIREMENT CLASS	TRSCX	193,077	0.8%
FPA CRESCENT FUND	FPACX	190,454	0.8%
DODGE & COX GLOBAL BOND FUND CLASS I	DODLX	186,760	0.8%
VANGUARD SMALL-CAP VALUE INDEX FUND ADMIRAL SHARES	VSIAX	175,485	0.8%
T. ROWE PRICE HEALTH SCIENCES FUND	PRHSX	173,627	0.7%
FIDELITY SELECT IT SERVICES PORTFOLIO	FBSOX	166,727	0.7%
FIDELITY SELECT RETAILING PORTFOLIO	FSRPX	165,929	0.7%
OSTERWEIS STRATEGIC INCOME FUND	OSTIX	165,869	0.7%
FIDELITY SELECT BIOTECHNOLOGY PORTFOLIO	FBIOX	159,683	0.7%
VANGUARD DIVIDEND APPRECIATION INDEX FUND ADMIRAL SHARES	VDADX	159,211	0.7%
VANGUARD INFORMATION TECH INDEX FUND ADMIRAL SHARES	VITAX	159,187	0.7%
DOUBLELINE LOW DURATION BOND FUND CLASS N	DLSNX	151,761	0.7%
PFG AMERICAN GROWTH STRATEGY FUND CLASS R	PFGGX	149,992	0.6%
HARBOR CAPITAL APPRECIATION FUND INSTITUTIONAL CLASS	HACAX	136,689	0.6%

Fund	Ticker	Market Value	%
VANGUARD LONG-TERM TREASURY FUND INVESTOR SHARES	VUSTX	135,760	0.6%
PRIMECAP ODYSSEY STOCK FUND	POSKX	134,913	0.6%
USAA NASDAQ 100 INDEX FUND	USNQX	133,478	0.6%
PFG AMERICAN CONSERVATIVE INCOME STRATEGY FUND CLASS R	PFCOX	129,023	0.6%
BARON OPPORTUNITY FUND RETAIL CLASS	BIOPX	128,930	0.6%
VANGUARD ENERGY FUND	VGENX	127,042	0.5%
SPROTT GOLD EQUITY FUND INVESTOR CLASS	SGDLX	123,480	0.5%
RYDEX PRECIOUS METALS FUND CLASS A	RYMNX	117,685	0.5%
U.S. GLOBAL INVESTORS GOLD AND PRECIOUS METALS FUND	USERX	108,671	0.5%
SCHWAB TOTAL STOCK MARKET INDEX FUND	SWTSX	104,475	0.4%
PROFUND NASDAQ 100 FUND INVESTOR CLASS	OTPIX	103,594	0.4%
FIDELITY TOTAL BOND FUND	FTBFX	101,650	0.4%
VANGUARD MARKET NEUTRAL FUND INVESTOR SHARES	VMNFX	101,503	0.4%
PROFUND SEMICONDUCTOR ULTRASECTOR FUND INVESTOR CLASS	SMPIX	99,392	0.4%
FIDELITY NASDAQ COMPOSITE INDEX FUND	FNCMX	97,859	0.4%
VANGUARD INTERMEDIATE-TERM TREASURY FUND INVESTOR SHARES	VFITX	94,714	0.4%
PFG FIDELITY INSTITUTIONAL AM EQUITY SECTOR STRATEGY FUND CLASS R	PFFSX	92,817	0.4%
PFG BR EQUITY ESG STRATEGY FUND CLASS R	PFESX	92,306	0.4%
TIAA-CREF CORE IMPACT BOND FUND RETAIL CLASS	TSBRX	90,295	0.4%
TIAA-CREF LARGE-CAP GROWTH FUND INSTITUTIONAL CLASS	TILGX	87,824	0.4%
T. ROWE PRICE BLUE CHIP GROWTH FUND	TRBCX	85,048	0.4%
VANGUARD LONG-TERM CORPORATE BOND INDEX FUND ADMIRAL SHARES	VLTCX	84,618	0.4%
VANGUARD INTERNATIONAL GROWTH FUND	VWIGX	82,367	0.4%
VANGUARD GLOBAL WELLINGTON FUND ADMIRAL SHARES	VGWAX	81,047	0.3%
HENNESSY FOCUS FUND INVESTOR CLASS	HFCSX	81,018	0.3%
VANGUARD WELLESLEY INCOME FUND ADMIRAL SHARES	VWIAX	80,780	0.3%
VANGUARD UTILITIES INDEX FUND ADMIRAL SHARES	VUIAX	80,593	0.3%
PROFUND SEMICONDUCTOR ULTRASECTOR FUND SERVICE CLASS	SMPSX	79,476	0.3%
PROFUND PRECIOUS METALS ULTRASECTOR FUND INVESTOR CLASS	PMPIX	77,670	0.3%
PFG FIDELITY INSTITUTIONAL AM EQUITY INDEX STRATEGY FUND CLASS R	PFFFX	77,034	0.3%
FIDELITY PACIFIC BASIN FUND	FPBFX	76,845	0.3%
HOMESTEAD SMALL COMPANY STOCK FUND	HSCSX	76,797	0.3%
MATTHEWS INDIA FUND INVESTOR CLASS	MINDX	74,859	0.3%
VANGUARD LONG-TERM GOVERNMENT BOND INDEX FUND ADMIRAL SHARES	VLGSX	74,209	0.3%
FIDELITY SELECT GOLD PORTFOLIO	FSAGX	72,916	0.3%
FIDELITY CHINA REGION FUND	FHKCX	66,330	0.3%
MADISON COVERED CALL AND EQUITY INCOME FUND CLASS Y	MENYX	65,596	0.3%
BLACKROCK HEALTH SCIENCES OPPORTUNITIES PORTFOLIO CLASS A	SHSAX	65,510	0.3%
VIRTUS ZEVENBERGEN INNOVATIVE GROWTH STOCK FUND CLASS A	SAGAX	64,307	0.3%
VANGUARD INTERMEDIATE-TERM BOND INDEX FUND ADMIRAL SHARES	VBILX	63,482	0.3%

