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Document control

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Overview

This procedure to process death claims, unclaimed decedent property account segregation, beneficiary distributions, and escheatment processes using NRS Imaging & Workflow, Film Index Retrieval System (FIRST), Accurint, Nationwide Financial Claims Database (NFCD) and DCdirect. Generally, the Beneficiary Claims team attempts to locate identified beneficiaries using several resources, such as NRS Imaging & Workflow, FIRST, and Accurint. Thereafter, the beneficiary is confirmed before processing. All beneficiary tracking records are maintained in Nationwide Financial Claims Database and distribution processing is performed on DCdirect. It is very important to review plan guidelines or plan documents for all cases. Access plan information via the plan profile Nationwide Knowledge Intranet.

Regulatory policy

Nationwide adheres to Internal Revenue Service regulations to support procedures to complete this process. Nationwide associates are responsible to adhere to any restrictions or obligations placed upon this process by the plan sponsor, through the plan documents or administrative agreements and funding contracts with third-party broker dealer firms. An error in this process exposes Nationwide to litigation or reputational risk and financial loss.

Roles and responsibilities

Team	Role	Reports	Responsibility	
Beneficiary Claims	Financial Services Analyst	NF Operations Manager	Good order review of death claim paperwork. Processing distribution in DCdirect.	
QC Balancing	Financial Services Specialist	NF Operations Manager	Quality check of account maintenance split or distribution processed in DCdirect.	

Escalation and remediation

Escalation reason	Remediation
Beneficiary disagrees with account split.	Consult with Team Lead/Manager.
Any legal documentation that requires additional review or guidance from General Counsel.	Consult with Team Legal Specialist.
Unable to verify beneficiary or the beneficiary listed is not valid.	Consult with Team Legal Specialist.

System access and tools

General knowledge of the following systems is required to process these transactions:

- Accurint
- DCdirect
- Film Index Retrieval System (FIRST)
- Nationwide Financial Claims Database (NFCD)
- Nationwide Knowledge Intranet
- NRS Imaging & Workflow
- Outlook

Process map

Process maps apply to select Retirement Plans procedures as determined by the Business Process Analysis Team.

Good order requirements

List all requirements needed to consider the request in good order prior to processing.

1. Proper death claim documentation is necessary to begin processing a distribution.

	lf	Then
	Proper documentation is not provided,	Refer to the "Account Segregation Quality Control" section for direction.
\sim		

2. Segregate the account into an account for the beneficiary(ies), per the "Account Segregation Quality Control" section.

lf	Then
The account is not properly segregated,	Refer to the <u>"Account Segregation</u> " section for direction.

3. Process the distribution, if applicable.

lf	Then
The distribution is not processed accurately,	Refer to the <u>"Process Distribution on DCdirect"</u> section for direction.

4. Perform a Quality Control review to ensure the split and distribution were accurately processed.

Beneficiary distribution options

Beneficiary distribution options depend on:

- 1. Relationship to the participant (spousal, non-spousal, non-individual).
- 2. Date the form is received in the office in relation to the death of the participant.
- 3. Deceased participant's age.
- 4. Whether or not the deceased participant was receiving a distribution prior to the date of death.

Note: Applies only to non-individual charity or estate claims.

If	Then
The deceased participant dies in the year he/she would have reached age 70 $\frac{1}{2}$,	The beneficiary of the deceased participant must receive a payment to satisfy the required minimum distribution that is due to the participant prior to December 31 st .

Beneficiary	Future payout Election Date	Lump Sum	Partial Lump Sum & Periodic Payment	Periodic Payment	Purchased Annuity	Rollover	5- Year Rule
Spouse ²	Yes	Yes	Yes	Yes	Yes	Yes	Yes ¹
Non-Spouse	Yes	Yes	Yes	Yes	Yes	Yes	Yes ¹
Trust	Yes, up to 5 years	Yes	Yes, up to 5 years	No	No	Yes*	Yes

Beneficiary	Future payout Election Date	Lump Sum	Partial Lump Sum & Periodic Payment	Periodic Payment	Purchased Annuity	Rollover	5- Year Rule
Non- Individual (Charity or Estate)	No* No**	Yes* Yes**	Yes, up to 5 years* Yes, up to 5 years **	Yes* Yes**	No* No**	No* No**	Yes* Yes ^{**1}

* The participant died prior to the required beginning date.

** The participant died after the required beginning date.

Note: Spousal Beneficiary: Begin distributions by December 31st of the calendar year in which the participant attains age 70 ½. Pay the entire account balance over a period that does not extend beyond the life expectancy of the spousal beneficiary. Calculations vary based on the age of the spousal beneficiary.

Non-Spousal Beneficiary: Begin distributions by December 31st of the calendar year following the participant's death and pay the entire account balance over a period that does not extend the life expectancy of the non-spousal beneficiary.

lf	Then
The beneficiary(ies) do not begin	The Five-Year rule applies.

Note: Spousal Beneficiary Death Prior to Distribution Commencement

lf	Then
The surviving spouse dies after the participant but before the start of distributions and paperwork was filed with Nationwide,	Pay benefits owed to the beneficiary of the spouse based on the remaining life expectancy of the spousal beneficiary by using the distribution options available to a non-spousal beneficiary. Note: Refer to the chart above.
A required minimum distribution payment was due to the deceased participant,	The beneficiary of the spouse must receive this payment.

Note: Five-Year Payment Rule – Distribute the entire account balance by the end of the

calendar year which contains the fifth anniversary of the participant's death. The "Five-

Year Payment" rule applies to select plans for all beneficiaries. Refer to the plan

document or plan specific information for additional details.

Distribution period chart

Distribution Category	Designated Beneficiary	Distribution Period
Death prior to required minimum distribution	Spousal	Table V – Spousal life expectancy
Death prior to required minimum distribution	Non-spousal	Table V – Beneficiary life expectancy
Death prior to required minimum distribution	None	5-Year Rule
Death prior to required minimum distribution	Trust	Table V – Oldest beneficiary life expectancy
Death prior to required minimum distribution	Non-individual (e.g. Charity or Estate)	5-Year Rule
Death prior to required minimum distribution	Multiple Beneficiaries	Table V – Beneficiary / Oldest beneficiary life expectancy
Death prior to required minimum distribution	Multiple Beneficiaries – Separate Accounts	Table V – Life expectancy of each beneficiary
Death after required minimum distribution	Spousal	Table V – Spousal life expectancy
Death after required minimum distribution	Non-spousal	Table V – Beneficiary life expectancy
Death after required minimum distribution	None	Table V – Deceased participant life expectancy
Death after required minimum distribution	Trust	Table V – Beneficiary or oldest beneficiary life expectancy
Death after required minimum distribution	Non-individual (e.g. Charity or Estate)	Table V – Deceased participant life expectancy
Death prior to required minimum distribution	Spousal	Table V – Spousal life expectancy

Service level agreement

Name	Delivery Method	Destination	Owned By	Timeframe/Frequency
QC of segregation of assets	Nationwide Financial Claims Database	QC Balancing Team	QC Balancing Team	Within 24 hours of the segregation of assets.
Distribution of beneficiary account	DCdirect	Beneficiary	Beneficiary Claims & Process Team	Within 2 business days of segregation of participant account to beneficiary account, per the request of the beneficiary.

Step-by-step procedure

Participant death verification

This section explains how to verify the death of the participant.

- 1. Check the following applications for verification of death:
 - NRS Imaging & Workflow
 - Accurint
 - Berwyn
 - Internet sites such as:
 - o Google
 - o Find A Grave.com
 - o Columbus Library website

lf	Then
If unable to verify the death with notification from the Death Master File or outside third-party source,	Do not move forward with the claim.
If unable to verify the death with	Move forward with beneficiary verification as a

lf	Then
notification from family member/friends via	death certificate is required on file before any
call center,	payment goes out.

