



JLARC PRESENTATION

July 6, 2026

Celebrating 30 years of helping Virginia families

1996

Virginia Prepaid



Education Program

2000



Virginia College Savings PlanSM

2010

Virginia**529**
College Savings Plan



2016

Virginia**529**SM

2026



Commonwealth
SaversSM

Industry Leading Programs*

Education Savings

\$123.3B in AUM**
20.7% of 529 Market

Celebrating 30 years of
education savings!

invest529[®]
CollegeAmerica[®]



Disability Savings

\$336.1M in AUM
10.3% of ABLE Market

Supporting individuals with
disabilities for 10+ years

ABLEnow[®]
ABLEAmerica[®]



State-Facilitated Private Retirement

\$27.3M in AUM
1,100+ Active Employers

Serving 25,000+
private-sector workers saving
for retirement

retirepathVASM



Access & Affordability

\$24M
Scholarships awarded to
Virginia students over 16 years!

Serving 70,000+ students
annually

SOARVirginia[®]
SOARScholars[®]



*Data as of 3/31/2026

**Education Savings also includes assets from DB529: Prepaid529 & Tuition Track Portfolio

30 Years of Achievement, Fulfillment & Endless Possibilities



Disability Savings Programs

ABLEnow and ABLEAmerica – Disability Savings Accounts



Program Highlights

- 2016 - ABLEnow program launched following the federal ABLE Act and state legislation
- 2019 - ABLEAmerica launched and remains the only advisor-sold ABLE program in the nation
- 2026 - ABLE Age Adjustment Act took effect - increased disability onset threshold from **26 to 46**
- 2026 - Transition to new recordkeeper in Q1
- Present - ABLEnow represents **10%** of the national ABLE market
 - ABLEnow avg. balance - **\$13,155**
 - ABLEAmerica avg. balance - **\$22,011**
 - 91% of accounts receive annual contribution

ABLEnow Transition Update

- Recordkeeper transition, moving all active accounts and mapping **\$200+ million AUM** completed March 23, 2026.
- Customers and prospects responding positively to an **improved customer experience**.
- Enhancements include **reduced fees**, a **modernized account management platform**, and a new gifting tool.
- New **Entity Management Dashboard** provides easier account administration for organizations supporting individuals with disabilities.

Almost 15,000

Existing accounts
registered post-
conversion

Over 3,000

new accounts opened
in first two months
post-conversion



Program Administrator



Program Recordkeeper

Retirement Savings Program

RetirePath VA At a Glance

- June 2023: RetirePath Virginia opened statewide
 - Employer threshold - 25 or more eligible employees.
 - Employee eligibility limited to FT workers (at least 30 hours/week).
- July 1, 2026: Program expansion
 - Employer eligibility threshold reduced to 5 or more eligible employees, eliminating full-time requirement.
 - 350,000+ additional Virginia workers and 35,000+ Virginia businesses are now eligible to participate.

Program Momentum

25,000+ Virginia workers have already started saving for retirement.

\$30+ million saved since program launch.



\$160

average monthly contribution per participant.

2026 Legislative Change: RetirePath Virginia Expansion

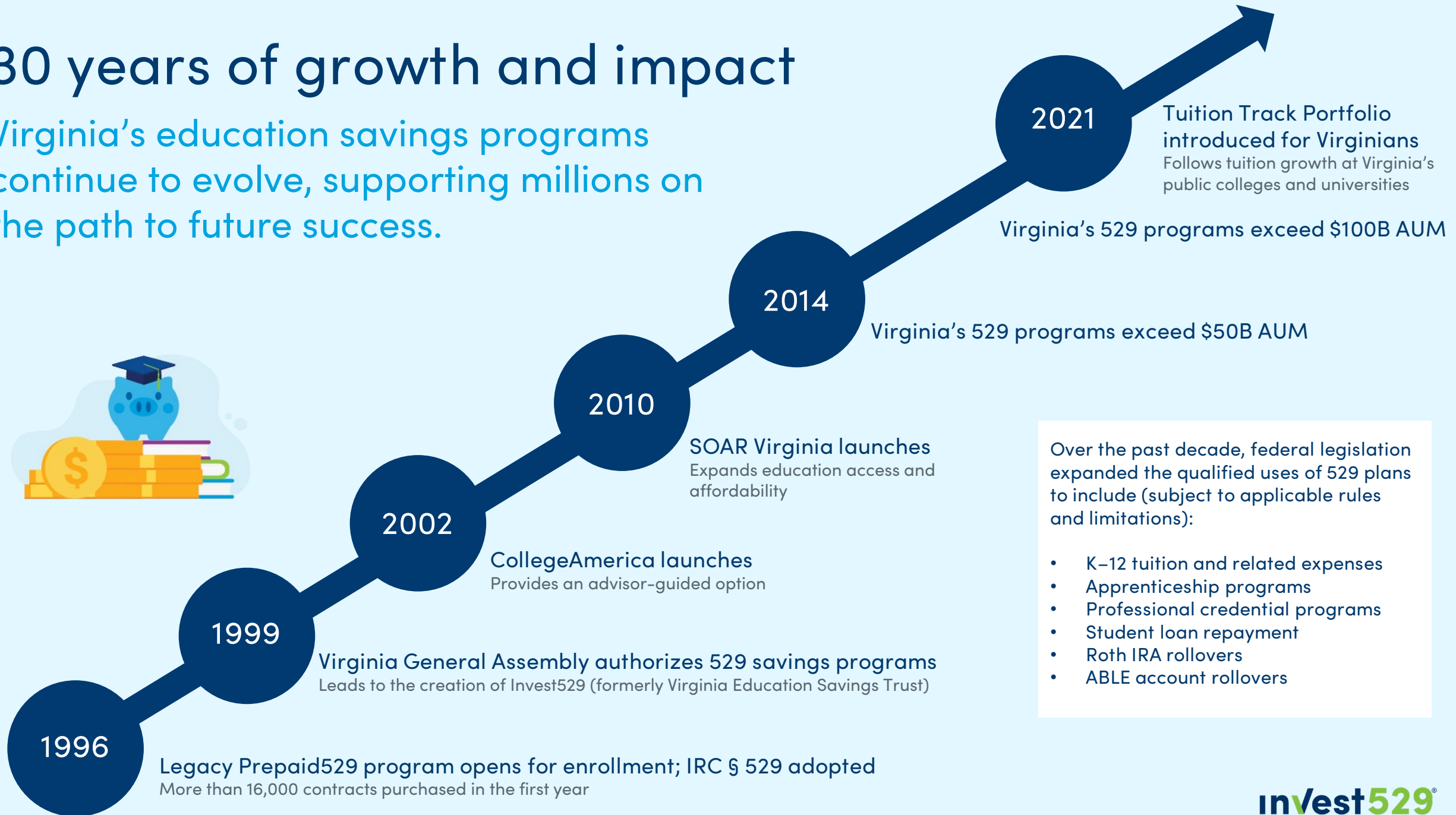
- Virginia General Assembly unanimously passed legislation expanding program.
- Thank you for your continued support.
- Expanded program projected to serve nearly 120,000 Virginia workers by FYE 2027¹.