# Self-Directed Brokerage Window Follow-Ups (cont'd.)

## • Holdings in self-directed widow by fund:

Fund	Ticker	Market Value	%
TIAA-CREF SOCIAL CHOICE EQUITY FUND RETAIL CLASS	TICRX	62,585	0.3%
FIDELITY GLOBAL COMMODITY STOCK FUND	FFGCX	60,092	0.3%
GOLDMAN SACHS SMALL-CAP EQUITY INSIGHTS FUND CLASS A	GCSAX	59,775	0.3%
DODGE & COX INTERNATIONAL STOCK FUND CLASS I	DODFX	59,554	0.3%
BLACKROCK MID-CAP GROWTH EQUITY PORTFOLIO CLASS A	BMGAX	59,298	0.3%
FIDELITY ADVISOR GOLD FUND CLASS I	FGDIX	57,575	0.2%
CALVERT U.S. LARGE-CAP CORE RESPONSIBLE INDEX FUND CLASS A	CSXAX	57,539	0.2%
FIDELITY ENVIRONMENT AND ALTERNATIVE ENERGY PORTFOLIO	FSLEX	57,352	0.2%
PGIM JENNISON GLOBAL OPPORTUNITIES FUND CLASS A	PRJAX	57,251	0.2%
FIDELITY 500 INDEX FUND	FXAIX	57,039	0.2%
FIDELITY REAL ESTATE INDEX FUND	FSRNX	56,790	0.2%
PARNASSUS CORE EQUITY FUND INVESTOR CLASS	PRBLX	56,444	0.2%
FIDELITY MID-CAP STOCK FUND	FMCSX	55,425	0.2%
TIAA-CREF CORE IMPACT BOND FUND RETIREMENT CLASS	TSBBX	55,232	0.2%
BARON PARTNERS FUND RETAIL CLASS	BPTRX	55,042	0.2%
BLACKROCK TECHNOLOGY OPPORTUNITIES FUND CLASS A	BGSAX	54,016	0.2%
VANGUARD GLOBAL EQUITY FUND	VHGEX	52,806	0.2%
FIDELITY INTERNATIONAL INDEX FUND	FSPSX	52,708	0.2%
AMERICAN CENTURY DISCIPLINED GROWTH FUND INVESTOR CLASS	ADSI	52,648	0.2%
VANGUARD DIVIDEND GROWTH FUND INVESTOR CLASS	VDIGX	51,993	0.2%
PARNASSUS ENDEAVOR FUND INVESTOR CLASS	PARWX	51,759	0.2%
VANGUARD ENERGY FUND ADMIRAL SHARES	VGELX	50,594	0.2%
FIDELITY TOTAL MARKET INDEX FUND	FSKAX	50,356	0.2%
U.S. GLOBAL INVESTORS WORLD PRECIOUS MINERALS FUND	UNWPX	49,480	0.2%
T. ROWE PRICE COMMUNICATIONS AND TECHNOLOGY FUND INVESTOR CLASS	PRMTX	48,577	0.2%
HARBOR SMALL-CAP GROWTH FUND INSTITUTIONAL CLASS	HASGX	48,143	0.2%
BLACKROCK ALL-CAP ENERGY AND RESOURCES FUND CLASS A	BACAX	47,638	0.2%
VANGUARD GLOBAL CAPITAL CYCLES FUND INVESTOR SHARES	VGPMX	46,445	0.2%
VANGUARD MID-CAP INDEX FUND ADMIRAL SHARES	VIMAX	46,030	0.2%
FIDELITY GROWTH DISCOVERY FUND	FDSVX	45,534	0.2%
GOLDMAN SACHS MID-CAP GROWTH FUND CLASS A	GGOAX	45,055	0.2%
VANGUARD DEVELOPED MARKETS INDEX FUND ADMIRAL SHARES	VTMGX	44,996	0.2%
BRIDGEWAY SMALL-CAP VALUE FUND	BRSVX	44,955	0.2%
ARTISAN MID-CAP FUND INVESTOR CLASS	ARTMX	44,214	0.2%
PROFUND RISING RATES OPPORTUNITY 10 FUND INVESTOR CLASS	RTPIX	43,703	0.2%
FIDELITY GROWTH STRATEGIES FUND	FDEGX	43,156	0.2%
FIDELITY SMALL-CAP STOCK FUND	FSLCX	43,052	0.2%
FIDELITY SELECT MEDICAL TECHNOLOGY AND DEVICES PORTFOLIO	FSMEX	40,560	0.2%
PROFUND SHORT REAL ESTATE FUND INVESTOR CLASS	SRPIX	40,453	0.2%
FIRST EAGLE GLOBAL FUND CLASS A	SGENX	38,434	0.2%

Fund	Ticker	Market Value	%
USAA PRECIOUS METALS AND MINERALS FUND	USAGX	38,303	0.2%
SCHWAB S&P 500 INDEX FUND	SWPPX	37,883	0.2%
RYDEX DYNAMIC S&P 500 2X STRATEGY FUND CLASS A	RYTTX	37,311	0.2%
GABELLI GOLD FUND CLASS AAA	GOLDX	36,428	0.2%
WASATCH HOISINGTON U.S. TREASURY FUND	WHOSX	36,018	0.2%
VANGUARD SMALL-CAP INDEX FUND ADMIRAL SHARES	VSMAX	35,968	0.2%
RYDEX INVERSE GOVERNMENT LONG BOND STRATEGY FUND CLASS A	RYAQX	35,783	0.2%
VANGUARD FTSE SOCIAL INDEX FUND ADMIRAL SHARES	VFTAX	34,956	0.2%
T. ROWE PRICE ALL-CAP OPPORTUNITIES FUND INVESTOR CLASS	PRWAX	34,212	0.1%
FIDELITY SELECT LEISURE PORTFOLIO	FDLSX	33,894	0.1%
RYDEX DYNAMIC DOW 2X STRATEGY FUND CLASS A	RYLDX	33,496	0.1%
VANGUARD SELECTED VALUE FUND	VASVX	33,442	0.1%
GOLDMAN SACHS U.S. EQUITY ESG FUND CLASS A	GAGVX	32,908	0.1%
FIDELITY SELECT WIRELESS PORTFOLIO	FWRLX	32,679	0.1%
PRIMECAP ODYSSEY GROWTH FUND	POGRX	32,646	0.1%
VANGUARD WELLESLEY INCOME FUND INVESTOR SHARES	VWINX	32,412	0.1%
GOLDMAN SACHS EMERGING MARKETS EQUITY FUND CLASS A	GEMAX	31,825	0.1%
FIDELITY SELECT TECH HARDWARE PORTFOLIO	FDCPX	31,487	0.1%
AMERICAN CENTURY FOCUSED DYNAMIC GROWTH FUND INVESTOR CLASS	ACFOX	31,468	0.1%
GABELLI FOCUSED GROWTH AND INCOME FUND CLASS I	GWSIX	31,455	0.1%
MUHLENKAMP FUND	MUHLX	30,862	0.1%
BNY MELLON INTERNATIONAL BOND FUND CLASS I	DIBRX	30,740	0.1%
HARBOR DISRUPTIVE INNOVATION FUND INSTITUTIONAL CLASS	HAMGX	30,464	0.1%
OAKMARK FUND INVESTOR CLASS	OAKMX	30,151	0.1%
RYDEX NASDAQ 100 2X STRATEGY FUND CLASS A	RYVLX	29,969	0.1%
FIDELITY VALUE FUND	FDVLX	28,176	0.1%
FIDELITY LARGE-CAP GROWTH ENHANCED INDEX FUND	FLGEX	27,299	0.1%
BARON GLOBAL ADVANTAGE FUND RETAIL CLASS	BGAFX	27,153	0.1%
FIDELITY SMALL-CAP INDEX FUND	FSSNX	26,949	0.1%
MATTHEWS ASIA INNOVATORS FUND INVESTOR CLASS	MATFX	26,913	0.1%
VANGUARD CONSUMER STAPLES INDEX FUND ADMIRAL SHARES	VCSAX	26,740	0.1%
FIDELITY NATURAL RESOURCES FUND	FNARX	26,504	0.1%
T. ROWE PRICE AFRICA AND MIDDLE EAST FUND	TRAMX	26,388	0.1%
VANGUARD HEALTH CARE INDEX FUND ADMIRAL SHARES	VHCIX	24,319	0.1%
VANGUARD SHORT-TERM BOND INDEX FUND ADMIRAL SHARES	VBIRX	24,030	0.1%
INVESCO DIVIDEND INCOME FUND CLASS A	IAUTX	23,779	0.1%
VAN ECK INTERNATIONAL INVESTORS GOLD FUND CLASS A	INIVX	23,303	0.1%
MATTHEWS CHINA SMALL COMPANIES FUND INVESTOR CLASS	MCSMX	23,278	0.1%
FIDELITY SMALL-CAP VALUE FUND	FCPVX	23,046	0.1%
INVESCO GOLD AND SPECIAL MINERALS FUND CLASS A	OPGSX	22,579	0.1%

