

Guideline for Developing a Written Policy on Managing Inquiries and Complaints from Plan Beneficiaries

Plan administrators are encouraged to develop a written policy to document their process for managing inquiries and complaints from plan beneficiaries. The content of the policy will vary from plan to plan, depending on the number, frequency and complexity of inquiries and complaints that are generally handled by the plan administrator. The content will also depend on whether inquiries and complaints will be handled in-house or by third-party service provider(s).

The plan administrator should determine the policy's content based on what is most appropriate for the pension plan (e.g., different details or levels of tracking for inquiries versus complaints, etc.). Note that all processes do not have to be contained under one policy document (i.e., separate documents for handling inquiries, complaints, communication requirements, training requirements, etc.). In addition, the policy (or policies) should be reviewed periodically to determine if information needs to be updated or if additional information should be included. See FSCO policy [A300-450 \(Administrator's Management of Inquiries and Complaints from Plan Beneficiaries\)](#) for information about the plan administrator's responsibilities when dealing with inquiries and complaints from plan beneficiaries.

When the plan administrator is developing the policy, the list of key items below should be considered.

Participants and their Responsibilities

Identify:

- All individuals who are responsible for handling inquiries and complaints from plan beneficiaries (e.g., names, titles, specific roles, etc.).
- The responsibilities of all individuals who are entrusted with this task (e.g., their fiduciary obligations, delegated responsibilities, confidentiality requirements, etc.).

Processes or Procedures

Develop:

- The process for logging and tracking inquiries and complaints that are received from plan beneficiaries. Include information about:
 - the form in which they were received (e.g., letter, e-mail, telephone, in person, etc.);
 - the category or type of inquiries or complaints (e.g., pension calculation, plan provisions, marriage breakdown, etc.); and
 - any difference(s) in the tracking of inquiries versus complaints.

(Note: This information is useful for identifying training requirements and areas of improvement, determining how to properly allocate resources, and measuring against performance targets.)

- The procedure for acknowledging receipt of inquiries or complaints based on the form in which they were received (e.g., by letter, e-mail, telephone, in person, etc.).
- The procedure for responding to plan beneficiaries based on the form in which the inquiries or complaints were received (e.g., by letter, e-mail, telephone, in person, etc.).
- The procedure that sets out the information that should be included in letters to plan beneficiaries, such as:
 - the date when the inquiry or complaint was received;
 - the date when a response will be provided;
 - a summary of the issue;
 - the conclusion based on a review of the issue;
 - who to contact for questions; and
 - what options are available if plan beneficiaries disagree with the response.
- The procedure for handling confidential or sensitive information.
- The procedure for documenting verbal inquiries or complaints.
- The timelines for providing an acknowledgment and response to inquiries or complaints. Include information about any difference(s) in response times based on the form in which they were received, such as:
 - in writing (by letter, e-mail, fax, memo, etc.); or
 - verbally (by telephone, in person, etc.).
- The procedure for contacting plan beneficiaries' collective bargaining agent(s), if applicable.
- The follow-up process if a response cannot be provided to the plan beneficiary within the initial deadline (e.g., provide a reason for the delay and the anticipated response date, etc.).
- The internal approval process (e.g., required sign-offs before the response is sent to plan beneficiaries) (if applicable).
- The internal dispute resolution process (if applicable).
- The procedure for dealing with conflicts of interest.
- The procedure for dealing with plan beneficiaries who have mental or physical disabilities.
- The procedure for reporting to senior level staff and/or to appropriate governance oversight bodies (e.g., pension committee) concerning the volume and type of complaints, and the action(s) that was/were taken to address or resolve the complaints.

Communication Requirements

Determine:

- Information about the inquiries and complaints process that needs to be communicated to plan beneficiaries (e.g., contact information, instructions to plan beneficiaries, etc.) and how that information will be communicated to them (e.g., company website, pension statements, etc.).
- How often the plan administrator should communicate with plan beneficiaries (e.g., whenever there is a change in contact information or administrative processes, etc.).
- If the plan beneficiary's collective bargaining agent must be contacted (where applicable).

Skills and Knowledge Requirements

Specify:

- Training and education requirements for those individuals who are responsible for responding to plan beneficiaries' inquiries and complaints.
- Requirements for continuing education and ongoing training.
- Performance targets and how those targets will be monitored (e.g., measuring response times, volume and frequency of complaints, etc.).

Educational and Instructional Information

Specify:

- Information about plan beneficiaries' rights and obligations under the pension plan (e.g., plan beneficiaries' rights to information, what information is needed from plan beneficiaries to process their pension entitlements, etc.).
- Information about where records relating to plan beneficiaries' inquiries or complaints will be kept and for how long.
- Information concerning the disclosure of conflicts of interest.
- Instructions for when an inquiry or complaint should be escalated to senior level staff and/or to any other governance oversight body (if applicable).
- Information about other guides or procedures that should be followed by those individuals who are responsible for managing inquiries and complaints.

Delegated Responsibilities (if applicable)

Specify:

- The delegated responsibilities of the third party service providers (service providers) and how they will be supervised by the plan administrator.
- Instructions to the service providers about which type of issues should be brought to the plan administrator's attention and when this should occur.
- Instructions for complying with the policy on managing plan beneficiaries' inquiries and complaints.
- The plan documents that must be provided to the service providers and when those documents should be provided to them (i.e., to ensure that the service providers have accurate and current information about the pension plan).

Monitoring Requirements

Monitor:

- The processes and regular reporting requirements.
- The performance of individuals or service providers that have been delegated tasks (if applicable).
- Whether the service providers have met the terms of the contract (if applicable).
- How often the process will be reviewed to determine:
 - if those individuals who are responsible for this job are adhering to the policy;
 - whether the contact information is up-to-date; and
 - if any improvements to the process are necessary.

Track:

- The number of inquiries and complaints that were received and identify any significant complaints (e.g., by volume and/or topic).
- The resolution of complaints.
- The number of inquiries or complaints that were escalated to senior level staff and/or to any governance oversight body.
- The timelines for addressing inquiries or complaints, and if responses were provided in a timely manner.