Checklist for Implementing Rule 498A

The newly enforced combination of SEC rules 498A and 30e-3 provides firms with the opportunity to streamline and enhance their end-investor communications model. However, compliance will require a plan.

**PLANNING AND ANALYSIS**

- Determine which products should transition to prospectus summaries
- Identify which products will use the Great-West Notice
- Establish a transition timeline for your chosen products

**DOCUMENT COMPOSITION**

- Revise the current statutory prospectus
- Create initial summary prospectuses for each transitioning product
- Decide which contracts will be covered by each prospectus summary
- Develop updating summary prospectuses for each affected product

**DATA MANAGEMENT**

- Outline document relationships between the current statutory document and the new summary documents
- Determine if summary prospectuses are available for the sub-accounts available in your products
- Identify a data source for sub-account information and make it available in the fund appendix
- Establish a process to update the fund appendix when changes become available

**DISTRIBUTION AND BUSINESS RULES**

- Design business rules that establish which, when and where investors receive documents
- Incorporate industry best practices within your distribution strategy
- Establish a process to keep your document library up to date and compliant
- Optimize operations to automate the management and complexity of new and existing document fulfillment
- Personalize ongoing and transaction-based fulfillment for product and fund documents to adhere to regulations while eliminating over-delivery

**WEB HOSTING, LINKING AND LAYERING**

- Enhance your document web hosting solution to accommodate new document types
- Link shared sections across all related regulatory documents
- Establish a relationship between all product- and fund-level documents
- Support presentation of the products’ sub-fund mappings and/or the linking and layering requirements of the following documents:
  - Summary Prospectus
  - Statutory Prospectus
  - Annual Report
  - Semi-Annual Report
  - SAI
  - Portfolio Holdings
- Support the one-click rule between the documents’ TOCs
- Ensure documents can be easily downloaded and printed
The move away from multiple, large paper-based communications to smaller, easier-to-digest summary documents will increase engagement, lower costs and benefit sales activity.

There are big incentives to transition to the 498A model, but a successful implementation comes with a long checklist.

TURN COMPLIANCE INTO NEW OPPORTUNITY
Data management and optimization have always been at the heart of the Broadridge communications infrastructure. They become even more important now that rule 498A shifts focus away from offset printing. Fully updated to further optimize your implementation of rules 498A and 30e-3, our solution allows you to seamlessly and successfully check all the right boxes.

Talk to us.
We can help you lower costs while delivering the experience investors expect.
Gavin.Long@broadridge.com or +1 978 247 7304