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Office of Regulations and Interpretations  
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Department of Labor  
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Washington, D.C. 20210  
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Re: Advance Notice of Proposed Rulemaking regarding Lifetime Income Illustrations (RIN 1210-AB20)

Dear Sir or Madam:

TIAA-CREF appreciates the opportunity to comment on the Department of Labor's ("Department") Advance Notice of Proposed Rulemaking ("ANPRM") regarding the inclusion of lifetime income illustrations on participant quarterly benefit statements for defined contribution plans. We believe ensuring participants receive such information on a regular basis is an important part of the retirement planning process. Accordingly, TIAA-CREF already includes this information on all of our participants' quarterly benefit statements, continuing with our long history of providing participants with regular information about lifetime income.

Providing recurring income projections serves as a regular reminder for participants of how close (or far away) they are to meeting the goal of receiving an adequate income in retirement. Seeing a straightforward projection of future income can prove to be a wake-up call for participants that results in heightened awareness of retirement planning issues, which can in turn lead to actions (e.g., increased savings rates) that ultimately will enhance their retirement security. Therefore, we believe all defined contribution retirement plans should supply this information to participants.

## **I. Introduction**

TIAA-CREF is the leading provider of retirement services in the academic, research, medical, and cultural fields. We manage over \$523 billion in retirement assets on behalf of 3.9 million participants and serve more than 15,000 institutions.<sup>1</sup> Teachers Insurance and Annuity Association of America ("TIAA") was incorporated as a stock life insurance company in the State of New York in 1918 and is a licensed

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<sup>1</sup> As of June 30, 2013.

insurer in all 50 states, the District of Columbia and Puerto Rico. The College Retirement Equities Fund (“CREF”) is registered as an investment company with the Securities and Exchange Commission under the Investment Company Act of 1940 as amended. CREF is supervised by the New York State Department of Financial Services and is registered as an insurance company in several states.

At the core of our not-for-profit heritage is TIAA-CREF’s mission “to aid and strengthen” the financial future of the clients we serve by providing financial products that best meet their special needs. Our retirement plan annuities and mutual funds offer a range of options to help individuals and institutions meet their retirement plan administration and savings goals, as well as income and wealth protection needs. In 2012, TIAA-CREF paid out more than \$4.3 billion in annualized payments to over 259,000 participants through lifetime annuity contracts, reflecting our basic principle of ensuring that retirees receive a guaranteed stream of income.

TIAA-CREF has been providing income illustrations to plan participants for decades without high costs or burdens to our plan sponsors or us. As described in more detail below, we are able to do this by using a set of reasonable assumptions that are clear, consistent and easily applied. We hope the Department will consider using our lifetime income illustrations as a framework for developing appropriate lifetime income illustrations.

## **II. TIAA-CREF’s Approach to Providing Lifetime Income Illustrations**

### **A. Projections should be required and should utilize lifetime income**

TIAA-CREF submitted a letter (“Letter”) to Employee Benefits Security Administration (“EBSA”) Assistant Secretary Phyllis Borzi, dated November 20, 2011, regarding lifetime income illustrations. In the Letter, we support the inclusion of lifetime income illustrations on participant quarterly benefit statements and explain how TIAA-CREF currently provides such illustrations. A copy of the Letter is included with this submission as Appendix A.

We fully support the Department’s goal of providing lifetime income illustrations for all participants in defined contribution plans and generally are supportive of the approach taken by the Department in the ANPRM. We note that the overall purpose of providing lifetime income illustrations is to educate and encourage participants to view their retirement plan accumulations as primarily a vehicle for income replacement during retirement and not just as a savings account. A very effective way to do this is to provide income replacement projections for all defined contribution plan participants and, as a matter of policy, we believe every participant should have the benefit of this information.

Regularly reminding participants how much they may have at retirement expressed in terms they are more likely to understand – such as the income stream they may realize – is a more effective communication tool than showing them a savings accumulation value. In our experience, more effective communication leads to higher participant engagement, and higher participant engagement leads to improved savings rates. It is also important for participants to begin thinking about lifetime income early on in their careers, and for providers to educate participants about the importance of lifetime income in retirement. Participants should not start learning about income replacement just prior to retirement. For the reasons noted above, the earlier we can engage participants to save at a level likely to help them achieve their desired amount of income in retirement, the more likely they will retire financially secure.<sup>2,3,4</sup>

TIAA-CREF has a long history of providing retirement income projections based on a life annuity payout dating back more than 50 years. We use a lifetime annuity payout in our projections because only a life annuity guarantees that a plan participant will have replacement income throughout his or her retirement years. No other form of distribution can guarantee the receipt of income throughout retirement. Participants should think about income replacement before they approach retirement age so that they can take action to save more earlier if they need to do so. The longer their time horizon before retirement, the more time they will have to contribute amounts that will help them achieve a better outcome at retirement.

Others may argue against using a life annuity as the basis for income illustrations because they do not offer annuity products. The ANPRM, however, sets forth assumptions that such providers (e.g., mutual fund providers) can use to provide lifetime annuity illustrations to plan participants. Note that in addition to being a leading annuity provider, TIAA-CREF is also a large mutual fund provider that offers its own mutual funds as well as over 300 mutual fund families on its record keeping platform. We fully understand the advantages of offering such investments in plans. Nevertheless, because the purpose of the illustration is to educate participants about income replacement throughout retirement, we believe the illustration should focus on the estimated amount of lifetime income the participant may receive. Life annuities guarantee an income stream that cannot be outlived while mutual fund distributions do not. Accordingly, a lifetime annuity projection that takes into consideration income replacement options for participants is a better guide for participants when making retirement decisions.

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<sup>2</sup> Gopi Shah Goda, Colleen F. Manchester, Aaron J. Sojourner, “The Effect of Lifetime Income Disclosures on Retirement Savings,” Working Paper. TIAA-CREF Institute (2013).

<sup>3</sup> Jodi DiCenzo, “Behavioral Finance and Retirement Plan Contributions: How Participants Behave, and Prescriptive Solutions,” Employee Benefit Research Institute Issue Brief No. 301 (Jan. 2007).

<sup>4</sup> S.S. Iyengar, G. Huberman, and W. Jiang, “How Much Choice is Too Much: Determinants of Individual Contributions in 401K Retirement Plans,” in O.S. Mitchell and S. Utkus (Eds.), *Pension Design and Structure: New Lessons from Behavioral Finance* (2004).

In this regard, in recommending that a life annuity be used as a basis for lifetime income illustrations we would emphasize that we are not recommending any particular product or construct. Our key argument is that to properly align participant incentives for retirement, it is critical that those participants be provided meaningful information regarding their potential income stream in addition to information about the funds in which they are investing in their retirement accounts. Indeed, we would argue that providing participants only with information about their accumulations could be misleading because it does not provide them with the full retirement picture. Further, participants who only receive information about their accumulations may be more likely to underestimate the amount of funds they will need in retirement, while individuals who receive income disclosures along with general retirement planning information are more likely to increase their savings rates.<sup>5</sup>

#### **B. Assumptions for projecting income should be standard across plans and investment options**

As we discuss in more detail in the Letter, TIAA-CREF provides a projection of how much monthly lifetime income a participant may receive starting at age 65 if he or she does not increase his or her current rate of contributions, increases them by \$100 per month, or increases them by \$250 per month. The object of this approach is to provide the participant in simple terms an estimate of what to expect upon retirement assuming the current rate of contributions continues (but reflecting increases based on a salary increase assumption) while encouraging the participant to increase such contributions if the resulting income is projected to be less than adequate. We do not provide an estimate of the account balance at retirement because we think that would be counter-productive: the point of the projection is to encourage the participant to think in terms of lifetime monthly income and not in terms of a savings accumulation.

We include in a participant's benefit statement every plan that we record keep where he or she is an active participant, accumulations under every plan he or she formally participated in that we record keep, and every TIAA-CREF individual retirement account ("IRA"). The income projection applies to all of these plans and IRAs. If we are to continue this practice, it is crucial we be permitted to make these projections based on uniform criteria that we can apply to all of the plans and IRAs regardless of specific plan terms and the specific contracts and other funding vehicles used under them. For this reason, we do not believe in-plan annuities should be treated any differently than other plan investments for purposes of the projection. Because participants can invest in many different in-plan annuities through the plans and IRAs they participate in during their careers, and because such annuities provide an accumulation amount until annuitized, there is no compelling reason to treat them

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<sup>5</sup> Gopi Shah Goda, Colleen F. Manchester, Aaron J. Sojourner, "The Effect of Lifetime Income Disclosures on Retirement Savings," Working Paper. TIAA-CREF Institute (2013).

differently from other plan investments subject to the income projection. It also would be quite costly and impractical to ask service providers to track the different annuities in which plan participants have invested.

Our practice of providing a standard projection should be continued because it accomplishes the goals of raising the participant's awareness of lifetime income and conveying to the participant an idea of what to expect at retirement, taking into consideration all of the plans and IRAs that we record keep.

To reiterate, the purpose of the projection is to give participants some idea of their income at retirement, so they can evaluate lifetime income replacement and take action if the projection is below what they will need. The projection is not intended to project to the dollar what a participant will receive or to provide a basis of comparison across plans or annuity products. That kind of accuracy over the course of many years for accumulating income for retirement (a period that can span decades) would be impossible. The income projection is always going to be an estimate of what a participant may expect. It is a guide and not a prediction. We, therefore, encourage the Department to continue to allow plan service providers to make these estimates in as simple and uniform a way as possible by using reasonable assumptions that can be applied to all plans and IRAs serviced by the plan provider.

