

Hogan in Ignites: DOL Proposal Presumes Fiduciary Wisdom, Critics Say That's the Problem

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Haynes Boone Counsel [Tom Hogan](#) spoke with *Ignites* following a proposed six-factor framework substitutes process for judgment, leaving plan participants exposed as alternatives move onto retirement menus.

Read an excerpt below.

While the three practitioners Ignites spoke to confirmed that participant disclosure is governed by separate Erisa provisions, Tom Hogan, a counsel in Haynes Boone's employee benefits and executive compensation practice group, said he expected this rule to do more.

"I thought there was going to be something more akin to 404(c) disclosures as opposed to this. ... There is no disclosure," said Hogan.

Read the full *Ignites* article [here](#).