Education Savings Programs

30 years of growth and impact

Virginia's education savings programs continue to evolve, supporting millions on the path to future success.



Over the past decade, federal legislation expanded the qualified uses of 529 plans to include (subject to applicable rules and limitations):

- K-12 tuition and related expenses
- Apprenticeship programs
- Professional credential programs
- Student loan repayment
- Roth IRA rollovers
- ABLE account rollovers

Online portfolio selection tool helps families navigate 20+ award-winning Invest529 portfolios

Portfolio Selection Assistant



What are you saving for?

Higher Education
Tuition, fees, meals, room & board, textbooks, supplies and more

K-12 Education
Tuition at private, public and religious schools

Target Enrollment Portfolios



Index Portfolios



Principal Protected Portfolios



Target Risk Portfolios






Specialty Portfolios



Tuition Track Portfolio: A unique option for Virginia families

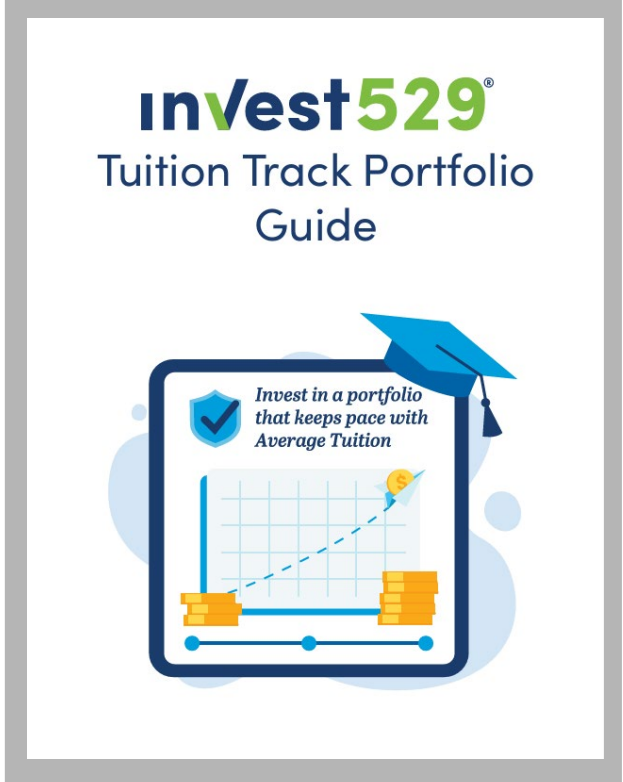
- Tuition Track Portfolio is a principal-protected Invest529 option designed to move in step with Average Tuition growth at Virginia’s public colleges and universities. It is the successor to Prepaid529, which closed to new enrollment in 2019.
- Since launch in 2021, Virginians have opened 14,000+ Tuition Track accounts.
- Resources and messaging continue to be tested and refined to help families better understand how Tuition Track works and how it can support their education savings goals with a defined benefit option.

 <p>Performance Overview</p> <p>See how Tuition Track has aligned with tuition changes over time.</p> <p>Review Performance</p>	 <p>On-demand Session</p> <p>Watch a short overview of how Tuition Track works.</p> <p>View Webinar</p>	 <p>Tuition Track Calculator</p> <p>Plan for how many units to buy with the portfolio that grows at the same rate as tuition.</p> <p>Use the Calculator</p>
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on-demand webinar, calculator, and other educational resources



intro video



downloadable guide

Access & Affordability: SOAR Virginia

ACCESS

Expand the Pipeline

- ▶ Early Outreach
- ▶ College and Career Exploration
- ▶ Mentorship and Coaching



AFFORDABILITY

Pay for Education

- ▶ FAFSA Completion
- ▶ Scholarships
- ▶ Financial Education



ATTAINMENT

Degree Completion

- ▶ Career Exploration and Transition
- ▶ Wraparound Support
- ▶ Workforce Credentials



From Inception



STUDENTS
REACHED

221K+

across Virginia



FOCUS ON
HIGH-NEED
POPULATIONS

- Low-income students
- First-generation students
- Racially and ethnically underrepresented students
- Adult learners
- Rural students
- Student with disabilities
- Parent students
- Foster youth



INVESTMENT IN
STUDENTS

\$36M

Supporting programs that
promote success for all
Virginians

Postsecondary Enrollment

SOAR
Scholars

80%

Virginia's
Community Colleges

72%



64%

FAFSA Completion

SOAR
Scholars

98%

GRASP

75%

Virginia's
Community Colleges

74%



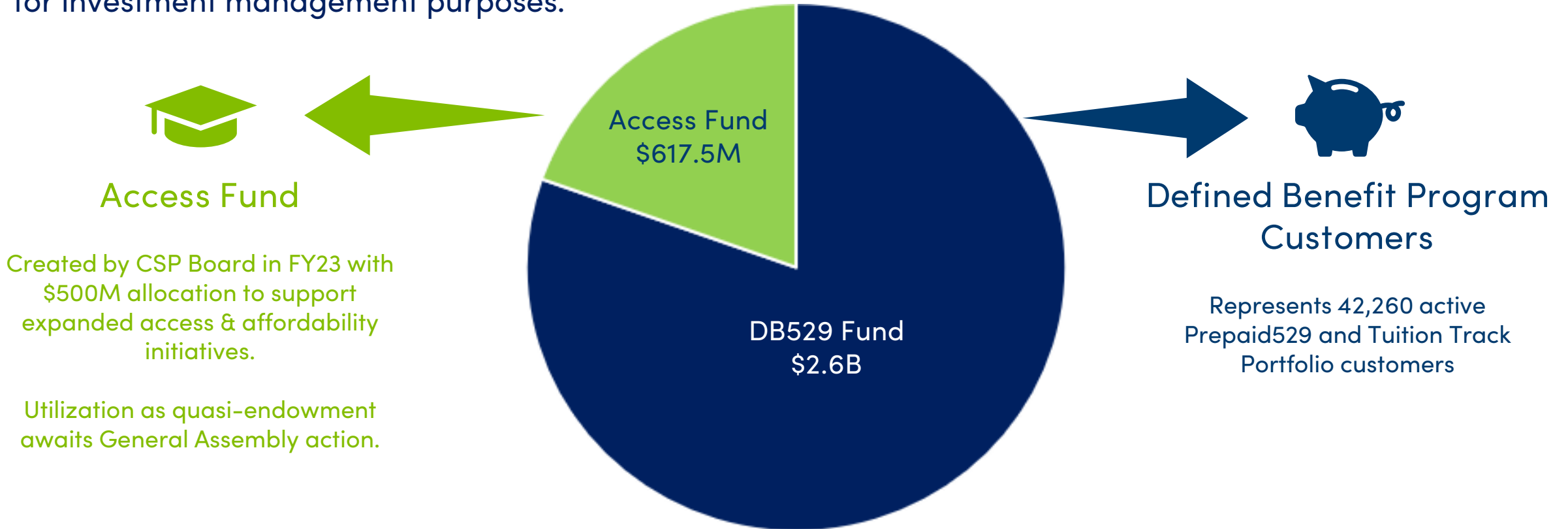
56%

JLARC Presentation 2026

Defined Benefit 529 Fund (DB529) and Access Fund

DB529 and Access Funds as of March 31, 2026

The Defined Benefit 529 (DB529) Fund and the Access Fund are sub-funds of the special non-reverting Commonwealth Savers Plan Enterprise Fund established in enabling legislation. All assets are commingled for investment management purposes.

