

Item 1 Cover Page

Plan Confidence Corporation

IARD # 283781

March 25, 2021

Kevin T. Clark, RFTM, Chief Executive Officer and Chief Compliance Officer
Plan Confidence Corporation

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This brochure provides information about the qualifications and business practices of Plan Confidence Corporation. If you have any questions about the contents of this brochure, please contact us by phone at 312-373-0772 or e-mail at kevin@planconfidence.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”), or by any state securities authority.

“Registration does not imply a certain level of skill or training.”

Additional information about Plan Confidence Corporation also is available on the SEC's website at: www.adviserinfo.sec.gov.

Item 2 Material Changes

Plan Confidence Corporation’s (PLAN CONFIDENCE CORPORATION) initial Form ADV Part 2A Disclosure Brochure registration became effective on May 16, 2016.

We have made the following material changes since our last Form ADV Fiscal Year-Ending filings in February 2020:

- PLAN CONFIDENCE CORPORATION has revised the following disclosures:
 - Item 4, Advisory Business and Plan Confidence Corporation TM services description on pages 3-4;
 - Item 5, Plan ConfidenceTM Service Fee and Fee Authorization starting on pages 4-5;
 - Item 7, Plan ConfidenceTM Fee Minimum on page 5;
 - Item 14, Client Referrals and Other Compensation on pages 9; and
 - Item 16, Investment Discretion on page 9.

For a complete review of Plan Confidence Corporation’s services, activities and disclosures please review the following Form ADV Part 2A Disclosure Brochure content.

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Item 4 Advisory Business

PLAN CONFIDENCE CORPORATION has been an “internet only” investment adviser registered with the United States Securities and Exchange Commission (“SEC”) since May 2016. PLAN CONFIDENCE CORPORATION is notice filed in the state of Florida and in other states as required by state rules and regulations. PLAN CONFIDENCE CORPORATION is a Corporation and was incorporated in the state of Delaware in 2016. Kevin T. Clark, RFTM, is the Chief Executive Officer (“CEO”) and Mark Reddark is the Chief Technology Officer of PLAN CONFIDENCE CORPORATION. As of March 1, 2021, Kevin Clark owns 68.5% of PLAN CONFIDENCE CORPORATION, Mark Reddick owns 20% of PLAN CONFIDENCE CORPORATION and other parties own the remaining 11.5% interest.

Under SEC Investment Advisers Act Rule 203A-2(e), an “internet only” investment adviser cannot have personnel elaborate or expand upon the investment advice provided by its interactive website. An “internet only” investment adviser cannot simply aggregate and provide financial information in response to user-provided requests that do not include personal information.

An “internet only” investment adviser’s interactive website must provide advice through computer-based models or applications based on personal information supplied by the client.

Plan Confidence™

Plan Confidence™ is an online investment advice service created by PLAN CONFIDENCE CORPORATION. Plan Confidence™ allows Clients to receive illustrative asset allocation models that utilize the available investment options within a Client’s universe of investment options available in their plan(s). Each Client will be provided an asset allocation model designed for a Client’s unique risk profile. Client’s risk profile may be selected using multiple factors which include, but are not limited to, Client’s age, assets outside of Client’s universe of investment option, expected time to retire, selected Morningstar Categories, and risk tolerance. Client may change their asset allocation model at any time for any reason.

Plan Confidence™ services do not analyze, recommend or provide discretionary trading on any individual securities, Target Date funds, Asset Allocation model portfolios or company stock investment options.

Plan Confidence Corporation offers three levels of service:

“Do It Yourself” – Non-Discretionary, personalized investment advice with the use of five strategic models and three semi-tactical models. Quarterly rebalancing for the strategic models and possibly more frequent trading with the use of semi-tactical models. Monthly advice provided for “Future Allocations”. Advice will be uploaded to the participant dashboard and an email and/or “push” notification will be sent to the participant. It is up to the participant to log in to their plan sponsor/custodian website and make any and all changes to their account.

“SaaS Lease” – Non-Discretionary, personalized investment advice through non-affiliated State registered and SEC registered investment adviser (RIA) firms. Each RIA firm may use the five strategic models and three semi-tactical models as provided by Plan Confidence Corporation or use their own models. If using the Plan Confidence models, there will be quarterly rebalancing for the strategic models and possibly more frequent trading with the use of semi-tactical models. Monthly advice provided for “Future Allocations”. RIA firms will also be able to program the Plan Confidence software with their own unique models. The frequency of rebalancing and methods of advice (Strategic, Tactical, etc) will be at the discretion of the RIA. Regardless of the model provider, advice will be uploaded to the participant dashboard and an email and/or “push” notification will be sent to the participant. It is up the participant to notify Plan Confidence Corporation, their adviser, or to log in to their plan sponsor/custodian website and make any and all changes to their account.

“Do It For Me” – Non-discretionary, personalized investment advice with the use of five strategic models and three semi-tactical models. Quarterly rebalancing for the strategic models and possibly more frequent trading with the use of semi-tactical models. Monthly advice provided for “Future Allocations”. Advice will be uploaded to the participant dashboard and an email and/or “push” notification will be sent to the participant. The participant will be notified via email when new advice has been uploaded and the participant will notify Plan Confidence Corporation

to implement the trades. Plan Confidence Corporation will utilize the services a third-party Order Management System (Feex) to implement the trades.

