IRS Issue Snapshot Highlights Plan Sponsor Responsibilities to Missing Participants and Beneficiaries

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The IRS recently published an Issue Snapshot (the ?ÃÂ£***Snapshot***?ÃÂ¥) on **IRS.gov** that revisits the steps a plan sponsor must complete in order to locate missing plan participants and beneficiaries. While the Snapshot does not contain any new guidance, its publication is an indication that ensuring plan sponsors are undertaking appropriate steps to locate missing participants and beneficiaries remains an area of focus for the IRS, including when they are conducting plan audits. Under current IRS guidance, plan sponsors should complete the following steps to attempt to locate missing plan participants and beneficiaries:

- Search for alternate contact information (address, telephone number, email, etc.) held by the plan or any related plan, sponsor, or publicly-available records or directories.
- Use a commercial locator service, credit reporting agency, or proprietary Internet search tool for locating individuals.
- Mail a letter via certified mail to the last known mailing address and through any appropriate means for other addresses or contact information known for the individuals (including email addresses and telephone numbers).

It is important to note that both the DOL and PBGC have issued their own guidance on the steps plan sponsors must complete when attempting to locate missing participants and beneficiaries, which is beyond the scope of the Snapshot. For additional information on the missing participant guidance issued by the IRS, DOL, and PBGC, please see our prior blog posts **here** and **here**. The Snapshot is available **here**.

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