Beneficiary research & verification

This section explains how to verify beneficiary information found on the on the Death Master File (DMF) that is pulled from the Nationwide Financial Claims Database (NFCD).

NRS IMAGING & WORKFLOW

This section explains how to search for beneficiary information in NRS Imaging & Workflow.

- 1. Access NRS Imaging & Workflow.
- 2. Go to the File Cabinet tab and perform the following:
 - a. Enter the member account number, SSN or first and last name in their respective fields and then select Search.
 - b. When the member transactions appear under the Transactions section, review all documents associated with each transaction.

Note: Supporting documents are located under the Documents section.

c. Proceed to the Beneficiary Thorough Search & Contact section after the beneficiary is verified.

lf	Then
The beneficiary(ies) is not verified in NRS Imaging & Workflow,	Proceed to the FIRST section for instructions that explain how to research beneficiary information archived in the FIRST online database.
The beneficiary(ies) is not verified in the first Microfilm Database,	Contact Capture Operations East via e-mail to request further research: askcaptureoperations@nationwide.com
	Note: Original plan number is required. Use the database for most requests, using email only for older requests.
The beneficiary(ies) is not verified by	Refer to the Plan Document.

lf	Then
Capture Operations East,	
The Plan Document can verify the beneficiary(ies),	Proceed to verify beneficiary address.
The Plan Administrator, local office, and/or the previous service provider is not able to verify the beneficiary(ies), *for special cases only	Refer to the Plan Document for direction on how to manage an account with no beneficiary designated.
If beneficiary is not designated, *for special cases only	Refer to the Beneficiary Not Designated section of the plan document for processing details.

FILM INDEX RETRIEVAL SYSTEM (FIRST)

This section explains how to perform research on FIRST.

- 1. Access FIRST.
- 2. Enter the member Social Security Number in the ID field and then select Search.
- 3. When results appear, perform the following:
 - a. Mark the SAL RED AGREEMENT box.
 - b. Enter a note as displayed in the image below.
 - c. Select Submit Request.

Note: Results provided within approximately 24 hours vial email.

4. Proceed to the Notification Process section after verifying the beneficiary.

VERIFY BENEFICIARY

This section explains how to determine default beneficiary(ies) when unable to identify a designated beneficiary.

1. Verify default beneficiary by reviewing the corresponding Plan Document.

lf	Then
The default beneficiary is verified,	Proceed to the Beneficiary Recordkeeping & Notification section.
The default beneficiary is not verified,	Send paper request to General Counsel for review. See Ambiguous Beneficiary Designations section

BENEFICIARY THOROUGH SEARCH & CONTACT

This section explains how to perform a Thorough Search, as defined by the <u>RSA (Regulatory</u> <u>Settlement Agreement)</u>, for any death claim notification. The Thorough Search includes any effort to locate a beneficiary.

1. Use LexisNexis-Accurint to locate beneficiary(ies).

lf	Then
Unable to locate the beneficiary address via LexisNexis-Accurint,	Mail beneficiary distribution forms to address of record, per the Beneficiary Recordkeeping & Notification section, and update Nationwide Financial Claims Database, accordingly.
A response is not received within 120 days of mailing paperwork to the beneficiary or upon receipt of undeliverable mail notification,	Use Accurint to perform another search and mail beneficiary distribution forms to the updated address, per the Beneficiary Recordkeeping & Notification section, and update Nationwide Financial Claims Database, accordingly.
Unable to locate an updated Accurint address,	Update the Nationwide Financial Claims Database account status to Deemed Abandoned.
A response is not received within 60 days after the final 120-day mailing to the updated Accurint address,	Update the Nationwide Financial Claims Database account status to Deemed Abandoned.

2. Proceed to the Beneficiary Recordkeeping and Notification section after the beneficiary is located.

AMBIGUOUS BENEFICIARY DESIGNATIONS

This section explains how to manage questionable beneficiary designations.

lf	Then
The designated beneficiary is listed as "My wife", "My husband" or "My spouse" on file,	Research and verify the spouse at the time of designation.
Research is not successful,	Refer to the Escalation and Remediation section for further direction.
The designated beneficiary is listed as "My children", "All my children", "All surviving children" or "All surviving children of this marriage" on file,	Perform the following: Use Accurint or reference the participant obituary to research and verify child(ren) information Mail <u>Affidavit for All Surviving Children</u> to at least

lf	Then
	one the confirmed child(ren), along with instructions
The designated beneficiary is listed as "As designated per will" on file,	Refer to the "Escalation and Remediation" section for further direction.
The designated beneficiary is listed as "My mother", "My father", "My sister" or "My brother" on file,	Perform the following: Use Accurint or reference the participant obituary to research and verify parent/sibling information Mail <u>Affidavit for Any Surviving Parent/Sibling</u> , along with instructions
A beneficiary is not identified or listed on file,	Refer to the Plan Document for direction in the event of no beneficiary listed.

Beneficiary recordkeeping and notification

This section describes required beneficiary updates and notifications in accordance with RSA guidelines after receiving the Death Master File (DMF), DMF Report, or from the death claim checklist via Nationwide Financial Claims Database. This includes the Tidy Balance review process, per Step 2 of this section.

Note: This section also explains how to handle returned mail because of a bad address.

- 1. Access DCdirect.
- 2. Enter the date of death.
- 3. Place a Death Claim hold on the account.

lf	Then
Redepositing uncashed checks, Note: This only applies before distribution of the check and within the same tax year.	Send a request to the Customer Service Resolutions team to stop the check and redeposit the funds.

Note: Refer to the Plan Document for possible hierarchy before defaulting to the Estate if unable to locate the beneficiary on file.

- 4. Import beneficiary supporting documents and Accurint information into the transaction.
- 5. Update Nationwide Financial Claims Database and DCdirect with new beneficiary information, as discovered.
- 6. Publish notification letter and the Beneficiary Distribution Form to the beneficiary(ies) to

If	Then
The beneficiary(ies) did not respond to the initial letter and return the form,	Call the beneficiary(ies) and pend the transaction for 30-calendar days from the current date. Note: After contact is established, proceed to the Claim Form & Documentation Review section.
The beneficiary(ies) did not respond to the initial letter and return the form or call within the extended 30-calendar day pend period,	 Perform the following: Attempt a 2nd call. Publish the 2nd letter from Intuition to the beneficiary(ies). Pend the transaction for an extended 30-calendar days. Note: After contact is established, proceed to the Claim Form & Documentation Review section.
The beneficiary(ies) did not respond to the initial letter or call and return the form within the extended 30-calendar day pend period,	Publish the 3rd letter from Intuition, along with an email (if provided) and then pend the transaction for an extended 30-calendar days. Note: After contact is established, proceed to the Claim Form & Documentation Review section.
The beneficiary(ies) did not respond to the initial letter, (email) or call and return the Distribution Form within the extended 30-calendar day pend period,	 Perform the following: Attempt the 3rd and final call. Publish the 4th and final letter from Intuition to the beneficiary(ies). Pend the transaction for an extended 30-calendar days. Note: After contact is established, proceed to the Claim Form & Documentation Review section.
The beneficiary(ies) did not respond to the initial letter, (email) or call and return the form within the extended 30- calendar day pend period,	Instruct another team member to review the account for contact information. Note: Import overlooked beneficiary(ies) contact information into the corresponding Imaging transaction.
Processing undeliverable mail,	 Perform the following: Retrieve undelivered mail via NRS Imaging & Workflow. Review returned mail and update NRS Imaging & Workflow and Nationwide Financial Claims Database with bad address information. Note: Mark the Returned Mail box in Nationwide Financial Claims Database.

