

March 24, 2022

The Honorable Richard Neal
Chairman
House Committee on Ways and Means
1102 Longworth House Office Building
Washington, D.C. 20515

The Honorable Kevin Brady
Ranking Member
House Committee on Ways and Means
1139 Longworth House Office Building
Washington, D.C. 20515

The Honorable Bobby Scott
Chairman
House Committee on Education and Labor
2176 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Virginia Foxx
Ranking Member
House Committee on Education and Labor
2101 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Neal, Ranking Member Brady, Chairman Scott, and Ranking Member Foxx,

Thank you for your leadership to expand our retirement savings system and strengthen the retirement security of millions of Americans. Vanguard is pleased to support your bipartisan legislation, the Securing a Strong Retirement Act of 2022, which would benefit retirement savers by allowing for greater choice in investments, improving participant decision making, and simplifying retirement plan administration.

Vanguard is a leading provider of investment, advisory, and recordkeeping services for defined contribution retirement plans. Our core purpose is to take a stand for all investors, to treat them fairly, and to give them the best chance for investment success. With more than \$1.8 trillion in defined contribution assets, Vanguard helps millions of Americans save for a secure retirement. We provide direct defined contribution recordkeeping and investment related services to 4.6 million participants and nearly 1,400 plan sponsors, which account for more than \$530 billion of Vanguard's total assets under management.

The Securing a Strong Retirement Act of 2022 will provide greater choice and fairness in investment decisions. Currently, most 403(b) plans, the typical retirement savings vehicle for workers in public education institutions, many nonprofits, and other charitable organizations cannot invest in low-cost collective investment trusts (CITs) which are increasingly popular investment options for 401(k) plans. CITs and mutual funds are both excellent, low-cost options in retirement plans. Allowing 403(b) plans to invest in CITs will help meet the diverse needs of their participants and ultimately improve their ability to enjoy a secure retirement.

In addition, Vanguard supports your efforts to aid in participants' decision making, including your provision to improve performance benchmarks for investments. Current disclosure regulations require a fund's performance to be compared to an appropriate market index. However, the current comparisons do not properly account for popular investments like Target Date Funds, which feature a mix of asset classes. This provision will ensure performance benchmarks are more accurate and effective, and result in more suitable comparisons when

selecting an investment for unique retirement goals. Vanguard also supports your efforts to include automatic enrollment in all new plans. Defaults are incredibly powerful in retirement savings, and automatic enrollment and automatic escalation have been proven to generate stronger outcomes for savers. Vanguard's *How America Saves 2021: Insights to Action* found plans that use automatic enrollment have a 92% participation rate compared with 62% for plans with voluntary enrollment and employees who worked for firms with automatic enrollment saved more than 50% more for retirement than those employed at firms with voluntary enrollment.¹

Your bill also includes provisions to improve the administration of retirement savings plans and ensure savers don't have to prematurely deplete hard-earned savings. As Americans are living and working longer, Vanguard supports further increasing the required minimum distribution age to 75. Your bill also addresses a growing issue related to missing participants by establishing a retirement savings lost and found database to address the longstanding public policy challenges associated with previous employer-sponsored accounts that participants may have become separated from.

As you continue to refine your bill, we strongly encourage you to reconsider the inclusion of a provision mandating an annual paper benefit statement. We have long supported the right of participants to receive their documents in paper for those who prefer it, but our data clearly shows that electronic delivery leads to better information and ultimately stronger retirement outcomes across all age ranges.² This provision will increase costs for participants, deliver less timely information, and fail to encourage interaction with online tools and education that might otherwise lead to increased retirement savings over time. Conversely, electronic delivery provides a secure, convenient, and personalized way to access important information while providing more up-to-date information and interactive capabilities.

Thank you again for your bipartisan efforts to improve the current retirement savings system. We welcome the opportunity to continue working with you on these important issues. If you have any questions or would like to discuss our views further, please contact Ben Barasky at (202) 824-1284.

Sincerely,

/s/ John James

John James
Managing Director, Institutional Investor Group
The Vanguard Group, Inc.

¹ See Vanguard's [How America Saves 2021: Insights to Action \(Page 3\)](#).

² Vanguard participants who are digitally engaged have a higher average payroll deferral of 11%, while participants who are not digitally engaged have an average payroll deferral of 6.34%. Average balances are three times higher for digitally engaged participants, outcomes consistent with the superior experience of electronic delivery.