

## iAnalyze Frequently Asked Questions

This document answers frequently asked questions (FAQs) regarding the iAnalyze launch. For easier reference, these FAQs are organized into the following categories:

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### **About the DOL Fiduciary Rule** [\(top\)](#)

#### **What is the U.S. Department of Labor's (DOL's) new Fiduciary Rule?**

It changes the definition of who is a fiduciary for purposes of the Employee Retirement Income Security Act of 1974 (ERISA). Generally speaking, anyone who provides investment advice for qualified retirement accounts and IRAs ("Retirement Accounts") is deemed a fiduciary and subject to restrictions on activities, including the types of compensation that can be received. The new rule applies to any advice relating to:

- ERISA plans such as 401(k)s;
- Traditional IRAs and qualified annuities;
- Roth IRAs;
- Health Savings Accounts (HSAs) and Coverdell Education Savings Accounts.

#### **What does the new rule mean for my business?**

The new DOL Fiduciary Rule expands the definition of firms and individuals that are considered investment advice fiduciaries on ERISA plans and IRAs. If you are deemed to be a fiduciary under the new DOL rule, you are prohibited from receiving differential or variable compensation in connection with the provision of investment advice—including sales commissions, trail payments such as 12b-1 fees, and other payments received by broker-dealers, like revenue-sharing payments from product sponsors. After the rule is effective, in order to receive such compensation in connection with a qualified account, the account holder must sign a Best Interest Contract Exemption (BICE) agreement or qualify for Prohibited Transaction Exemption under ERISA.

## What is a Prohibited Transaction Exemption (PTE)?

The Employee Retirement Income Security Act of 1974 prohibits a fiduciary from engaging in a transaction that creates an inherent conflict of interest. The DOL has recently published a new PTE that allows a fiduciary to receive variable compensation. It is known as the Best Interest Contract Exemption (BICE).

## How does this new rule change the way I work with my clients?

Non-qualified accounts are not subject to the new DOL Fiduciary Rule. However, if you provide financial services to a client with both qualified and non-qualified accounts, clients may find it confusing that their accounts with you are subject to different standards and compensation models. However, whether or not the rule will impact your specific advisory business will depend on a number of factors that will be addressed in future communications and as more clarity around the forthcoming rule is known in 1Q17.

## How long do I have to become DOL-ready?

As currently written, all new business – including Brokerage, Direct and Advisory – must be written in a DOL-compliant format as of April 10, 2017. All existing business must be brought into DOL-compliance by December 31, 2017.

## How will the new US Presidential Administration potentially impact the DOL Rule?

As Cetera Financial Group CEO Robert Moore and President Adam Antoniadis stated in a communication November 14, 2016, the firm continues to work toward a DOL implementation date of April 10, 2017. We will forge ahead with our ongoing efforts to develop an operating environment that enables your success in the future, including in the post-DOL world. Our overriding priority is to ensure that you are in the best position possible to provide the advice and service your clients need in compliance with regulatory requirements, while diligently providing an environment for you to manage a successful practice. If the policy and regulation priorities of the new Administration change after January 20, 2017 we will adjust our DOL-related initiatives accordingly.

### What determines my potential revenue at risk?

iAnalyze details potential revenue at risk by identifying all revenue generated from qualified and IRA accounts. While this calculation is meant to raise awareness for the impact of the DOL Fiduciary Rule on your business, it may not be accurate and does not indicate you will lose or gain revenue as a result of the new DOL rule. It is intended to illustrate that fees may be impacted by the DOL rule and results will vary based on business practices and available exemptions. Actual steps for remediating accounts not currently in compliance with the DOL rule will be made available with the December 2016 update to iAnalyze. iAnalyze will be introduced and discussed later in this document.

### What would be defined as “Not DOL Compliant”?

The first phase of iAnalyze is to give account level detail on impact to provide visibility to accounts that will potentially be impacted by DOL Fiduciary Rule and Cetera’s policies. Determining which accounts are compliant or not compliant will be identified in the second release of iAnalyze which will detail required actions to bring each account into compliance. While not all accounts will require remediation, for those that require action, we will identify the needed action steps.