Intuition and contact the beneficiary(ies) same day.

lf	Then
	 Use LexisNexis Accurint to locate current beneficiary address information.
	• Create new letters with current information and send to the new beneficiary address.
All attempts to establish contact with	The account is abandoned; Perform the following:
the beneficiary(ies) failed,	Change beneficiary(ies) status in Nationwide Financial Claims Database to Age for Escheat.
	 Update the claim in Nationwide Financial Claims Database to indicate that the account is abandoned.
	 Refer to Deemed/Abandoned Process Escheatment.

7. When positive contact is established, perform the following:

- Confirm that you are communicating with the beneficiary
- Provide relevant account information
- Coordinate accordingly with the beneficiary(ies) for necessary follow-ups

Claim form & documentation review

This section explains how to follow-up with the beneficiary(ies) after contact is established. Required: Beneficiary must complete and submit the Beneficiary Distribution Form to process the transaction.

- 1. Ensure the Beneficiary Distribution Form sections are complete and in good order.
 - Plan Type (Required)
 - Beneficiary and Plan Part Information (Required)
 - Payout Options (Required)
 - Beneficiary Designation (Optional)
 - Direct Deposit (Optional)
 - Overnight Check Option (Optional)
 - Authorization (Required)
 - Plan Sponsor Authorization (Only applies to 401(k) and 401(a) plans that require

authorization)

lf	Then
The Distribution Form is not in good order or supporting documentation is missing,	Contact the beneficiary to correct the form and/or request necessary supporting documentation. Note: Contact the beneficiary every 30 days until the transaction is in good order or until the account is deemed abandoned.

2. Ensure that necessary documentation is received to process the transaction.

Example: Death Certificate

Note: For death certificate processing requirements, refer to the Account Maintenance Split QC section for more detailed information.

3. Continue to the Update Nationwide Financial Claims Database section to add notes to the account, as necessary.

Not In Good Order processing

1. Note Nationwide Financial Claims Database with the information and follow-ups.

Update Nationwide Financial Claims Database

This section explains how to update the Nationwide Financial Claims Database.

- 1. Access Nationwide Financial Claims Database.
- Select the appropriate transaction in the Priority Workflow section.
 Note: Follow Up Contact Management and Follow Up Requirements Management are the only two Update Reason options that apply to this scenario.
- 3. Select Requirement Management from the Features menu.
- 4. Update the status of Case Level Requirements to reflect the nature of the transaction:
 - Pending The transaction is in reach-out mode and the requested documents are not yet received.
 - Received The transaction is received, and in review.

- Received NIGO The documents received are not in good order.
- Reviewed The transaction is in good order.
- Waived Does not apply to this account.

If	Then
The transaction alarms out once the 30 days have passed, but the required documents are not received,	Update the Follow Up Days to 30. Note: Follow up contact cannot exceed four letters, three phone calls and one email, if applicable.

Note: The Date of Status Change automatically populates when status is updated.

- 5. Update the status of Claim Level Requirements to reflect the nature of the transaction:
 - Pending The transaction is in reach-out mode and the requested documents are not yet received.
 - Received The transaction is received, and in review.
 - Received NIGO The documents received are not in good order.
 - Reviewed The transaction is in good order.
 - Waived Does not apply to this account.

lf	Then
The transaction alarms out once the 30 days have passed, but the required documents are not received,	Update the Follow Up Days to 30. Note: Follow up contact cannot exceed four letters, three phone calls and one email, if applicable.

Note: The Date of Status Change automatically populates when status is updated.

- 6. Update the status of Beneficiary Level Requirements to reflect the nature of the transaction:
 - Pending The transaction is in reach-out mode and the requested documents are not yet received.
 - Received The transaction is received, and in review.
 - Received NIGO The documents received are not in good order.
 - Reviewed The transaction is in good order.
 - Waived Does not apply to this account.

lf	Then
The transaction alarms out once the 30 days have passed, but the required documents are not received,	Update the Follow Up Days to 30. Note: Follow up contact cannot exceed four letters, three phone calls and one email, if applicable.

Note: The Date of Status Change automatically populates when status is updated.

Death claim processing: paperwork in good order

This section explains how to begin processing claims that are in good order.

ACCOUNT SEGREGATION

- 1. When the Account Services Application window appears, access the Beneficiary tab and then perform the following:
 - a. Select Add Row, as necessary.
 - Enter beneficiary information as presented on the claim form under the Primary Beneficiary(ies) section, as necessary.

Required: First Name; Last Name; Relationship; Allocated Percentage.

lf	Then
The beneficiary is a Trust or Estate,	Complete the Organization field.

2. Update the following fields under the Beneficiary Info section and then select Submit:

- Tax ID field and Social Security Number
- DOB
- Mailing address information
- Note: Mark the Use Account Holder's Address box, as applicable.
- Phones (Optional)
- Emails (Optional)
- 3. Select Census Updates from the shortcut navigation menu.
- 4. Click on the Dates/Statuses tab and then perform the following:
 - a. Update the Date of Death field.
 - b. For participants only, enter the date of death in the Term Date field.
 - c. Select Deceased from the Employment Status drop-down menu.
 - d. Select Submit.

- 5. Access the Holds tab to remove all holds on the account and then select Submit.
- 6. Select Account Transfer from the shortcut menu and in the Create New Payee Account tab, perform the following:
 - Select the appropriate beneficiary from the New Payee Account For drop-down menu.
 - b. Select the correct gender from the Gender drop-down menu.
 - c. Select Submit.
 - d. Select Account Transfer from the shortcut navigation menu.
- 7. In the Create New Payee Account tab, perform the following:
 - a. Select the appropriate payee from the New Payee Account For drop-down menu.
 - b. Make the appropriate selection from the Gender drop-down menu.
 - c. Select Submit.
- 8. Click the Transfer Account tab and then perform the following:
 - a. Select DRO, COURT ORDER, DEATH CLAIM PROCESSING SDNP from the Gain/Loss Reason drop-down menu.
 - b. Select Account Split Beneficiary from the Request Type drop-down menu.
 - c. Under the Payout Options section, select Single Payment Partial or Single Payment – Partial from the Payout Type drop-down menu, based on beneficiary designation.
 - d. Under the Payees section, select Add Row. Select the appropriate payee from the Payee Type drop-down menu.
 - e. Select Submit.
- 9. Select Census Updates from the short-cut menu.
- 10. Click on the Holds tab and then perform the following:
 - a. Remove all maintenance holds.
 - b. Select Submit.
 - c. Using the Tax ID search function, enter the Beneficiary Social Security Number in the Search field and then select Search.
- 11. When the Beneficiary account appears, select Census Updates from the short-cut

navigation menu.

12. Click on the Holds tab to remove all maintenance holds and then select Submit.

PROCESS DISTRIBUTION ON DCDIRECT

Request Types:

- Death
- External plan-to-plan rollover
- Required minimum distribution
- Required minimum distribution supplement

This section explains how to process the distribution on DCdirect.

Note: Distributions are not forced. Refer to the <u>Beneficiary Distribution Options</u> section for more information about distribution payout options.

- 1. Access DCdirect.
- 2. Select Account Services from the Shortcuts menu.
- 3. Using the Tax ID search function, enter the participant SSN in the Search field and then select Search.
- 4. When the Account Services Application screen appears, select the correct beneficiary, per the Beneficiary Distribution Form.
- 5. Select Distributions from the short-cut menu.
- 6. In the Distribution History screen, go to the Distribution Form tab and update the Request Type Options section by performing the following:
 - a. Update the Effective Date field if indicated on the Beneficiary Distribution Form, otherwise, enter the current date.
 - b. Select DRO, COURT ORDER, DEATH CLAIM PROCESSING SDNP from the Gain/Loss Reason drop-down menu only in the event of backdating the distribution.
 - c. Make the appropriate selection from the Request Type drop-down menu:

Request Types	Request Type Descriptions
Death	Partial distribution, lump sum distribution, and ongoing systematic distribution.
External Plan to Plan Rollover Note: Standard: Spousal beneficiaries only NYSDCP: All beneficiaries	Rollover to an outside service provider. Note: When an required minimum distribution balance appears, Process that amount first.
Required minimum distribution	Ongoing required minimum distribution. Note: Select the appropriate year of distribution from the required minimum distribution Year drop-down menu.
Required minimum distribution Supplemental	One-time partial distribution. Note: Select the appropriate year of distribution from the required minimum distribution Year drop-down menu.

