



PENSION & BENEFITS QUARTERLY

President's Letter



I want to personally welcome everyone back to the 2016-2017 season of the Western Pension & Benefits Council, SF Chapter!

The NFL kicked off on September 8 and our season opener is September 22 at a cool new venue. Much like Levi Stadium, we hope to be speaking to a sellout crowd at SPUR.

My first words of thanks go to all the volunteers at ASPPA and WP&BC who worked tirelessly over the last year to produce a fantastic summer conference. Seattle as a host city never disappoints and the programming and speakers were well worth being involved in the Southwest Airlines technology debacle (well, maybe not, but life happens). Please be sure to join in the fun next Summer when we head to Anaheim from July 9-12, 2017.

My next words of thanks and praise, go to none other than **Janie Waters**, our newsletter publisher and creative director. Thirty years of hanging with our crew and putting together these informative and creatively designed newsletters. If you want to know anything about the Chapter, Janie is probably in the "know" as she is THE only person who has experienced all 30 years. I've seen about 20 as a volunteer, 25 or more as a member, but she's had a bird's eye view of all our rich history. If her keyboard and emails could talk! So, on behalf of the Board, Committee Chairs and Volunteers, and our members, we say a great big heartfelt thank you! Putting these issues together tends to look a lot like the last 10 minutes before Thanksgiving dinner. All appears to be going well and then the final dash is controlled chaos! But we get it done each and every time.

I can't go without expressing my gratitude to the Board, Committee Members, and especially the Program Committee. In case you didn't know it, you have the best Program Committee who is already hard at work and done planning the entire fall lineup. Unlike Downton Abbey, Castle, CSI, and a few more, we are not cancelled or done with our programming. We are just getting into full swing for another epic season of mystery, drama, comedy, and maybe even some family friendly shows. Even the regulatory and legislative January program is almost set! You will have to come out to each and every

meeting to thank the great team of professionals who make this all possible. We start the year with a look at financial wellness on September 22 at a cool new venue, SPUR. Then, move into the November program to learn about the State of California's Secure Choice Plan experience, set for November 10. In case you needed more of an incentive to come on out, you can join the ranks of Past President **Andrew Ferguson** and other attendees who are winners of the monthly meeting contests. We've bet on the stock market, the fiduciary rule, and had fun with raffling off many grand prizes at the Member Appreciation program in May. I don't want to give it away, but the September contest may be politically inspired, but not what you think!

Free drinks may also be another reason to come check out our meetings and events this year. You learn, network, and break up the "I'm wondering when I can stop saying or typing the words "fiduciary rule or ACA."

Well, you can stop wondering – I just typed both! And they continue to be hot topics and we will offer our best insights and updates on these issues and more. For good reasons or not, we now have a myriad of lawsuits pending, including 403(b) plans coming under review. Who says benefits are boring?

With what are sure to be exciting election results, a new year, new rules of fiduciary conduct taking affect, these growing lawsuits against retirement plan sponsors, the continued debate of the benefits and sustainability of the ACA, you can bet the January update session will be quite lively.

Finally, I know I speak for all when I say thank you to our financial sponsors. We are able to bring you industry thought leaders, nice venues, and even sometimes free drinks—all thanks to the dedicated and financial generosity of the many organizations who support us (see page 9 for the list!). So unless you enjoy a glass of wine at your office about 4 o'clock, come on out to our meetings, grab a glass of something, enjoy yourself, meet new people, and learn about our industry trends and best practices from many of the best. It is how we all stay on top of our professional games!

For now, with friendship and high standards for our industry,

Tina Alexander Chambers
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MEMBER PROFILE

Tom Bernard



Name: Tom Bernard
Company: Ernst & Young LLP
Title: Executive Director, Tax Services
Education: B.S., UC Berkeley – Environmental Economics;
MBA, Wharton School of Business
Years in the industry: 19
Please tell us about your first “real” job: Paper boy

BUSINESS BACKGROUND

Nature of your work: I help my clients solve complex problems related to the Affordable Care Act, Employer Tax Credits, Unemployment Claims and Employment Tax Advisory. I focus on the financial implications of the Affordable Care Act, including workforce analytics, statutory compliance and reporting, marketplace exchange management, as well as ASC 450 reviews of ACA processes and procedures for financial statement purposes. Successful execution of these projects requires working closely with governmental and economic development and state agencies, as well as across various departments such as Human Resources, Technology, Payroll, Tax and Finance to execute these projects.

How you got into the field: Recruited after college.