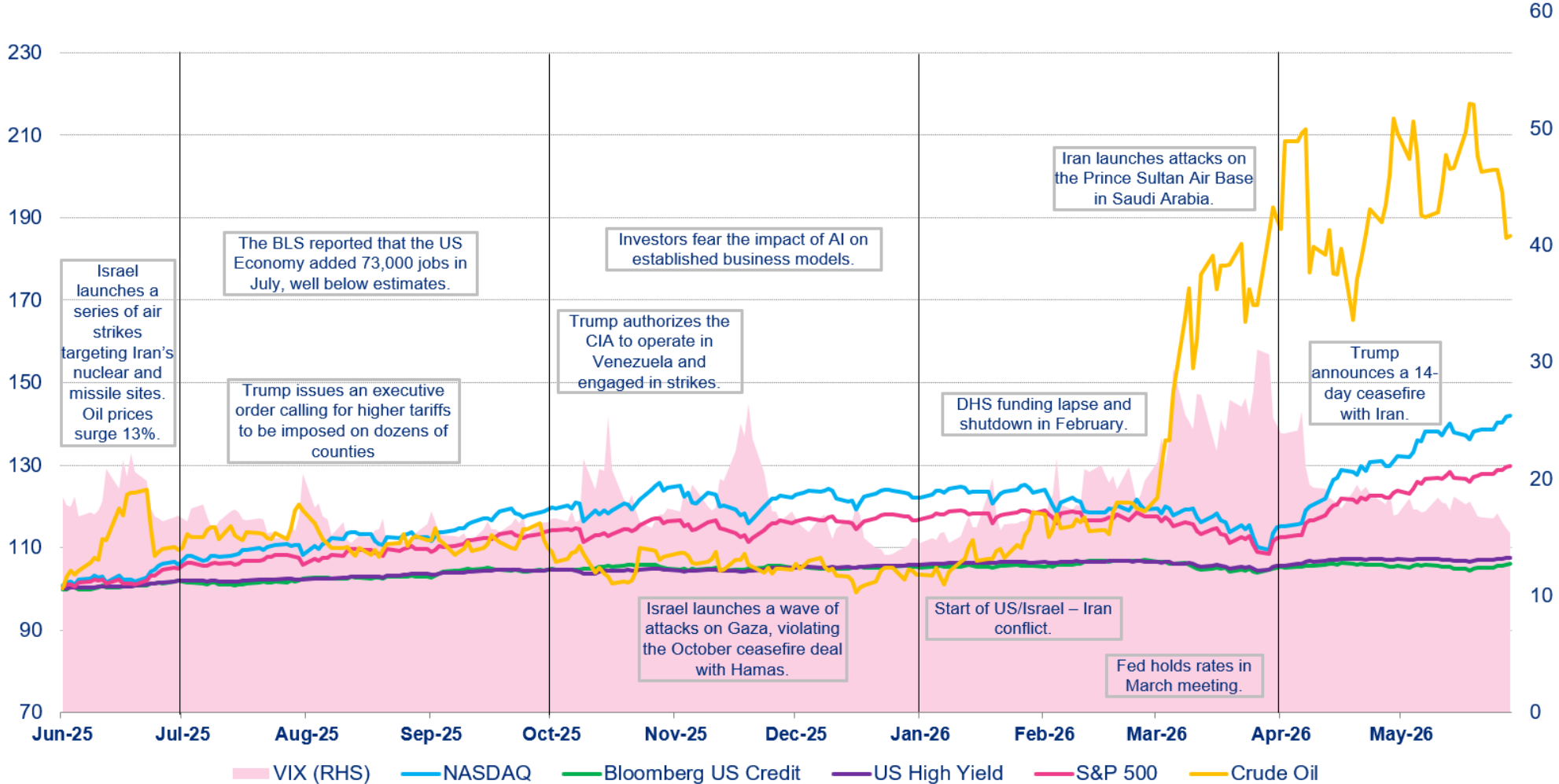


*On June 25, 2026, the CSP Board authorized an additional \$375M allocation to the Access Fund. The Board approved another allocation up to \$175M by Dec. 2026, if all parameters of its Comprehensive Risk Framework remain positive.