- d. Continue to the next Payout Options section in the Distribution Form tab.
- 7. Proceed to the section that applies to the appropriate payout option:
 - Death Fixed Payment Systematic Distribution
 - Death Fixed Period Systematic Distribution
 - Death Single Payment Entire Balance
 - Death Partial Payment
 - External Plan-to-Plan Rollover
 - <u>RMD (Required Minimum Distribution)</u>
 - <u>RMD Supplemental Partial</u>
 - <u>RMD Supplemental Entire Balance</u>

PAYOUT OPTION: DEATH – FIXED PAYMENT SYSTEMATIC DISTRIBUTION

This section explains how to enter distribution details into DCdirect when Death - Fixed Payment Systematic Distribution is selected as the payout option on the Beneficiary Distribution Form.

- 1. Under the Payout Options section of the Distribution Form tab, perform the following:
 - a. Select Fixed Payment Systematic Distribution from the Payout Type drop-down menu.

- b. Enter the payout amount in the Payout Amount field.
- c. Select Standard from the Calculation Method drop-down menu unless COLA is selected on the form.
- d. Make the appropriate selection from the Growth Rate drop-down menu:

If	Then
COLA is selected on the Beneficiary Distribution Form,	Select Assumed Growth Rate from the Growth Rate drop-down menu.
COLA is selected on the Beneficiary Distribution Form,	Select COLA from the Growth Rate drop-down menu.

- e. Make the appropriate selection from the Systematic Withdrawal Frequency dropdown menu.
- f. Make the appropriate selection from the Priority drop-down menu, as necessary. Note: Only the Single Payment Partial payout type is only allowed with a Fund Specific priority.
- g. Make the appropriate selection from the Priority Type drop-down menu, as necessary.
- h. Scroll down to the Payees section.

Note: Contact the beneficiary to resolve any issue related to the form.

- 2. In the Payees section, make the appropriate selection from the Payee Type drop-down menu and then scroll to the Tax Information section, if tax forms are provided, otherwise, select Submit.
 - a. Select Account Holder (Self) for Lump Sum distributions
 - b. Select IRA for Non-Spousal Beneficiary rollovers

lf	Then
Account Holder (Self) is selected,	Select Mail to Account Holder or ACH under the Payee Information section based on distribution instructions.
ACH is selected,	Perform the following:
	 Enter the bank name in the Financial Institution/Plan Name field.
	2. Verify via GIACT.
	3. Make the appropriate selection from the Type

If	Then
	 of Account drop-down menu. 4. Complete the Financial Institution Routing Number field. 5. Complete the Financial Institution Account Number field.
Directed to mail the distribution,	Mark the Override Payment Issuance Flag box if a manual check is required or mark the Overnight Fee box if the distribution is requested for overnight delivery service.

3. Under the Tax Information section of the DCdirect Distribution Form tab, perform the following for Federal withholding when a Federal W4-P and/or state tax form is provided:

- a. Mark the Edit Tax Information box.
- b. Make the appropriate selection from the Define Exemptions drop-down menu based on the direction of the Federal W4-P form and enter the number of exemptions in the adjacent field.
- c. Make the appropriate selection from the Additional Withholding Type drop-down menu.

lf	Then
Additional percentage is selected,	Enter the additional withholding percentage in the Additional Percent field.
Additional amount is selected,	Enter the additional withholding amount in the Additional Amount field.
Specific amount is selected,	Enter the specified withholding amount in the Specific Amount field.
None is selected,	Continue to the next step.

d. Under the Tax Information section, update State withholding details based on the submitted State tax form or the State default withholding.

If	Then
A State tax form is not submitted,	The State default withholding is applied, and a selection is not required.

e. Select Submit after completing all sections.

PAYOUT OPTION: DEATH – FIXED PERIOD SYSTEMATIC DISTRIBUTION

This section explains how to enter distribution details into DCdirect when Death - Fixed Period Systematic Distribution is selected as the payout option on the Beneficiary Distribution Form.

- 1. Under the Payout Options section of the Distribution Form tab, perform the following:
 - Make the appropriate selection from the Calculation Method drop-down menu.
 Note: Select Assumed Growth Rate if COLA is selected on the Beneficiary
 Distribution Form. When Assumed Growth Rate is selected, select COLA from the
 Growth Rate drop-down menu.
 - b. Make the appropriate selection from the Systematic Withdrawal Frequency dropdown menu based on the Beneficiary Distribution Form.
 - c. Enter the desired distribution frequency in the Payment Period fields.
 - d. Make the appropriate selection from the Recalculation Frequency drop-down menu based on the form.
 - Make the appropriate selection from the Priority drop-down menu, as necessary.
 Note: Only the Single Payment Partial payout type is only allowed with a Fund Specific priority.
 - f. Make the appropriate selection from the Priority Type drop-down menu, as necessary.
 - g. Scroll down to the Payees section.
- In the Payees section, make the appropriate selection from the Payee Type drop-down menu and then scroll to the Tax Information section, if tax forms are provided, otherwise, select Submit.
 - For lump sum distributions, select Account Holder (Self)
 - For non-spousal beneficiary rollovers, select IRA

lf	Then
Account Holder (Self) is selected,	Select Mail to Account Holder or ACH under the Payee Information section based on distribution instructions.
ACH is selected,	Perform the following:

lf	Then
	 Enter the bank name in the Financial Institution/Plan Name field. Verify via GIACT.
	3. Make the appropriate selection from the Type of Account drop-down menu.
	 Complete the Financial Institution Routing Number field.
	 Complete the Financial Institution Account Number field.
Directed to mail the distribution,	Mark the Override Payment Issuance Flag box if a manual check is required or mark the Overnight Fee box if the distribution is requested for overnight delivery service.

3. Under the Tax Information section of the DCdirect Distribution Form tab, perform the following for Federal withholding when a Federal W4-P and/or state tax form is provided:

- a. Mark the Edit Tax Information box.
- b. Make the appropriate selection from the Define Exemptions drop-down menu based on the direction of the Federal W4-P form and enter the number of exemptions in the adjacent field.
- c. Make the appropriate selection from the Additional Withholding Type drop-down menu.

lf	Then
Additional percentage is selected,	Enter the additional withholding percentage in the Additional Percent field.
Additional amount is selected,	Enter the additional withholding amount in the Additional Amount field.
Specific amount is selected,	Enter the specified withholding amount in the Specific Amount field.
None is selected,	Continue to the next step.

d. Under the Tax Information section, update State withholding details based on the submitted State tax form or the State default withholding.

lf	Then
A State tax form is not submitted,	The State default withholding is applied, and a selection is not required.
a Calact Submit after completing all agetions	

e. Select Submit after completing all sections.

PAYOUT OPTION: DEATH – SINGLE PAYMENT - ENTIRE BALANCE

This section explains how to enter distribution details into DCdirect when Single Payment – Entire Balance is selected as the payout option on the Beneficiary Distribution Form.