### I thought qualified advisory accounts were not impacted by the rule?

To varying degrees, all qualified accounts are impacted by the DOL Fiduciary Rule, including advisory accounts. While some of the implications to advisory accounts will be resolved at the product level, there are certain circumstances where you will need to work directly with the client to resolve any conflicts. We will highlight these specific circumstances in the next release of iAnalyze and provide you with complete guidance on the steps to resolution.

### Is there a timeline I can access to see what’s coming next?

All of our DOL DynamiQs related content and materials can be found on Guideport. Please log in to your broker-dealer workstation where you will be able to access Guideport and the DOL DynamiQs section of the site. We have produced a timeline that helps you prepare for what’s coming throughout 2017 that can be found [here](#).

## **Introduction to iAnalyze [\(top\)](#)**

### **What is DOL DynamiQs™?**

To help independent financial advisors address the DOL's changes to Fiduciary Rules, Cetera Financial Group® offers DOL DynamiQs—an actionable strategy for adapting to this transformative issue. Breathe easier knowing you have a clearly defined approach to prepare for the new rule, from education to implementation. DOL DynamiQs is delivered in three phases—Learn, Plan, and Act—that walk you through all the steps you need to help position your practice for future success.

### **What is iAnalyze?**

As part of our DOL DynamiQs program, we developed a business management dashboard, called iAnalyze, which identifies revenue, assets and accounts impacted to better understand the scope of effort required to resolve these potential business risks. iAnalyze pulls data from multiple sources to deliver a single view of your business across multiple revenue streams and product categories. iAnalyze will continue to grow in capabilities and features as it will become part of our enterprise business management dashboard tool.

### **How does iAnalyze help me understand the DOL impact on my business?**

The initial launch of iAnalyze delivers a business analysis of all your clients, assets and products. This report enables advisors to quantify and evaluate the direct DOL Fiduciary impact on their business at an account level.

### **How do iQuantify and iAnalyze work together?**

Our DOL support tools and resources were launched in two phases. The first phase delivered iQuantify, which helped you diagnose your “DOL readiness” from a practice management perspective. This uncovers the necessary business changes needed to facilitate DOL-compliant changes across business development, operations, human capital, business management and succession planning. This phase was designed to help prepare your business for asset conversion and transition into DOL compliant solutions. iAnalyze is the second phase of our DOL support tools and resources which builds upon the work already invested in iQuantify to prepare your practice.

### Will iQuantify be a pre-requisite to access iAnalyze?

Yes. We designed iQuantify and iAnalyze to work together in distinct phases to help you prepare for the implementation of the DOL Fiduciary Rule. While iQuantify helps you build better practice efficiencies to facilitate client account remediation, iAnalyze is meant to quantify the impact of the rule to give you a much better ability to address accounts and revenue that are no longer compliant. If you have not yet completed the iQuantify assessment, you will be redirected there first and then connected to iAnalyze once the assessment is complete.

### With the release of iAnalyze, how do I now access iQuantify?

The iQuantify application is now accessible directly from within the iAnalyze tool. Expand the left navigation menu by clicking on the top icon and simply click *“Retake iQuantify”*. You will be redirected to the results page of the iQuantify assessment where you will be able to access your custom learning tracks as well as retake the assessment. This summary page also now contains a link to redirect you back into iAnalyze.

### Once I complete the iQuantify Assessment, is my information saved?

Yes. Your assessment results will be saved and displayed in the iAnalyze dashboard. You can return and complete the various learning tracks or retake the assessment right from within iAnalyze. On the left navigation menu simply click *“Retake iQuantify”* and you will be redirected to the results page of the iQuantify Assessment, where you will be able to access your custom learning tracks as well as retake the assessment.

### Can I retake the assessment?

Yes. However, you can only retake the assessment after you complete it for the first time. On the results page, you will find a link that will allow you to retake the assessment. Please note that if you choose to retake the assessment, your initial results will no longer be available in iQuantify.