What you like about the field: Every day presents a new challenge. It's gratifying to help clients find actionable solutions, especially employers who are managing the complexities of the ACA reporting requirements, the volume of data required and the rapidly changing landscape.

PERSONAL

Ways you spend free time: With family, running, and volunteering at my kids' school.

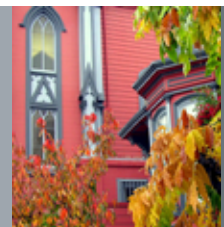
Guiding philosophy: Do the right thing.

Favorite charities: San Francisco/Marin Food Bank and Golden Gate National Recreation Area

Last books read: Creativity Inc.

Restaurant recommendations: Pacific Catch in San Francisco – try the Poke bowl.

What will you do when you retire: Sail around the world.





Qualified Pension Plans

Annual Pension Data: On May 27, 2016, the Pension Benefit Guaranty Corporation (“PBGC”) released its annual update on pension statistics for single-employer and multiemployer plans. The Data Book generally covers information recently reported by pension plans. A new multiemployer table added this year includes time series data on participants in plans by zone status as defined under the Pension Protection Act of 2006 through 2013.

<http://www.pbgc.gov>

Multiemployer Plan Mergers and Transfers: On June 6, 2016, PBGC published a proposed rule to implement statutory changes under the Multiemployer Pension Reform Act of 2014 (“MPRA”) affecting mergers of two or more multiemployer plans and transfers of assets and liabilities between multi-employer plans. Under MPRA, PBGC has authority to facilitate plan mergers by providing technical or financial assistance, if necessary, to avoid plan insolvency if statutory requirements are met. The proposed rule would provide guidance on the process for requesting a facilitated merger, including a request for financial assistance, and also reorganize and update the existing regulation.

<http://www.pbgc.gov>

Multiemployer Plan Trends: On June 6, 2016, the Internal Revenue Service (“IRS”) published guidance for multiemployer plans on common compliance issues in connection with participation agreements, conflicts among plan documents, participation by non-collectively bargained employees, and actuarial adjustments.

<http://www.irs.gov>

Phased Retirement Payments: On June 10, 2016, the IRS published Notice 2016-39 which explains that if certain conditions are satisfied, payments received by an employee from a qualified defined benefit plan during phased retirement (an arrangement where a participant commences distribution of a portion of their retirement benefits while continuing to work on a part-time basis) are not received as an annuity for purposes of section 72 of the Internal Revenue Code (“Code”). Notice 2016-39 also explains the present value factors for calculating the accrued benefit under Code Section 72(e)(8), and the time for determining the basis recovery fraction. Examples of basis recovery calculations are included. Notice 2016-39 applies to taxable years beginning on or after January 1, 2016, but taxpayers may apply the notice to prior taxable

years. The IRS also issued Revenue Procedure 2016-36 which provides guidance regarding the application of Treasury Regulation sections 1.72-2(b)(2) and 1.72-4(b)(1) to non-qualified contracts, and that Notice 2016-39 does not apply to amounts that are received from a non-qualified contract.

<http://www.irs.gov>

Determination Letters: On June 29, 2016, the IRS issued Revenue Procedure 2016-37 which modifies the determination letter program for qualified plans. As of January 1, 2017, a sponsor of an individually designed plan (“IDP”) will be permitted to submit a determination letter application only for initial plan qualification, plan termination, and in certain other circumstances which are described in the revenue procedure. The IRS anticipates making exceptions based on program capacity to work additional applications, and the need for rulings in certain areas. Revenue Procedure 2016-37 also eliminates the interim amendment period under Revenue Procedure 2007-44, and replaces it with a new approach to the remedial amendment period. An IDP’s Section 401(b) remedial amendment period for required amendments will be tied to a Required Amendment List (published after October 1 of each year) unless legislation or other guidance states otherwise. Discretionary amendments will still be required by the end of the plan year in which the plan amendment is operationally put into effect, as under Revenue Procedure 2007-44.

<http://www.irs.gov>

Best Interest Contract Exemption: On July 7, 2016, the Department of Labor (“DOL”) published technical corrections to its Best Interest Contract Exemption (“BICE”), which was published on April 8, 2016. BICE was adopted by the DOL in connection with the publication of a final regulation defining who is a fiduciary of an employee benefit plan under ERISA as a result of giving investment advice to a plan or its participants or beneficiaries. BICE allows certain persons that are fiduciaries under the ERISA or the Code, or both, by reason of providing investment advice, to receive compensation that may otherwise be prohibited. The corrections fix typographical errors, make minor clarifications to provisions that might otherwise be confusing, and confirm insurers’ broad eligibility to rely on the exemption, consistent with the exemption’s scope and the DOL’s final regulatory impact analysis. The BICE, as corrected, is applicable to transactions occurring on or after April 10, 2017.