- Under the Payout Options section, select Single Payment Entire Balance from the Payout Type drop-down menu and then scroll down to the Payees section.
- In the Payees section, make the appropriate selection from the Payee Type drop-down menu and then scroll to the Tax Information section, if tax forms are provided, otherwise, select Submit.
 - For lump sum distributions, select Account Holder (Self)
 - For non-spousal beneficiary rollovers, select IRA

lf	Then
Account Holder (Self) is selected,	Select Mail to Account Holder or ACH under the Payee Information section based on distribution instructions.
ACH is selected,	 Perform the following: Enter the bank name in the Financial Institution/Plan Name field. Verify via GIACT. Make the appropriate selection from the Type of Account drop-down menu. Complete the Financial Institution Routing Number field. Complete the Financial Institution Account Number field.
Directed to mail the distribution,	Mark the Override Payment Issuance Flag box if a manual check is required or mark the Overnight Fee box if the distribution is requested for overnight delivery service.

- 3. Under the Tax Information section of the DCdirect Distribution Form tab, perform the following for Federal withholding when a Federal W4-P and/or state tax form is provided:
 - a. Mark the Edit Tax Information box.
 - b. Make the appropriate selection from the Define Exemptions drop-down menu based on the direction of the Federal W4-P form and enter the number of exemptions in the adjacent field.

c. Make the appropriate selection from the Additional Withholding Type drop-down menu.

If	Then
Additional percentage is selected,	Enter the additional withholding percentage in the Additional Percent field.
Additional amount is selected,	Enter the additional withholding amount in the Additional Amount field.
Specific amount is selected,	Enter the specified withholding amount in the Specific Amount field.
None is selected,	Continue to the next step.

d. Under the Tax Information section, update State withholding details based on the submitted State tax form or the State default withholding.

lf	Then
A State tax form is not submitted,	The State default withholding is applied, and a selection is not required.

e. Select Submit after completing all sections.

PAYOUT OPTION: DEATH – PARTIAL PAYMENT

This section explains how to enter distribution details into DCdirect when Death - Partial

Payment is selected as the payout option on the Beneficiary Distribution Form

- 1. Under the Payout Options section, perform the following:
 - a. Select Single Payment Partial from the Payout Type drop-down menu.
 - b. Complete the Payment Amount field based on the percentage or dollar amount listed on the Distribution Form.
 - c. Make the appropriate selection from the Priority drop-down menu, as necessary.

lf	Then
The Payee requests distribution from a mix of funds,	Select Fund from the Priority drop-down menu and then select either Hierarchy or Percentage from the Priority Type drop-down menu.
The Payee requests distribution from a specific fund,	Select Fund Specific from the Priority drop-down menu and then select either Hierarchy or Percentage from the Priority Type drop-down menu.

lf	Then
The Payee requests distribution from a mix of sources,	Select Source from the Priority drop-down menu and then select either Hierarchy or Percentage from the Priority Type drop-down menu.
The Payee requests distribution from a mix of funds and sources,	Select Source & Fund from the Priority drop-down menu and then select either "Hierarchy" or Percentage from the Priority Type drop-down menu.

- d. Scroll down to the Define Priority section.
- 2. In the Define Priority section, perform the following:
 - a. Select the Add Row icon.
 - b. Make the appropriate selection from the Financial Instrument/Source drop-down menu.
 - c. Based on the direction the distribution request, populate the Percent or Amount fields.
 - d. Scroll down to the Payees section.
- In the Payees section, make the appropriate selection from the Payee Type drop-down menu and then scroll to the Tax Information section, if tax forms are provided, otherwise, select Submit.
 - For lump sum distributions, select Account Holder (Self)
 - For non-spousal beneficiary rollovers, select IRA

If	Then
Account Holder (Self) is selected,	Select Mail to Account Holder or ACH under the Payee Information section based on distribution instructions.
ACH is selected,	 Perform the following: Enter the bank name in the Financial Institution/Plan Name field. Verify via GIACT. Make the appropriate selection from the Type of Account drop-down menu. Complete the Financial Institution Routing Number field. Complete the Financial Institution Account Number field.

lf	Then
Directed to mail the distribution,	Mark the Override Payment Issuance Flag box if a manual check is required or mark the Overnight Fee box if the distribution is requested for overnight delivery service.

- 4. Under the Tax Information section of the Distribution Form tab, perform the following for Federal withholding when a Federal W4-P and/or state tax form is provided:
 - a. Mark the Edit Tax Information box.
 - b. Make the appropriate selection from the Define Exemptions drop-down menu based on the direction of the Federal W4-P form and enter the number of exemptions in the adjacent field.
 - c. Make the appropriate selection from the Additional Withholding Type drop-down menu.

If	Then
Additional percentage is selected,	Enter the additional withholding percentage in the Additional Percent field.
Additional amount is selected,	Enter the additional withholding amount in the Additional Amount field.
Specific amount is selected,	Enter the specified withholding amount in the Specific Amount field.
None is selected,	Continue to the next step.

d. Under the Tax Information section, update State withholding details based on the submitted State tax form or the State default withholding.

lf	Then
A State tax form is not submitted,	The State default withholding is applied, and a selection is not required.

e. Select Submit after completing all sections.

PAYOUT OPTION: EXTERNAL PLAN-TO-PLAN ROLLOVER

This section explains how to enter distribution details into DCdirect when External Plan-to-Plan Rollover is selected as the payout option on the Beneficiary Distribution Form.

Note: An external plan-to-plan rollover transfers funds to an IRA account and is only applicable

to spousal beneficiary requests.

- 1. Under the Payout Options section, perform the following:
 - a. Select Single Payment Partial from the Payout Type drop-down menu.
 - b. Complete the Payment Amount field based on the percentage or dollar amount listed on the Beneficiary Distribution Form.
 - c. Make the appropriate selection from the Priority drop-down menu.

lf	Then
The Payee requests distribution from a mix of funds,	Select Fund from the Priority drop-down menu and then select either Hierarchy or Percentage from the Priority Type drop-down menu.
The Payee requests distribution from a specific fund,	Select Fund Specific from the Priority drop-down menu and then select either Hierarchy or Percentage from the Priority Type drop-down menu.
The Payee requests distribution from a mix of sources,	Select Source from the Priority drop-down menu and then select either Hierarchy or Percentage from the Priority Type drop-down menu.
The Payee requests distribution from a mix of funds and sources,	Select Source & Fund from the Priority drop-down menu and then select either Hierarchy or Percentage from the Priority Type drop-down menu.
The Payee requests distribution from a specific source,	Select Source Specific from the Priority drop-down menu.

- d. Scroll down to the Define Priority section.
- 2. In the Define Priority section, perform the following:
 - a. Select the Add Row icon.
 - b. Make the appropriate selection from the Financial Instrument/Source drop-down menu.
 - c. Based on the direction the distribution request, populate the Percent or Amount fields.
 - d. Scroll down to the Payees section.
- 3. In the Payee Information section, perform the following:
 - a. Select the Mail to Financial Institution radio button.
 - b. Enter the bank name in the Financial Institution/Plan Name field.

- c. Enter the bank address information in the fields provided.
- d. Complete the Financial Institution Account Number field, if provided.

lf	Then
The account number is not provided,	Enter a period in the field.
e. Select Submit.	

PAYOUT OPTION: REQUIRED MINIMUM DISTRIBUTION (RMD)

This section explains how to enter distribution details into DCdirect for required minimum distributions.

- 1. Under the Payout Options section, perform the following:
 - a. Select RMD Systematic Distribution from the Payout Type drop-down menu.
 - b. Select the designated frequency from the Systematic Withdrawal Frequency dropdown menu.

If	Then
The Payee did not indicate the distribution frequency,	The transaction is not in good order. Call the Payee and send the <u>NIGO Letter</u> <u>Additional Docs letter</u> if the call is unsuccessful.