## **Accessibility** [\(top\)](#)

### **How do I access iAnalyze?**

To access iAnalyze, log in to your broker-dealer's online advisor workstation or intranet site. You will be able to access the site via the iAnalyze banners embedded within each site.

### **What is Guideport?**

Guideport is a convenient new portal to a group of valuable tools Cetera Financial Group has built to help advisors develop and grow their business. In addition to iAnalyze, it provides access to Pentameter®, Connect2Clients® and Guided Retirement Solutions. You can single-sign-on (SSO) into Guideport from your respective broker-dealer workstation.

### **I am a Summit or Girard Advisor, when will I have access to the tool?**

With the December 2016 update to iAnalyze, advisors affiliated with Girard Securities will have access to both iQuantify and iAnalyze. Advisors affiliated with Summit Brokerage Services will not have access to iAnalyze with the December 2016 update due to underlying data issues. Cetera Financial Group is working towards a quick resolution on the Summit data set to deliver iAnalyze to Summit advisors in early 1Q17.

### **I am a transitioning ICC or VSR advisor; is my data included in iAnalyze?**

It will take 60-90 days after the date you officially transition for this data to become available within the iAnalyze application. VSR and ICC advisors who have already completed iQuantify will also be able to see their results when iAnalyze becomes available. We currently estimate transitioned ICC and VSR advisors will have access to iAnalyze in early 1Q17 as their data model populates.

### **Can non-licensed staff or those without active production access the tool?**

Unfortunately, our first release of iQuantify only permits those with active production or GDC to access the tool. We are considering whether to introduce this as an enhancement in our next release.

### If I dismiss the iAnalyze pop-up, how do I navigate back to iAnalyze?

For those advisors that access the iAnalyze site through a pop-up, once it is dismissed there is a small banner ad on the workstation home screen that will direct you back into iAnalyze.

### Does it matter which browser I use?

iAnalyze is compatible with Chrome, Firefox, Safari, and Internet Explorer 10 (IE 10) or above. For assistance with browser compatibility, please call your firm's respective help desk.

### What do I do if my session expires?

The session inactivity period in iAnalyze is one hour. Upon expiration, you can relaunch iAnalyze from your broker-dealer's online advisor workstation or intranet site.

### Can I view iAnalyze on my iPad?

While iAnalyze is accessible on all mobile devices, when viewing the application on an iPad in portrait mode, some of the numbers in the bar graph may not display properly.

## **Data and Analytics** [\(top\)](#)

### **What new functionality and information is included in the December 2016 release of iAnalyze?**

Cetera Financial Group will be leveraging iAnalyze to expose advisors to our DOL-related policies. With the December release of iAnalyze, the application will provide detailed Line of Business (LOB) information on both New and Existing Qualified and Non-Qualified accounts that will answer:

- 1.) If an advisor can continue to earn revenue in the impacted account type
- 2.) What exemptions (EX: BIC contract) may be available for the impacted account type
- 3.) What action(s) are required by which party (CFG or Advisor)
- 4.) What date(s) the required actions are needed by
- 5.) Any additional considerations

In addition, advisors will see an enhanced user interface that will announce any new or additional policy information that has been decided upon through a highlighted green bar above the LOB information and exclamation points (!) on both the left-side navigation pane and LOB tabs.

Future enhancements to iAnalyze will include a Resource Center with the required documentation needed to bring accounts into compliance, including BIC contracts and any new advisory paperwork, as well as end retail-client communication templates.

### **Is the data a complete and accurate representation of my business?**

While accurate data from multiple data sources is an industry challenge, we are confident that the data contained within the tool is as accurate as possible. iAnalyze will pull data from a variety of sources, including Albridge, Broadridge, direct business feeds and broker-dealer commission systems. When reconciling multiple commission and asset feeds, it is possible for data to be duplicated or represented in a way that is different than what you receive today. We are constantly working to ensure high-quality data and we will continue to assure that future releases improve upon this data integrity. For the purposes of understanding the impact of the DOL rule on your business, the downloadable account-level data should provide you with the data you need to understand the impact on your business.