### **C. TIAA-CREF's income projection assumptions**

As described in the Letter, TIAA-CREF, in making its projections takes the ending balance (excluding certain payout contracts) on the quarterly report and only considers balances covered in the quarterly report. The ending balance is projected to grow according to the following reasonable long-term actuarial economic assumptions: the 12-month average of total employer and employee contributions is projected to grow 3% annually (rounded to the nearest year using the participant's birthday) reflecting assumed inflation increases as well as a non-guaranteed hypothetical annual growth rate of 6% until age 65.

Sample lifetime retirement monthly income is based on using a single life annuity with a 10-year guarantee period at age 65. The amount of lifetime income reflects an annuity payout rate based upon an assumed interest rate of 4% and the mortality assumptions used in computing current total income under TIAA pension annuities. We use the current TIAA mortality table. This projected income is then adjusted for inflation.

Additionally, it is important to note the following:

1. The projection assumes that all investments earn the same nominal rate of return (we use 6%) regardless of the participant's actual asset allocation. This is an assumption that meets the objective of being

simple to apply and easy to explain to participants. As we state above, in-plan annuities should be treated the same as other plan investments for this purpose.

2. The projection assumes that future contributions equal the dollar amount of contributions made in the prior year and increasing at 3% each year in the future to reflect assumed future salary growth. If the contributions for a participant change in a given quarter, this will be reflected going forward in the projections made on the subsequent quarterly statements.
3. The projected income at retirement is reduced by an assumed inflation rate of 3%.
4. The projection assumes that retirement income commences at age 65 and only shows the initial income at the point of retirement. We note that while retirement ages may vary, most of the plans we record keep use age 65 as the normal retirement age.
5. As a standard, the projection assumes the participant converts the projected balance (which is not shown) into a life annuity based on a 4% assumed interest rate at age 65 for a single-life annuity with a 10-year guarantee period. Our participants usually do not choose a pure life annuity and some form of guarantee period is more typical. We do not show the projected balance because, as discussed above, the purpose of the projection is to provide the participant an order of magnitude of monthly lifetime retirement income and not a savings accumulation.
6. While we use the mortality table applicable to our current annuities, we do not attempt to use current annuity purchase rates. First, these income projections may reflect a combination of fixed annuities, variable annuities and mutual funds, so the use of current fixed annuity purchase rates would have limited applicability. Second, our fixed annuity purchase rates can vary significantly between rates applicable to “new money” versus rates applicable to funds remitted in previous years (what we describe as “vintage” rates). Note, however, that we do provide individual annuity purchase rates to participants upon request. Such requests are more common as retirement nears.
7. Within the illustrations we provide on our benefit statements, we encourage our participants to further personalize their illustrations by using our online tools or speaking with one of our retirement planning specialists. These more detailed illustrations permit participants to

vary the assumptions described above and can provide them with a variety of different, more detailed projections.

These standard assumptions described above permit us to provide retirement income projections in a cost effective manner to all of our participants on a quarterly basis across all of the plans and IRAs that we record keep.

### **III. The ANPRM**

#### **A. The ANPRM Safe Harbor for “reasonable assumptions” in contrast to TIAA-CREF’s projection method**

The general rule under the ANPRM for determining the projected account balance and the lifetime income streams requires reasonable assumptions and generally accepted investment theories and actuarial principles. The ANPRM also contemplates safe harbor assumptions that will be deemed to meet these requirements.

While the safe harbor assumptions in the ANPRM closely track those used by TIAA-CREF, there are some differences. We understand the Department’s desire to provide a safe harbor on which all plan sponsors can rely. However, if the safe harbor is flexible enough it can facilitate the standardization we think is vitally important for making cost effective and consistent income projections across all plans.

As discussed in Section II.B above, we apply a standard approach to income projections across all our plans and IRAs. This approach permits us to provide one projection per benefit statement applicable to all of the accumulations covered in the benefit statement. We note also that if a safe harbor is included in the regulation most plans will want to adopt it because the plan sponsors will know that they are always meeting the “reasonable assumption” requirements in the general rule. For that reason, they most likely will insist their retirement plan providers apply the standard.

As mentioned previously, we have been providing income projections to our participants for decades. Accordingly, millions of participants are used to seeing their illustrations in a specific format with a certain set of assumptions. If we are forced to change our methodology, we are concerned that our participants who have been using these illustrations to help them plan for their retirement could experience widespread confusion if their income projections were to change materially. For this reason, we reiterate our request that the Department allow enough flexibility in any safe harbor so that we could continue to deliver the projections as we do today.

The ANPRM safe harbor for determining the projected account balance requires that the illustration make the following assumptions:

1. **Annual contributions will continue and grow at 3% per year.** This is the assumption we use as well.
2. **A 7% investment return.** We believe 6% is better and would be pleased to discuss with you why we believe 6% is the better assumption. Nevertheless, for purposes of the safe harbor we suggest this be changed so that, assuming a reasonable basis for using another percentage, the 7% requirement will be “no greater than 7%.” That way, given historical rates of return in light of the current interest rate environment, providers will be free to use a different percentage that will, given the 7% cap, not unduly exaggerate expected investment returns. Furthermore, we believe it is important for plan providers and plan sponsors to have an ongoing process in place that allows for adequate monitoring of these assumptions and that they be amenable to changing the assumptions used should this become necessary.
3. **A 3% inflation rate.** This is the assumption we use as well.

For determining the lifetime income stream the safe harbor requires:

1. **An interest rate equal to the 10-year constant maturity Treasury securities rate for the first business day of the last month of the period to which the statement relates.** For purposes of projecting lifetime income, we use a 4% payout annuity interest rate. This 4% assumption actually reflects the assumed interest rate underlying our variable annuity payout rates and reflects the rate used in our fixed annuity “graded payment” method. Thus, it reflects the actual rates used in converting variable annuity accumulations into lifetime income and also reflects a popular life annuity payout method associated with our fixed annuity product that many of our retiring participants choose. In addition, the use of the 4% assumed interest rate from year to year lends stability to our quarterly income projections. On the other hand, if one used the 10-year Treasury security rate, there could be significant volatility in projected income over a relatively short span of years. Therefore, we believe that any safe harbor should be flexible enough to cover a reasonable range of assumed payout annuity interest rates.
2. **The IRC section 417(e) mortality table.** Our income projections reflect the mortality table we currently use in determining fixed annuity income. We believe the safe harbor should provide sufficient flexibility in the choice of the underlying mortality table to accommodate any reasonable mortality table. In fact, our mortality table is much more reflective of the table underlying current annuity



purchases (from most annuity carriers), as it is based on an individual annuity table as opposed to the group mortality table suggested in the ANPRM.

3. **The use of plan rates if the plan offers annuity distributions.** Just as we believe using a different earnings rate for in-plan annuities is unworkable because it does not convey to the participant a reasonable idea of what to expect at retirement (discussed in Section II.B), this provision would be unworkable for us as well. First, we offer a range of fixed and variable annuities with features that can differ over the period that plan contributions are typically made. It would be very complex and expensive to try to reflect different underlying guaranteed interest and payout annuity rates for all of our participants on a quarterly basis under all of their plans and IRAs based on those different rates. Second, our fixed annuity contractual rates reflect very conservative accumulation interest rates and payout annuity rates that would greatly underestimate the projected income at retirement. In reality, the actual credited interest rates generally reflect significant amounts of additional (*i.e.*, dividend) income and our actual payout annuity rates reflect then-current payout annuity interest rates and current mortality rates. Finally, the mandatory use of “plan rates” would not be applicable to our variable annuities, which do not have any guarantees in respect to minimum interest rates. We think the safe harbor should be changed to allow the use of actual plan rates without mandating such use.
4. **Transitional relief.** Our participants are accustomed to seeing an income projection based on the assumptions we currently apply and have been applying for decades. We would like to be able to continue using those assumptions and think that the safe harbor should be broad enough to permit us to do so. If the Department disagrees and mandates the use of different assumptions in its safe harbor, we will have to manage the transition from the assumptions we prefer and our participants expect to those the Department mandates. We would like to avoid the confusion that such a transition will cause for our participants. We also would like to be given sufficient advance notice to manage such a transition smoothly and with as little confusion to our participants as possible if the Department mandates a change.

## **B. Other Issues**

1. **The number of income projections required on the quarterly statement should be limited to one**

In addition to the projection of lifetime income that both TIAA-CREF provides and the ANPRM contemplates, the ANPRM also would require a projection of the participant's current account balance without further contributions and earnings assuming that the participant had reached normal retirement age as of the date of the benefit statement.

While we reiterate our support for providing income illustrations on benefit statements, we do not believe this projection would be a useful one for participants for several reasons. At the very least, the participant will experience investment gains over time, which we believe should be included in the projection even if contributions cease. Further, we note that if plan contributions cease for a participant, that change will be reflected in subsequent projections that take into account projected contributions based on earnings and current contribution rates (which, on a 12-month average, gradually will decrease to zero). Because the purpose of providing illustrations is to educate participants and encourage them to act in terms of future lifetime income, we do not see the value of using a set of assumptions that essentially assume the participant has no future, is at normal retirement age and has static plan account values. We believe including such a projection will confuse participants without being helpful.