# Self-Directed Brokerage Window Follow-Ups (cont'd.)

## • Holdings in self-directed widow by fund:

Fund	Ticker	Market Value	%
VOYA CORPORATE LEADERS TRUST FUND SERIES B	LEXCX	22,114	0.1%
FIDELITY STOCK SELECTOR SMALL-CAP FUND	FDSCX	21,928	0.1%
FIDELITY EUROPE FUND	FIEUX	21,509	0.1%
CROMWELL CENTERSQUARE REAL ESTATE FUND INVESTOR CLASS	MRESX	21,138	0.1%
MATTHEWS CHINA FUND INVESTOR CLASS	MCHFX	20,238	0.1%
JPMORGAN SMID-CAP EQUITY FUND CLASS A	PECAX	19,646	0.1%
JPMORGAN LARGE-CAP GROWTH FUND CLASS A	OLGAX	19,606	0.1%
FIDELITY SELECT HEALTH CARE SERVICES PORTFOLIO	FSHCX	18,944	0.1%
FIDELITY SELECT AUTOMOTIVE PORTFOLIO	FSAVX	18,889	0.1%
VANGUARD LONG-TERM TAX-EXEMPT FUND ADMIRAL SHARES	VWLUX	17,072	0.1%
SCHWAB DIVIDEND EQUITY FUND	SWDSX	16,758	0.1%
COLUMBIA PYRFORD INTERNATIONAL STOCK FUND CLASS A	PISDX	15,942	0.1%
VANGUARD LARGE-CAP INDEX FUND ADMIRAL SHARES	VLCAX	14,681	0.1%
RYDEX INVERSE DOW 2X STRATEGY FUND CLASS A	RYIDX	14,284	0.1%
DELAWARE SMID-CAP GROWTH FUND INSTITUTIONAL CLASS	DFDIX	14,050	0.1%
RYDEX INVERSE S&P 500 2X STRATEGY FUND CLASS A	RYTMX	13,424	0.1%
VANGUARD ENERGY INDEX FUND ADMIRAL SHARES	VENAX	13,315	0.1%
FIDELITY SELECT MATERIALS PORTFOLIO	FSDPX	13,123	0.1%
ALLSPRING PRECIOUS METALS FUND CLASS A	EKWAX	12,928	0.1%
VANGUARD INFLATION PROTECTED SECURITIES FUND	VIPSX	12,436	0.1%
T. ROWE PRICE NEW ASIA FUND	PRASX	12,270	0.1%
VANGUARD SMALL-CAP GROWTH INDEX FUND ADMIRAL SHARES	VSGAX	11,861	0.1%
FIDELITY EMERGING MARKETS FUND	FEMKX	11,800	0.1%
FIDELITY JAPAN FUND	FJPNX	11,253	0.0%
T. ROWE PRICE GLOBAL TECHNOLOGY FUND	PRGTX	11,123	0.0%
KINETICS SMALL-CAP OPPORTUNITIES FUND	KSCOX	11,014	0.0%
FIDELITY ADVISOR GROWTH OPPORTUNITIES FUND CLASS I	FAGCX	10,866	0.0%
FIDELITY EMERGING ASIA FUND	FSEAX	10,588	0.0%
PUTNAM LARGE-CAP VALUE FUND CLASS A	PEYAX	10,337	0.0%
FIDELITY SELECT DEFENSE AND AEROSPACE PORTFOLIO	FSDAX	9,668	0.0%
CLEARBRIDGE SELECT FUND CLASS A	LCLAX	9,592	0.0%
RYDEX DYNAMIC RUSSELL 2000 2X STRATEGY FUND CLASS A	RYRUX	9,365	0.0%
FIDELITY SELECT PHARMACEUTICALS PORTFOLIO	FPHAX	9,144	0.0%
T. ROWE PRICE SCIENCE AND TECHNOLOGY FUND INVESTOR CLASS	PRSCX	9,068	0.0%
FIDELITY DISRUPTORS FUND	FGDFX	8,697	0.0%
T. ROWE PRICE GLOBAL STOCK FUND	PRGSX	8,346	0.0%
VANGUARD INTERNATIONAL DIVIDEND APPRECIATION INDEX FUND ADMIRAL SHARES	VIAAX	7,564	0.0%
FIDELITY STOCK SELECTOR ALL-CAP FUND	FDSSX	7,207	0.0%
FRANKLIN GOLD AND PRECIOUS METALS FUND ADVISOR CLASS	FGADX	7,204	0.0%
VANGUARD EXPLORER FUND	VEXPX	7,177	0.0%