### How is Total Revenue calculated?

Total Revenue or gross dealer concessions (GDC) is the sum of all production for the listed accounts in the past 12 months. If a representative has joint production numbers, the total GDC is reflective of only those accounts in which the advisor is the primary advisor. Monthly GDC is based on a rolling 12-month calculation. Please use your most recent commission statement for accurate commission and revenue information.

### Why are the revenue numbers not matching my commission payments?

The initial intent of iAnalyze is to help you better understand the impact of the DOL rule on your business. The tool identifies revenue by account in order to help you prioritize those accounts with the largest impact on your total revenue. Revenue is represented as 12month trailing GDC, but due to a difference in time-periods it may differ from what is reflected on your commission statements. The revenue shown is T-12 GDC from a recent closing period, but could be a month or so behind what you are seeing on your commission statements.

### Why does the trail GDC for each account appear to be incorrect?

This is because at certain firms our commission process allocates trail GDC to specific rep IDs as opposed to specific accounts. In these cases, we proportioned the trail revenue according to the brokerage mutual funds currently held in your client accounts. This will result in a correct trail GDC for your total business but will be slightly higher or lower for each specific account. We are in the process of modifying our commission processes and systems to alleviate this problem.

### Why is revenue “zero” for some of my funded accounts?

This is because we are unable to find a match for revenue from the assets specifically associated with these accounts.

### How is Total Assets calculated?

Total Assets is calculated by summing the Total Asset Value for each position within each client account including advisory, brokerage and direct lines of business. The calculation includes asset values prior to special considerations for business associated with split or joint rep codes. Prior month-end total assets will be updated within a month following the end of the previous month. For example, end of September asset values will be reflected by the end of October. This means that Albridge/Broadridge feeds will likely not be consistent.

### How are accounts with split rep codes treated within iAnalyze?

In the case of split and joint advisors, the assets and revenue are assigned to the primary advisor. If the primary advisor is not identifiable then the assets and revenue are assigned to the first advisor listed on the account.

### How are the account segments defined in iAnalyze?

We have taken your assets and segmented them to help visualize the DOL rule's impact across both small and large accounts to better understand where the rule impacts your revenue the most. Within each segment, we identify the total number of assets and revenue impacted. For example, the \$250,000 - \$500,000 asset segment aggregates all data for accounts with assets between \$250,000 - \$500,000 to show the size and scope of the rule's impact.

### How often will account level information be updated in iAnalyze?

With the December 2016 release of iAnalyze, account level information has been updated through September, 2016 month-end.

Beginning in 2017, data within iAnalyze will be updated monthly so that as you make changes and transition accounts to DOL compliance, these will be reflected in the tool. Due to this lag, you will notice a slight difference in assets and revenue levels. Additionally, we cannot control the refresh rate for third-party data providers from which we do not receive regular updates. This also may contribute to discrepancies in reporting when compared to other systems.

### Is the Accounts page a full representation of my client accounts?

No. This page is meant to identify your top 20 impacted accounts by revenue organized from the highest impact to the least. You can find a complete list of all your accounts, whether impacted by DOL or not, in the downloadable CSV file found within the download section of iAnalyze.

### Why are some of my accounts missing?

There are a number of reasons that could contribute to iAnalyze being an incomplete representation of all your accounts. If an account is under a joint or split ID, and you are not the primary representative on that ID, you will not see the account or associated revenue on your report. Additionally, if the account was opened in the last 60 days it may not be reflected on the report as the data refresh could be between cycles. Also, because we collect Turnkey Asset Management Program (TAMP) data directly from the provider, we are not able to independently verify all accounts and associated revenue. There are also situations where we are not able to associate a TAMP account with an advisor and a handful of TAMP providers have opted-out from sending us account-level detail.

### Will I be able to see my account data by household?

In order to understand the impact of the DOL rule on your business, iAnalyze reflects all revenue, product and asset data across both impacted and non-impacted accounts rather than by household. The downloadable CSV file can be manually manipulated in Excel to provide deeper client-level visibility and aggregated impact. In future versions of the tool, we hope to build functionality that will allow you to make account associations at the household level, but the current version focuses specifically on an account-by-account basis.