Additionally, if the participant is married, the ANPRM contemplates two other projections (the current balance projection and the future income payout projection) for a joint and 50% survivor benefit. Plan providers generally do not track marital status for purposes of the quarterly benefit statements and we do not believe it is an industry practice to do so. Marital status can change and TIAA-CREF's and the industry's practice is not to capture this information until benefits are to commence, at which time it is appropriate to request supporting documentation. It would be expensive and impractical to have to track marital status solely to provide income replacement projections. As we stated in [Section II.C](#), participants can obtain detailed projections based on their own assumptions through either our online tools or discussions with our financial consultants. We do not believe it is necessary to provide joint and survivor projections for all of our participants on a quarterly basis.

That said, we could provide such a projection if permitted to assume that all of our participants are married and that their spouses are their same age. While this would be administratively feasible to provide, we still would argue for providing just the one lifetime income projection we now provide (income replacement based on the assumptions discussed above) without the requirement to provide a joint and survivor annuity projection. This would allow us to accomplish the overall goal of ensuring participants gain a better understanding of lifetime income while encouraging them to seek more information about what this means from their plan provider or another investment professional.

Finally, many research studies on participant behavior have shown that the more variation and choice introduced to the participant’s decision-making process, the less engaged they become, and ultimately the less action they take.<sup>6,7</sup>

We believe it would be a mistake to require the array of projections contemplated in the ANPRM. It misses the purpose of the projection, which is to encourage participants to evaluate retirement income and not just savings accumulation. One projection is sufficient for educational purposes. Four projections will not provide participants a significantly different picture of what to expect in retirement and will only create confusion. It also will take up valuable space on quarterly benefit statements to explain the differences and the assumptions used in making the different projections. Further, we offer online tools and personal guidance to those participants who seek more detailed projections based on their individual circumstances and we strongly encourage our participants to leverage these options and play an active role in the retirement planning process.

## **2. Retirement Date Assumption**

As discussed in Section II.C above, we use age 65 as the assumed retirement date for our projections. We do not track actual retirement dates for plan benefit statements and as we also pointed out, our quarterly statements cover any retirement plan in our records that the participant has a balance in as well as any IRA. Accordingly, applying actual retirement dates would be costly, administratively challenging and of marginal benefit. If the Department is of the opinion that age 65 is not the proper age assumption, we could apply the participant’s Social Security Full Retirement age for purposes of the income projection. Use of either age 65 or the Social Security Full Retirement age would work from a cost and administrative point of view. It would, however, take time for us to transition to this new requirement and would change the assumptions our participants are accustomed to using.

## **3. Financial Industry Regulatory Authority (“FINRA”) Guidance on Projections**

The Department is considering, among other things, that benefit statements would contain a statement that “projections and lifetime income stream illustrations are estimates and not guarantees.” FINRA Rule 2210(d)(1)(F) provides that “[c]ommunications may not predict or project performance, imply that past performance will recur or make any exaggerated or unwarranted claim, opinion or

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<sup>6</sup> Sheena S. Iyengar, “The Effects of Choice Proliferation on Retirement Savings Behavior,” TIAA-CREF Institute (May 2008).

<sup>7</sup> Shlomo Benartzi with Roger Lewin, “Save More Tomorrow: Practical Behavioral Finance Solutions to Improve 401(k) Plans,” Penguin Books (2012).

forecast.” Thus, FINRA Rule 2210(d)(1)(F) already requires a statement to the effect that projections are estimates and not guaranteed.

The income illustration on our current benefit statement complies with the FINRA rule, as well as the projection requirement under consideration by the Department. First, the information provided in the illustration is provided for informational purposes only, and specifically states that the information is purely hypothetical and does not illustrate projected performance. Second, our benefit statement states, “[p]ast performance is not a guarantee of future results.”

The Department also is considering working with FINRA to provide guidance similar to the guidance provided in connection with the Department’s recently finalized participant-level fee disclosure regulation. In other words, the Department would seek relief from FINRA regarding benefit statement projections. Because the FINRA rule governing projections already requires a statement to the effect that projections are estimates and not guaranteed, as noted above, we do not believe the Department needs to seek relief from FINRA for making these types of projections on benefit statements. Nevertheless, if the Department does seek FINRA relief for benefit statement projections, we ask that the Department consider that such relief apply to governmental and church plans not subject to ERISA. Our experience has been that many such non-ERISA plans seek to follow the Department’s rules as a “best practice.” If FINRA relief is required to do so, we respectfully request that such relief cover all of our clients, including non-ERISA governmental and church plans.

#### **4. Insurance Loads**

We do not factor in insurance loads when making our projections and do not believe factoring in such loads, even on an estimated basis, is advisable. Using our assumptions or using the assumptions suggested in the safe harbor under the ANPRM (*i.e.*, the combination of the Treasury Mortality Table and the 10-year Treasury bond rate) without any further adjustments for insurance loads already results in an annuity payout rate that is reasonably conservative. Adjusting further for estimated “loads” will produce a result that generally will be too low and will reduce the annuity payout rate making a conservative projection even more conservative.

#### **5. Potential Litigation**

In providing these income replacement projections it is always possible that litigants may claim the plan sponsor and its service providers have breached their fiduciary duties under ERISA by making improper estimates and promises. It would, accordingly, be helpful if the Department were to explicitly state in the regulation that providing income projections under either the safe harbor in the regulation or the general rule is not only required, but also will, on a per se basis, comply with the plan sponsor’s ERISA fiduciary duties to provide these projections. From a disclosure

point of view, the regulation should, as the ANPRM contemplates, include a statement to the effect that projections are “illustrations only and that actual monthly payments that may be received at normal retirement age will depend on numerous factors and may vary from the illustrations in the benefit statements.” It should be clear that these projections are not predictions, but only estimates provided for educational purposes and that more detailed illustrations tailored specifically to the individual participant’s situation can be obtained using online tools or by contacting a retirement expert. There also should be a requirement in the regulation to include a statement delineating the assumptions used in making the estimated projections. If this is done, the regulation should provide that no plan fiduciary, plan sponsor, or other person (such as a plan service provider) should have any liability under ERISA as a result of providing the required income illustrations.

#### **IV. Summary of TIAA-CREF Comments**

We appreciate the Department’s ongoing efforts to improve lifetime income in defined contribution plans. Providing lifetime income illustrations on participant benefit statements will help change the mindset of those saving for retirement from simply accumulating assets to one of achieving a comfortable income that will last throughout retirement. The following provides a summary of the comments provided in the preceding sections.

1. TIAA-CREF has been providing regular income replacement projections to its participants for decades and does so in a simple and cost effective manner. We recommend the Department consider our practices as a framework for providing lifetime income illustrations.
2. We support including life annuity projections on all defined contribution plan benefit statements to encourage plan participants to view their savings in terms of income replacement vehicles and not just for purposes of wealth accumulation.
3. The projection should be in the form of a life annuity because only a life annuity can provide income for life. Providers who do not offer annuity products can provide such projections using standard assumptions set forth in the regulation.
4. There should be just one projection required on the benefit statement based on a single life annuity (with or without a guaranteed or “certain” period). This will serve to focus the participant on the amount of monthly retirement income without causing confusion. Further, we do not believe a projection based solely on a participant’s current accumulation should be required.

5. While no projection method will provide a perfect projection, providing multiple projections on a participant's benefit statement likely would only cause confusion. We believe one projection will suffice for purposes of focusing the participant on income replacement. Plan providers can and do offer tools that allow participants to change the assumptions and make other projections on their own and/or with the help of our retirement income specialists.
6. The safe harbor should be flexible enough to permit plan providers who offer annuity products to continue to utilize current practices. The 7% income assumption should be changed to "up to 7%" and should allow for payout annuity rates based on reasonable interest and mortality rates. Plans should not be required to apply an insurer's contractual rates because these vary from plan to plan and from contract to contract. Contractual rates generally are set at very conservative levels and would not be appropriate for reasonable income projection purposes. In addition, such a provision would not be relevant to variable annuities. We use a 4% interest rate assumption and we believe that also should be acceptable without our having to apply the 10-year constant maturity Treasury rate, which adds volatility to these projections. Finally, in-force annuities should be treated as any other investment for purposes of the income assumptions in making these projections.
7. The income projection method chosen by the Department, in any event, should be designed for use by all plans and IRAs in a cost effective and standard way so plan providers can continue to manage a cost-effective process for their participants.
8. Retirement age should be standard — either age 65 (preferable) or Social Security Full Retirement Age. In addition, if a joint and survivor annuity illustration is required (and we are not in favor of including such a projection), providers should be permitted to assume the participant is married and that his or her spouse is the same age. It is important we be permitted to make standard assumptions that we can apply across all of our plans and IRAs in a cost-effective manner.
9. We strongly encourage the Department to adopt a broad and flexible safe harbor that permits continued use of our current practices. We have been providing income projections to our participants for decades and, accordingly, they are very comfortable with the format and assumptions we utilize. Accordingly, we hope to be able to continue to provide our 3.9 million participants with the illustrations they have been using to plan for their retirement. If the safe harbor

ultimately is not broad enough to permit providers to continue to utilize projections in the manner they currently do, an adequate transition period will be necessary.

10. We do not believe that FINRA relief is needed, but if it is sought, such relief should apply to both ERISA and non-ERISA governmental and church plans as well.
11. It is not necessary to factor in insurance loads in making these projections because to do so will result in projections that are too low given the assumptions used by TIAA-CREF and contemplated in the ANPRM.
12. In order to mitigate the possibility of adverse litigation, the Department should specify in the regulation that complying with its terms will result in the plan sponsor, any plan fiduciary and any other person involved in providing the income illustrations being deemed to meet ERISA requirements. It also should specify the disclosures required concerning the assumptions used in making these projections and a statement that the projections are estimates provided for educational purposes only and are not predictions or guarantees.