JLARC Presentation 2026

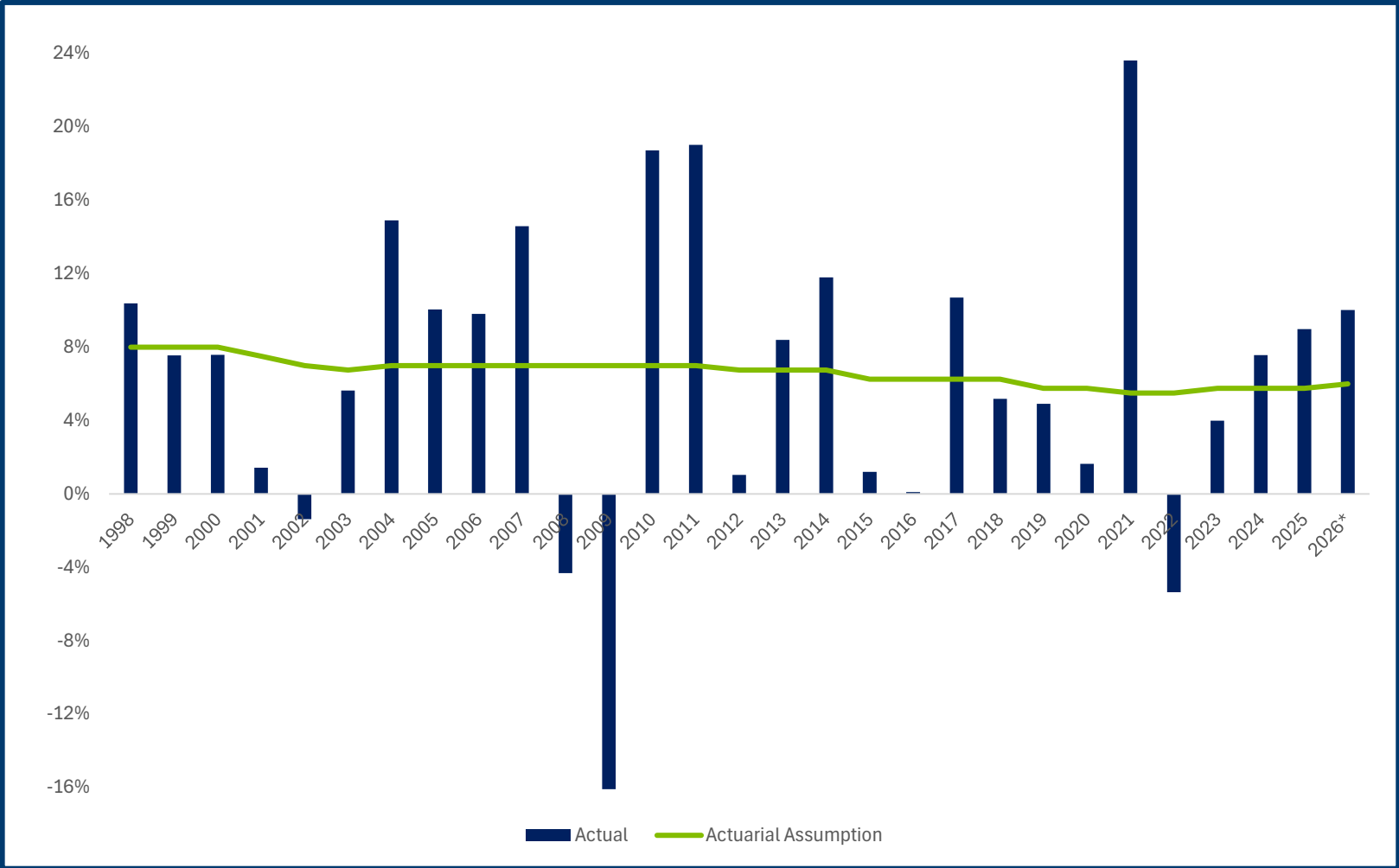
Investments

One Year Market Overview



Source: Refinitiv and Bloomberg. Data as of May 31, 2026. NASDAQ, Bloomberg US Credit, US High Yield, S&P 500, and S&P GSCI Crude Oil indexed to 100 at May 31, 2025.
 Note: For visual reasons, events might not exactly pinpoint to the day they actually happened.
 We do not imply a direct causal relationship between market movements and every single event.

DB529 Fund Performance: Investing for the Long-Term



Total Fund Performance (since inception)	6.37%
Total Fund Benchmark (since inception)	6.18%
Long-Term Actuarial Return Assumption	6.00%
2026 FYTD Return	10.03%

Source: BNY
 Notes: Past performance is no guarantee of future results
 *Performance returns through 5-31-2026

Invest529 Target Enrollment Portfolios Net of Fee Performance

TARGET ENROLLMENT PORTFOLIOS						
	Inception Ending	10 Year Ending	5 Year Ending	3 Year Ending	1 Year Ending	Cal Year Ending
2045 Portfolio	9.69					9.69
<i>2045 Benchmark</i>	9.90					9.90
2042 Portfolio	16.26			16.94	22.36	9.02
<i>2042 Benchmark</i>	15.63			16.29	22.42	9.25
2039 Portfolio	9.49		7.61	16.20	21.39	8.44
<i>2039 Benchmark</i>	9.06		7.47	15.47	21.07	8.51
2036 Portfolio	8.82		6.95	14.81	18.78	7.25
<i>2036 Benchmark</i>	8.88		6.85	14.23	18.41	7.28
2033 Portfolio	7.08	8.21	6.31	13.39	16.92	6.40
<i>2033 Benchmark</i>	7.07	8.19	6.22	12.89	16.45	6.35
2030 Portfolio	6.72	7.09	5.00	10.78	12.17	4.17
<i>2030 Benchmark</i>	6.67	7.03	5.00	10.52	11.80	4.10
2027 Portfolio	5.04	5.70	3.24	7.35	7.17	1.99
<i>2027 Benchmark</i>	4.96	5.65	3.36	7.35	6.91	1.86
2024 Portfolio	4.70	4.40	1.98	4.42	3.85	1.46
<i>2024 Benchmark</i>	4.48	4.43	2.42	5.02	4.02	1.37

Source: BNY

Notes: Past performance is no guarantee of future results;

*Performance returns thru 5-31-2026

CollegeAmerica Target Date Funds Performance

(inception date in parantheses)	Average annual total return						YTD	12 mo YLD
	Lifetime	10 Years	5 Years	3 Years	1 Year			
College 2042 Fund - Class 529 A (3/15/2024) - CTD42	12.75	-	-	-	19.83	-3.22	0.9	
College 2042 Fund - Class 529 F2 - CTD42	13.10	-	-	-	20.11	-3.21	1.1	
Morningstar US 529 Target-Enrollment 2042+ Average	12.86				18.18	-1.45	-	
College 2039 Fund - Class 529 A (3/26/2021) - CTD39	7.31	-	7.38	14.98	17.65	-2.74	1.5	
College 2039 Fund - Class 529 F2 - CTD39	7.65	-	7.71	15.33	18.03	-2.65	1.7	
Morningstar US 529 Target-Enrollment 2039 Average	7.29	-	7.59	14.04	16.89	-1.40	-	
College 2036 Fund - Class 529 A (2/9/2018) - CTD36	8.16	-	6.72	13.50	14.66	-1.75	2.2	
College 2036 Fund - Class 529 F2 - CTD36	8.46	-	7.02	13.80	14.96	-1.75	2.5	
Morningstar US 529 Target-Enrollment 2036 Average	7.89	-	6.79	12.70	14.78	-1.18	-	
College 2033 Fund - Class 529 A (3/27/2015) - CTD33	7.12	8.16	5.50	10.87	11.22	-0.76	2.9	
College 2033 Fund - Class 529 F2 - CTD33	7.42	8.46	5.79	11.17	11.51	-0.68	3.1	
Morningstar US 529 Target-Enrollment 2033 Average	7.40	8.76	5.72	11.03	12.76	-0.86	-	
College 2030 Fund - Class 529 A (9/14/2012) - CTD30	7.05	6.64	4.37	8.28	8.64	-0.29	3.2	
College 2030 Fund - Class 529 F2 - CTD30	7.33	6.93	4.65	8.58	8.93	-0.29	3.5	
Morningstar US 529 Target-Enrollment 2030 Average	7.41	7.46	4.74	9.39	10.39	-0.57	-	
College 2027 Fund - Class 529 A (9/14/2012) - CTD27	5.66	5.02	3.01	6.11	6.31	-0.16	3.4	
College 2027 Fund - Class 529 F2 - CTD27	5.94	5.30	3.29	6.37	6.60	-0.08	3.7	
Morningstar US 529 Target-Enrollment 2027 Average	6.19	6.12	3.56	7.37	7.90	-0.09	-	
College Enrollment Fund - Class 529 A (9/14/2012) - CEF	1.70	1.98	1.97	4.90	5.21	-0.21	3.9	
College Enrollment Fund - Class 529 F2 - CEF	1.96	2.24	2.23	5.18	5.52	-0.10	4.2	
Morningstar US 529 Target-Enrollment College Average	2.82	3.44	2.67	5.37	6.04	0.19	-	
Bloomberg U.S. Aggregate 1-5 Years Index	1.82	1.99	1.70	4.43	4.33	0.20	4.2	