Fund	Ticker	Market Value	%
VANGUARD HIGH YIELD CORPORATE BOND FUND INVESTOR SHARES	VWEHX	6,727	0.0%
FIDELITY TREND FUND	FTRNX	5,926	0.0%
TIAA-CREF GREEN BOND FUND RETAIL CLASS	TGROX	5,863	0.0%
GUINNESS ATKINSON RENMINBI YUAN AND BOND FUND	GARBX	5,126	0.0%
HARDING LOEVNER EMERGING MARKETS PORTFOLIO ADVISOR CLASS	HLEMX	5,072	0.0%
RYDEX INVERSE RUSSELL 2000 2X STRATEGY FUND CLASS A	RYIUX	5,047	0.0%
RYDEX INVERSE NASDAQ 100 2X STRATEGY FUND CLASS A	RYVTX	5,018	0.0%
USAA SCIENCE AND TECHNOLOGY FUND	USSCX	4,756	0.0%
BUFFALO FLEXIBLE INCOME FUND	BUFBX	4,671	0.0%
VANGUARD GLOBAL EX-U.S. REAL ESTATE INDEX FUND ADMIRAL SHARES	VGRLX	4,620	0.0%
FIDELITY SELECT CONSUMER DISCRETIONARY PORTFOLIO	FSCPX	4,601	0.0%
TIAA-CREF GROWTH AND INCOME FUND INSTITUTIONAL CLASS	TIGRX	4,532	0.0%
TIAA-CREF REAL ESTATE SECURITIES FUND RETIREMENT CLASS	TRRSX	4,279	0.0%
T. ROWE PRICE QM U.S. SMALL-CAP GROWTH EQUITY FUND	PRDSX	4,276	0.0%
MATTHEWS EMERGING MARKETS SMALL COMPANIES FUND INVESTOR CLASS	MSMLX	4,026	0.0%
AMERICAN CENTURY ONE CHOICE IN-RETIREMENT PORTFOLIO INVESTOR CLASS	ARTOX	3,582	0.0%
KINETICS INTERNET FUND	WWWFX	3,560	0.0%
VANGUARD INTERMEDIATE-TERM TREASURY FUND ADMIRAL SHARES	VFIUX	3,557	0.0%
MATTHEWS CHINA DIVIDEND FUND INVESTOR CLASS	MCDFX	3,509	0.0%
OAKMARK INTERNATIONAL FUND INVESTOR CLASS	OAKIX	3,467	0.0%
T. ROWE PRICE EQUITY INCOME FUND	PRFDX	3,375	0.0%
TIAA-CREF SOCIAL CHOICE LOW CARBON EQUITY FUND RETAIL CLASS	TLWCX	2,963	0.0%
FEDERATED HERMES GLOBAL TOTAL RETURN BOND FUND CLASS A	FTIIX	2,771	0.0%
FIDELITY SELECT FINTECH PORTFOLIO	FSVLX	2,745	0.0%
FIDELITY INTERNATIONAL GROWTH FUND	FIGFX	2,638	0.0%
CALVERT GLOBAL WATER FUND CLASS A	CFWAX	2,537	0.0%
ALLSPRING DYNAMIC TARGET DATE 2050 FUND CLASS A	WTDLX	2,085	0.0%
VANGUARD LONG-TERM TREASURY FUND ADMIRAL SHARES	VUSUX	2,070	0.0%
VANGUARD FINANCIALS INDEX FUND ADMIRAL SHARES	VFAIX	1,544	0.0%
FIDELITY DISRUPTIVE FINANCE FUND	FNTFX	1,481	0.0%
FIDELITY LARGE-CAP VALUE INDEX FUND	FLCOX	1,424	0.0%
FIDELITY INTERNATIONAL SUSTAINABILITY INDEX FUND	FNIDX	1,192	0.0%
PUTNAM GLOBAL TECHNOLOGY FUND CLASS A	PGTAX	877	0.0%
T. ROWE PRICE LATIN AMERICA FUND	PRLAX	829	0.0%
PARNASSUS MID-CAP FUND INVESTOR CLASS	PARMX	800	0.0%
VANGUARD CONSUMER DISCRETIONARY INDEX FUND ADMIRAL SHARES	VCDAX	665	0.0%
FIDELITY ADVISOR NEW INSIGHTS FUND CLASS I	FINSX	624	0.0%
NORTHERN SMALL-CAP VALUE FUND	NOSGX	558	0.0%
CRM MID-CAP VALUE FUND INVESTOR CLASS	CRMMX	544	0.0%
MFS GROWTH ALLOCATION FUND CLASS I	MGWIX	540	0.0%
BARON EMERGING MARKETS FUND RETAIL CLASS	BEXFX	517	0.0%
FIDELITY ADVISOR CHINA REGION FUND CLASS I	FHKIX	482	0.0%
BAIRD INTERMEDIATE BOND FUND INSTITUTIONAL CLASS	BIMIX	456	0.0%
FIDELITY SMALL-CAP GROWTH FUND	FPCGX	277	0.0%
PROFUND SHORT NASDAQ 100 FUND INVESTOR CLASS	SOPIX	208	0.0%
VOYA RUSSIA FUND CLASS A	LETRX	103	0.0%

# 5

## Morningstar Model Portfolios





# Morningstar Model Portfolios – RC Performance

As of December 31, 2022

	Performance %						Inception Date
	1 Quarter	Year to Date	1 Year	3 Years	5 Years	Since Inception	
<b>RC</b>							
<b>Very Conservative RC</b>	2.9	-4.2	-4.2	2.4	3.3	3.6	04/01/2014
<i>Very Conservative Benchmark RC</i>	2.8	-5.8	-5.8	1.7	2.9	3.3	
<b>Conservative RC</b>	4.3	-6.0	-6.0	3.2	3.8	4.4	04/01/2014
<i>Conservative Benchmark RC</i>	4.5	-7.5	-7.5	2.8	3.8	4.4	
<b>Moderately Conservative RC</b>	5.7	-8.8	-8.8	3.8	4.7	5.7	04/01/2014
<i>Moderately Conservative Benchmark RC</i>	5.5	-10.0	-10.0	3.2	4.3	5.2	
<b>Moderate RC</b>	7.0	-10.7	-10.7	4.1	4.9	5.9	04/01/2014
<i>Moderate Benchmark RC</i>	7.0	-11.6	-11.6	3.6	4.7	5.8	
<b>Moderately Aggressive RC</b>	8.6	-12.4	-12.4	4.7	5.5	6.5	04/01/2014
<i>Moderately Aggressive Benchmark RC</i>	8.4	-13.3	-13.3	3.9	4.9	6.2	
<b>Aggressive RC</b>	9.9	-14.5	-14.5	4.9	5.9	7.2	04/01/2014
<i>Aggressive Benchmark RC</i>	9.5	-15.4	-15.4	4.1	5.2	6.7	
<b>Very Aggressive RC</b>	11.0	-15.7	-15.7	5.1	5.9	7.3	04/01/2014
<i>Very Aggressive Benchmark RC</i>	10.8	-17.1	-17.1	3.9	5.2	6.9	
<b>RC Ex-TIAA</b>							
<b>Very Conservative RC Ex-TIAA</b>	2.5	-9.3	-9.3	0.3	1.8	2.5	04/01/2014
<i>Very Conservative Benchmark RC Ex-TIAA</i>	2.9	-12.4	-12.4	-1.0	1.3	2.2	
<b>Conservative RC Ex-TIAA</b>	4.4	-11.5	-11.5	1.1	2.5	3.5	04/01/2014
<i>Conservative Benchmark RC Ex-TIAA</i>	4.8	-13.2	-13.2	0.6	2.5	3.5	
<b>Moderately Conservative RC Ex-TIAA</b>	5.7	-12.0	-12.0	2.3	3.7	4.9	04/01/2014
<i>Moderately Conservative Benchmark RC Ex-TIAA</i>	5.7	-14.7	-14.7	1.3	3.2	4.4	
<b>Moderate RC Ex-TIAA</b>	7.0	-13.3	-13.3	2.8	4.1	5.3	04/01/2014
<i>Moderate Benchmark RC Ex-TIAA</i>	7.2	-15.1	-15.1	2.1	3.8	5.2	
<b>Moderately Aggressive RC Ex-TIAA</b>	8.6	-13.9	-13.9	4.0	4.8	6.1	04/01/2014
<i>Moderately Aggressive Benchmark RC Ex-TIAA</i>	8.5	-15.7	-15.7	2.8	4.3	5.8	
<b>Aggressive RC Ex-TIAA</b>	9.9	-14.5	-14.5	4.8	5.5	6.8	04/01/2014
<i>Aggressive Benchmark RC Ex-TIAA</i>	9.6	-16.5	-16.5	3.5	4.8	6.4	
<b>Very Aggressive RC Ex-TIAA</b>	11.0	-15.7	-15.7	5.2	5.9	7.3	04/01/2014
<i>Very Aggressive Benchmark RC Ex-TIAA</i>	10.8	-17.1	-17.1	3.9	5.2	6.9	