<http://www.dol.gov>

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Inflation Adjusted Penalty Amounts: On July 21, 2016, the DOL issued an interim final rule to adjust the amounts of civil penalties assessed or enforced in its regulations. The penalty increases affect retirement and health and welfare plans. Beginning in 2017, the DOL will adjust the new ERISA Title I penalty amounts annually or inflation not later than January 15 of each year. The DOL published a table showing the adjusted penalties per violation. The rule became effective August 1, 2016. The new amounts apply to civil penalties assessed after August 1, 2016, whose associated violations occurred after November 2, 2015. A Fact Sheet and Q&A guidance on the interim final rule was published.

<http://www.dol.gov>

Form 5500 Proposal: On July 21, 2016, the DOL, IRS, and PBGC published a proposed rule on changes to the Form 5500 Annual Return/Report series and related regulations. The revisions to the Form 5500: (1) modernize financial reporting; (2) update fee and expense information on plan service providers; (3) enhance data mineability; (4) provide greater information regarding group health plans, including adding a new Schedule J (Group Health Plan Information); and (5) improve compliance through selected new questions regarding plan operations, service provider relationships, and financial management of the plan. The proposed regulations also would make improvements to the certification requirements for the limited scope audit requirements, and allow group health plans to use the Form 5500 to satisfy certain reporting requirements in the Affordable Care Act. The proposed changes to the DOL regulations implement the form revisions. Under the proposal, the form revisions would begin with the Plan Year 2019. Some form changes may be implemented earlier or later depending on the public comments and developments in the EFAST2 procurement process. Comments are due by October 4, 2016.

<http://www.dol.gov>

Waiver of 60-Day Rollover Requirement: On August 24, 2016, the IRS published Revenue Procedure 2016-47 which creates a self-verification procedure for waiver of the 60-day rollover requirement. Code sections 402(c)(3) and 408(d)(3) provide that any amount distributed from a qualified plan or individual retirement account (“IRA”) will be excluded from income if it is transferred to an eligible retirement plan no

later than the 60th day following the day of receipt. Revenue Procedure 2016-47 provides for a written self-certification (subject to verification on audit) that may be used by a taxpayer claiming eligibility for a waiver. The written certification must: (1) confirm that there has been no prior denial by the IRS; (2) explain that one of the designated reasons for missing the 60-day deadline applies; and (3) the contribution must be made to the plan or IRA as soon as practicable, or within 30 days, after the reason(s) no longer prevent the taxpayer from making the contribution. The IRS and plan administrators and trustees may rely on a taxpayer’s truthful self-certification that they qualify for a waiver under the circumstances outlined in Revenue Procedure 2016-47. Even if a taxpayer does not self-certify, the IRS now has the authority to grant a waiver during a subsequent examination. A model self-certification letter is included. Revenue Procedure 2016-47 became effective on August 24, 2016.

<http://www.irs.gov>

State-Run Retirement Savings Programs for Non-

Governmental Employees: On August 25, 2016, the DOL published a final rule assisting states in creating individual retirement account programs for workers that do not have access to workplace savings programs. The final rule provides guidance for states in designing programs by providing a safe harbor from ERISA coverage to reduce the risk of ERISA preemption of the relevant state laws. In order to qualify under the final rule, a state program must be:

- Established pursuant to state law and administered by the state;
- Provide for a limited employer role limited to ministerial activities; and
- Voluntary for employees even if it requires automatic enrollment if adequate notice of their ability to opt-out.

The DOL also issued a proposed rule that would enable some larger cities to create retirement savings plans. A news release and fact sheet on the final and proposed rules is available.

<http://www.dol.gov>

California Retirement Program: On August 31, 2016, the California State Senate approved SB 1234, a bill to create a retirement savings program for private sector workers.

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If signed by Gov. Jerry Brown, California would have the authority to establish the Secure Choice Retirement Savings Program, a voluntary workplace retirement savings plan that enables participation through automatic employee payroll contributions into a personal retirement account managed by the California Secure Choice Retirement Savings Investment Board. The bill specifies numerous duties and reporting requirements of the Board in implementing and maintaining the program, and outlines funding sources and expenditure limitations. The bill would express legislative approval of the program and its implementation on January 1, 2017.

