



## CALIFORNIA SECURE CHOICE RETIREMENT SAVINGS INVESTMENT BOARD

915 Capitol Mall, Room 110  
Sacramento, CA 95814  
p (916) 651-7427  
f (916) 651-3125  
www.treasurer.ca.gov/scib

September 10, 2015

The Honorable Thomas E. Perez  
Secretary  
U.S. Department of Labor  
200 Constitution Ave., NW  
Washington, D.C. 20210

Dear Secretary Perez:

The California Secure Choice Retirement Savings Investment Board (CSCRSIB) supports the efforts of the Department of Labor (Department) to update the definition of “fiduciary” to apply to a wider array of advice relationships than currently exist in regulations. The concept behind the Proposed Rule and exemptions look to bolster consumer protections for retirement plan participants by ensuring financial professionals who provide retirement advice and products act in their clients’ best interest.

CSCRSIB was established in an effort to address the looming retirement security crisis facing millions of Californians by providing a safe, secure, and convenient way to save for retirement. Retirement insecurity is not unique to California. Nationwide, about half of households age 55 or older have no retirement savings and have few other resources to draw on in retirement. Though Social Security is vital to the financial security of Americans, its benefits alone are not enough to sustain them in retirement.

We believe the proposed fiduciary rule will improve upon retirement security by holding fiduciaries accountable for their actions and assuring they perform their duties to the highest ethical standards. We also support the Department’s efforts to “safeguard plan participants by imposing trust law standards of care and undivided loyalty on plan fiduciaries, and by holding fiduciaries accountable when they breach those obligations.” Furthermore, CSCRSIB supports increased transparency beyond the requirements of the Proposed Rule and applaud the Department’s efforts to address conflicts of interest in the rollover of plan assets, which is one of the most significant financial decisions participants can make concerning retirement savings.

We believe these regulations can bolster the economic security of millions of Americans by assuring they are covered by retirement savings plans free from harmful conflicts of interest.

### MEMBERS

JOHN CHIANG, CHAIRMAN  
State Treasurer

BETTY YEE  
State Controller

MICHAEL COHEN  
Director of Finance

EDWARD J. DE LA ROSA  
Senate Committee on Rules  
Appointee

YVONNE R. WALKER  
Speaker of the Assembly  
Appointee

HEATHER HOOPER  
Governor Appointee

WILLIAM SOKOL  
Governor Appointee

MARTY MORGENSTERN  
Governor Appointee

CYNTHIA POLLARD  
Governor Appointee

**ACTING EXECUTIVE  
DIRECTOR**  
Christina Elliott

Thank you for the opportunity to provide comments and we commend your efforts to increase transparency, protect the integrity of retirement benefits, and provide opportunities to increase retirement security for all Americans.

Sincerely,

The California Secure Choice Retirement  
Savings Investment Board

*Original signed by*

John Chiang, Chair  
California State Treasurer

Members:

Betty T. Yee  
California State Controller

Michael Cohen  
California Director of Finance

Edward J. De La Rosa  
Senate Committee on Rules Appointee

Yvonne R. Walker  
Speaker of the Assembly Appointee

Cynthia Pollard  
Governor Appointee

William Sokol  
Governor Appointee

Marty Morgenstern  
Governor Appointee

Heather Hooper  
Governor Appointee