

Colorado SecureSavings Program

Annual Legislative Report Fiscal Year 2023-2024



Colorado SecureSavings Board & Staff

Board Chair

Colorado State Treasurer Dave Young

Board Members

Carolyn S. Paul

James Martin

Jennifer Luce

Kara Woolley

Kelly Stecklein

Keshia Allen Horner

Matthew Propst

Toby Nuber

Staff Contact

Hunter Railey

Director, Colorado SecureSavings Program

Colorado Department of the Treasury

200 E. Colfax Ave. #140

Denver, CO 80203

(303) 507-5292

william.railey@state.co.us

Staff Members of the ColoradoSecureSavings Program

Anna Stevens, Program Manager

Daniela Leibovici, Communications Manager

Darius West, Outreach Specialist

Anthony Baker, Outreach Specialist

Table of Contents

	6
Introduction	
Timeline: March 1, 2024 – April 1, 2025	9
Program Overview	10
Summary of Common Complaints	13
ProgramData	14
Marketing & Outreach Strategy	16
The Partnership for a Dignified Retirement	19
Resources	21

Executive Summary

The Colorado SecureSavings Program strives to ensure all workers in the State of Colorado have the opportunity to retire with dignity.

Governor Jared Polis signed the Colorado SecureSavings Program (the "Program" or "CSSP") into law in July 2020 to address the retirement savings crisis. Nearly half of all families in the United States have no retirement assets. Among families who are nearing retirement, four in ten households have no retirement assets. This is true in Colorado where, at the time the Colorado SecureSavings Program was created, about 40% of the workforce did not have access to a retirement savings account or program at work. The Colorado SecureSavings Program provides employers with an easy, accessible avenue to help their employees save for retirement. It is provided to employers at no cost and with no employer fiduciary responsibility.

This report fulfills the Board's annual statutory obligation pursuant to **CRS § 24-54.3-111**. The Colorado Revised Statutes require the Board to produce an annual report on or before April 1 including the following information:

"At a minimum, the report shall include statistics regarding enrollment in the program, the number of program accounts opened, the average amount employees are saving through the program, average contribution levels, a summary of common complaints or concerns about the program, and information regarding the administrative costs and fees associated with the program."

The Colorado SecureSavings Program has reached nearly 60,000 employers since the Program launched in January 2023. To date, over 16,600 employers have enrolled, over 75,000 savers have been enrolled in the Program, with well over \$108 million saved. The SecureSavings Program continues to be, by far, the fastest growing and most successful program per capita when compared to other state sponsored retirement programs across the country.

Key Program milestones since our last report:

- Supported savers as they accumulated more than \$108 million in assets in less than two years of operation.
- Reached the milestone of 75,000 funded active accounts in the SecureSavings Program
- Registered over 16,600 employers.
- Brought nearly 60,000 businesses into compliance since the Program officially launched, over 6,000 of which are new since last year's report.
- Launched three partner state programs in Maine, Delaware, and Vermont.
- Added the Nevada Employee Savings Trust to the Partnership for a Dignified Retirement.

- Promoted the Program through television and radio advertisements, digital platforms, print media in rural communities, as well as billboards and digital signs in strategic locations.
- Continued direct engagement with newly eligible employers in calendar year 2025.



Figure 1- New York Times article featuring the Colorado SecureSavings Program

Introduction

The CSSP is a state-facilitated automatic enrollment IRA program designed and administered by the Colorado SecureSavings Board through the Colorado Department of the Treasury.

The Program's goal is to provide a dignified retirement by giving access to retirement savings to the nearly 1 million Colorado workers not currently saving through a workplace retirement plan.

Barriers and Challenges

The biggest barriers that **employers** face to providing a retirement plan to employees include:

- · The administrative complexity of retirement plans;
- · Financial cost of administering plans and providing matching contributions;
- Minimal incentives to provide robust benefits in industries with high employee turnover; and
- Anticipated low participation by employees ("savers").

The biggest challenges that **savers** face include:

- Overestimating support offered by safety net programs, such as Social Security;
- Gaps in financial literacy;
- Lack of adequate access to financial services and financial service representatives;
- Unstable employment including multiple employers and/or frequent employment changes; and
- Do not make enough money to meet contribution minimums, or do not feel they make enough money to save for retirement.

The CSSP Board designed a Program that directly addressed the impediments and concerns expressed by employers and workers.

