

MEMO# 25799

January 13, 2012

Institute Responds to DOL Request on IRA Data

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TO: PENSION COMMITTEE No. 3-12

PENSION OPERATIONS ADVISORY COMMITTEE No. 3-12 RE: INSTITUTE RESPONDS TO DOL REQUEST ON IRA DATA

The Institute submitted the attached letter in response to the Department of Labor's request [\[1\]](#) for comprehensive information about individual IRA accounts and their owners, which the Department had requested in connection with its work on the reproposal of the fiduciary definition rule. [\[2\]](#) Our letter explains that the type of data DOL has asked for does not reside with the Institute and its members. We offered, however, to meet with the Department staff to describe the regular research the Institute has and to discuss whether it might be useful to the Department in informing its economic analysis for the reproposal.

Anna Driggs
Associate Counsel

[Attachment](#)

endnotes

[\[1\]](#) The Department's letter asks among other things for detailed information showing: each investment held in an individual IRA account, its rate of return over 40 quarters and its class, performance, strategy, risk and fees; detailed information on flows into and transactions involving the investment, including price, commissions and loads, markups/drops of principal transactions and the references against which they were measured, and whether transactions were initiated by the investor or adviser; the type of IRA account, distribution channel through which the individual opened the account, identification and attributes of the adviser, and compensation arrangements of the registered rep and financial institution, including separate/variable compensation by each security and transaction; the advice rendered to the account including specific recommendations and whether they were solicited; and demographic information about the account holder, including economic attributes, financial literacy, investment strategy or preferences and length of time with the financial firm and adviser.

[\[2\]](#) For Institute's materials in connection with the DOL fiduciary definition proposal, see [Memorandum](#) to Pension Members No. 8-11 [24941], dated February 3, 2011 (original comment letter); [Memorandum](#) to Pension Members No. 17-11 [25000], dated March 2, 2011 (testimony); [Memorandum](#) to Pension Members No. 21-11 [25084], dated April 12, 2011 (follow up hearing submission); and [Memorandum](#) to Pension Members No. 23-11 [25210], dated May 23, 2011 (reproposal letter).

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