ABLEnow Performance

ABLEnow Investment Performance as of 3/31/2026						
	3 month	1 year	3 years	5 years	Since Inception	Inception Date
Aggressive Growth Portfolio	-1.31%	18.44%	14.25%	7.69%	9.87%	12/2016
Benchmark	-2.04%	18.01%	14.21%	7.86%	10.15%	12/2016
Conservative Income Portfolio	-0.50%	7.33%	6.23%	2.14%	3.87%	12/2016
Benchmark	-0.68%	7.35%	6.36%	2.28%	4.07%	12/2016
Moderate Growth Portfolio	-1.05%	14.76%	11.57%	5.86%	7.91%	12/2016
Benchmark	-1.59%	14.45%	11.58%	6.04%	8.18%	12/2016
Money Market Portfolio	0.89%	4.07%	4.77%	3.37%	2.34%	12/2016
Benchmark	0.92%	4.21%	4.96%	3.49%	2.46%	12/2016

**March 2026 performance returns include returns for legacy ABLEnow options from 3/1 - 3/23, and returns for post transition ABLEnow options from 3/24 - 3/31. March returns for the Money Market Portfolio includes return for the legacy Money Market Portfolio from 3/1 - 3/23, and the new FDIC-Insured option from 3/24 - 3/31. The same methodology was used for the respective benchmark returns.*

ABLEAmerica Performance

(inception date in parantheses)	Average annual total return							
	Lifetime	15 Years	10 Years	5 Years	3 Years	1 Year	YTD	12 mo YLD
Global Growth Portfolio - Class ABLE A (5/18/2012) - PSGG	10.99	-	11.06	6.85	15.78	21.83	-3.93	0.9
Global Growth Portfolio - Class ABLE F2 - PSGG	11.29	-	11.33	7.04	16.00	22.07	-3.88	1.1
Morningstar US Fund Global Aggressive Allocation Average	9.97	-	9.92	7.26	14.36	18.27	-0.61	-
Growth Portfolio - Class ABLE A (5/18/2012) - PSG	12.16	-	11.98	8.16	17.43	19.94	-5.62	0.4
Growth Portfolio - Class ABLE F2 - PSG	12.46	-	12.26	8.35	17.67	20.12	-5.56	0.6
Morningstar US Fund Aggressive Allocation Average	9.57	-	9.07	6.56	12.46	13.33	-1.46	1.7
Growth and Income Portfolio - Class ABLE A (5/18/2012) - PSGI	10.14	-	10.06	8.25	14.53	16.36	-2.31	1.7
Growth and Income Portfolio - Class ABLE F2 - PSGI	10.42	-	10.32	8.46	14.77	16.57	-2.27	1.9
Morningstar US Fund Moderately Aggressive Allocation Average	8.50	-	9.29	7.33	12.89	15.35	-1.04	1.8
Moderate Growth and Income Portfolio - Class ABLE A (5/18/2012) -	8.88	-	8.61	7.02	12.44	15.11	-1.04	2.2
Moderate Growth and Income Portfolio - Class ABLE F2 - PSMGI	9.17	-	8.89	7.25	12.69	15.33	-0.94	2.4
Morningstar US Fund Moderate Allocation Average	7.61	-	8.07	6.16	10.91	11.92	-1.18	2.1
Conservative Growth and Income Portfolio - Class ABLE A (5/18/2012) -	7.11	-	7.09	6.41	10.37	11.46	0.05	3.6
Conservative Growth and Income Portfolio - Class ABLE F2 - PSCGI	7.38	-	7.34	6.62	10.58	11.67	0.10	3.8
Morningstar US Fund Moderately Conservative Allocation Average	5.11	-	5.91	4.48	8.76	9.94	-0.34	3.2
Preservation Portfolio - Class ABLE A (5/18/2012) - PSP	1.64	-	1.85	1.58	4.00	3.87	0.07	3.9
Preservation Portfolio - Class ABLE F2 - PSP	1.95	-	2.15	1.86	4.24	4.17	0.22	4.1
Morningstar US Fund Short-Term Bond Average	2.02	-	2.44	2.34	5.05	4.42	0.17	4.3
Bloomberg 1-5 Year U.S. Government/Credit A+ Index	1.70	-	1.85	1.58	4.14	4.03	0.15	3.9
American Funds U.S. Government Money Market Funds - Class ABLE A	1.14	1.29	1.95	3.10	4.40	3.69	0.80	3.6
American Funds U.S. Government Money Market Funds - Class ABLE	1.19	1.34	2.00	3.18	4.51	3.80	0.83	3.7
Morningstar US Fund Money Market-Taxable	1.15	1.32	1.97	3.13	4.46	3.75	0.82	-
USTREAS T-Bill Auction Ave 3 Mon	1.43	1.60	2.37	3.60	4.89	4.12	0.93	-