# Morningstar Model Portfolios – RC Allocations

As of December 31, 2022

## RC

Fund Name	Very Conservative	Conservative	Moderately Conservative	Moderate	Moderately Aggressive	Aggressive	Very Aggressive
American Century High Income Y	8%	8%	5%	5%	4%	-	-
Cohen & Steers Instl Realty Shares	-	-	3%	3%	3%	3%	4%
DFA Inflation-Protected Securities I	7%	6%	6%	4%	3%	-	-
DFA US Targeted Value I	-	3%	8%	7%	10%	10%	9%
Diamond Hill Large Cap Y	-	6%	-	3%	6%	11%	19%
Dodge & Cox Global Stock	11%	4%	3%	3%	4%	7%	12%
GQG International Opportunities Fund	-	-	-	-	4%	4%	-
PIMCO Total Return Instl	-	-	-	-	-	-	-
T. Rowe Price Large-Cap Growth I	-	-	-	-	-	-	-
T. Rowe Price Stable Value Fund	11%	8%	5%	4%	-	-	-
TIAA Traditional	40%	34%	30%	22%	15%	7%	-
Vanguard Developed Markets Idx Instl	-	6%	10%	15%	17%	19%	23%
Vanguard Emerging Mkts Stock Idx I	-	3%	4%	6%	7%	9%	11%
Vanguard Extended Market Idx I	-	-	3%	4%	-	4%	10%
Vanguard Federal Money Market Investor	3%	3%	-	-	-	-	-
Vanguard Institutional Index Instl Pl	-	8%	15%	19%	20%	18%	12%
Vanguard Total Bond Market Index I	20%	11%	8%	5%	4%	5%	-
William Blair Small-Mid Cap Gr I	-	-	-	-	3%	3%	-

## RC Ex-TIAA

Fund Name	Very Conservative	Conservative	Moderately Conservative	Moderate	Moderately Aggressive	Aggressive	Very Aggressive
American Century High Income Y	10%	8%	5%	5%	4%	-	-
Cohen & Steers Instl Realty Shares	-	-	3%	3%	4%	3%	4%
DFA Inflation-Protected Securities I	9%	7%	5%	4%	3%	-	-
DFA US Targeted Value I	-	3%	8%	7%	4%	10%	9%
Diamond Hill Large Cap Y	3%	8%	-	3%	8%	11%	19%
Dodge & Cox Global Stock	-	-	3%	3%	-	7%	12%
GQG International Opportunities Fund	-	-	-	-	4%	4%	-
PIMCO Total Return Instl	5%	-	-	-	-	-	-
T. Rowe Price Large-Cap Growth I	-	-	-	-	-	-	-
T. Rowe Price Stable Value Fund	23%	18%	15%	11%	7%	5%	-
Vanguard Developed Markets Idx Instl	3%	8%	10%	15%	18%	19%	23%
Vanguard Emerging Mkts Stock Idx I	-	3%	4%	6%	8%	9%	11%
Vanguard Extended Market Idx I	3%	-	3%	4%	6%	4%	10%
Vanguard Federal Money Market Investor	7%	3%	3%	-	-	-	-
Vanguard Institutional Index Instl Pl	-	8%	15%	19%	19%	18%	12%
Vanguard Total Bond Market Index I	37%	34%	26%	20%	12%	7%	-
William Blair Small-Mid Cap Gr I	-	-	-	-	3%	3%	-

# Morningstar Model Portfolios – RC Benchmarks

As of December 31, 2022

## RC Benchmarks

Index	Very Conservative	Conservative	Moderately Conservative	Moderate	Moderately Aggressive	Aggressive	Very Aggressive
Blmbg. Barc. Global Inflation-Linked US TIPS	9%	6%	6%	4%	3%	-	-
Blmbg. Barc. US Agg. Bond	31%	22%	15%	11%	6%	6%	-
Blmbg. Barc. US Corp HY	7%	5%	4%	3%	3%	-	-
Citi Treasury Bill 3 Mo.	3%	3%	-	-	-	-	-
FTSE NAREIT All Equity REITs	-	-	3%	3%	3%	3%	4%
MSCI EAFE GR	4%	8%	12%	17%	21%	24%	28%
MSCI EM GR	-	3%	4%	6%	8%	10%	12%
Russell 1000 Growth	-	4%	7%	9%	10%	12%	13%
Russell 1000 Value	3%	7%	7%	11%	13%	15%	17%
Russell 2000 Growth	-	-	3%	3%	3%	4%	4%
Russell 2000 Value	-	-	3%	3%	4%	5%	6%
Russell Mid Cap Growth	3%	4%	3%	3%	5%	6%	7%
Russell Mid Cap Value	-	4%	3%	5%	6%	8%	9%
TIAA Traditional	40%	34%	30%	22%	15%	7%	-

## RC Ex-TIAA Benchmarks

Index	Very Conservative	Conservative	Moderately Conservative	Moderate	Moderately Aggressive	Aggressive	Very Aggressive
Blmbg. Barc. Global Inflation-Linked US TIPS	9%	7%	5%	4%	3%	-	-
Blmbg. Barc. US Agg. Bond	67%	54%	43%	33%	21%	13%	-
Blmbg. Barc. US Corp HY	7%	5%	4%	3%	3%	-	-
Citi Treasury Bill 3 Mo.	7%	4%	3%	-	-	-	-
FTSE NAREIT All Equity REITs	-	-	3%	3%	3%	3%	4%
MSCI EAFE GR	4%	8%	12%	17%	21%	24%	28%
MSCI EM GR	-	3%	4%	6%	8%	10%	12%
Russell 1000 Growth	-	4%	7%	9%	10%	12%	13%
Russell 1000 Value	3%	7%	7%	11%	13%	15%	17%
Russell 2000 Growth	-	-	3%	3%	3%	4%	4%
Russell 2000 Value	-	-	3%	3%	4%	5%	6%
Russell Mid Cap Growth	3%	4%	3%	3%	5%	6%	7%
Russell Mid Cap Value	-	4%	3%	5%	6%	8%	9%