Program Structure

The CSSP Board has created a program which provides a high-quality retirement option available to workers in Colorado.

For employers, CSSP:

- Is provided to employers at no cost;
- Has minimal administrative burdens, and carries no fiduciary responsibility for employers; and

For savers:

- · The Program is managed via a public/private partnership within Treasury;
- Contributions flow into Roth Individual Retirement Accounts (IRA) which are portable from one job to the next; and
- Workers have the opportunity to save regardless of income.

The CSSP Board was officially established on September 15, 2020 and hired an Executive Director in February 2021. Since that time, the CSSP Board and Treasury staff have completed the initial program design, negotiated contracts with vendors, and officially launched the Program.

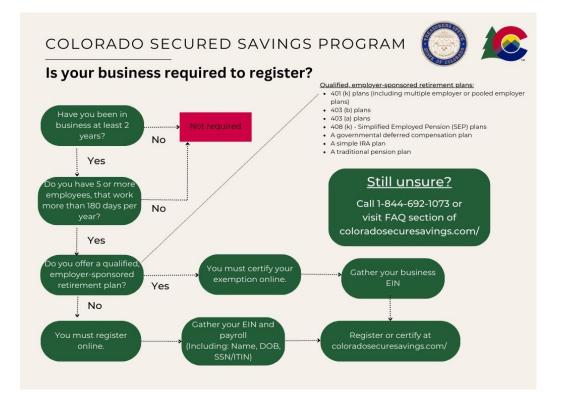


Figure 2 - Flow chart designed to simplify the registration process during presentations

Program Staff

The Program is supported by the following staff:

- A nine-member oversight board chaired by Colorado State Treasurer Dave Young;
- An executive director;
- Four professional staff dedicated to program operations, communications, and outreach;
- Legal counsel retained via the Colorado Department of Law to provide guidance regarding securities law and Employee Retirement Income Security Act (ERISA); and
- A program administrator (Vestwell Holdings, Inc.), and two investment managers (State Street Global Advisors and BlackRock Investments LLC).

The Program was designed as a public/private partnership. In order to best meet the needs of employers and savers, the Board established relationships with top level private partners to ensure enrollment, onboarding, and account management operate in a smooth, accessible manner. This structure provides enormous benefits to participants and taxpayers alike. Participants who lack access to a workplace retirement plan can now save for their future using some of the best tools and investment managers in the industry at a competitive price.

Taxpayers can be reassured that the State has not taken on additional legal or financial liabilities in the process of implementing the Program. As a result, businesses and their employees now have a high-quality savings opportunity that is accessible to all.

Recent Progress

Since the release of the 2024 annual report, the Program has completed its second year of implementation and is working with CDLE to ensure all eligible employers have received Program communications prior to initiating joint compliance efforts. Additionally, the Program is preparing to conduct outreach to newly eligible employers to notify them of statutory requirements and to ensure they either enroll in CSSP or purchase a qualified private retirement plan.

Timeline: March 1, 2024 – April 1, 2025

March 2024

- Sent notices to newly eligible businesses for implementation in calendar year 2024.
- Added 360 payroll integration with Gusto
- CSSP held Q1 Board meeting

April 2024

- Follow-up notices sent to 2024 employers
- Initiation of partnership discussions with Vermont officially announced

May 2024

- Follow-up notices sent to 2024 employers for annual deadline
- Treasurer Young promoted the upcoming Summer 2024 CSSP State Tour

June 2024

- First round of post deadline notices sent
- The CSSP Board held its Q2 Meeting

July 2024

- Follow-up notices sent to 2024 eligible employers
- Vermont officially joins the Partnership for a Dignified Retirement
- Delaware EARNS becomes the second state to launch under the partnership arrangement

August 2024

• CSSP begins direct email campaign to support payroll contribution compliance

September 2024

• Treasurer Young becomes the chairperson of the State Facilitated Retirement Programs Working Group with the National Association of State Treasurers

November 2024

- CSSP holds the Q3 2024 Board Meeting
- Pre-enforcement notices are sent directly to employers not yet in compliance from calendar year 2023

December 2024

- VermontSaves becomes the third partner state to launch
- The Nevada Employee Savings Trust (NEST) elects to join the Partnership for a Dignified Retirement

January 2025

- CSSP holds Q4 Board meeting
- CSSP clears milestones of over \$100 million in assets under management, and over 70,000 funded saver accounts in under two full years of operation

March 2025

• Employers identified for 2025 enrollment

Program Overview

Employer Requirements

The following statutory requirements of CSSP apply to businesses that have:

- Been in operation for two or more years, and;
- Five or more employees

Businesses that meet these criteria are required to either sponsor a qualified private retirement plan or register for CSSP and facilitate payroll contributions on behalf of participating savers at their business.