RetirePath Performance

RetirePath Investment Performance as of 3/31/2026						
As of 3/31/2026	Fiscal Year to Date	1 Year	3 Year	Since Inception	Inception Date	
BlackRock LifePath Index 2030 Fund K	6.52	12.89	10.60	11.21	3/1/2023	
<i>BenchMark</i>	6.10	12.50	10.50	11.18	3/1/2023	
BlackRock LifePath Index 2035 Fund K	7.04	14.78	12.07	12.68	3/1/2023	
<i>BenchMark</i>	6.45	14.30	11.93	12.58	3/1/2023	
BlackRock LifePath Index 2040 Fund K	7.78	16.80	13.62	14.20	3/1/2023	
<i>BenchMark</i>	7.04	16.13	13.39	14.00	3/1/2023	
BlackRock LifePath Index 2045 Fund K	8.47	18.63	15.00	15.54	3/1/2023	
<i>BenchMark</i>	7.55	17.82	14.71	15.27	3/1/2023	
BlackRock LifePath Index 2050 Fund K	9.03	20.40	16.11	16.64	3/1/2023	
<i>BenchMark</i>	8.02	19.52	15.77	16.28	3/1/2023	
BlackRock LifePath Index 2055 Fund K	9.38	21.42	16.66	17.16	3/1/2023	
<i>BenchMark</i>	8.28	20.40	16.27	16.75	3/1/2023	
BlackRock LifePath Index 2060 Fund K	9.40	21.51	16.68	17.18	3/1/2023	
<i>BenchMark</i>	8.33	20.55	16.32	16.80	3/1/2023	
BlackRock LifePath Index 2065 Fund K	9.38	21.48	16.67	17.17	3/1/2023	
<i>BenchMark</i>	8.33	20.55	16.32	16.80	3/1/2023	
BlackRock LifePath Index 2070 Fund K	9.28	21.35	-	12.65	9/24/2024	
<i>BenchMark</i>	8.33	20.55	-	11.67	9/24/2024	
BlackRock LifePath Index Retirement Fund K	6.08	11.01	8.77	9.37	3/1/2023	
<i>BenchMark</i>	5.76	10.71	8.72	9.42	3/1/2023	
BlackRock Cash Funds Treasury Fund (BR1XX)	3.00	4.19	4.89	4.77	3/1/2023	
<i>BenchMark</i>	3.01	4.11	4.82	4.83	3/1/2023	
iShares U.S. Aggregate Bond Index Fund (WFBIX)	3.05	4.37	3.61	4.34	3/1/2023	
<i>BenchMark</i>	3.10	4.35	3.63	4.38	3/1/2023	
iShares Total U.S. Stock Market Index Fund (BKTSX)	6.38	18.09	17.86	18.35	3/1/2023	
<i>BenchMark</i>	6.39	18.06	17.88	18.34	3/1/2023	
iShares MSCI EAFE International Index Fund (BTMKX)	10.44	23.30	14.60	15.34	3/1/2023	
<i>BenchMark</i>	11.51	21.27	13.62	14.11	3/1/2023	

JLARC Presentation 2026


Appendix

Commonwealth Savers Board (as of 6/30/2026)



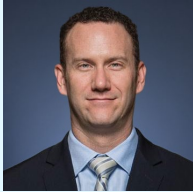
Lisa N. Jennings – Chair
*First Senior Executive Vice President,
PenFed (ret)*

- Appointed 7/12/22



Susan Ferguson – Vice Chair
Lecturer, James Madison University

- Appointed 7/10/23



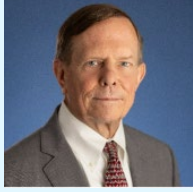
A. Scott Fleming
*Director, State Council of
Higher Education*

- Ex-Officio Member



Dr. David Doré
*Chancellor, Virginia Community
College System*

- Ex-Officio Member
- Craig Herndon, Vice-Chancellor
serves as designee



David L. Richardson
Treasurer of Virginia

- Ex-Officio Member



Sharon Lawrence
State Comptroller

- Ex-Officio Member



Jessica Holte
*Relationship Manager,
Blueprint Financial Group*

- Appointed 7/1/25



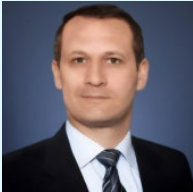
Clyde Clark
*Senior Vice President/
Relationship Manager, Blue
Ridge Bank*

- Appointed 7/1/25



Kristin Carleton
CEO, All Needs Planning

- Appointed 7/1/24



Ricardo Chamorro
*Executive Vice President,
PenFed Credit Union*

- Appointed 7/1/23



Dan Banister
Owner, Banister Automotive

- Appointed 7/1/24

Commonwealth Savers Investment Expertise

Investment Advisory Committee (IAC)



Timothy Berry, CFA
*Managing Director,
 Lighthouse Partners*
IAC Chair



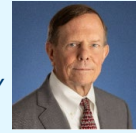
Frederick Nolde, CFA
*Managing Director,
 Investure*
IAC Vice-Chair



Jessica Holte*
*Relationship Manager,
 Blueprint Financial Group*



David Back
*Investment Officer,
 Virginia Department of Treasury*



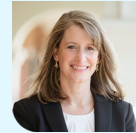
David L. Richardson*
*State Treasurer,
 Virginia Department of Treasury*



Ricardo Chamorro*
*Executive Vice President,
 PenFed Credit Union*



Lisa N. Jennings*
*First Senior Executive Vice
 President,
 PenFed (ret)*



Kristina Alimard, CFA
*Chief Operating Officer,
 UVIMCO*



Farrah Holder
*Managing Director,
 IMB Partners*



Chris Culbertson, CFA
*Managing Director
 Institutional Investments,
 Brockenbrough & Co.*

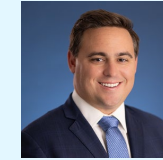


Mary Morris
*Chief Executive Officer,
 Commonwealth Savers*



Dan Banister*
*Owner,
 Banister Automotive*

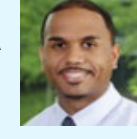
Internal Investment Team



**Michael Swink,
 CFA, CPA**
Investment Director



Victoria Rikkola, CFA
*Principal Investment
 Analyst*



Marek Harris
*Investment Operations
 Manager*



Mason Antrim
Sr. Investment Analyst



Maria Slowe, APMA
Sr. Investment Analyst

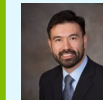


**Oscar Guardado,
 CFA, CAIA**
Sr. Investment Analyst



Felix Falcon
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 Principal*



Ali Yasin
Investment Analyst

CSP Board Fiduciary Steps to Assess Risk and Address DB529 Fund Actuarial Surplus

Capital Adequacy Risk Framework

Actuarial Valuation and RBC Analysis

Stress Testing and Stochastic Models

Risk Scorecard and Thresholds

Investment Management

Access Fund Established 2023

Statements of Investment Policy and Guidelines

Access Fund Spend Policy

Plan for Potential Trust Purposes

Prepaid529 Enhanced Benefits

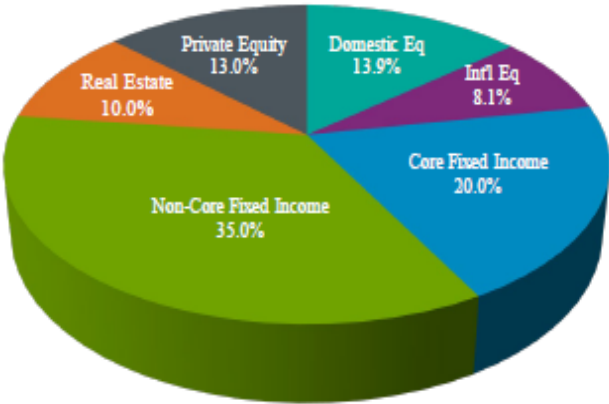
Access and Affordability – SOAR Virginia Expansion

Scholarships, Mentoring, Career & Technical Training

General Assembly must authorize use of Access Fund, confirm governance structure and further decision-making