<http://www.assembly.ca.gov>

Mortality Tables for 2017: On September 6, 2016, the IRS issued Notice 2016-50 which sets forth the mortality tables for minimum funding and present value requirements for 2017 to be used for defined benefit pension plans. The updated tables apply for purposes of calculating the funding target and other items for valuation dates occurring during calendar year 2017. The notice also includes a modified unisex version of the mortality tables for use in determining minimum present value for distributions with annuity starting dates that occur during stability periods beginning in the 2017 calendar year.

<http://www.irs.gov>

Health and Welfare Plans

Wellness Program Notice: On June 16, 2016, the Equal Employment Opportunity Commission (“EEOC”) published a sample notice and guidance to assist employers comply with obligations under a recently issued Americans with Disabilities Act (“ADA”) rule. The ADA requires employers who offer wellness programs that collect employee health information to provide a notice to employees informing them what information will be collected, how it will be used, who will receive it, and what will be done to keep it confidential. Wellness programs often gather health information through voluntary health risk assessments or biometric screenings that include medical examinations (such as tests to detect high blood pressure, high cholesterol, or diabetes). The EEOC published FAQs about the notice requirement and use of the sample notice. The requirement to provide the notice takes effect as of the first day of the plan year that begins on or after January 1, 2017, for the health plan an employer uses to calculate any incentives it offers as part of the wellness program.

<http://www.eeoc.gov>

Notice of Coverage Options: On June 21, 2016, the Departments of Labor (“DOL”), Health and Human Services (“HHS”), and the Treasury (collectively, the Departments), released Frequently Asked Question (“FAQ”) About the Affordable Care Act Implementation (Part 32). In Technical Release 2013-02, the DOL indicated that the COBRA election notice may be used by plan administrators to assist qualified beneficiaries in understanding coverage options upon experiencing a qualifying event, including information on enrollment in Marketplace coverage.

The FAQ provides that a group health plan administrator may include additional information about Marketplace coverage with the COBRA model election notice such as information on how to obtain assistance with enrollment, the availability of financial assistance, information about Marketplace websites and contact information, particular products offered in the Marketplaces, and other information to help qualified beneficiaries choose between COBRA and other coverage options. COBRA election notices may be tailored to particular groups like young adults aging out of dependent coverage on their parents’ health plan. Notices are required to be “easily understood by the average plan participant” and, therefore, information should not be too lengthy or difficult to understand.

<http://www.dol.gov>

2016 Information Reporting Forms: On July 7, 2016, the IRS released draft Forms 1094 and 1095 for the 2016 tax year (for filing in early 2017). On August 2, 2016, draft instructions for Forms 1095-C, Employer-Provided Health Insurance Offer and Coverage, and 1094-C, Transmittal of Employer-Provided Health Insurance Offer and Coverage Information Returns. The instructions explain form revisions, new indicator codes for conditional offers for spousal coverage, reporting for aggregated Applicable large employer (“ALE”) Groups (a group of ALEs treated as a single employer under the Code), and COBRA continuation coverage as well as include new definitions, and the remaining forms of transition relief have been amended to clarify for which months in 2016 the transition relief applies (references to transition relief that applied only in calendar year 2015 is removed). On August 10, 2016, draft instructions for Forms 1094-B, Transmittal of Health Coverage Information Returns, and 1095-B, Health Coverage, were released. The instructions explain new filing

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requirements (reporting of catastrophic coverage under the proposed rules issued on August 2, 2016), form revisions, clarifications on reporting coverage in more than one minimum essential coverage plan, and that excepted benefits (limited-scope vision and dental benefits) should not be reported. The IRS also released draft Publication 5164, Test Package for Electronic Filers of Affordable Care Act Information Returns for 2017.

<http://www.irs.gov>

HIPAA Fact Sheet on Ransomware: On July 11, 2016, HHS published a Fact Sheet to help organizations understand and respond to the threat of ransomware. Ransomware is a type of malware (malicious software) that encrypts data with a key known only to the hacker and makes the data inaccessible to authorized users, until a ransom is paid. The HIPAA Security Rule requires implementation of security measures to prevent the introduction of malware, including ransomware. The Fact sheet covers the following topics:

- Conducting a risk analysis to identify threats and vulnerabilities to electronic protected health information (ePHI) and mitigate or remediate identified risks;
- Implementing procedures to safeguard against malicious software;
- Training authorized users on detecting malicious software and reporting such detections.
- Limiting access to ePHI to only those persons or software programs requiring access; and
- Maintaining an overall contingency plan that includes disaster recovery, emergency operations, frequent data backups, and test restorations.