The Colorado SecureSavings Program provides employers with an easy, accessible avenue to help their employees save for retirement. The Program is provided to employers at no cost, and with no employer fiduciary responsibility. Employers meeting the statutory requirements for eligibility have only three legal obligations, if they do not offer a qualified private retirement plan:

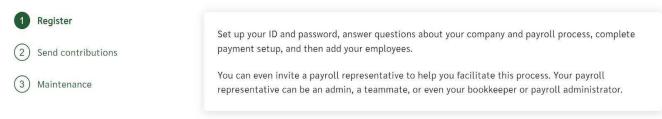
- 1. Register their business or certify their exemption
- 2. Upload their employee roster, and
- 3. Facilitate contributions during regular payroll periods.

After two years of operation, Program data indicates registration takes the average employer fewer than 15 minutes to complete. Additionally, administering regular payroll contributions takes approximately five minutes. This stands in contrast to private plans, which can often require a substantial amount of business owner time and resources. These three requirements are the only legal obligations for participating employers with respect to the Program.

The CSSP platform was designed to easily integrate with major payroll platforms, reducing the amount of time employers spend administering payroll contributions. Moreover, employers may delegate payroll contributions to a third-party administrator, removing the burden of administering the Program entirely from their day-to-day responsibilities.

Your role in three simple steps

We know that running your business is your top priority. That's why Colorado SecureSavings is easy to set up and requires only light account maintenance. The process takes just three simple steps. We'll take care of the rest, at no cost to you.



In the third year of Program operation, the change in employer behavior continues to be positive. CSSP has initiated a structural shift that improves access for those who have traditionally lacked access to financial services while increasing demand for private financial professionals supporting their communities.

The result is, and will continue to be, a statewide partnership between the Colorado Department of the Treasury and financial professionals helping workers build assets and create the financial legacies necessary to support sustainable communities. The trend is already clear as payroll provider, Gusto, reported a 45% increase in private plan adoption in calendar year 2023 in addition to those employers participating in CSSP. Additional data continue to point to increases in private plan adoption, as well as broader retirement plan coverage across the state in 2024.

Employee Benefits

The Program, by nature of its design, makes it easy for employees to save. If a saver works for a participating employer, they receive a program description booklet sent via email or US mail, detailing the Program, fees, how to access and manage their account, as well as information on opting out. Employees have 30 days after their employer enrolls them before funds are contributed from their paychecks.

Finally, employees can opt-out and rejoin the Program at any time. There is no special or limited enrollment period.

The SecureSavings Program is also available on a voluntary basis to individuals who fall outside the statutory requirements, such as those working for an employer with less than five employees or those who are self-employed, seasonal, or 1099 workers. These individuals can sign up for the Program by linking their bank account to their Roth IRA and then contributing regularly, similar to employees contributing via payroll.

There are two ways to participate

1 Save through your employer

- If your employer participates in Colorado SecureSavings, you can choose to:
- Do nothing and save automatically. Your employer will add you to the program. If you choose to do nothing, after 30 days you will be enrolled automatically with the default savings and investment options. The default savings rate is 5% of your gross pay, and that amount is deducted from your paycheck after taxes have been taken out.
- Customize your account. You can choose to customize your contribution amounts, <u>investment options</u>, and beneficiaries. Once enrolled, you'll start saving a percentage of your paycheck automatically in your own retirement savings account — a Roth IRA.



If you're self-employed or don't work for an employer registered with Colorado SecureSavings, you can contribute directly to your own Roth IRA account. It's easy and takes only a few minutes to get started:

- Create an account. You'll just need your Social Security number, date of birth, and residential address.
- Customize your savings choices. Set up automatic contributions from your bank account to your Colorado SecureSavings account, or choose the initial minimum contribution and select your investment options. Learn more about <u>contribution limits</u>.