# Morningstar Model Portfolios – RCP Performance

As of December 31, 2022

	Performance %						Inception Date
	1 Quarter	Year to Date	1 Year	3 Years	5 Years	Since Inception	
<b>RCP</b>							
<b>Very Conservative RCP</b>	2.5	-6.7	-6.7	1.1	2.4	3.0	04/01/2014
<i>Very Conservative Benchmark RCP</i>	2.8	-4.7	-4.7	1.6	2.6	3.0	
<b>Conservative RCP</b>	4.4	-7.5	-7.5	2.1	3.2	3.9	04/01/2014
<i>Conservative Benchmark RCP</i>	4.5	-7.5	-7.5	2.5	3.5	4.2	
<b>Moderately Conservative RCP</b>	5.4	-10.5	-10.5	3.1	4.1	5.2	04/01/2014
<i>Moderately Conservative Benchmark RCP</i>	5.5	-10.6	-10.6	2.7	3.9	4.9	
<b>Moderate RCP</b>	7.2	-11.7	-11.7	4.0	4.8	5.7	04/01/2014
<i>Moderate Benchmark RCP</i>	7.0	-12.5	-12.5	3.2	4.4	5.5	
<b>Moderately Aggressive RCP</b>	8.5	-13.2	-13.2	4.4	5.2	6.4	04/01/2014
<i>Moderately Aggressive Benchmark RCP</i>	8.4	-14.1	-14.1	3.4	4.6	6.0	
<b>Aggressive RCP</b>	9.8	-14.2	-14.2	5.4	5.9	7.1	04/01/2014
<i>Aggressive Benchmark RCP</i>	9.5	-16.1	-16.1	3.7	4.9	6.5	
<b>Very Aggressive RCP</b>	11.0	-15.8	-15.8	5.4	5.9	7.3	04/01/2014
<i>Very Aggressive Benchmark RCP</i>	10.8	-17.1	-17.1	4.0	5.2	6.9	
<b>RCP Ex-TIAA</b>							
<b>Very Conservative RCP Ex-TIAA</b>	3.2	-12.2	-12.2	-0.7	1.5	2.3	04/01/2014
<i>Very Conservative Benchmark RCP Ex-TIAA</i>	3.1	-11.9	-11.9	-1.0	1.2	2.2	
<b>Conservative RCP Ex-TIAA</b>	4.5	-13.3	-13.3	0.6	2.3	3.4	04/01/2014
<i>Conservative Benchmark RCP Ex-TIAA</i>	4.8	-12.9	-12.9	0.5	2.4	3.5	
<b>Moderately Conservative RCP Ex-TIAA</b>	5.9	-14.1	-14.1	1.3	3.2	4.6	04/01/2014
<i>Moderately Conservative Benchmark RCP Ex-TIAA</i>	5.7	-14.5	-14.5	1.1	3.0	4.3	
<b>Moderate RCP Ex-TIAA</b>	7.2	-14.8	-14.8	2.6	4.0	5.2	04/01/2014
<i>Moderate Benchmark RCP Ex-TIAA</i>	7.2	-15.1	-15.1	2.0	3.8	5.1	
<b>Moderately Aggressive RCP Ex-TIAA</b>	8.7	-14.8	-14.8	3.8	4.9	6.1	04/01/2014
<i>Moderately Aggressive Benchmark RCP Ex-TIAA</i>	8.5	-15.7	-15.7	2.8	4.3	5.8	
<b>Aggressive RCP Ex-TIAA</b>	9.9	-15.0	-15.0	4.5	5.4	6.7	04/01/2014
<i>Aggressive Benchmark RCP Ex-TIAA</i>	9.6	-16.5	-16.5	3.3	4.7	6.3	
<b>Very Aggressive RCP Ex-TIAA</b>	10.7	-16.0	-16.0	5.3	5.8	7.3	04/01/2014
<i>Very Aggressive Benchmark RCP Ex-TIAA</i>	10.8	-17.1	-17.1	3.9	5.2	6.9	

# Morningstar Model Portfolios – RCP Allocations

As of December 31, 2022

## RCP

Fund Name	Very Conservative	Conservative	Moderately Conservative	Moderate	Moderately Aggressive	Aggressive	Very Aggressive
American Century High Income Y	6%	7%	5%	5%	4%	-	-
Cohen & Steers Instl Realty Shares	-	-	3%	3%	3%	3%	4%
DFA Inflation-Protected Securities I	7%	6%	6%	4%	3%	-	-
DFA US Targeted Value I	-	3%	7%	7%	7%	10%	8%
Diamond Hill Large Cap Y	-	6%	-	3%	8%	10%	19%
Dodge & Cox Global Stock	11%	4%	3%	3%	4%	8%	7%
GQG International Opportunities Fund	-	-	-	-	4%	4%	-
PIMCO Total Return Instl	27%	11%	6%	-	-	-	-
TIAA Traditional	40%	32%	25%	16%	10%	5%	-
Vanguard Developed Markets Idx Instl	-	6%	10%	15%	17%	18%	25%
Vanguard Emerging Mkts Stock Idx I	-	3%	4%	6%	7%	9%	12%
Vanguard Extended Market Idx I	-	-	3%	4%	7%	4%	12%
Vanguard Federal Money Market Inv	3%	3%	-	-	-	-	-
Vanguard Institutional Index Instl PI	-	8%	16%	19%	17%	19%	13%
Vanguard Total Bond Market Index I	6%	11%	12%	15%	9%	7%	-
William Blair Small-Mid Cap Gr I	-	-	-	-	-	3%	-

## RCP Ex-TIAA

Fund Name	Very Conservative	Conservative	Moderately Conservative	Moderate	Moderately Aggressive	Aggressive	Very Aggressive
American Century High Income Y	8%	8%	4%	4%	4%	-	-
Cohen & Steers Instl Realty Shares	-	-	3%	3%	3%	3%	4%
DFA Inflation-Protected Securities I	6%	7%	5%	4%	3%	-	-
DFA US Targeted Value I	-	3%	8%	7%	9%	10%	8%
Diamond Hill Large Cap Y	-	6%	-	3%	8%	12%	19%
Dodge & Cox Global Stock	12%	3%	3%	3%	4%	7%	7%
GQG International Opportunities Fund	-	-	-	-	4%	3%	-
PIMCO Total Return Instl	3%	3%	-	-	-	-	-
T. Rowe Price Large-Cap Growth I	-	-	-	-	-	-	-
Vanguard Developed Markets Idx Instl	-	6%	10%	15%	17%	19%	25%
Vanguard Emerging Mkts Stock Idx I	-	3%	4%	6%	7%	9%	12%
Vanguard Extended Market Idx I	-	-	3%	4%	-	4%	12%
Vanguard Federal Money Market Inv	7%	3%	3%	-	-	-	-
Vanguard Institutional Index Instl PI	-	8%	15%	19%	18%	18%	13%
Vanguard Total Bond Market Index I	64%	50%	42%	32%	19%	12%	-
Vanguard Total International Bond Market Index	-	-	-	-	-	-	-
William Blair Small-Mid Cap Gr I	-	-	-	-	4%	3%	-

# Morningstar Model Portfolios – RCP Benchmarks

As of December 31, 2022

## RCP Benchmarks

Index	Very Conservative	Conservative	Moderately Conservative	Moderate	Moderately Aggressive	Aggressive	Very Aggressive
Blmbg. Barc. Global Inflation-Linked US TIPS	9%	6%	6%	4%	3%	-	-
Blmbg. Barc. US Agg. Bond	31%	24%	20%	17%	11%	8%	-
Blmbg. Barc. US Corp HY	7%	5%	4%	3%	3%	-	-
Citi Treasury Bill 3 Mo.	3%	3%	-	-	-	-	-
FTSE NAREIT All Equity REITs	-	-	3%	3%	3%	3%	4%
MSCI EAFE GR	4%	8%	12%	17%	21%	24%	28%
MSCI EM GR	-	3%	4%	6%	8%	10%	12%
Russell 1000 Growth	-	4%	7%	9%	10%	12%	13%
Russell 1000 Value	3%	7%	7%	11%	13%	15%	17%
Russell 2000 Growth	-	-	3%	3%	3%	4%	4%
Russell 2000 Value	-	-	3%	3%	4%	5%	6%
Russell Mid Cap Growth	3%	4%	3%	3%	5%	6%	7%
Russell Mid Cap Value	-	4%	3%	5%	6%	8%	9%
TIAA Traditional	40%	32%	25%	16%	10%	5%	-

## RCP Ex-TIAA Benchmarks

Index	Very Conservative	Conservative	Moderately Conservative	Moderate	Moderately Aggressive	Aggressive	Very Aggressive
Blmbg. Barc. Global Inflation-Linked US TIPS	9%	7%	5%	4%	3%	-	-
Blmbg. Barc. US Agg. Bond	67%	54%	43%	33%	21%	13%	-
Blmbg. Barc. US Corp HY	7%	5%	4%	3%	3%	-	-
Citi Treasury Bill 3 Mo.	7%	4%	3%	-	-	-	-
FTSE NAREIT All Equity REITs	-	-	3%	3%	3%	3%	4%
MSCI EAFE GR	4%	8%	12%	17%	21%	24%	28%
MSCI EM GR	-	3%	4%	6%	8%	10%	12%
Russell 1000 Growth	-	4%	7%	9%	10%	12%	13%
Russell 1000 Value	3%	7%	7%	11%	13%	15%	17%
Russell 2000 Growth	-	-	3%	3%	3%	4%	4%
Russell 2000 Value	-	-	3%	3%	4%	5%	6%
Russell Mid Cap Growth	3%	4%	3%	3%	5%	6%	7%
Russell Mid Cap Value	-	4%	3%	5%	6%	8%	9%