HIPAA covered entities and business associates are required to develop and implement security incident procedures and response and reporting processes that are reasonable and appropriate to respond to malware and other security incidents.

<http://www.hhs.gov>

Minimum Essential Coverage: On August 2, 2016, the IRS issued proposed regulations providing guidance under Code section 6055 which relates to IRS Forms 1095-B and 1095-C, Part III. Code section 6055 requires health insurance issuers, certain employers, and others that provide minimum essential coverage to individuals to report to the IRS

information about the type and period of coverage, and furnish related statements to covered individuals. The proposed rule describes new mandatory reporting requirements for providers of catastrophic coverage in 2017 (voluntary for 2016), requires a State agency administering coverage under the Basic Health Program (additional health-care coverage option to certain individuals not eligible for Medicaid) to report that coverage, and describes the plans for which reporting is not required. The proposed regulations provide specific rules regarding truncated taxpayer identification number (“TIN”) on statements to taxpayers, and TIN solicitation rules for section 6055 reporting. The regulations generally apply for taxable years ending after December 31, 2015, and may be relied on for calendar years ending after December 31, 2013. The only exception is the rules relating to reporting of coverage under catastrophic plans, which are proposed to apply for after December 31, 2016. Comments or hearing requests are due by October 3, 2016.

<http://www.irs.gov>

Federally-Facilitated Marketplace (“FFM”) User Fee:

On August 22, 2016, the Centers for Medicare & Medicaid Services (“CMS”) released a web-based form through which Third-Party Administrators (“TPAs”), including Pharmacy Benefit Managers (“PBMs”), that provide services to a self-insured group health plan offered by an eligible organization, and FFM issuers that have entered into an agreement with these TPAs, can report contraceptive claims costs incurred by plan participants and beneficiaries for the 2015 benefit year. CMS published FAQs to assist with navigating the submission process and understanding the mechanism through which CMS will apply the user fee adjustment to issuers. A User Fee Adjustment Web Form and Quick Start Guide is available.

<http://www.cms.gov>

2016 Maximum Individual Shared Responsibility

Payment: On September 6, 2016, the IRS issued Revenue Procedure 2016-43 which provides the national monthly average premium for a bronze-level qualified health plan available through Exchanges. Code Section 5000A provides that if a taxpayer, or an individual for whom the taxpayer is liable, is without minimum essential coverage for one or more months in a taxable year, then the taxpayer is liable for the individual shared responsibility payment when filing his or her federal income tax return, unless an exemption applies.

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The payment is the lesser of (1) the sum of the monthly penalty amounts, or (2) the sum of the monthly national average bronze plan premiums for the shared responsibility family (as defined under Code section 5000A). For 2016, the monthly national average bronze plan premium is \$223 per individual and \$1,115 for a family with five or more members. Revenue Procedure 2016-43 is effective for taxable years ending after December 31, 2015.

<http://www.irs.gov>

Verification of Special Enrollment Periods: On September 6, 2016, CMS issued information clarifying special enrollment periods. The guidance outlines the efforts that CMS has taken to prevent misuse or abuse of special enrollment periods, and explains the categories of information needed to make necessary policy changes. CMS is implementing a pilot in 2017 to evaluate a pre-enrollment verification process, specifically, the impact of pre-enrollment verification of special enrollment eligibility on compliance, enrollment, continuity of coverage, the risk pool, and other outcomes. Comments are due by September 20, 2016.

<http://www.cms.gov>

Executive Compensation

Proposed Section 409A Regulations: On June 21, 2016, the Internal Revenue Service (“IRS”) published proposed regulations that would clarify or modify the final regulations (issued in 2007) and the proposed income inclusion regulations (issued in 2008) to help taxpayers comply with the requirements of Internal Revenue Code (“Code”) section 409A. The proposed regulations are narrowly tailored and are not intended to propose a general revision of prior rules. The proposed rules withdraw a specific provision of the 2008 proposed rules regarding the calculation of amounts includible in income under Section 409A(a)(1) and replaces that provision with revised proposed regulations. The proposed rules became effective on June 22, 2016. Comments and requests for a public hearing are due by September 20, 2016. A notice outlining certain corrections to the proposed rule was published on August 4, 2016.