Administrative Cost and Fees

Easily accessible on the CSSP website, savers and employers alike can find information on the administrative cost and fees of the program. Currently, CSSP utilizes a hybrid fee structure that includes a mix of dollar based fees, and asset based fees. **All savers pay a dollar based fee of \$22 annually to service their accounts**.

Investment Options	Underlying Investment Fees	Program Administration Fee	Total Annualized Asset-Based Fee
Capital Preservation	0.12%	0.20%	0.32%
Target Date	0.09%	0.20%	0.29%
Fixed Income	0.025%	0.20%	0.225%
International Equity	0.10%	0.20%	0.30%
Domestic Equity	0.02%	0.20%	0.22%

Annualized Asset based fees vary by investment choice, and can viewed in the table below:

As implementation and ongoing administration of the Program continue, the Board, staff, and vendors are committed to evaluating and improving service delivery. We continue to operate from the idea that **the goal is more savers**, regardless of whether they save through CSSP or private plans.



Summary of Common Complaints

Consistent with the reporting requirements established in CRS 24-54.3-111, the following concerns have emerged during the initial implementation of the Program:

- **Confusion regarding exemption certification**: A number of employers with existing qualified retirement plans have contacted Treasury staff expressing concern that they did not receive an access code to certify their exemption. This confusion stemmed from the novel rollout structure of the Program in which Treasury staff utilized federal form 5500 data to identify existing retirement plans used by Colorado employers. These employers were automatically exempted in an effort to lessen employer administrative burdens.
- **Discomfort with state mandates**: Some employers have signaled discomfort with any government requirements in general. These interactions have been limited, and the statute provides employers with the option of utilizing the state program or pursuing a private retirement plan option if they fall under the statutory requirements.
- Administrative challenges: In a limited number of circumstances, employers struggled to navigate the process for submitting payroll contributions. This has primarily been an issue for employers submitting paper checks on behalf of employees, but there have been several instances in which employers submitting payroll data through our platform have expressed confusion and requested help. It is important to note that issues were resolved with the support of the Program's call center, and Program staff continue to highlight resources on the **Help** page to ensure participating employers are equipped to administer contributions.
- **High turnover workplaces**: Employers experiencing high employee turnover or "churn" noted that complying with employee eligibility requirements, as defined in statute, prove difficult in environments where there are regular staffing changes. This issue has been mitigated, in part, through flexibility incorporated into the adopted Program rules that allow employers to add new employees at regular intervals (i.e., once every six months) as opposed to needing to monitor when new employees officially hit the eligible employee threshold. Additional efforts to support employers in high turnover environments (the hospitality industry, in particular) will be made in the form of direct education and additional employer communications. Initial feedback from impacted businesses indicates the flexibility in the Program rules is sufficient to significantly reduce administrative burdens.
- Misinformation: Private retirement plan managers continue to provide eligible employers with
 incorrect information regarding their obligations under the statute. The inaccurate information
 given to employers is, generally, that they are required to purchase a private retirement plan.
 Program staff are monitoring trends in this area and will refer impacted employers to the Colorado
 Department of Law moving forward.

Program Data

Since launching the program for enrollment in January 2023, the SecureSavings program has gathered internal data to measure the success of the outreach strategy and the program itself. Approximately a year out from launch, the program currently has over 75,000 savers with their total contributions totaling over \$108 million.

A summary of Program Engagement Data (as of March 31, 2025) is detailed in the table below:

Year	2023	2024	2025
Enrolled Employers	2,944	14,332	16,657
Open Accounts	3,183	68,374	91,355
Funded Accounts	2,403	51,814	75,532
Average Monthly Contributions per Saver	\$76.63	\$194.08	\$185.98
Average Funded Account Balance	\$184.36	\$940.96	\$1,432.95

Over 16,600 employers have enrolled in the Program. Moreover, of the nearly 44,000 certified exempt businesses, approximately 29,000 have verified they are currently offering a private retirement plan. While there are a significant number of non-compliant employers currently identified in the data, this is to be expected, especially for the first year of a state facilitated retirement program. Due to uncertainties in the initial data, it is unclear whether some of the non-compliant businesses observed actually fall under the statutory requirements based on employee count, or if the contact information listed is correct.

Program staff continue to work with CDLE to improve data accuracy and ensure all eligible employers subject to statutory requirements receive proper notification prior to any attempts to formally bring them into compliance. During the next year, the SecureSavings Program is confident that it will be able to bring significantly more businesses into compliance and expand the Program to workers across the state. In the year since the program has launched, Program staff have begun to collect insights on the saver population. The average saver contributes \$185.98 on a monthly basis, and the average total account balance for savers is \$1,432.98 as of March 31, 2025.