- c. Scroll to the Payee Information section.
- In the Payees section, make the appropriate selection from the Payee Type drop-down menu and then scroll to the Tax Information section, if tax forms are provided, otherwise, select Submit.
 - For lump sum distributions, select Account Holder (Self)
 - For non-spousal beneficiary rollovers, select IRA

If	Then
Account Holder (Self) is selected,	Select Mail to Account Holder or ACH under the Payee Information section based on distribution instructions.
ACH is selected,	Perform the following:
	 Enter the bank name in the Financial Institution/Plan Name field. Verify via GIACT.

lf	Then
	 Make the appropriate selection from the Type of Account drop-down menu.
	 Complete the Financial Institution Routing Number field.
	 Complete the Financial Institution Account Number field.
Directed to mail the distribution,	Mark the Override Payment Issuance Flag box if a manual check is required or mark the Overnight Fee box if the distribution is requested for overnight delivery service.

- 3. Under the Tax Information section of the Distribution Form tab, perform the following for Federal withholding when a Federal W4-P and/or state tax form is provided:
 - a. Mark the Edit Tax Information box.
 - b. Make the appropriate selection from the Define Exemptions drop-down menu based on the direction of the Federal W4-P form and enter the number of exemptions in the adjacent field.
 - c. Make the appropriate selection from the Additional Withholding Type drop-down menu.

lf	Then
Additional percentage is selected,	Enter the additional withholding percentage in the Additional Percent field.
Additional amount is selected,	Enter the additional withholding amount in the Additional Amount field.
Specific amount is selected,	Enter the specified withholding amount in the Specific Amount field.
None is selected,	Continue to the next step.

d. Under the Tax Information section, update State withholding details based on the submitted State tax form or the State default withholding.

lf	Then
A State tax form is not submitted,	The State default withholding is applied, and a selection is not required.

4. Select Submit after completing all sections.

PAYOUT OPTION: EQUIRED MINIMUM DISTRIBUTION SUPPLEMENTAL – PARTIAL

This section explains how to enter distribution details into DCdirect for partial required minimum distributions.

- 1. Under the Payout Options section, perform the following:
 - a. Select Single Payment Partial from the Payout Type drop-down menu.
 - b. Complete the Payment Amount field based on the percentage or dollar amount listed on the Beneficiary Distribution Form.
 - c. Scroll down to the Payees section.
- In the Payees section, make the appropriate selection from the Payee Type drop-down menu and then scroll to the Tax Information section, if tax forms are provided, otherwise, select Submit.

If	Then
Account Holder (Self) is selected,	Select Mail to Account Holder or ACH under the Payee Information section based on distribution instructions.
ACH is selected,	Perform the following:1. Enter the bank name in the Financial Institution/Plan Name field.2. Verify via GIACT.
	 Make the appropriate selection from the Type of Account drop-down menu. Complete the Financial Institution Routing
	Number field. 5. Complete the Financial Institution Account Number field.
Directed to mail the distribution,	Mark the Override Payment Issuance Flag box if a manual check is required or mark the Overnight Fee box if the distribution is requested for overnight delivery service.

3. Under the Tax Information section of the Distribution Form tab, perform the following for Federal withholding when a Federal W4-P and/or state tax form is provided:

a. Mark the Edit Tax Information box.

- b. Make the appropriate selection from the Define Exemptions drop-down menu based on the direction of the Federal W4-P form and enter the number of exemptions in the adjacent field.
- c. Make the appropriate selection from the Additional Withholding Type drop-down menu.

If	Then
Additional percentage is selected,	Enter the additional withholding percentage in the Additional Percent field.
Additional amount is selected,	Enter the additional withholding amount in the Additional Amount field.
Specific amount is selected,	Enter the specified withholding amount in the Specific Amount field.
None is selected,	Continue to the next step.

d. Under the Tax Information section, update State withholding details based on the submitted State tax form or the State default withholding.

lf	Then
A State tax form is not submitted,	The State default withholding is applied, and a selection is not required.

e. Select Submit after completing all sections.

PAYOUT OPTION: REQUIRED MINIMUM DISTRIBUTION SUPPLEMENTAL – ENTIRE BALANCE

This section explains how to enter distribution details into DCdirect for required minimum distribution supplemental – entire balance.

- Under the Payout Options section, select Single Payment Entire Balance from the Payout Type drop-down menu and then scroll to the Payees section.
- 2. In the Payees section, make the appropriate selection from the Payee Type drop-down menu and then scroll to the Tax Information section, if tax forms are provided, otherwise, select Submit.

lf	Then	
Account Holder (Self) is selected,	Select Mail to Account Holder or ACH under the Payee Information section based on distribution instructions.	
ACH is selected,	Perform the following:	
	 Enter the bank name in the Financial Institution/Plan Name field. 	
	2. Verify via GIACT.	
	3. Make the appropriate selection from the Type of Account drop-down menu.	
	 Complete the Financial Institution Routing Number field. 	
	 Complete the Financial Institution Account Number field. 	
Directed to mail the distribution,	Mark the Override Payment Issuance Flag box if a manual check is required or mark the Overnight Fee box if the distribution is requested for overnight delivery service.	

- 3. Under the Tax Information section of the Distribution Form tab, perform the following for Federal withholding when a Federal W4-P and/or state tax form is provided:
 - a. Mark the Edit Tax Information box.
 - b. Make the appropriate selection from the Define Exemptions drop-down menu based on the direction of the Federal W4-P form and enter the number of exemptions in the adjacent field.
 - c. Make the appropriate selection from the Additional Withholding Type drop-down menu.

lf	Then
Additional percentage is selected,	Enter the additional withholding percentage in the Additional Percent field.
Additional amount is selected,	Enter the additional withholding amount in the Additional Amount field.
Specific amount is selected,	Enter the specified withholding amount in the Specific Amount field.
None is selected,	Continue to the next step.

d. Under the Tax Information section, update State withholding details based on the submitted State tax form or the State default withholding.

lf	Then
A State tax form is not submitted,	The State default withholding is applied, and a selection is not required.

e. Select Submit after completing all sections.

Account maintenance and payout quality control

This section explains how to review claim documentation before processing the distribution using the <u>Death Claim QC Review - Account Segregation Processing Checklist</u>

- 1. QC Balance team access Nationwide Financial Claims Database.
- 2. Open the claim by selecting the claim number and select the Quality Check option.
- 3. Complete the Quality Check Information section of the good order checklist.
- 4. Access NRS Imaging & Workflow and search by participant SSN to locate appropriate form(s).
- 5. Access DCdirect and select Account Services from the shortcut menu.
- 6. Enter the participant SSN in the Tax ID field and click Search.
- 7. Select Distributions from the shortcut menu.
- Verify the account split or payout information matches the paperwork in NRS Imaging & Workflow.
- 9. Return to Nationwide Financial Claims Database and click 'Submit' when finished.

lf	Then
Any information is incorrect,	Select Not Approved from the Status drop-down list.
	Note: Nationwide Financial Claims Database automatically routes the claim back to the examiner once submitted.
All information is correct,	Once submitted, Nationwide Financial Claims Database saves the work and submits the QC into the system, then closes the claim.

DISTRIBUTION PROCESSING QUALITY CONTROL

This section is performed by the Quality Control team after a distribution is entered in DCdirect by the Beneficiary Claims team.

 Review the Imaging transaction details, DCdirect Distribution Detail Summary, and QC Checklist previously completed by the Money-Out team to confirm accurate set up of the payout.

Verify:

- Alternate Payee Form is complete
- Receipt of Certified Death Certificate
- Accurint/Berwyn Database review evidence
- Beneficiary verification is complete, and documentation is on file
- Payout option is verified and keyed correctly
- Tax form is complete and keyed correctly, if applicable
- ACH form is complete and keyed correctly, if applicable
- Signature is on all applicable forms
- IRS Letter with EIN # if beneficiary is an estate, if applicable
- IRS Letter with TIN # if beneficiary is a trust, if applicable

Note: For first-time distributions, review the participant account to confirm that the alternate payee account is set up correctly.