## **V. Conclusion**

We appreciate both the Department's continued efforts around improving lifetime income options in defined contribution plans and the opportunity to comment on the ANPRM. We would be happy to meet with Department representatives to discuss this further. If you have any questions or if we can be of further assistance, please do not hesitate to contact me at 212.916.4292.

Sincerely,



Edward Van Dolsen  
President, Retirement & Individual Services



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November 30, 2011

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Re: Lifetime Income Illustrations

Dear Assistant Secretary Borzi:

We understand that the Department of Labor (“DOL”) is working on guidance related to providing lifetime income illustrations on participant benefit statements. In light of TIAA-CREF’s long experience with including income illustrations on quarterly benefit statements, we have prepared the enclosed paper to offer suggestions on how the guidance might be structured.

It is our understanding that the Department’s efforts are aimed at ways to improve lifetime income and retirement security for Americans. TIAA-CREF actively participated in the Lifetime Income Request for Information process, sharing the depth of our more than 90 years experience in providing retirement products through our written comments<sup>1</sup> and then followed by our testimony at the hearings held in September 2010.<sup>2</sup>

The attached paper is intended to present additional details on the issue of providing illustrations of lifetime income on participant benefit statements. TIAA-CREF strongly believes in the importance of providing this information to participants, and we currently include income illustrations on our quarterly benefit statements. We have done so, in one form or another, on a regular basis for almost 50 years. The paper sets forth our views on why we think this is important,

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<sup>1</sup> U.S. Department of Labor and Department of the Treasury. “Request for Information Regarding Lifetime Income Options for Participants and Beneficiaries in Retirement Plans.” TIAA-CREF comments submitted by Larry M. Chadwick, Vice President for Government Relations Public Policy. (April 30, 2010)

<sup>2</sup> U.S. Department of Labor and Department of the Treasury. “Joint Hearing on Issues Relating to Lifetime Income Options for Participants and Beneficiaries in Retirement Plans.” TIAA-CREF testimony delivered by Paul Van Heest, Senior Vice President for Institutional Product Management. (September 14, 2010)



APPENDIX A

outlines a number of the procedures and assumptions we utilize when providing illustrations, and offers concrete proposals for providing these illustrations to participants.

We appreciate the DOL's efforts surrounding the overarching initiative of improving lifetime income. TIAA-CREF representatives are available to meet with the DOL to explain and elaborate on the points raised in the attached paper or to answer any other questions that you may have.

In addition, I ask that, as you move forward, you look to TIAA-CREF as a resource that can provide you with a unique perspective based on our extensive experience providing retirement products to our clients.

Very truly yours,



**Brandon Becker**  
Executive Vice President and Chief Legal Officer  
TIAA-CREF

cc: Michael L. Davis, Deputy Assistant Secretary, Employee Benefits Security Administration  
Joe Canary, Director, Office of Regulations and Interpretations, Employee Benefits  
Security Administration  
Mark Iwry, Senior Advisor to the Secretary and Deputy Assistant Secretary for Retirement  
and Health Policy, U.S. Department of Treasury

Attachment: Providing Lifetime Income Projections on Benefit Statements

## Providing Lifetime Income Projections on Benefit Statements

### **I. Introduction**

TIAA-CREF appreciates the opportunity to present the Department of Labor (“DOL”) with our perspective on providing illustrations of lifetime income streams on participant benefit statements. We believe ensuring participants see such information on a regular basis is an important part of the retirement planning process. Accordingly, TIAA-CREF already includes this information on all of our participants’ quarterly benefit statements, continuing with our long history of providing participants with regular information about lifetime income dating back almost 50 years.

Providing recurring income projections serves as a regular reminder for participants of how close (or far away) they are to meeting the goal of receiving an adequate income in retirement. Seeing a straightforward projection of future income can prove to be a wake-up call for participants that results in heightened awareness of retirement planning issues, which can in turn lead to actions (e.g., increased savings rates) that ultimately will enhance their retirement security. Therefore, we believe all defined contribution retirement plans should supply this information to participants.

This paper discusses: (1) why we believe seeing this information can help improve retirement security; (2) how we present the income projections we provide on our quarterly statements and the assumptions we use to make these projections; (3) the importance of providing additional resources to help participants reach their retirement planning goals; and (4) some suggested guidelines for a safe harbor, in the event the DOL were to take that path.

### **II. About TIAA-CREF**

TIAA-CREF is the leading provider of retirement services in the academic, research, medical, and cultural fields. We manage over \$440 billion in retirement assets (as of 9/30/11) on behalf of 3.7 million participants and serve more than 15,000 institutions. TIAA was incorporated as a stock life insurance company in the State of New York in 1918. CREF is registered as an investment company with the Securities and Exchange Commission under the Investment Company Act of 1940. CREF is supervised by the New York State Department of Financial Services and is registered as an insurance company in several states.

At the core of our not-for-profit heritage is TIAA-CREF’s mission “to aid and strengthen” the financial future of the clients we serve by providing financial products that best meet their special needs. Our retirement plan annuities and mutual funds offer a range of options to help individuals and institutions meet their retirement plan administration and savings goals, as well as income and wealth protection needs. In 2010, TIAA-CREF paid out more than \$10 billion in retirement income and other payments to over 700,000 retirees. That figure includes annuity payments, reflecting our basic principle of ensuring that retirees receive a guaranteed stream of

income, but also consists of systematic withdrawal payments, required minimum distributions, and interest-only income, highlighting the importance of ensuring flexible retirement income options.

### **III. Changing the Retirement Goal Mindset**

The Employee Retirement Income Security Act (ERISA) requires participants who direct the investment of their defined contribution plan assets receive, at least quarterly, a statement of their account. While providing participants with regular reports about their savings is important, there is no requirement that these statements review ways in which individuals could use their savings to initiate an income stream at retirement. This approach inadvertently encourages individuals to view these accounts as wealth accrual vehicles, instead of highlighting their actual purpose – ensuring that individuals and their families have adequate retirement income that both will replace the paycheck they have relied on for so many years *and* last until the day they (or their dependents) die.

One way to shift the focus away from a “wealth accumulation” mindset is to ensure benefit statements include an illustration of the potential monthly lifetime income participants could receive if they decided to convert their account balance into an income stream at retirement. Providing such a projection allows participants to become familiar with the concept of lifetime income early in the retirement saving and planning process, effectively shifting the focus to an “income goal.”

These projections also serve as an educational tool, providing participants with a “reality check” that can result in more informed retirement planning decisions, encourage actions that could improve their chances of receiving an adequate income in retirement, and prevent unpleasant surprises when retirement arrives and individuals confront, often for the first time, the concept of retirement income. Having a clearer idea about the projected level of income also makes it easier to establish goals and set contribution rates centered on producing adequate retirement income. Finally, encouraging participants to incorporate the figures on their social security statements into these illustrations can help sharpen the focus of the full retirement picture.

A recent survey of defined contribution plan participants published by the American Council of Life Insurers (ACLI) demonstrates an existing appetite for information on lifetime income. The results of this study found:

- 91% of respondents would like to see a lifetime income stream illustration on their benefits statements;
- 60% would start saving more immediately if the illustration showed their monthly income would be inadequate in retirement; and
- 85% expressed an interest in having this information available on their regular retirement statement or via a secure website.<sup>1</sup>

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<sup>1</sup> ACLI, Retirement Choices Study, Matthew Greenwald and Associates, April 2010.

## APPENDIX A

TIAA-CREF for almost 50 years has been providing our participants with regular statements, in one form or another, showing how accumulations will translate into retirement income. Exhibit A at the end of this document includes a sample of one of our earliest versions from 1963. The most recent iteration is the Retirement Income Projection provided to all of our participants on their quarterly benefit statements (see Exhibit B for a sample statement). The projection, which is displayed clearly and prominently on the first page of each statement, uses certain standard assumptions (e.g., retirement at age 65) to show participants what their monthly income would be at retirement if they continued at their current rate of savings or, alternatively, if they were to save another \$100 or \$200 per month. In addition, the Retirement Income Projection suggests that participants speak with one of our consultants or go online to learn more.

The Retirement Income Projection is one of a combination of factors that contributes to TIAA-CREF having a client base that is well informed and, consequently, well prepared for retirement. Our overall focus on educating our participants about lifetime income throughout their careers and the fact that virtually all of our participants have access to annuity products both during the accumulation stage and as an income option at retirement, results in enhanced retirement security for our participants. In fact, a recent survey conducted by the TIAA-CREF Institute found that 80% of higher education employees (TIAA-CREF's core market) are either "very confident" or "somewhat confident" in their retirement income prospects, compared with 54% of U.S. workers generally.<sup>2</sup> The TIAA-CREF Institute also found that 95% of higher education workers have "personally saved for retirement," compared with 69% of U.S. workers generally.<sup>3</sup>

#### **IV. The Projected Approach vs. the Current Approach**

A significant issue regarding providing illustrations on benefits statements has been whether it is best to use a set of assumptions that accounts for future contributions and growth in the account (the "projected approach") or whether to assume no growth or future contributions and immediate annuitization of the current accumulation (the "current balance approach").

TIAA-CREF uses the projected method when illustrating income on our benefits statements. We have concluded that the projected approach provides participants more valuable information and a more realistic picture of what their income may look like at retirement. In addition, the projected illustration can be used as a basis for suggested changes participants can make to improve outcomes.

Some argue that a projected income illustration is harder for participants to understand given the number of assumptions that must be made. Others have expressed concerns that the projected approach could create unrealistic expectations and make participants feel overly secure. We address both of these concerns by structuring our Retirement Income Projections in a manner that can be easily understood by the average participant.

