

DOL AUDIT CHECKLIST



Item	Fully Insured	Self Funded	Carrier/TPA	Comments
Signed Plan documents, wrap documents, trust agreements and amendments	✓	✓		Carrier certificate booklets typically do not include the required ERISA information. Plans should have an ERISA plan document (or wrap document) in addition to all carrier provided certificates, as well as a policy for distribution.
Signed Annual reports (IRS Form 5500), audited plan financial statements (if applicable) and all supplemental schedules	✓	✓		
Summary annual reports	✓	✓		
Health insurance policies, certificates, amendments and riders	✓	✓	✓	Including Rx
Minutes of any plan or committee meetings	✓	✓		If applicable
A copy of annual notices and the description of procedures for distribution (HIPAA notice of special enrollment rights, WHCRA, Newborn's act, CHIPRA, Michelle's Law and COBRA)	✓	✓		
A copy of an employee enrollment application, enrollment packet/forms provided at open enrollment and any other document provided during open enrollment (or online enrollment process)	✓	✓		
Financial records, including trust, bank and brokerage statements; account ledgers and journals, invoices/records relating to expenses and/or feeds paid from plan assets	✓	✓		
Service provider contracts or letters of engagement (TPA, stop-loss, reinsurance, attorneys, accountants, consultants, etc.)	✓	✓		
Sample of health insurance billing invoices, premium schedules, employee and employer contribution schedules and payroll records of withholdings for benefits	✓	✓		
Fidelity bond, including all riders and endorsements		✓		In most cases, this is not required for a fully insured plan
Fiduciary liability insurance policy		✓		In most cases, this is not required for a fully insured plan
Listing of all officers of the plan sponsor and their tenure	✓	✓		
Listing of all plan trustees and/or fiduciaries and their tenure	✓	✓		
A copy of the Summary of Benefits and Coverage (SBC)		✓	✓	Required for grandfathered health plans for the first renewal after September 23, 2013
Sample Certificate of Creditable Coverage (COCC)		✓	✓	

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Records of claims denied due to imposition of the pre-existing condition exclusion (as well as the plan's determination and reconsideration of creditable coverage, if applicable) or proof that the plan does not impose a pre-existing condition exclusion		✓	✓	
Documents describing the plan's procedures regarding notification to participants of the length of pre-existing condition exclusion period that remains after offsetting prior creditable coverage		✓	✓	
A list of participants or beneficiaries whose coverage has been rescinded, the reason for the rescission, and a copy of the written notice of rescission		✓	✓	
A sample of a notice of adverse benefit determination, notice of final internal adverse determination, and a notice of final external review decision		✓	✓	
All documents relating to the use or collection of genetic information, for any reason, with respect to the plan	✓	✓	✓	Health Risk Assessments?
All documents describing any wellness programs or disease management programs offered by the plan	✓	✓		Tobacco/non-tobacco discounts? On-site clinic? Biometric screenings? Flu shots? Walking program? Reasonable alternative standards, policies and procedures.
If the plan is or has claimed grandfathered health plan status under PPACA, provide a copy of the grandfathered health plan status disclosure statement that was required to be included in plan materials provided to participants and beneficiaries describing the benefits provided under the plan and records documenting the terms of the plan in effect on March 23, 2010, and other documentation necessary to verify, explain or clarify grandfathered health plan	✓	✓		Benefit summaries, rates, contributions year-over-year from March 23, 2010, to current, etc.
All documents relating to the receipt and disposition of any medical loss ratio rebate paid by an insurer	✓	✓		Was it received? How was it distributed? How was the rebate calculated, etc.?
Any other documents which may explain or clarify the above items	✓	✓	✓	

This list is not all inclusive and is subject to change. This information is provided for reference only and should not be construed as legal advice. This is to be used only as a guide. Specific documentation requested by a DOL auditor is subject to interpretation and may differ from this information. General guidelines assume that data requested is for the last three plan years, unless otherwise specified. **Checklist provided by Benefit Insurance Marketing — a UBA Partner Firm. Revised May 11, 2015.**



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