If	Then
The distribution was not processed correctly,	 Perform the following: Cancel the distribution transaction. Reassign the transaction to the initial processor. Add a note into the corresponding transaction in Nationwide Financial Claims Database claim that explains the issue(s).
The distribution was processed correctly,	Perform the following:1. Complete the checklist.2. Import the checklist in Nationwide Financial Claims Database claim.

lf	Then	
	3. Send transaction to "Close".	
The beneficiary is taking a distribution after the account split,	Review the distribution as a Segregation of Account transaction.	

Deemed abandoned/escheatment

- Adjust a beneficiaries' status to Deemed Abandoned in Contact Management.
- If an attempt to claim money marked Pending for Escheatment occurs, and is in the dormancy period, stop pay the check sending it back into the Nationwide Financial Claims Database work queue. It will return to the first examiner who managed the claim's work queue.
- Deeming the account abandoned is a two-day process. Day one is processed in DCdirect, day two the claim is complete in Nationwide Financial Claims Database.
- If the account needs a required minimum distribution processed it is a three-day process.
 Day one is processing the required minimum distribution in DCdirect, day two is processing the rest of the account from DCdirect, and day three the claim is complete in Nationwide Financial Claims Database.

DEEMED ABANDONED BY REASON OF DE MINIMIS:

Claim amount is allowed only if the account is less than \$100.00. Requirement – One attempt via mail with no response after 30 days from each beneficiary.

STANDARD PROCESS

- Day 1 Examiner enters an external plan to plan transfer out of DCdirect to move money. Ensure no tax record is created.
- 2. Day 2: Once the balance is available out of DCdirect from the transfer, complete decision sheet in Nationwide Financial Claims Database and route to QC. Does show up on

DCdirect reporting. Claim appears on DCdirect reporting on Day 1 and Nationwide Financial Claims Database on Day 2 for QC from Common Pool.

REQUIRED MINIMUM DISTRIBUTION PROCESS

- 1. Day 1: Examiner enters a required minimum distribution supplemental out of DCdirect to move money. Ensure no tax record is created.
- Day 2: Examiner enters an external plan to plan transfer out of DCdirect to move money. Ensure no tax record is created.
- 3. Day 3: Once the balance is available out of DCdirect from the transfer, complete decision sheet in Nationwide Financial Claims Database and route to QC.

ESCHEATMENT PROCESS IN DCDIRECT

- 1. Pull up the participants account in DCdirect, remove the Death Hold on the account by completing the following:
 - a. Click Census Updates.
 - b. Click Holds.
 - c. Un-check the Death Hold box.
 - d. Click Submit.
- 2. Click on Distributions.
- 3. Select the Distributions Form tab.
- 4. For the request type select External Plan to Plan Transfer.
- 5. For Payout Type do Single Payment Entire Balance.
- 6. Under Payee Information for Financial Institution/Plan Name put Nationwide Escheatment.
- 7. In the Financial Institution Account Number, input a 1.

Note: Check the Override Payment Issuance Flag box. If not, a hard copy check is issued to the participant's address in DCdirect and requires manually stop paying the check. ALWAYS check this box.

- 8. Select Submit.
 - When processing transactions, Account Holder Termination Date is required pop-up may appear.
 - Enter the participant's date of death (DOD) in the Termination Date field to continue processing.
- When processing transactions, the address on file for the account holder is not valid pop-up may appear. Proceed to the Account tab and select Name & Address tab. The Good Mailing Address: marker shows as No.
- 10. Change the Good Mailing Address: marker to Yes and hit Submit.
- 11. Click Proceed.
- 12. Click OK on the Confirmation pop-up. This allows the distribution to process.
- 13. Add a Pop-up for the account.
- 14. Select Log Contact.
 - For Contact Type select Distribution Death Claim.
 - Add a note stating that the account has been deemed abandoned.
 - Check the box for Special Attention.
 - Check the box for Indefinite.
- 15. Save and Close.

DEEM ABANDONED IN NATIONWIDE FINANCIAL CLAIMS DATABASE AFTER CASE AND CLAIM ARE CREATED

1. Navigate to Beneficiary Management. If the Claim is not from the pending KDDB, add the beneficiaries required.

If	Then
The Claim was a pending claim from KDDB,	Import all the Beneficiaries first.
Note: Ensure edits or updates to each beneficiary are made (either when imported, or	
afterward.)	

lf	Then
The Claim is not from the pending KDDB,	Add the beneficiaries required.

- 2. Navigate to Requirement Management
 - a. Review Death Certificate Details to update Date of Death, Cause of Death, and Location of Death if needed and Save the changes.
 - b. Complete the Case Level requirements by marking them Reviewed when in good order, a Case Level requirement is required to process a Decision Sheet.
 - c. Complete the Claim Level requirements by marking them Reviewed when in good order.
 - d. Complete the Beneficiary's requirements (if any are required) by marking them Reviewed when in good order and Submit the changes.
 - i. Possibly none because this is a deemed abandoned scenario.
- 3. Navigate to Contact Management
 - Regardless if the claim was pending from KDDB or is a new claim from normal course of business or DMF, for Nationwide Financial Claims Database to process the deemed abandoned transaction in the decision sheet for each beneficiary, complete the following:
 - i. Add 1 Mail attempt with a status of anything other than Contacted
 - ii. Add 1 Returned Mail attempt with status of anything other than Contacted
 - iii. Add 1 Search attempt by Accurint with a status of anything other than Contacted
 - iv. Add 1 Search attempt by Web/Google with a status of anything other than Contacted
 - v. Add 1 Search attempt by Third Party with a status of anything other than Contacted
- 4. Change the Beneficiary Status to Deemed Abandoned.
- 5. Select No Further Leads and select Save.
- 6. Select Submit on Contact Management Screen.

7. Select OK.

lf	Then
A special requirement has been created for the scenario of Deemed Abandoned – No Further Leads,	Go to the Requirements Management for this beneficiary and complete the requirement.

- 8. Navigate to Decision Sheet.
 - Select the beneficiary that has been deemed abandoned and expand the Beneficiary/Payee Detail Section
 - b. Notice that the Requirements Status is Reviewed, Contact Status is No Contact, and Beneficiary Status is Deemed Abandoned

lf	Then
The funds are left in the participa	nt's Select the Payment Option drop down and select:
account or moved into the forfeiture account,	Ire Deemed Abandoned Remain in the Account
	Deemed Abandoned Move to Forfeiture Account
The funds are escheated to the s	tate, Select Payment Type Deemed Abandoned.

- 9. Select the correct Organization from the drop down. This is found in the participant's DCdirect account as Primary Association Code.
 - a. Add the participant's account number to the Beneficiary's account number field.
 - b. Add the EXACT amount being sent to the state in the Beneficiary's Payout Amount field.
 - c. If a required minimum distribution was processed, this amount need added to the External Plan to Plan amount for the total. Ex: RMD = \$1.00, External plan to plan = \$4.00. The total in Nationwide Financial Claims Database is \$5.00.
 - d. Add any comments required for the Beneficiary in the comment box.
 - e. Add any claim level comments in the claim level comment box.
 - f. Check the box "Do you want to process this payment request?"
 - g. Select OK to submit.
- 10. Notate DCdirect. Outline beneficiary(ies) names that were escheated and the dollar amount for each. Not a pop-up. Do not check the special attention box.

REQUIRED MINIMUM DISTRIBUTION SUPPLEMENTAL

- 1. Select External Plan to Plan Transfer. The following fields appear as a sign the account needs a required minimum distribution supplemental processed first.
 - Required minimum distribution Amount
 - Required minimum distribution Remaining Amount

If these are omitted, the following pop-up appears.