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<sup>2</sup> Retirement Confidence on Campus: The 2010 Higher Education Retirement Confidence Survey, Paul J. Yakaboski, TIAA-CREF Institute, June 2010.

<sup>3</sup> Id.

## V. TIAA-CREF Income Illustration Assumptions

The following section outlines the assumptions TIAA-CREF uses when providing Retirement Income Projections on our participants' quarterly statements. While by their very nature, assumptions produce results intended to provide an idea of a potential outcome and are not intended to be exact, it is nevertheless important they be "reasonable." For example, steps should be taken to ensure that plan providers do not utilize unrealistic returns on investments or contribution rates that the majority of participants might not be able to attain. We believe the assumptions we utilize, as explained below, fall within this reasonable category.

**A. Growth Rate.** The projection assumes all investments earn the same nominal rate of return, regardless of the participant's actual asset allocation. While historical returns for each asset class (e.g., equities, fixed income)<sup>4</sup> can and will vary from an assumed nominal rate of return, we believe that a conservative long-term assumption should be used predicated on a well-balanced portfolio, the importance of which we impart to all of our participants through our literature, online tools, and personal counseling sessions. Using a single rate of assumed earnings also helps make it easier for participants to understand the assumptions. The projected growth rate would be adjusted downward to reflect an assumed inflation rate, resulting in a real rate of return.

**B. Future Contributions.** The projection assumes that future contributions equal the dollar amount of contributions made in the prior year, but increasing at 3% each year in the future (to reflect assumed future salary growth). In addition, we then reduce the projected income at retirement by an assumed inflation rate of 3%, resulting in an inflation-adjusted figure. We believe it is appropriate to show participants figures based on their current actions. If an individual and/or the individual's employer are actively contributing to the retirement plan, it should be assumed that contributions will continue. Alternatively, if a participant or an employer changes the contribution rate or stops contributing, the annual projection reflects the change as an updated assumption for the rest of the participant's career.

**C. Retirement Age.** Although retirement ages, of course, vary, the projection assumes retirement income commences at age 65 and only shows the initial income at the point of retirement. While some argue the assumed retirement age should be set at the individual's full Social Security retirement age, the fact is that retirement ages vary greatly among individuals. We use age 65 because most of our retirement plans still utilize this as their normal retirement age, and because we believe there is some value in uniformity and simplicity (i.e., all participants will have the same normal retirement age).

**D. Retirement Income Option.** The projection assumes that the participant converts the projected account balance into a life annuity, based on a 4% assumed interest rate at age 65 (the assumed retirement date). The initial income is based on a single-life annuity with a 10-year guaranteed period. We have found very few participants actually choose a pure single-life annuity, and instead elect either a two-life (joint and survivor) annuity or single-life annuity with a 10, 15, or 20-year guaranteed period. In fact, based on figures from 2010, only 15% of our participants

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<sup>4</sup> While historical returns provide no guarantee of future performance, as of September 2011, the 30-year average annual return for the Barclays Capital Aggregate Bond Index was 9.3%; for the S&P 500 it was 10.81%; and for the Russell 3000 it was 10.64%. (Source: Ibbotson)

who began receiving annuity income chose a pure single life annuity. The vast majority chose additional options that provide income to heirs through a guaranteed period and/or a joint and survivor option.

**E. Payout Conversion Factor.** The payout annuity conversion factor reflects a net assumed interest rate of 4% per year and current TIAA mortality rates. As the projection only shows initial (first-year) income, there is no need for an assumed post-retirement inflation factor.<sup>5</sup>

We believe our assumptions provide participants with projections that benefit participants as they plan for their retirement using the lifetime income products we offer. As the DOL moves forward with their initiative regarding illustrations, we would encourage the DOL to permit plans to use assumptions consistent with the products they have chosen to make available to participants. In addition, it is also important to ensure that illustration assumptions do not inadvertently benefit companies not offering products designed to provide participants with lifetime income streams.

## **VI. Providing Participants with Additional Resources**

While we believe the Retirement Income Projection is an important tool for our participants' income planning needs, by no means do we think it should be the only option available. As stated previously, one of the underlying goals of providing this information to our participants is to encourage them to take action and become more involved in the retirement planning process. When making decisions about retirement income, participants should be aware of additional considerations such as how much of their salary they will need to replace in retirement (generally 70% to 90% of salary) and how this income should be structured (participants should have a number of income options from which to choose). Accordingly, we explicitly encourage participants to contact TIAA-CREF and speak with one of our retirement planning specialists or go online to obtain more information and/or further personalize their projections.

We have two online tools that allow participants to view more detailed retirement projections. Our [Retirement Goal Evaluator](#) is available to the public on the TIAA-CREF web site. Based on information plugged into the calculator by an individual, such as current contribution rates, accumulations, and allocations, the Retirement Goal Evaluator provides a general snapshot of what the individual could expect in retirement and, more importantly, how much more he or she will need to save on an annual basis to meet certain retirement income goals.

An additional online educational tool is available only to our participants via secure login. This tool provides detailed projections based on current account accumulations, contribution rates, and investment allocation. It also allows participants to customize the illustration, and review annuity income options in addition to other distribution options such as systematic withdrawal and interest only options. We have been offering this tool for many years and will be launching a revised version in the very near future.

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<sup>5</sup> In addition, under our TIAA Traditional Graded Benefit payment method, the participant would see income rise to the extent that future net investment rates of return during retirement exceed 4%. Such increases would at least partially offset the effect of inflation.

Offering these additional tools coincides with our belief that all participants should be educated about lifetime income products throughout their careers. Increased education helps participants to use such investments in both the deferral and income stages. Educational efforts should begin early and continue throughout a participant's career so when retirement age arrives, it is not the first time they are considering retirement income. It is important to ensure plan participants become familiar with the concept of receiving lifetime income as soon as they start contributing to a retirement plan. This includes providing participants with illustrations of how their savings will translate into a lifetime income stream in retirement.

## **VII. Safe Harbor Suggestions**

We think all individually directed defined contribution plans should provide retirement income illustrations on benefit statements. This approach will help further the goal of educating participants about the underlying goal of their retirement plan – generating enough income to replace the paycheck they were accustomed to receiving prior to retirement.

In this regard, we understand that there also is some interest in taking a safe harbor approach to this issue. Therefore, the following is a list of some items the DOL could consider if it were to issue a safe harbor for plans that choose to provide this information.

- A. Allow annuity providers to use rates either recently or currently available to participants and asset values as of a reasonable time in the past. Plans and their providers should not be required to supply “up-to-the-minute” illustrations, as they are intended for the long-term education of participants.
- B. Require a statement, written in plain English, describing for participants the assumptions used to produce the illustration.
- C. Provide inflation adjustments in present value.
- D. Provide guidelines and/or examples of the mortality assumptions that could be used.
- E. When considering earnings assumptions, it could be helpful to refer to Financial Industry Regulatory Authority (FINRA) regulations to determine earnings rates that can be used for illustrations.
- F. Use a commencement date of either age 65 or the participant's normal Social Security retirement age.

## **VIII. Conclusion**

Providing illustrations on participant benefit statements is part of a larger goal to change the average worker's mindset from asset accumulation to income replacement. Illustrations should

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encourage participants to learn more about lifetime income, reevaluate their retirement goals regularly, and make decisions both at retirement and throughout their careers that will result in lifetime financial security for individuals and their families.

Illustrations should be easy to understand and should provide a simplified view of retirement, but also should make clear that more detailed information can be obtained through other resources, whether via the company's web site or an in-person discussion with an advisor. Done right, income illustrations on benefit statements can provide participants with a vital missing piece of the retirement planning puzzle and help increase retirement security for Americans.



Date: 3/4/63

A-1856

# Sent: 1195

TEACHERS INSURANCE AND ANNUITY ASSOCIATION OF AMERICA  
COLLEGE RETIREMENT EQUITIES FUNDTHOMAS C. EDWARDS  
Vice President730 THIRD AVENUE  
NEW YORK 17, N. Y.

March 4, 1963

To the Business Officer:

It is a pleasure to send you these advance copies of the new TIAA and CREF slips, which will be going out to policyholders later this month.

Our new electronic data processing equipment makes it possible for us to send reports on TIAA and CREF annuities at the same time each year, with calendar year figures for both companies. The CREF report this year will be transitional, showing the premiums and accumulation units credited during the nine-month period since the last CREF report: April 1, 1962 through December 31, 1962. The next CREF report will cover the full calendar year of 1963.

There are two other changes from previous years:

1. The income illustration on the right-hand section of the TIAA and CREF slips assumes that the last periodic premium paid in 1962 will continue without increasing or decreasing until the scheduled retirement date (previous illustrations used the average periodic premium paid to the annuity during the report year). For most people, a projection based on the latest periodic premium will give a more realistic illustration than one based on an average for the year. Of course,

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if the last periodic premium paid in 1962 is not typical of the premiums a person will be paying in future years, his illustration will be affected accordingly. Individual illustrations using a different premium assumption are always available on request.

2. The TIAA reports to owners of annuity contracts issued before July 1, 1941 have been revised and expanded this year to integrate with the new electronic data processing equipment and to give the annuity owners additional information. Their reports will now show the amount of yearly annuity income already purchased to begin at the scheduled retirement age, and the right-hand portion will provide the illustration of total annuity income based on the stated assumptions as to future premiums, retirement age, income option and the like.