Program staff are working with the Colorado Department of Labor and Employment to build a compliance framework to ensure all businesses falling under statutory requirements provide a retirement option to their employees.



As of March 31, 2025, the number of employers still needing to take action is 33,335.

Figure 3 - Chris Strowmatt, general manager of Blue Bonnet Cafe in Denver, is a champion of the Colorado SecureSavings retirement program. She said it requires minimal upkeep and provides a benefit to attract and retain workers (Photo credit: Colorado Sun).

Marketing & Outreach Strategy

The primary focus for CSSP's marketing and outreach efforts have been increasing business enrollment through targeted awareness campaigns. Aligning outreach efforts with the timing of compliance letter distribution, CSSP leverages press releases, stakeholder engagement, and digital marketing to ensure businesses understand their obligations. Events such as sponsorship opportunities and presentations have and will continue to provide in-person engagement opportunities, while social media campaigns and Google Ads will ensure widespread visibility.

Collaboration with government agencies and business networks continue to play a crucial role in maximizing outreach efficiency. Additionally, the development of a digital toolkit has supported ongoing efforts to bridge enrollment gaps and enhance program participation. The execution of paid media strategies will bolster enrollment numbers and increase brand awareness.

Major Accomplishments

Press Release for Business Enrollment Compliance

- Drafted and distributed a press release encouraging Colorado businesses to take action on enrollment.
- Aligned the message with the compliance letters being sent to businesses.
- Increased media coverage and awareness about the compliance requirements.

Social Media Campaign

- Developed seven reusable social media graphics emphasizing the urgency of enrollment.
- Scheduled posts strategically to maintain engagement and reinforce the key message.
- Collaborated with Colorado State Treasury's Communication Director and Communications
- Specialist to improve social media strategy.

Digital Toolkit Development

- Created a comprehensive digital toolkit for stakeholders to streamline CSSP marketing efforts, distributed by key stakeholders to their networks of employers. The Digital Toolkit includes:
 - CSSP logo and branding materials
 - Social media graphics and templates
 - o Relevant links for enrollment and compliance guidance

Sponsored Segment on Lifestyle Shows

- Secured a sponsored segment on Colorado & Company with 9News.
- Utilized CSSP's marketing budget for paid media to maximize reach and impact.

Goals for Next Year

Targeted Google Ads Campaign

- Launch paid search, video, and Performance Max Google Ads campaigns.
- Target cities, towns, and zip codes with the highest enrollment gaps.
- Use YouTube and Performance Max campaigns for broad reach at a lower cost.

Internal Collaboration with Government Organizations

- Partner with internal government agencies to market CSSP effectively.
- Add CSSP information to government websites to reach new and existing business owners:
 - o Colorado Secretary of State's Office
 - o Department of Regulatory Affairs
 - o MyBizColorado

Expanding Partnerships and Stakeholder Engagement

- Continuously seek new organizations to collaborate with for increased program visibility.
- Conduct in-person presentations in regions with low enrollment to engage stakeholders.
- Follow up with organizations via phone if email outreach proves unresponsive.

Direct Employer Outreach

- CSSP will utilize email, letters and automated phone calls directly to employers.
- CSSP has partnered with Start-Up Colorado (SUCO) to leverage a collaborative campaign plan that would expand outreach with businesses all around Colorado, especially in rural areas.
- CSSP will employ direct outreach to create opportunities for focus groups and testimonial submissions; these efforts will further inform future stakeholder support.













RKSPACES





Figure 4 – Logos of organizations to which CSSP staff presented to this year

Traditional Media Successes

Traditional media channels continue to provide the most broad-based opportunities for reaching employers and savers. Program staff continue to pursue paid media opportunities, specifically with radio and television with the Colorado Broadcasters Association. Additionally, key milestones and deadlines have proven to be excellent opportunities for earned media engagement.

- The Program's relationship with the Colorado Broadcaster's Association provides statewide awareness to the reach largest possible audience. The FY 24-25 campaign has run:
 - o 3,600 radio spots
 - 270 television spots
- The Program continues to run earned media campaigns around America Saves Week, National Small Business Month, Financial Literacy Month, and National Retirement Security Month
- Treasurer Young's sponsored 9News segment reached 20,000 households.