# Morningstar Model Portfolios – Static Allocation Performance

As of December 31, 2022

	Performance %						Inception Date
	1 Quarter	Year to Date	1 Year	3 Years	5 Years	Since Inception	
<b>RC</b>							
Very Conservative RC (Static)	2.3	-6.5	-6.5	1.5	2.7	3.3	04/01/2014
<i>Very Conservative Benchmark RC (Static)</i>	2.6	-4.5	-4.5	1.9	2.9	3.3	
Conservative RC (Static)	4.2	-7.7	-7.7	3.3	4.1	4.7	04/01/2014
<i>Conservative Benchmark RC (Static)</i>	4.2	-7.1	-7.1	2.9	3.9	4.5	
Moderately Conservative RC (Static)	5.3	-8.9	-8.9	4.1	5.0	5.7	04/01/2014
<i>Moderately Conservative Benchmark RC (Static)</i>	5.5	-9.3	-9.3	3.4	4.5	5.3	
Moderate RC (Static)	6.2	-11.4	-11.4	4.4	5.4	6.4	04/01/2014
<i>Moderate Benchmark RC (Static)</i>	6.8	-11.6	-11.6	3.6	4.7	5.8	
Moderately Aggressive RC (Static)	7.4	-12.6	-12.6	5.1	6.0	7.1	04/01/2014
<i>Moderately Aggressive Benchmark RC (Static)</i>	8.0	-13.5	-13.5	3.9	5.0	6.3	
Aggressive RC (Static)	8.1	-15.3	-15.3	5.1	6.2	7.6	04/01/2014
<i>Aggressive Benchmark RC (Static)</i>	9.1	-15.8	-15.8	3.8	5.1	6.6	
Very Aggressive RC (Static)	9.8	-16.0	-16.0	5.3	6.1	7.6	04/01/2014
<i>Very Aggressive Benchmark RC (Static)</i>	10.3	-17.3	-17.3	3.9	5.3	6.9	
<b>RCP</b>							
Very Conservative RCP (Static)	2.4	-7.2	-7.2	1.3	2.6	3.1	04/01/2014
<i>Very Conservative Benchmark RCP (Static)</i>	2.6	-4.8	-4.8	1.6	2.6	3.0	
Conservative RCP (Static)	4.2	-8.1	-8.1	2.9	3.8	4.4	04/01/2014
<i>Conservative Benchmark RCP (Static)</i>	4.2	-7.8	-7.8	2.5	3.6	4.2	
Moderately Conservative RCP (Static)	5.3	-9.9	-9.9	3.6	4.6	5.4	04/01/2014
<i>Moderately Conservative Benchmark RCP (Static)</i>	5.5	-10.3	-10.3	2.9	4.1	4.9	
Moderate RCP (Static)	6.3	-12.5	-12.5	3.9	5.0	6.1	04/01/2014
<i>Moderate Benchmark RCP (Static)</i>	6.8	-12.6	-12.6	3.1	4.4	5.5	
Moderately Aggressive RCP (Static)	7.4	-13.4	-13.4	4.6	5.7	6.8	04/01/2014
<i>Moderately Aggressive Benchmark RCP (Static)</i>	8.0	-14.1	-14.1	3.5	4.8	6.0	
Aggressive RCP (Static)	8.1	-15.7	-15.7	4.9	6.1	7.5	04/01/2014
<i>Aggressive Benchmark RCP (Static)</i>	9.1	-16.4	-16.4	3.6	5.0	6.5	
Very Aggressive RCP (Static)	9.8	-16.0	-16.0	5.3	6.1	7.6	04/01/2014
<i>Very Aggressive Benchmark RCP (Static)</i>	10.3	-17.3	-17.3	3.9	5.3	6.9	

# 6

## SECURE 2.0 Update

**AON**





# SECURE 2.0

The Setting Every Community Up for Retirement Enhancement Act of 2022 (“SECURE 2.0”) was signed into law on December 29, 2022, as part of the Consolidated Appropriations Act, 2023.

Acknowledgement of **broader financial challenges** that serve as barriers to retirement savings

Increasing retirement savings through **automation, incentives, and flexibility**

Support for employees as they **manage income** to and through retirement

Improve outcomes in 403(b) plans by allowing potential future use of **Collective Investment Trusts (CITs)** and access to **Pooled Employer Plans (PEPs)**

Support for effective and prudent use of **defined benefit** pension plan assets

This document is not intended to represent a comprehensive summary of SECURE 2.0, but rather to highlight key provisions we expect to be of most interest to employers and their employees.

# Increasing Retirement Savings

## Expanding Plan Coverage

### Part-Time Worker Coverage Rules

- Employees that work 500 or more hours in two consecutive years must be allowed to make deferrals to their employer's DC plan
- SECURE 2.0 shortened eligibility period from three years to two years for 401(k) plans
- Now extended to ERISA 403(b) programs

Effective: **2025**

**Required**

### How it works

- Supersedes the “universal availability” exclusion for employees that normally work less than 20 hours per week
- Sponsors must track hours to ensure covered employees are offered deferral opportunity

### Actions:

- Review options to track for compliance
- Decide if any hours requirement for deferral should be eliminated, weighing administrative and plan cost considerations
- Consider whether to update access to employer match (and how this fits with DEI goals)

# 36%

of 403(b) sponsors have immediate eligibility to receive match

# 38%

of 403(b) sponsors require 12 months of service to receive match

Source: Plan Sponsor of America 2022 403(b) Plan Survey

# Increasing Retirement Savings

## Catch-up and Roth Contributions

### New Requirements for Catch-up Contributions

- Catch-up contributions must be designated as Roth for employees with earnings >\$145,000 (indexed)
- Optional for other employees

Effective: **2024**

#### Required

#### Actions:

- Amend plan if Roth not currently offered
- Coordinate payroll services
- Consider administrative implications and communications

### Roth Designation for Employer Contributions

- 401(a), 403(b) and 457(b) can allow employees to elect to have employer contributions made as Roth
- Available for matching and nonelective employer contributions
- Contributions must be 100% vested

Effective: **Upon enactment**

#### Optional

#### Actions:

- Address administrative complexities including if deferral and employer contributions are made to different plans
- Consider communication challenges

# 58%

of 403(b) plans offer Roth

Source: Plan Sponsor of America 2022 403(b) Plan Survey

# Addressing Broader Financial Challenges

## Emergency Savings and Withdrawals

### Emergency Savings

- Emergency savings sidecar accounts for non-highly compensated employees (capped at \$2,500)
- Roth basis only
- Automatic enrollment allowed (ERISA)

Effective: **2024**

**Optional**

#### **Actions:**

- Decide whether to add emergency savings account to retirement plan
- Payroll updates should be immediately considered
- Recordkeeping and administration updates as necessary