<http://www.irs.gov>

Deferred Compensation Plans of State and Local Governments and Tax-Exempt Entities:

On June 22, 2016, the IRS issued proposed regulations on the taxation of deferred compensation plans established and maintained by the state or local governments or other tax-exempt organizations. The IRS issued final regulations under section 457 in 2003. The proposed amendments to the final regulations reflect statutory changes under Sections 457(a), (b), and (g), address certain issues under sections 457(e)(11) and 457(e)(12) that are not in the 2003 final regulations, and provide additional guidance under section 457(f). Specifically, the proposed regulations include rules for determining when amounts deferred under these plans are includible in income, the amounts that are includible in income, and the types of plans that are not subject to these rules under Code section 457. The proposed rule became effective on June 22, 2016. Comments and requests for a public hearing are due by September 20, 2016. A public hearing is scheduled for October 18, 2016.

<http://www.irs.gov>

Final Rule on Section 83(b) Elections: On July 26, 2016, the IRS issued final rules eliminating the procedural requirement for taxpayers to submit a copy of a Code Section 83(b) election with their federal income tax return. Under Section 83(b), a taxpayer receiving property subject to a substantial risk of forfeiture as compensation for services may elect to include in gross income the fair market value of property at the time of the transfer over the amount paid for the property. The final rules were adopted without modification to the proposed rules issued on July 17, 2015. Taxpayers must still comply with general recordkeeping requirements and maintain records sufficient to support the tax treatment of the property transfer. The final rules became effective on July 26, 2016, and apply to property transferred on or after January 1, 2016. For property transferred between January 1, 2015 and January 1, 2016, taxpayers can rely on the 2015 proposed rules.

<http://www.irs.gov>

Our deepest thanks to Anjuli Cargain of the Miller Law Group for her continuing work on the Quarterly Regulatory Update.



Western Pension and Benefits Council

San Francisco

Fall Events Schedule



Field Trip
Recology Tour of SF
October 18



Chapter Meeting
Creative Solutions Addressing Financial
Well-Being
September 22



Chapter Meeting
California Retirement Savings Plan
November 10

OUR FALL SCHEDULE IS PACKED WITH FANTASTIC SPEAKERS, UNIQUE VENUES, AND NEED-TO-KNOW INDUSTRY UPDATES.

FOR MORE INFORMATION AND TO REGISTER CHECK OUT OUR WEBSITE
WWW.WPBCSANFRANCISCO.ORG



The WP&BC San Francisco

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CHAPTER SPONSORSHIP OPPORTUNITY

The Chapter Board of Directors is pleased to announce that new sponsorship opportunities are now available to companies who wish to support important Chapter activities while increasing their exposure to plan sponsors and service providers in the Bay Area's professional pension and benefits community.

Sponsorships are available at four levels with corresponding benefits as detailed in the chart at right.

For additional information or to reserve your sponsorship, call Jenifer McDonald at the Chapter office, (415) 730-5479 or email info@wpbcsf.org



CHAPTER INFO AND BOARD OF DIRECTORS



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The Newsletter welcomes contributions from its members. If you would like to submit a topical benefits-related article or compile the quarterly regulatory update for an upcoming issue, please contact Tina Chambers at: tchambers@sageviewadvisory.com

EMPLOYMENT OPPORTUNITIES

If you wish to post an employment opportunity on our website, please read the following note:

Listings must comply with applicable regulations for employment advertising. Online job postings are free to WP&BC San Francisco Chapter members. Call Jenifer McDonald at the Chapter office for more information, (415) 730-5479. Email all listings to info@wpbcsf.com

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Membership in the WP&BC San Francisco Chapter is open to individuals who are productively, substantially and continuously engaged in work in the field of employee benefits. Any individual who has been engaged in work in the field of employee benefits may become a member upon submission of a completed membership application, payment of dues, and approval by the Chapter Board of Directors. To join, visit <http://www.westernpension.org>.

DISCLAIMER

While the Western Pension & Benefits Council seeks to include accurate and up-to-date information in the Newsletter, the Western Pension & Benefits Council makes no warranties or representations as to the accuracy of the material included in the Newsletter and assumes no responsibility for any errors or omissions in the content. Information contained in the Newsletter is believed to be correct as of the date of submission; however, the accuracy of the information may be affected by subsequent developments.

The Newsletter is provided on the understanding that the Western Pension & Benefits Council is not engaged in rendering legal, accounting or other professional advice. If legal advice or professional assistance is required, the services of an appropriate professional should be sought.