The TIAA and CREF slips, with an explanation of the changes being made, will be mailed later this month. This is not as early in the year as we had hoped for, but the transition to the new electronic data processing equipment slowed us down this year. Next year the reports will be scheduled for mailing in early February.

I hope this information will be helpful to you in answering questions from staff members or in referring them to TIAA for additional information. If you have any questions, please let us know.

Sincerely yours,



Vice President

Enclosures

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**tiaa** TEACHERS INSURANCE AND ANNUITY ASSOCIATION, 730 THIRD AVENUE, NEW YORK 17, NEW YORK

REPORT OF PREMIUMS AND BENEFITS UNDER YOUR TIAA ANNUITY CONTRACT FOR CALENDAR YEAR ENDING DECEMBER 31, 1962

1	2	3	4	5
Your Contract No.	The sum of all premiums paid in 1962, adjusted for any premiums paid in advance, was	The age your annuity is now scheduled to begin is Years      Months	The total yearly single life annuity income (starting at age shown) already purchased by the end of 1962 was	The value of the death benefit (available in instalments) at end of 1962 was

TIAA annuity contracts DO NOT provide for cash surrender or loans and cannot be assigned.

SPECIMEN

*William C. Greenough*  
PRESIDENT

F727-10-62 (A31,625-)

Please Read Explanation On Reverse Side

ILLUSTRATION (NOT GUARANTEED)

The amount of your TIAA retirement income will depend on the amount of premiums paid each year, your age at retirement, the income option you select, dividends declared by TIAA, and other factors. Although it is not possible to foresee changes in these factors and their effect on your TIAA annuity, the following illustration may be helpful in planning for your retirement years:

Your TIAA annuity income would be \_\_\_\_\_ per year...

IF the amount of periodic premiums being paid at the end of 1962 is continued thereafter until your annuity income begins...

and

IF your annuity income begins at the age shown in item 3 and you elect the Single Life Annuity option, which pays the largest income to you but provides no payment for a surviving beneficiary...

and

IF TIAA's current Minimum Rates and its current dividend scale are neither increased nor decreased.

ILLUSTRATION (NOT GUARANTEED)

The amount of your CREF variable annuity income will depend on the amount of premiums paid each year, your age at retirement, the income option you select, the investment experience of CREF's common stocks, and other factors. Your CREF income will change once a year during your retirement, reflecting primarily changes in the value of CREF's investments. Although it is not possible to foresee the changes in these factors and their effect on your CREF annuity, the following illustration may be helpful in planning for your retirement years:

Your CREF annuity income beginning at age \_\_\_\_\_ would be \_\_\_\_\_ per year...

IF the amount of periodic premiums being paid at the end of 1962 is continued thereafter until your annuity income begins...

and

IF your annuity income begins at the age shown above and you elect the Single Life Annuity option, which pays the largest income to you but provides no payment for a surviving beneficiary...

and

IF CREF's combined dividend and capital gain rate is 4% in each fiscal year and CREF's experience as to mortality and expenses coincides with the CREF factors now in use.

**cref** COLLEGE RETIREMENT EQUITIES FUND, 730 THIRD AVENUE, NEW YORK 17, NEW YORK

REPORT OF PREMIUMS AND ACCUMULATION UNITS UNDER YOUR CREF CERTIFICATE FOR PERIOD APRIL 1, 1962-DECEMBER 31, 1962

1	2	3	4	5
Your Certificate No.	The sum of all premiums paid in the period shown, adjusted for any premiums paid in advance, was	The total number of your accumulation units on December 31, 1962 was	The value of each accumulation unit on December 31, 1962 was	The total value of your accumulation units on December 31, 1962 was

CREF certificates do not guarantee a fixed dollar amount of annuity payments. They DO NOT provide for cash surrender or loans and cannot be assigned. All CREF premiums, values and benefits are payable in U.S. currency.

SPECIMEN

*William C. Greenough*  
PRESIDENT

F-729-10-62

Please Read Explanation on Reverse Side



This portion of your statement contains an illustrative TIAA annuity income amount based on certain assumptions. Your total retirement income will also include any income available from other sources, such as CREF, if you participate in CREF, Social Security, life insurance cash values, etc.

For a number of reasons, your actual TIAA income will differ from this illustration—your premium amount will probably change; you may retire at a younger or older age than that shown; TIAA's dividends will probably change; you may elect an income option that provides for a beneficiary; and so forth. However, we hope this illustration will be helpful in planning your retirement income, and we invite your inquiries for additional information about your annuity.

This portion of your statement contains an illustrative CREF annuity income amount based on certain assumptions. Your total retirement income will also include any income available from other sources, such as your TIAA annuity, Social Security, life insurance cash values, etc.

For a number of reasons, your actual CREF income will differ, and probably will differ substantially, from this illustration—your premium amount may change; you may retire at a younger or older age than that shown; CREF's investment experience will vary from year to year; the dollar amount of your CREF income during retirement will change once a year; you may elect an income option that provides for a beneficiary; and so forth. However, we hope this illustration will be helpful in planning your retirement income, and we invite your inquiries for additional information about your annuity.

**Item 2—Premiums:**  
**APPENDIX A**

The premiums shown are those due in 1962, except that any premium due previously and paid in 1962 for reinstatement of a lapsed contract is also included. Any premium paid in advance of its due date is included in the report for the year in which it was due.

If part of your premiums are paid through salary deduction, please bear in mind that deductions from December salaries are usually applied to pay premiums due January 1. Deductions made in December 1962 for January 1963 premiums will therefore appear in next year's report.

**Item 3—Age:**

This is the age at which lifetime annuity payments to you are presently scheduled to begin. You can elect to have payments begin at an older or younger age, and your annuity income will be commensurately larger or smaller.

**Item 4—Your Annuity Income:**

The figure shown is the total amount of yearly annuity income, beginning at the age shown in Item 3, already purchased by the premiums paid and dividends credited to your contract since it began. One-twelfth of the amount shown is payable each month.

The amount shown is a Single Life Annuity income, which provides the largest income during your lifetime, but provides no payment for a surviving beneficiary. You can elect this option or one of several other options at the time annuity payments begin. The other options provide an income for a surviving beneficiary and, therefore, an income that is smaller in amount during your lifetime than the Single Life Annuity.

**Item 5—Death Benefit:**

This is the total amount that has accumulated in your contract from premiums and interest, including dividends. If you die before annuity payments begin, the full accumulation at that time is paid as income to the beneficiary you have named. After annuity payments to you have begun, the death benefit, if any, depends on the annuity income option you select.

*Annuity contracts do not provide for cash surrender or loans and cannot be assigned. If premiums are discontinued at any time, you retain to your credit the total amount of annuity already purchased. The right to correct any clerical error in this statement is reserved.*

**EXPLANATION**

**Item 2—Premiums:**

The paid premiums shown are those due in the period April 1, 1962 to December 31, 1962. Any premium paid in advance of its due date is included in the report for the year in which it was due.

If part of your premiums are paid through salary deduction, please bear in mind that deductions from December salaries are usually applied to pay premiums due January 1. Deductions made in December 1962 for January 1963 premiums will therefore appear in next year's report.

**Item 3—Number of Accumulation Units:**

Each premium buys accumulation units, the number bought depending on the value of a unit at the time the premium is credited to the Fund. The number of your accumulation units shown in Item 3 includes not only the units purchased by premiums, but also an additional number of units purchased by your share of the dividend and miscellaneous income earned by the Fund.

**Item 4—Accumulation Unit Value:**

The dollar value of the CREF accumulation unit changes monthly, and is determined by the market value of all investments in the Fund as of the last day of each month. The figure shown is the value of the CREF accumulation unit on December 31, 1962, the last day of the period reported.

**Item 5—Total Value of Accumulation Units:**

The figure shown in Item 5 is the December 31, 1962 value of all the accumulation units you own. If you die before starting your CREF annuity income, the then current value of your accumulation units is used to provide an income of a certain number of annuity units each month for the beneficiary you have named.

At the time your CREF income begins, the then current value of your accumulation units is used to provide you a lifetime income of a certain number of annuity units each month. After this income has begun, the death benefit, if any, depends on the annuity income option you select.

The dollar value of the annuity unit, and therefore the CREF income to you or the beneficiary, changes once a year, reflecting primarily changes in the market value of CREF's investments.

*CREF certificates do not provide for cash surrender or loans and cannot be assigned. If premiums are discontinued at any time, accumulation units already purchased continue to participate in the Fund. The right to correct any clerical error in this report is reserved.*

**EXPLANATION**



FINANCIAL SERVICES  
FOR THE GREATER GOOD®

730 Third Avenue, New York, NY 10017-3206

999999 999999 999999

JOHN Q. PUBLIC  
123 MAIN STREET  
ANYTOWN, US 10000-1234



# Quarterly Retirement Portfolio Statement

April 1, 2009 - June 30, 2009



**For**  
**JOHN Q. PUBLIC**

## Customer Service

**Website:** [www.tiaa-cref.org](http://www.tiaa-cref.org)  
Automated 24 hour Information: 800 842-2252  
**Personal Assistance:** **800 842-2776**  
Monday – Friday, 8:00 AM - 10:00 PM Eastern  
Saturday, 9:00 AM - 6:00 PM Eastern  
Call 800 842-2776 if you have any questions or would like to discuss any other information on your statement. To view your most current account information, go to our website at [www.tiaa-cref.org](http://www.tiaa-cref.org) and log-in with your user ID and password. Please review your statement and let us know promptly of any inaccuracies. Unless we receive written notification within 60 days, we will assume our information is correct.