### How are my independent or outside RIA accounts handled in this report?

Real-time tracking of independent or outside RIA accounts is challenging, especially when we are not involved in the billing and reporting process. You will find that we may have correctly identified a portion of your independent or outside RIA accounts correctly, and when we could not identify them as such, they would be classified under either the brokerage or direct lines of business. In order to get the full benefit of the iAnalyze report, you may need to overlay your independent or outside RIA billing receivables on top of the amounts listed here, especially in cases where we do not act as your billing agent.

### In the downloaded CSV file, why are some client names listed as “Null”?

In the data we are not able to associate an account with a specific client. In these specific scenarios, you will be able to identify the client name by the listed account number.

## **Products and Segments** [\(top\)](#)

### Why are only a few products listed on the summary page for each line of business?

iAnalyze is meant to provide you with a high-level summary of your business across revenue, assets and accounts. The product categories listed within each line of business are dynamic and based entirely on the distribution of assets and revenue across your business. The data reflects your top six products in descending order (by either revenue or assets) with all remaining products aggregated into the “other” category. For full product details, please reference the downloadable CSV file.

### Why aren't all the sponsor company names listed for direct business?

The accuracy and completeness of the data depends largely on the source data we obtain from product sponsors and data aggregators. In many cases, the sponsor company name is either not included in the file or is coded as a number. While we don't see a fix in the shortterm, we will continue to work with these providers to improve the quality of the data.

### Are variable annuities categorized under direct business?

Unless a Variable Annuity is networked to a brokerage account, variable annuities will be represented in the direct business category. Check with your specific broker-dealer to better understand your firms policies around networking annuities.

### Is this also true for other alternative investment products such as BDC's and REITs?

Yes.

### Why does the report not specifically break out exchange traded funds (ETFs)?

ETFs are categorized differently by different vendors and often fall under either the equity or mutual fund categories. Again, this is an industry-wide challenge that we hope to solve in the near future.

### Where can I find information on my Retirement Plan business?

With reconciliation challenges between record-keeper feeds and custodial level data, the risk of redundancy in reporting for direct, brokerage and Retirement Plan product lines was significant enough for us to temporarily exclude Retirement Plan business as a stand-alone fourth vertical product line. Since much, if not all, of your Retirement Plan business revenue is represented within the direct and brokerage business lines it will not be specifically called out. We are working with our vendors and custodians to reconcile the data and hopefully update in the next release of the iAnalyze tool. If you would like more detailed information about your retirement plan business and help identifying this business within your report, please reach out to the Cetera Retirement Plan Solutions Team at [retirementplans@cetera.com](mailto:retirementplans@cetera.com).

### Does my report include information from Turnkey Asset Management Programs (TAMPs)?

Yes. While we collect Turnkey Asset Management Program (TAMP) data directly from the provider, some have opted-out from sending us account-level detail. Also, we are not able to independently verify all accounts and associated revenue. There are also situations where we are not able to associate a TAMP account with an advisor.

## **Support** [\(top\)](#)

### **Is there a specific roadmap for what I should do next?**

Continue engaging with the iQuantify tool and the DOL DynamiQs Consulting Team to help raise your proficiency in each practice management discipline. With the release of iAnalyze, you can now begin analyzing all client accounts, revenue and products to obtain a strong understanding of the form and structure of your business. Familiarizing yourself with impacted accounts will help you prepare for the next release which identifies specific steps for bringing impacted accounts into compliance. While not all accounts will require remediation, for those that need action, we will identify the required action steps.

### **Is there someone I can contact to help me review my personal business dashboard and data?**

Cetera Financial Group is always here to assist you. As part of the DOL DynamiQs program, each track provides contact information with a subject matter expert to give you professional guidance. If you are looking to ask general questions related to the DOL Fiduciary Rule, the DOL DynamiQs Program, iQuantify or iAnalyze, you can send an email to [dol@cetera.com](mailto:dol@cetera.com) or contact your broker-dealer for more information.

### **Who can I contact with questions?**

If you have any additional questions, please call the DOL Hotline at (800) 771-6316 or email [dol@cetera.com](mailto:dol@cetera.com).