### 403(b) Hardships Aligned with 401(k) Rules

- Participants can withdraw employee contributions and earnings
- May take hardship withdrawal without first taking a plan loan
- Employer may rely on employee's self-certification of a safe-harbor event (effective immediately)

Effective: **2024**

**Optional**

#### **Actions:**

- Understand hardship withdrawal prevalence for workforce
- Review plan rules if loans are required prior to requesting hardship
- Consider administrative procedures for multiple plans / vendors

**79%**

of 403(b) sponsors allow hardship withdrawals

**38%**

Sources: Plan Sponsor of America 2022 403(b) Plan Survey

Aon Defined Contribution and Financial Wellbeing Survey 2021, *Building a Financially Resilient Workforce*

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# Supporting Employees to and through Retirement

## Improving Tracking and Portability

### 457(b) Deferral Elections Aligned with 401(k) Rules

“First day of the prior month” requirement eliminated

#### Optional

#### Actions:

- Update administrative procedures
- Amend plan documentation and communication materials

### Mandatory Cash-out Threshold to \$7,000

Effective for plan distributions in **2024**

#### Optional

#### Actions:

- Decide whether to increase cash-out limit
- Amend plans as needed

### Required Minimum Distributions (RMDs) Age Increased

- The RMD age will increase from age 72 to age 73 beginning **2023** year and to age 75 beginning 2033

#### Automatic

#### Actions:

- Prepare for required administrative changes
- Amend plan documentation and communication materials

# Supporting Employees to and Through Retirement

## Improving Flexibility and Support for Lifetime Income

### Relaxed Rules for RMDs

- Reduces excise tax for failure to take RMD
- Facilitates Relaxes RMD rule restrictions on partial annuitization and certain popular commercial annuity features

Effective **immediately**

- Eliminates RMDs for Roth accounts

Effective **2024**

**Automatic**

#### Actions:

- Check with recordkeeper on any potential required actions

### Other Provisions to Support Lifetime Income

- Expands access to qualified longevity annuity contracts (QLACs)
- Provides a “free-look” period for participants to change mind

Effective **immediately** (with regulations due within 18 months)

**Automatic**

#### Actions:

- Review options for supporting lifetime income in the DC plan

### Mechanism to Remove Options

- SECURE 1.0 amendment regarding “lifetime income options” (LIOs)
- Plans can offer individual choice to retain LIO in an IRA or to liquidate and reinvest
- No published guidance

Effective **with SECURE 1.0**

**Optional**

#### Actions:

- Consider whether useful for a “refresh” of plan investment options, including current LIOs

# Collective Investment Trusts (CITs)

## Permit 403(b) to Use CITs

- Previously, 403(b) plans could only invest in annuity contracts and mutual funds
- Changes to the Internal Revenue Code now permit 403(b) plan investment in Collective Investment Trusts

Effective: **Immediately**

**Automatic**

## Security Law Exemptions Still Needed

- Corresponding amendments to security laws were ***not*** included in the final legislation
- Security law changes are still needed to make CITs viable investment options for 403(b) plans – which may take considerable time to implement

Effective: **TBD**

### Actions:

- Call or write your congress person to let them know why it is importance to make CITs viable investment options for 403(b) plans

# 52%

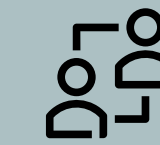
Percentage of total assets in CITs among 401(k) plans with greater than \$1B

Source: The BrightScope/ICI Defined Contribution Plan Profile: A Close Look at 401(k) Plans, 2019

# Understanding the Pooled Employer Plan (PEP) Option

SECURE 1.0 allowed for the creation of PEPs for 401(k) plans. SECURE 2.0 extends this opportunity to 403(b) plans.

PEPs are an enhanced retirement savings plan structure that allows employers to **pool 403(b) assets in a single trust to gain economies of scale** while **transferring fiduciary and operational responsibilities** to the PEP provider.



**Less work**  
for management teams



**Less risk**  
for employers and fiduciaries



**Lower costs**  
and improved outcomes for employees



# Impact of a PEP for Employers



## Pooled Plan Provider Responsibilities

Fiduciary Oversight and Compliance	Plan Management and Operations	Participant Delivery
Governance and Meetings	Plan Document/ SPD	Participant Experience
Select and Monitor Vendors	Audits and 5500	Financial Wellness
Regulatory Updates	Nondiscrimination Testing	Communication and Education
Investments/ Legacy Assets	Claims and Appeals	Recordkeeping

## Employer Responsibilities

Select Plan Design and Contribution Levels
Send Payroll and Contributions
Monitor Pooled Plan Provider

**SECURE 1.0** provides for distribution of a lifetime income investment (e.g., annuity) that is no longer authorized to be held as an investment option under a 403(b) plan in the form of a direct trustee-to-trustee transfer



# Other Provisions

SECURE 2.0 includes additional provisions not covered in detail in this document including:

- Expansion of EPCRS, including relief for auto-enrollment miscues
- Eliminating some communications to unenrolled participants
- Purchase long-term care insurance with retirement assets
- Requirement for annual paper statements
- Matching contribution on student loan repayments
- Regulatory review of reporting and disclosure requirements
- Higher catch-up limit ages 60-63 (greater of \$10,000 (indexed) or 150% of regular catch-up



# Action Plan for Secure 2.0 Provisions

Plans	Immediate or 2023	2024	2025	2026+
403(b) and 457(b) Plans	<ul style="list-style-type: none"> <li>• RMD Age/Other Changes</li> <li>• Special needs trust lifetime distribution</li> <li>• EPCRS &amp; Overpayment relief</li> <li>• Confirm allowable distributions (natural disasters, RMDs, QBADs, terminally ill exception, hardship, personal emergency, domestic abuse victims, etc.)</li> <li>• Allow employee to designate employer contributions as Roth</li> <li>• Review lifetime income options</li> <li>• Provide incentives for participation</li> <li>• Consider outsourced solutions such as a pooled employer plan</li> <li>• Self certification of hardship withdrawals</li> <li>• Eliminate first day of the month rule (457(b) plans only)</li> </ul>	<ul style="list-style-type: none"> <li>• Increase cash-out limit from \$5,000 to \$7,000</li> <li>• Reporting for Retirement Lost and Found</li> <li>• Catch-up required to be Roth for some</li> <li>• Emergency Savings Accounts</li> <li>• Student Loan Repayment</li> <li>• Auto-Portability</li> <li>• Eliminate RMDs on Roth accounts</li> <li>• Employer contributions allowed in hardship withdrawal</li> </ul>	<ul style="list-style-type: none"> <li>• Increase catch-up limit to 150% for ages 60-63.</li> <li>• Amend plans for SECURE 2.0</li> <li>• Long-term part-time workers eligible</li> <li>• Increased catch-up limits</li> </ul>	<ul style="list-style-type: none"> <li>• Reporting and disclosure changes</li> <li>• One paper statement per year</li> <li>• Performance benchmarks for asset allocation funds</li> <li>• Saver's Match (2027)</li> </ul>

**Black text: Automatic/happening**

**Blue text: Decision required**

**Red Text: Opportunity to Explore**

Note: Only provisions broadly applicable to qualified 403(b) and 457(b) retirement plans are noted above. The purpose of this summary is to help plan sponsors prioritize what decisions they need to make, when, and evaluate the potential impact of the changes for their plans/population.

# 7

## Appendix



# Your Consulting Team

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