## Portfolio Summary

	This Period	Year-to-Date
<b>Beginning Balance</b>	<b>\$278,263.85</b>	<b>\$283,476.90</b>
Additions	636.59	3000.00
Reductions	-20.00	-20.00
Gain/Loss	-10,727.16	-18,303.62
<b>Ending Balance</b>	<b>\$268,153.28</b>	<b>\$268,153.28</b>
PAL Loan Balance	\$10,999.00	

## Retirement Income Projection

As part of your retirement savings planning, have you considered how much you need to retire? Saving a little more now can add up by the time you retire. **These charts are purely hypothetical and do not illustrate past or projected performance.**

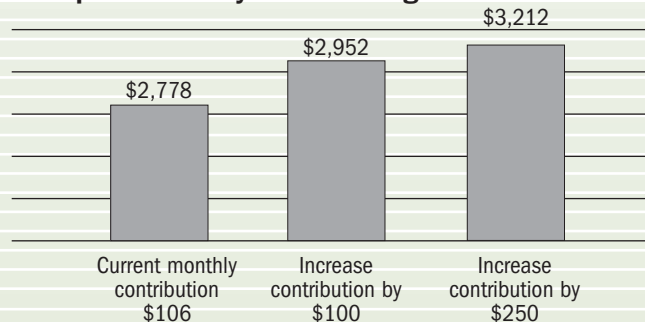
### What can you expect from Retirement Income?

Monthly Contribution	Contribution Increased by	Sample Lifetime Retirement Monthly Income at Age 65
\$106	\$0	\$2,778
\$206	\$100	\$2,952
\$356	\$250	\$3,212

Please refer to the disclosures at the back of this statement for more information.

To raise your savings rate or further personalize the retirement income projection, visit us online at [www.tiaa-cref.org](http://www.tiaa-cref.org) or call TIAA-CREF at 800-842-2776. Recent changes to your contribution amounts may not be reflected on this statement.

### Example of Monthly Income at Age 65



## Message Board

Welcome to TIAA-CREF! Your Quarterly Retirement Portfolio Statement will provide you with periodic information about your retirement portfolio with TIAA-CREF. The enclosed leaflet, Understanding Your Quarterly Retirement Portfolio Statement is a step-by-step guide on how to read your statement.

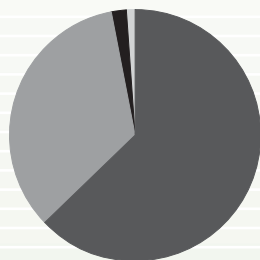
**Your Personalized Rate of Return**

This Period  
Year-to-Date

-6.83%  
15.36%

This figure is an estimate of the performance of the assets in your retirement portfolio, as reflected on this statement but excluding your Retirement Healthcare Savings Plan balances that are maintained at TIAA-CREF during the period(s) specified. Past performance is not a guarantee of future results. Please refer to the Disclosures Section for more information.

**Asset Allocation Summary**



Asset Allocation Percentages may not be exact due to rounding.

Current Percent	Asset Class	Current Value
33%	Equity	\$87,615.96
6%	Real Estate	18,744.46
60%	Guaranteed	158,822.99
1%	Multi-Asset	940.59
<b>100%</b>	<b>Total</b>	<b>\$266,124.00</b>

Asset Allocation Summary information is not displayed for Retirement Healthcare Savings Plan

**Activity Summary by Asset Class**

Asset Class/ Investment	Beginning Balance as of 04/01/2009	Additions	Reductions	Gain/Loss	Ending Balance as of 06/30/09
<b>Equity</b>					
CREF stock	\$99,744.73	\$0.00	-\$0.00	-\$12,128.77	\$87,615.96
<b>Real Estate</b>					
TIAA Real Estate	\$18,704.50	\$636.59	-\$20.00	-\$576.63	\$18,744.46
<b>Guaranteed</b>					
TIAA Traditional	\$156,657.19	\$0.00	-\$0.00	\$2,165.80	\$158,822.99
<b>Multi Asset</b>					
T/C Lifecycle 2040	\$3,157.43	\$0.00	-\$0.00	-\$187.56	\$2,969.87
<b>Total Account Value</b>	<b>\$278,263.85</b>	<b>\$636.59</b>	<b>-\$20.00</b>	<b>-\$10,727.16</b>	<b>\$268,153.28</b>

# Quarterly Retirement Portfolio Statement

April 1, 2009 - June 30, 2009

## APPENDIX A

JOHN Q. PUBLIC



### Portfolio Breakdown

	Beginning Balance as of 04/01/09	Ending Balance as of 06/30/09	
<b>Plans</b>			
ABC University Retirement Plan	\$19,704.50	\$19,685.05	Note: The Portfolio Breakout section of this statement is a summary of your total portfolio, including Retirement Healthcare Savings Plan assets.
DEF College Retirement Plan	256,401.92	246,438.95	
<b>Total Plans</b>	<b>\$276,106.42</b>	<b>\$266,124.00</b>	
<b>Other Accounts</b>			
ABC Retiree Health Savings Plan	\$2,157.43	\$2,029.28	
<b>Annuity Contracts in Your Plans</b>			
TIAA 12345678 CREF 23456789	\$256,401.92	\$246,438.95	
CREF U23456788	18,704.50	18,744.46	
<b>Total Annuity Contracts in Your Plans</b>	<b>\$275,106.42</b>	<b>\$265,183.41</b>	
<b>Other Investments in Your Plans</b>			
T/C Lifecycle Fund 2040	\$1,000.00	\$940.59	

### PLANS

### ABC University Retirement Plan

Annuity Contract(s) & Other Investments In This Plan	Vested Percentage	Vested Balance
Annuity Contract (CREF U23456788) & Other Investments	100%	\$19,685.05
<b>Total</b>		<b>\$19,685.05</b>

If a vested percent of 100% is displayed this means that you have satisfied the plan's vesting requirements, if applicable. Depending upon the contribution sources that exist under your plan, this may also include your own fully vested contributions and earnings. A vested percent of less than 100% represents the percentage of the plan's vesting service requirements that you have already satisfied for the delayed vesting contribution source(s).

If you have employer contributions that are subject to multiple vesting requirements a vesting percentage may not be displayed. You are always vested in your own contributions.

### Plan Investment Detail

Asset Class/ Investment	Beginning Balance as of 04/01/09	# of Units/ Shares	Unit/Share Price	Ending Balance as of 06/30/09	# of Units/ Shares	Unit/Share Price
<b>Pre-Tax Investments</b>						
<b>Real Estate</b>						
TIAA Real Estate CREF U23456788	\$18,704.50	59.4882	\$314.4237	\$18,744.46	60.8741	\$307.9218
<b>Multi Asset</b>						
T/C Lifecycle Fund 2040	\$1,000.00	49.0918	\$20.3700	\$940.59	49.0918	\$19.16
<b>Total Pre-Tax Investments</b>	<b>\$19,704.50</b>			<b>\$19,685.05</b>		
<b>Total</b>	<b>\$19,704.50</b>			<b>\$19,685.05</b>		



April 1, 2009 - June 30, 2009



**PLANS**

**ABC Unversity Retirement Plan (Continued)**

**Plan Transaction Detail**

Processing Date	Effective Date	Transaction Description	Investment	Number of Units/Shares	Unit/Share Price	Amount
<b>Additions</b>						
<b>Employee Pre Tax Contributions</b>						
04/02/2009	04/02/2009	Employee Pre Tax Contribution CREF U23456788	TIAA Real Estate Estate	0.0556	\$312.0787	\$17.36
04/16/2009	04/16/2009	Employee Pre Tax Contribution CREF U23456788	TIAA Real Estate Estate	0.2788	311.3898	86.81
05/26/2009	05/26/2009	Employee Pre Tax Contribution CREF U23456788	TIAA Real Estate Estate	0.2810	308.9859	86.81
<b>Total Employee Pre Tax Contributions</b>						<b>\$190.98</b>
<b>Employer Pre Tax Contributions</b>						
04/02/2009	04/02/2009	Employer Pre Tax Contribution CREF U23456788	TIAA Real Estate Estate	0.0742	\$312.0787	\$23.15
04/16/2009	04/16/2009	Employer Pre Tax Contribution CREF U23456788	TIAA Real Estate Estate	0.3717	311.3898	115.74
05/26/2009	05/26/2009	Employer Pre Tax Contribution CREF U23456788	TIAA Real Estate Estate	0.3746	308.9859	115.74
<b>Total Employer Pre Tax Contributions</b>						<b>\$254.63</b>
<b>Total Additions</b>						<b>\$445.61</b>
<b>Reductions</b>						
<b>Fees</b>						
05/26/2009	05/26/2009	Service Fee	TIAA Real Estate	-0.0637	\$314.4237	-\$20.00
<b>Total Fees</b>						<b>-\$20.00</b>
<b>Total Reductions</b>						<b>-\$20.00</b>
Salary reduction contributions have been received from your employer on your behalf. Please compare the information on your pay stub to the Effective Date of the contributions on this statement.						

**PLANS**

**DEF College Retirement Plan**

Annuity Contract(s) & Other Investments In This Plan	Vested Percentage	Vested Balance
Annuity Contract (TIAA 12345678/CREF 23456789) & Other Investments	100%	\$246,438.95
<b>Total</b>		<b>\$246,438.95</b>

If a vested percent of 100% is displayed this means that you have satisfied the plan's vesting requirements, if applicable. Depending upon the contribution sources that exist under your plan, this may also include your own fully vested contributions and earnings. A vested percent of less than 100% represents the percentage of the plan's vesting service requirements that you have already satisfied for the delayed vesting contribution source(s).

