Pentegra's Pooled Plan Provider Services

Institutional Fiduciary Oversight for Pooled Employer Plans

PENTEGRA

A More Comprehensive Approach to Retirement Plan Management

Today's retirement plan environment demands more—more oversight, more accountability, and more expertise. Increasing regulatory scrutiny, fiduciary complexity, and operational demands have made it difficult for many organizations to effectively manage retirement plans on their own.

Pooled Employer Plans (PEPs) were designed to address these challenges by restructuring how fiduciary responsibility is delivered.

As a Pooled Plan Provider (PPP), Pentegra brings an institutional approach to governance, helping ensure that retirement plans are managed with discipline, consistency, and accountability.

The Role of the Pooled Plan Provider

As a Pooled Plan Provider (PPP), Pentegra serves as the central fiduciary authority for PEPs, acting as:

- Plan Sponsor
- Named Fiduciary
- Plan Administrator 3(16)

In this role, Pentegra assumes responsibility for:

- Overall plan governance and compliance
- Plan administration and operational oversight
- Monitoring of service providers
- Ensuring fiduciary responsibilities are executed prudently and consistently

This structure shifts the burden of day-to-day plan management away from employers and into the hands of experienced fiduciary professionals.

A Disciplined Fiduciary Framework

Pentegra's model is built on a core principle: fiduciary responsibility should be assumed and executed—not fragmented or loosely coordinated.

Our approach emphasizes:

- Clear accountability across all plan functions
- Structured, repeatable governance processes
- Ongoing monitoring and documentation
- A defensible fiduciary framework aligned with regulatory expectations

Employers retain an important but focused role—selecting the PEP and monitoring its performance—while Pentegra manages the complexity behind the scenes.

Governance in Action: Plan Review Committee

Pentegra's fiduciary oversight is supported by a dedicated Plan Review Committee, a cross-functional team responsible for overseeing all aspects of the PEP.

The Plan Review Committee:

- Evaluates and approves service providers
- Monitors ongoing performance and service delivery
- Reviews fees and ensures reasonableness
- Maintains formal meeting cadence, documentation, and governance standards

This structure ensures that oversight is not only active—but consistent, documented, and repeatable.

A Structured Oversight Lifecycle

Pentegra applies a disciplined, three-stage oversight process to all service providers within the PEP:

1. **Initial Evaluation & Appointment**
   - Comprehensive due diligence on experience, capabilities, and infrastructure
   - Evaluation of services, fees, and alignment with plan objectives
   - Formal review and approval by the Plan Review Committee

2. **Ongoing Monitoring**
   - Continuous review of service delivery and operational performance
   - Monitoring compliance, reporting, and adherence to agreements
   - Identification and resolution of issues as they arise

3. **Periodic Review & Benchmarking**
   - Benchmarking of fees and services against market standards
   - Use of RFI/RFP processes where appropriate
   - Ongoing validation of provider suitability and reasonableness

This lifecycle ensures that fiduciary oversight is continuous—not static.

Oversight Across the Entire Plan Ecosystem

Pentegra provides comprehensive oversight across all key service providers, including:

- 3(38) Investment Manager
- Recordkeeper
- Trustee/Custodian
- Auditor
- Administrative and compliance functions

By centralizing oversight, Pentegra reduces fragmentation, strengthens coordination, and minimizes the risk of gaps in responsibility.

The Value for Employers and Partners

Pentegra's PPP model delivers meaningful advantages:

- Reduced fiduciary exposure through delegation to experienced professionals
- Institutional governance structure with defined processes and accountability
- Simplified administration through centralized oversight
- Improved consistency and compliance across plan operations
- Greater confidence in plan management and oversight

Employers move from managing a plan internally to participating in a professionally governed retirement plan designed to withstand scrutiny.

PEPs represent more than efficiency—they represent a shift toward institutional-grade retirement plan governance.

The Pentegra Difference

What differentiates Pentegra is the depth of our fiduciary model. Pentegra's approach goes beyond coordination—we deliver a fully integrated fiduciary model that combines:

Pentegra's Fiduciary Model					
True fiduciary assumption--not coordination	Institutional governance framework	Scalable, repeatable processes	Deep fiduciary expertise for a higher level of oversight	80+ years as an institutional fiduciary	Integrated PPP and 3(16) Services

The result is a retirement plan solution that is not only efficient—but structurally stronger and more defensible.

A fiduciary partner with more than eight decades of institutional fiduciary depth.

Pentegra's 3(16) Fiduciary Model

Our 3(16) Administrative fiduciary services shift key responsibilities, transferring many of the legal and operational burdens of managing a retirement plan.

As 3(16) Fiduciary Administrator, Pentegra assumes the risk and responsibility of doing this work for you.

- Plan Operational Oversight and Compliance
- Participant Notices, Statements and Disclosures
- Forfeitures & Suspense Accounts
- Plan Audit
- Compliance Testing
- Loans & Loan Repayments
- QDROs
- Participant Fee Disclosures
- Hardship Distributions
- Annual Plan Review Process
- Corrections
- Claims & Benefit Determinations
- New Hire & Termination Processing
- Government Filings
- Plan Document Administration
- Contributions

Think of it as an extra set of eyes on the plan.

A CEFEX Certified Administrator and Pooled Plan Service Provider

Pentegra is a CEFEX-certified Administrator and has also earned certification as a Centre for Fiduciary Excellence (CEFEX) Certified Pooled Plan Service Provider.

Pentegra is among an elite group of organizations certified by CEFEX, demonstrating adherence to globally recognized standards for fiduciary excellence, governance, and operational integrity.

Pentegra's CEFEX certifications provide independent validation of fiduciary excellence. As an independent fiduciary, we act solely in the best interests of plan sponsors and participants, without conflicts of interest or competing priorities. This independence allows us to deliver objective oversight, disciplined governance, and a higher standard of care.

We don't just support your plan—we take on fiduciary responsibility for it.

A Smarter Way Forward

PEPs represent a fundamental shift in how retirement plans are governed.

With Pentegra as your Pooled Plan Provider, you gain:

- Professional fiduciary oversight
- Reduced risk and complexity
- A scalable, future-ready plan structure

A more disciplined approach to retirement plan management—built for today's environment.

For more information, contact a Pentega PEP expert today.

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Follow our conversation.

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