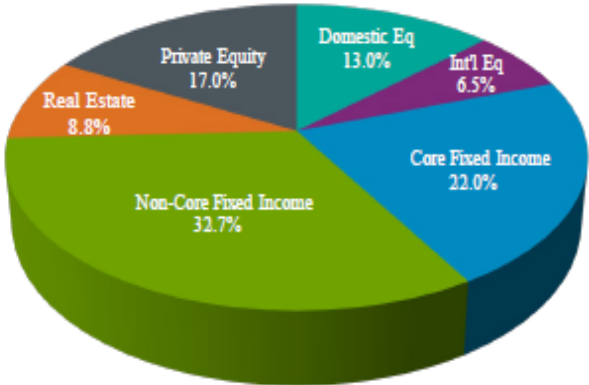
Defined Benefit 529 Investment Asset Allocation*

Target Allocation



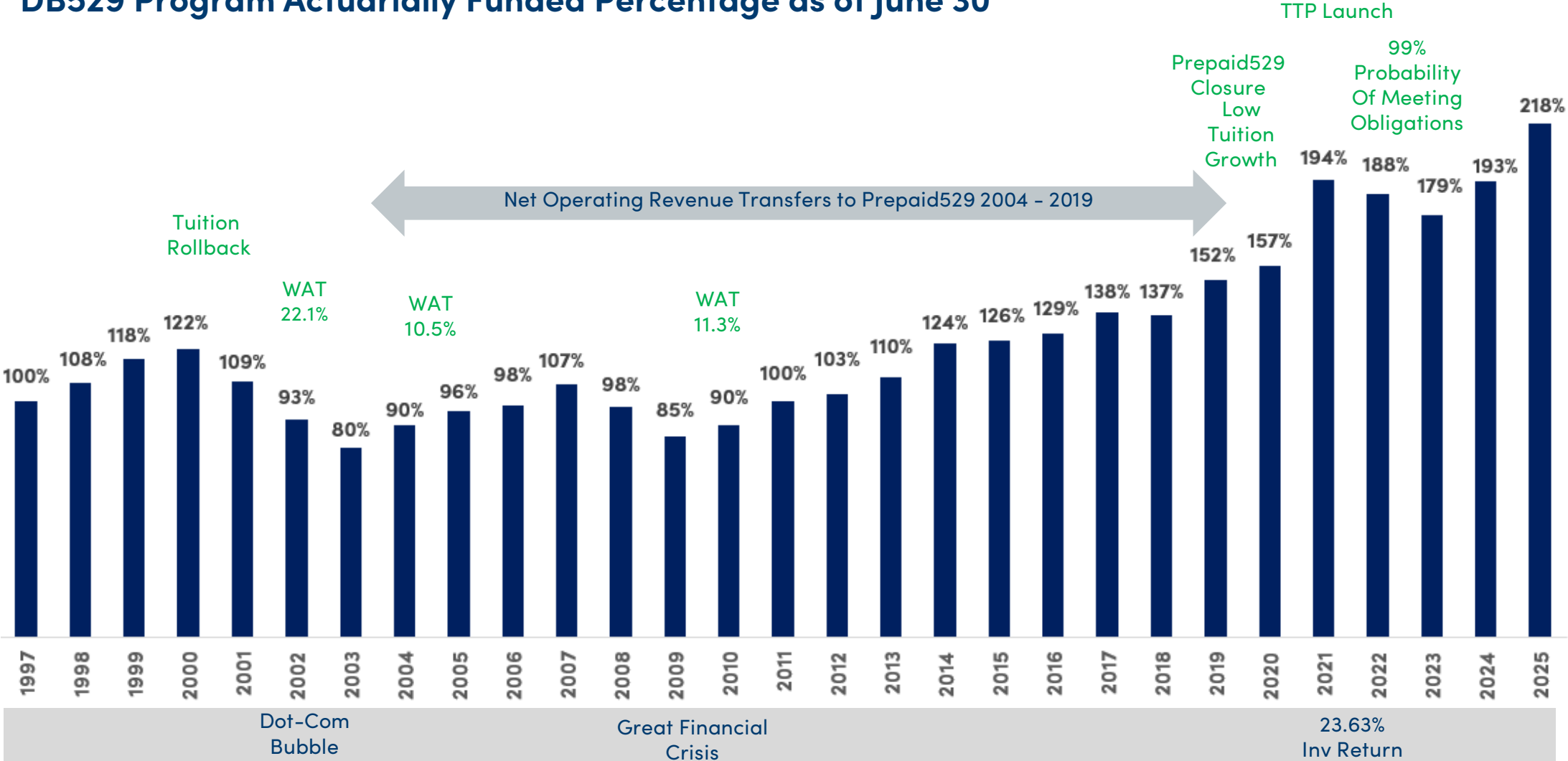
Asset Class	Target vs. Actual		
	Target	Actual	Over/(Under)
Equity	22.0%	19.5%	-2.5%
Domestic Equity	13.9%	13.0%	-0.9%
International Equity	8.1%	6.5%	-1.6%
Fixed Income	55.0%	54.7%	-0.3%
Core Fixed Income	20.0%	22.0%	2.0%
Non-Core Fixed Income	35.0%	32.7%	-2.3%
Real Estate	10.0%	8.8%	-1.2%
Private Equity	13.0%	17.0%	4.0%

Actual



Actuarial Valuation Reports – Plan Funded Status

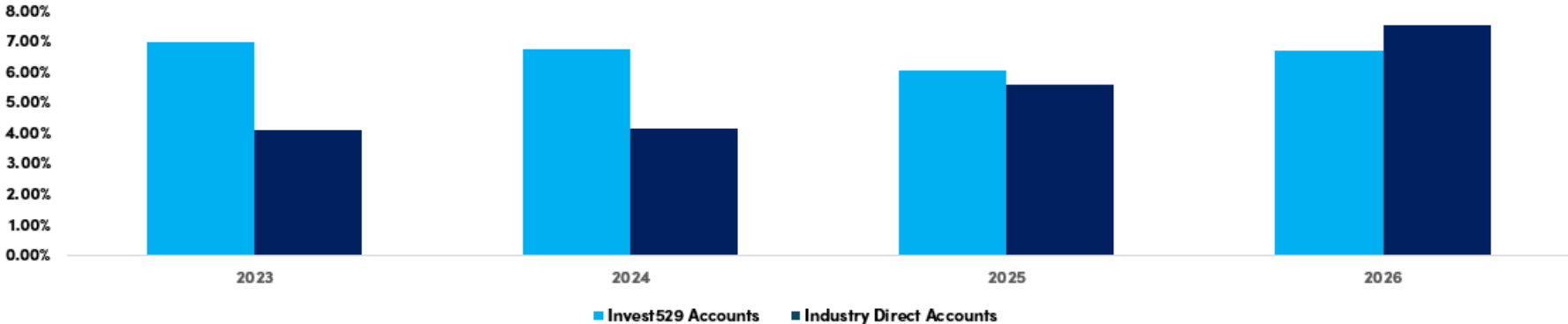
DB529 Program Actuarially Funded Percentage as of June 30