If you have employer contributions that are subject to multiple vesting requirements a vesting percentage may not be displayed. You are always vested in your own contributions.



April 1, 2009 - June 30, 2009

**PLANS**

**DEF College Retirement Plan (Continued)**

**Plan Investment Detail**

Asset Class/ Investment	Beginning Balance as of 04/01/09	# of Units/ Shares	Unit/Share Price	Ending Balance as of 06/30/09	# of Units/ Shares	Unit/Share Price
<b>After Tax Investments - ROTH</b>						
<b>Equity</b>						
CREF Stock CREF 23456789	\$99,744.73	428.2165	\$232.9306	\$87,615.96	428.2165	\$204.6067
<b>Guaranteed</b>						
TIAA Traditional TIAA 12345678	\$156,657.19	N/A	N/A	\$158,822.99	N/A	N/A
<b>Total</b>	<b>\$256,401.92</b>			<b>\$246,438.95</b>		

**Plan Transaction Detail**

*There were no transactions in this plan for this quarter.*

**OTHER ACCOUNTS**

**ABC Retiree Health Savings Plan**

**Annuity Contract(s)  
& Other Investments**

Annuity Contract (TIAA W12345678)

**Investment Detail**

Asset Class/ Investment	Beginning Balance as of 04/01/09	# of Units/ Shares	Unit/Share Price	Ending Balance as of 06/30/09	# of Units/ Shares	Unit/Share Price
<b>After Tax Investments</b>						
<b>Multi-Asset</b>						
T/C Lifecycle 2040 TIAA W12345678	\$2,157.43	105.9124	\$20.3700	\$2,029.28	105.9124	\$19.1600
<b>Total After Tax Investments</b>	<b>\$2,157.43</b>			<b>\$2,029.28</b>		

**Transaction Detail**

*There were no transactions in this plan for this quarter.*

April 1, 2009 - June 30, 2009

*The Annuity Contracts and Other Investments in Your Plans are shown to provide you with an alternative view of your investments with TIAA-CREF.*

**ANNUITY CONTRACTS IN YOUR PLANS**

**Investment Summary by Contract**

Contract/ Investment	Beginning Balance as of 04/01/09	# of Units/ Shares	Unit/Share Price	Ending Balance as of 06/30/09	# of Units/ Shares	Unit/Share Price
<b>CREF U23456788</b>						
TIAA Real Estate	\$18,704.50	59.4882	\$314.4237	\$18,744.46	60.8741	\$307.9218
<b>CREF 23456789</b>						
CREF Stock	\$99,744.73	428.2165	\$232.9306	\$87,615.96	428.2165	\$204.6067
<b>TIAA 12345678</b>						
TIAA Traditional	\$156,657.19	N/A	N/A	\$158,822.99	N/A	N/A
<b>Total</b>	<b>\$275,106.42</b>			<b>\$265,183.41</b>		

**OTHER INVESTMENTS IN YOUR PLANS**

**Investment Summary**

Investment	Beginning Balance as of 04/01/09	# of Units/ Shares	Unit/Share Price	Ending Balance as of 06/30/09	# of Units/ Shares	Unit/Share Price
T/C Life Cycle Fund 2040	\$1,000.00	49.0918	\$20.3700	\$940.59	49.0918	\$19.16
<b>Total</b>	<b>\$1,000.00</b>			<b>\$940.59</b>		

**Glossary**

**Portfolio Summary**

An overview of how your investments performed and how their values changed from the beginning of the quarter to September 30, 2008, and from the beginning of the year to September 30, 2008.

**Processing Date**

The date on which the transaction, contribution, transfer or payment is processed at TIAA-CREF.

**Effective Date**

The date as of which the contribution, transfer or payment began or ceased participating in the investment option or account.

**Gain/Loss**

The change in portfolio balances due to: (i) Unrealized Gains/Losses from investment holdings (including variable annuity accounts) after expenses are deducted, (ii) Other Gains/Losses and (iii) TIAA Interest. Only Other Gains/Losses are shown in the Transaction Detail sections of this statement.

**Asset Allocation**

A breakdown of how your total retirement portfolio is allocated across seven major asset classes; equities, fixed income, real estate, multi-asset, money market, guaranteed and other. For the illustrative pie chart asset class percentages may be rounded to the nearest full number percentage.

**TIAA Traditional**

TIAA Traditional, a guaranteed annuity account guarantees your principal and contractually specified interest rate. It also offers the opportunity for additional higher returns through additional amounts in excess of the guaranteed interest rate, which may be declared annually by the TIAA's Board of Trustees. Additional interest declared is not guaranteed for future years. If you have an RA contract, the TIAA Traditional Annuity contract does not allow lump-sum cash withdrawals from the TIAA Traditional Annuity and transfers must be spread over a 10-year period. If you have a GRA contract, lump-sum withdrawals are available from the TIAA Traditional Annuity only within 120 days after termination of employment and are subject to a surrender charge. All other withdrawals and all transfers to the Real Estate Account or to CREF must be spread over a 10-year period (five years for withdrawals after termination of employment).



## Disclosures

Portions of this statement provide information about specific transactions that have occurred during the quarter. Other portions of the statement provide information about the total number of units or shares held in your account, gains and losses during the quarter, account balances and other account related information. Each entity listed in this statement may contract with other entities for services related to the described activities.

Transactions in securities, including variable annuities and mutual funds, are effected by TIAA-CREF Individual & Institutional Services, LLC ("TC Services").

Account information for mutual funds held in your IRA is provided by TIAA on behalf of the TIAA-CREF Trust Company, FSB, as custodian. Investment products are not insured by the FDIC; are not deposits or other obligations of TIAA-CREF Trust Company, FSB; are not guaranteed by TIAA-CREF Trust Company, FSB; and are subject to investment risks, including possible loss of principal invested.

Your right to direct investments or transfer funds may be subject to certain limitations and/or restrictions under your employer's plan, if applicable and the terms of any funding options. Contact your Benefits Manager or call TIAA-CREF at 800 842-2776 if you have questions.

**Diversified and Well-Balanced Portfolio:** To help achieve long-term retirement security, you should give careful consideration to the benefits of a well-balanced and diversified investment portfolio. Spreading your assets among different types of investments can help you achieve a favorable rate of return, while minimizing your overall risk of losing money. This is because market or other economic conditions that cause one category of assets, or one particular security, to perform very well often cause another asset category, or another particular security, to perform poorly.

It is also important to periodically review your investment portfolio, your investment objectives, and the investment options under the Plan to help ensure that your retirement savings will meet your retirement goals. For more information or additional resources regarding individual investing and diversification, visit the Internet website of the Department of Labor at "[www.dol.gov/ebsa/investing.html](http://www.dol.gov/ebsa/investing.html)".

**Retirement Income Projection Assumptions:** Sample Lifetime Retirement Monthly Income at age 65 is not based upon your current asset allocation. It is based on your ending balance (excluding Minimum Distribution Option contracts and Transfer Payout Annuity contracts that are withdrawn in cash or transferred to other financial institutions) from your Portfolio Summary and does not consider assets outside those identified in this Quarterly Report. The Ending Balance is projected to grow according to the following assumptions: your current employer contribution rate and your personal monthly contributions shown in the chart, each projected to grow 3% annually (rounded to the nearest year, using your birthday) reflecting assumed inflation increases, as well as a non-guaranteed hypothetical annual growth rate of 6% until age 65. Accumulations in Interest Only contracts are assumed to remain at their current levels. Sample Lifetime Retirement Monthly Income is based on your life expectancy using a single life annuity with a 10 year guarantee period starting at age 65. The amount of lifetime income reflects an annuity payout rate based upon an assumed interest rate of 4% and TIAA's current annuity mortality rates. This projected income at retirement was discounted 3% annually to reflect the income amount in today's dollars. Your actual account performance will differ, and may be higher or lower. These charts are for informational and educational purposes only and do not constitute advice. Sample values shown are estimates and not guarantees and do not reflect federal/state taxes or investment fees and charges.

**Personalized Rate of Return** is an estimate of the performance of the assets in your retirement portfolio maintained by TIAA-CREF during the period specified. The figure: (1) includes expenses, interest and dividend payments; (2) includes contributions and withdrawals, weighted by the number of days between the date of contribution or withdrawal and the end of the quarter; (3) excludes the performance of products purchased through TIAA-CREF's brokerage window and Retirement Healthcare Savings product; and (4) may be different from the return of the individual funds or other investment options included in the portfolio. If your retirement portfolio included cash outflows or inflows the figure may differ from your actual rate of return depending on market volatility following these cash flows. The Personalized Rate of Return is based on the Modified Dietz Method of evaluating performance. Past performance is not a guarantee of future results. Please refer to the How to Read Guide or visit [tiaa-cref.org](http://tiaa-cref.org) for more information.

Account information for mutual funds held in your employer's retirement or savings plan is provided by TIAA on behalf of the plan and JPMorgan Chase Bank, N.A., as custodian.

For more detailed information including the plan's vesting schedule refer to the your plan's Summary Plan Description.

TIAA-CREF Trust Company, FSB is the custodian or trustee of the trust that holds the assets in Retirement Healthcare Savings Plan accounts. Investment products are not insured by the FDIC; are not deposits or other obligations of TIAA-CREF Trust Company, FSB; are not guaranteed by TIAA-CREF Trust Company, FSB; and are subject to investment risks, including possible loss of principal invested.

Account information for mutual funds held in your employer's retirement or savings plan is provided by TIAA on behalf of the plan and JPMorgan Chase Bank, N.A., as custodian