Digital Media Successes

Digital marketing allows the program to directly target key audiences throughout the state. Additionally, digital channels allow the program to track metrics such as advertisement performance, providing key data that will inform future advertisement buys and strategic development. The CSSP will be incorporating the following:

- In collaboration with the Colorado Broadcasters Association, Program staff will leverage LinkedIn advertisements to increase brand awareness.
- Social media content in collaboration with the Department's communications specialist.
- Develop videos of employers and savers to be used in digital marketing campaigns.
- Distribute shareable content to stakeholders to support their digital engagement strategies.

The Partnership for a Dignified Retirement

Pursuant to CRS § 24-54.3-103.5(1)(I), the Board is authorized "to assess the feasibility of multistate or regional agreements to administer the program through shared administrative resources and enter into those agreements if determined beneficial."

In 2022, the CSSP Board approved a multistate partnership governance structure, reflected in the Program's vendor contracts. Since that time, Program staff has actively worked with states with smaller relative populations as potential partners. Critically, this governance arrangement emphasizes collaboration amongst partner states without increasing legal liability or costs to any program participating.

In 2023, the Program officially partnered with the states of Maine and Delaware to formally launch the Partnership for a Dignified Retirement (PDR). The launch of the PDR makes Colorado the only state in the country successfully facilitating a multistate retirement consortium for state facilitated retirement programs. The Program has since added Vermont and Nevada to the PDR.

Since its launch, the PDR has successfully begun implementing partner programs in Maine (January 2024), Delaware (July 2024), and Vermont (December 2024). Nevada is expected to officially launch in July 2025. Program staff anticipate several new partner state opportunities in calendar year 2025 as well.

Serving as the lead state, Colorado provides oversight over the core vendor contracts with Vestwell, State Street Global Advisors, and BlackRock Investments. Within this arrangement, partner states adopt an identical program design as CSSP and facilitate their programs in a nearly identical manner, with cost savings to be realized as programs reach economies of scale.

This arrangement carries enormous benefits for all states participating; partner states can offer a program they could not otherwise provide due to small saver populations. Colorado is sharing best practices for program operations, as well as outreach and marketing, to ensure partners reach impacted employers and provide high quality administration of their programs.

For Colorado, as the number of partner states increases, savers will benefit from lower fees as the number of funded accounts and assets under management grow. Additionally, partner states are actively considering shared services arrangements to offset operating costs with joint program and investment consulting contracts. This will support the Program's efforts to operate in a budget neutral manner in the coming years.

The PDR officially cements Colorado as a national leader in closing the retirement savings gap. As increased attention is given to the retirement savings crisis, Colorado is well positioned to offer solutions that close the coverage gap in cost effective ways while directly addressing the needs of employers and workers alike.



Figure 5 - Eden Parker, an employee of Blue Bonnet Cafe in Denver for 30 years, opened her first retirement account in late 2022 with the SecureSavings Program (Photo credit: Colorado Sun).

Resources

These guides and resources explain the Colorado SecureSavings Program and benefits to employers and savers.

Resources for Employers

The <u>Employer Registration Checklist</u> outlines the steps needed to set up an employer Colorado SecureSavings account.

Employer Portal Help Center

Find step-by-step instructions, articles, and more in the Colorado SecureSavings Help Center:

- <u>Visit the employer Help Center.</u>
- <u>Watch the payroll submission webinar</u> for a walkthrough of the payroll process.

Employer Fact Sheet:

This PDF outlines facts about the program, eligibility requirements, and the benefits of Colorado SecureSavings for employers and employees.

- Employer fact sheet (English)
- Employer fact sheet (Español)

Resources for Savers:

This PDF outlines facts about the program, eligibility requirements, and the benefits of Colorado SecureSavings for savers.

- <u>Saver fact sheet (English)</u>
- Saver fact sheet (Español)

Program Forms:

Although accounts were designed to be managed online, the Program offers options to complete tasks offline. <u>Download Colorado SecureSavings program forms.</u>



This report was prepared by the Colorado Department of the Treasury. This report meets the reporting requirements outlined in CRS § 24-54.3-111.

April 1, 2025

treasury.colorado.gov

For more information, contact William H. Railey, Executive Director, at william.railey@state.co.us

Photo Credits: Adobe Stock, Colorado Sun