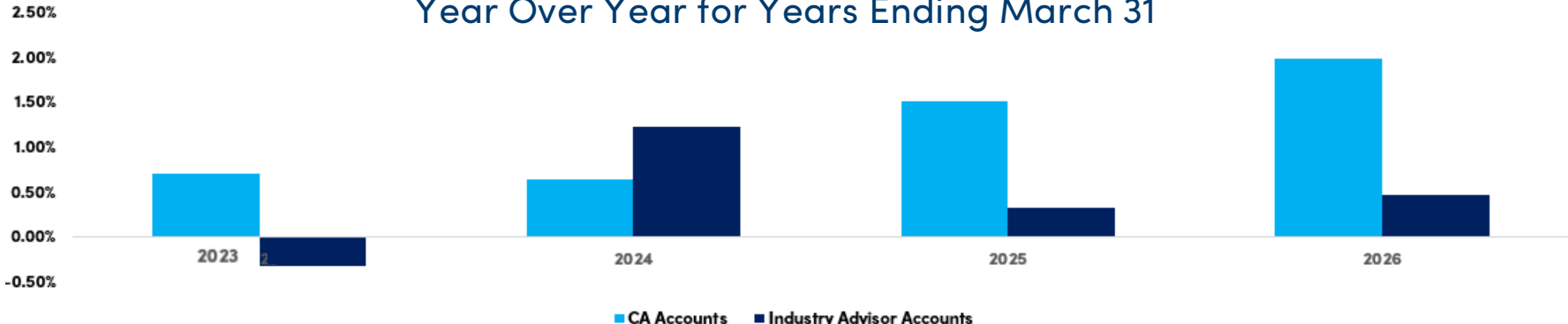
*WAT – Weighted Average Tuition for Virginia 4-year public institutions

Education Savings Account Growth

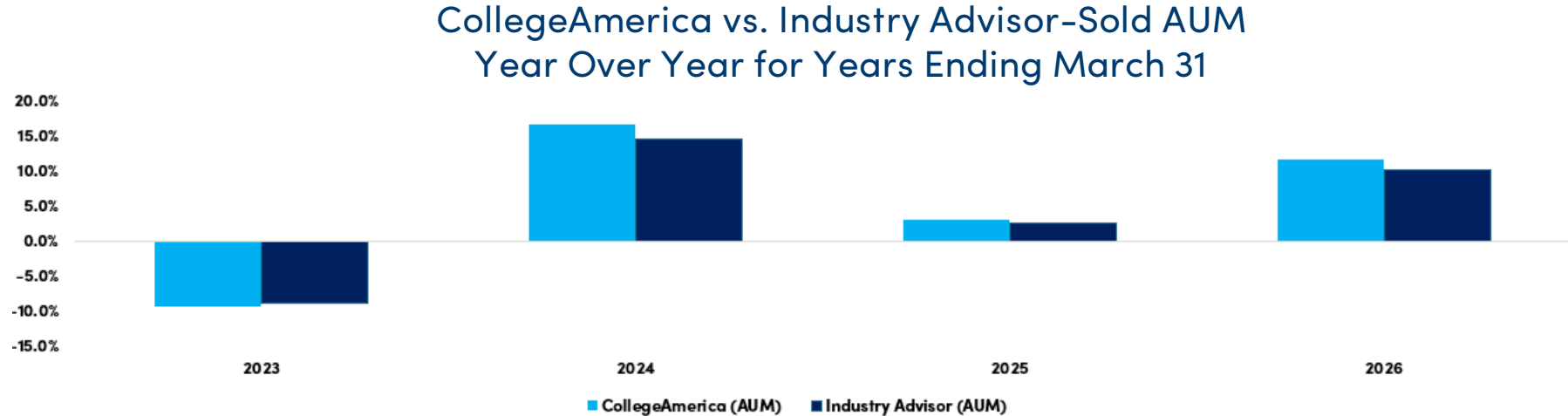
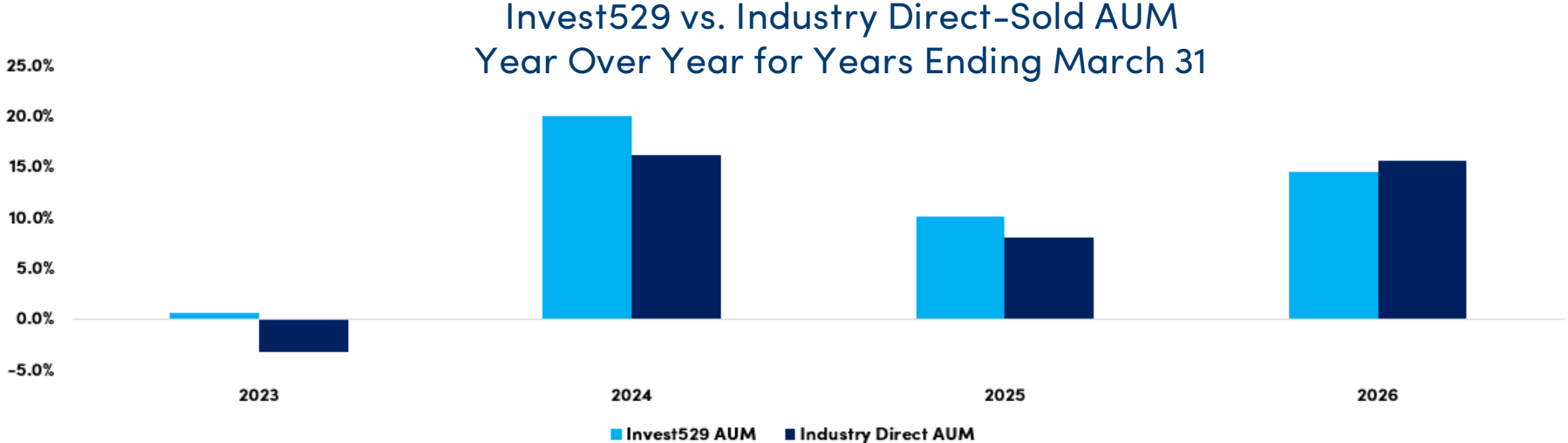
Invest529 vs. Industry Net Direct-Sold Accounts
Year Over Year for Years Ending March 31



CollegeAmerica vs. Industry Net Advisor-Sold Accounts
Year Over Year for Years Ending March 31



Education Savings AUM Growth



Commonwealth Savers Investment Management



Investment Advisory Committee, Investment Director and staff and investment consultant Mercer responsible for plan design, asset allocation, capital market forecasting, idea generation and underlying fund selection for all Commonwealth Savers programs.

Commonwealth Savers Board is trustee and fiduciary of the trust fund and has ultimate responsibility for investment management.



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