Distribution Request Failed - DCdirect	×
Distribution Request Failed	1
Transaction Request Not Allowed. 'Cannot perform save distribution. Cannot perform to	ransfers, rollovers
СК.	F

- Once the account is identified with a required minimum distribution, change the Request Type: to RMD Supplemental.
- 3. Choose Single Payment Partial as the Payout Type. Key the dollar amount listed for the required minimum distribution.
- 4. Leave Mail to Account Holder marked.
- 5. Check the Override Payment Issuance Flag box. Otherwise, a check is issued to the deceased participant's address in DCdirect.

PLANS WITH DEEMED ABANDONED ESCHEAT & DEEMED ABANDONED FORFEITURE

- Some plans with different money types have two different processes for Deemed Abandoned
 - State of Arizon 457 Deemed Abandon Escheats
 - State of Arizona 403B Does not Escheat
 - State of Arizon 401A Moves to Forfeiture account
 - San Diego 457 Deemed Abandon Escheats

- San Diego 401A Moves to Forfeiture account
- Phoenix 457 Deemed Abandon Escheats
- Phoenix 401A Moves to Forfeiture account
- 2. Nationwide Financial Claims Database is not able to differentiate between these money types. Use the following work around.

a. Create another case and claim for each money type. Example:

- Case A: Claim 1 Beneficiary Mickey Mouse 401(a) = \$40,000. Deemed Abandoned – Forfeiture Account. Process decision sheet. Close.
 All other beneficiaries of this claim may remain in this case. If any other beneficiary needs deemed abandoned as well, add to the next case and claim as well.
- Case B: Claim 2 Beneficiary Mickey Mouse 457 = \$40,000. Deemed Abandoned
 Deemed Abandoned (send payment request for escheatment). Close.

Quality control

The Quality Control review process is contained within the Step by Step Procedure.

Troubleshooting

BENEFICIARY CLAIM RELINQUISHMENT

A beneficiary may relinquish his or her rights to receive a distribution from a deceased participant account by properly executing the <u>"Disclaimer of Deferred Compensation Benefits"</u>. Note the disclaimer does not direct assets to another party, but merely disclaims a person's rights to the assets. If additional legal assistance is needed, contact General Counsel.

BENEFICIARY CORRESPONDENCE

Consult with the Correspondence team to create written responses to non-standard NIGO issues.

BENEFICIARY IN A FOREIGN COUNTRY

Nationwide requires a beneficiary living in a foreign country without a Social Security number to submit IRS form W-8. This form is available online at the <u>U.S. Department of State Foreign</u> <u>Embassy site</u>.

COMMUNITY PROPERTY LAWS

A plan administrator may distribute account proceeds to the listed beneficiary until receipt of a court order restraining payment or a written notice that a spouse is asserting (or plans to assert) his/her community property rights. If Nationwide receives such notice, contact General Counsel because community property laws differ from state to state and change frequently.

DETERMINING AGE OF LEGAL CAPACITY

In most states, 18 years of age is the age of majority. However, some states have exceptions for certain actions. Use the Contractual Obligations of Minors document, provided via the American Council of Life Insurance[®], to determine age of legal capacity. Contact General Counsel to review complex situations.

LEGAL REVIEW

A death claim situation may require a review by Nationwide General Counsel. Provide a copy of the plan document, along with supporting documentation. Pertinent documentation depends on the situation; however, it may consist of the following: Participation Agreement, Beneficiary Change Form, Letters, or other supporting documents relevant to the case.

PRIMARY VS. CONTINGENT BENEFICIARY

A participant may designate a primary and a contingent beneficiary. A participant may have multiple beneficiaries if more than one primary or contingent beneficiary is designated. A primary beneficiary is entitled to the account value after the death of the participant. Typically, a contingent beneficiary is entitled to the account value if the death of the primary beneficiary is prior to the death of the participant.

NON-INDIVIDUAL

A beneficiary making a claim must provide a church, company or organizational beneficiary with a correspondence on a letterhead that is signed by a person with apparent authority on behalf of the beneficiary. Make checks payable to the church, company or organization, as appropriate.

ESTATE DOCUMENTATION

If an estate is the designated beneficiary, Nationwide requires documentation to prove that a person is an Executor or an Administrator of an estate. Generally, Nationwide requires an original or certified copy of either the Appointment of an Executor or Letters of Administration, as issued by a court that has jurisdiction over the matter, to verify that a person is the executor or administrator of a participant's estate. A court order, from a court that has jurisdiction over the matter, to pay a person as the executor or administrator is also acceptable. Nationwide also requires a copy of the Letter from the IRS with the EIN of the estate.

TRUST DOCUMENTATION

Trust beneficiaries must have the required documentation by October 31st of the calendar year for when the participant died:

• Original or certified copy of the death certificate

- Letter of Notification from the IRS indicating the Trust Identification Number (TIN)
- Complete certified copy of the Nancy A. Participant Trust

GUARDIAN

To prove guardianship, Nationwide requires an original or certified copy of a Letter of Guardianship (court document) to prove that a person is a guardian or a birth certificate.

SIMULTANEOUS DEATH OF PARTICIPANT AND BENEFICIARY

If the beneficiary dies shortly after the participant, review the plan document to determine whether it contains a provision which requires a beneficiary to survive a participant by a certain number of days. If the plan document does not contain a provision, consult legal counsel to review the matter.

Note: Some states have "Simultaneous Death Acts" that determine the presumption of survival in cases where the property owner and beneficiary die within a short time of each other. Therefore, if plan provisions do not address this issue, a review by General Counsel is necessary.

WHAT IF AN ACCOUNT HAS LIFE INSURANCE OR AN SDO?

For an account with life insurance, create a new transaction and route it to the Life Processing team.

For an account with an SDO, notify Client Management via email to send a request to Schwab to pull all the assets from any holdings and to deposit the assets in the Money Market account. After assets are transferred to the Money Market account, pull the assets from Schwab by performing an exchange in DCdirect.

References

- <u>RSA (Regulatory Settlement Agreement)</u>
- Standard Beneficiary Claim Form
- Disclaimer of Deferred Compensation Benefits
- Death Claim QC Review Account Segregation Processing Checklist
- <u>Affidavit for Any Surviving Parent/Sibling</u>
- <u>Affidavit for All Surviving Children</u>
- U.S. Department of State Foreign Embassy site

Revision history

SharePoint automatically retains the revision history for this procedure upon publication. This procedure is a controlled document published by Business Support Services Knowledge Management for internal Nationwide online use only via Oracle Knowledge (transitioning to Knowledge Advanced during the fall of 2019) and SharePoint. Printing, copying, saving or reproducing this document risks non-conformance to the published procedure approved by the process owner.

Detailed revision history

Version 1		
Name and role	Date approved	Changes and notes
Writer: Sarah Kocher	4/13/2017	Updated procedure document to new OneNationwide format. Added NFCD content from KDDB content.
SME(s): Brian Charles Elizabeth Robinson	4/28/2017	Review, edit, approve.
Process Owner(s): Dana Lavengood	5/16/2017	Review, edit, approve.
Compliance: Clay Benton	5/18/2017	(Final approval date, per annual review. Optional per business needs)

Version 2		
Name and role	Date approved	Changes and notes
Writer: Sarah Kocher	7/2/2019	Annual review. Updated to new template. Changed passive-voice to active-voice.
SME(s): Brian Charles Elizabeth Robinson	9/24/2019	Review, edit, approve.
Process Owner(s): April Woodruff	9/24/2019	Review, edit, approve.
Compliance: Clay Benton		(Final approval date, per annual review. Optional per business needs)