Feex uses proprietary technology to place the recommended changes on the participant's plan sponsor/custodian website. Feex provides Plan Confidence Corporation with a platform to view and upload trades for our clients at any custodian. The Username and Password for the participant's account will be stored at Feex and used to execute the trades. At no time will Plan Confidence Corporation have access to the Username and/or Password and at no time will Plan Confidence have any direct communication with the custodian or custody of the participant's assets.

Amazon Web Services (AWS), a comprehensive web services provider, is utilized by PLAN CONFIDENCE CORPORATION to provide Plan Confidence™ hosting services to Clients. AWS centralizes security to protect sensitive data and prevent data loss by hosting data in a cloud environment, not on individual devices, which reduces the risk of intrusion through insecure devices or network connections. The environment provided by AWS includes web servers, encrypted databases, secure document storage and daily database backups. Access to the PLAN CONFIDENCE AWS account is secured by limited functionality with strong passwords and multi-factor authentication as provided by AWS.

PLAN CONFIDENCE CORPORATION is not an Employee Retirement Income Security Act (ERISA) Section 3(38) Investment Manager Fiduciary that makes investment management decisions and has discretionary authority for Qualified Retirement Plan assets. However, PLAN CONFIDENCE CORPORATION may be deemed an ERISA Section 3(21) (a) (ii) Limited Services Fiduciary that makes recommendations to plan participants contributing to Qualified Retirement Plans, Plan accounts and/or other qualified retirement accounts through the Plan Confidence™ services.

Co-Advisers

Registered investment advisers that have Co-Adviser agreements with PLAN CONFIDENCE CORPORATION, will provide advice to clients, assist clients in determining the suitability of the Plan Confidence™ services for their accounts, and assist clients in establishing and maintaining Plan Confidence™ services accounts. A Co-Adviser may also provide other investment advice to clients. A complete description of their services is described in their Form ADV Part 2A Disclosure Brochures.

Additional PLAN CONFIDENCE CORPORATION Advisory Service Disclosures

PLAN CONFIDENCE CORPORATION does not participate in any wrap fee program as a portfolio manager.

Item 5 Fees and Compensation

Plan Confidence™ Service Fee and Fee Authorization

Plan Confidence Non-Discretionary Service Fee – (Legacy Agreements dated prior to December 31, 2019) - Reoccurring monthly fee of \$12.70 (minimum) to \$250 (maximum) per account. Plan Confidence will retain up to \$12.00 of the monthly fee and the balance of the fee will be paid to Co-Advisor. Each Co-Advisor will set their portion of compensation using their own fee schedules. Co-Advisor is independently responsible the determination of the fees they charge for the services they rendered to the co-advised clients.

Plan Confidence “Do It Yourself” Non-Discretionary Service Fee – Reoccurring monthly fee of no more than 1.00% / 12 of your account balance.

Plan Confidence “Do It For Me” Non-discretionary Service Fee – Reoccurring monthly fee of no more than 1.25%/12 of **quarterly** account balance (\$30 minimum per quarter). Fee is reset quarterly. A third-party Order Management Service (OMS) retains .25% of the annual fee (paid quarterly in advance by Plan Confidence Corp).

Plan Confidence “SaaS Lease” Non-Discretionary Service Fee - collects a fee from each Investment Adviser Representative (IAR) and/or Registered Investment Adviser (RIA) for its service. However, the IAR and/or RIA may utilize the Plan Confidence Corporation’s fee billing through Stripe and trading system through FeeX. These are optional services and each IAR/RIA will set their own monthly fee which Plan Confidence Corporation will collect as a courtesy to the IAR/RIA

Fee Authorization- A recurring fee is paid in advance for **Plan Confidence™** services per each account serviced by PLAN CONFIDENCE CORPORATION. Client authorizes the recurring monthly fee through their employer, plan sponsor or Stripe, Inc. (“Stripe”), a third-party online payment processor. Stripe developed a secure online payment service to accept credit and debit card payments from Clients. Stripe is not a bank, custodian or a money services business (“MSB”). Stripe does not offer banking, custodial or MSB services as defined by the United States Department of Treasury. In addition, Stripe does not assume any liability for Plan Confidence services purchased using Stripe’s online payment service.

Plan Confidence™ Agreement Termination- Client may terminate Plan Confidence™ agreement and services by revoking their recurring monthly fee authorization through Stripe by “clicking” the cancel button on the participant’s dashboard. Plan Confidence™ agreements may also be terminated by either party effective upon receipt of written or electronic notice to the other party. The fees for these services do not include payment for other professional services.

General Compensation Conflicts Compliance Oversight Policies

PLAN CONFIDENCE CORPORATION Obligations – PLAN CONFIDENCE CORPORATION and its employee, associates and investment adviser representatives (“IAR”) are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice;
- The duty to ensure that investment advice is suitable to meeting the client’s individual objectives, needs, and circumstances and a duty to be loyal to clients.

Kevin T. Clark, RF™, the Chief Executive Officer (CEO) and Chief Compliance Officer (CCO) of PLAN CONFIDENCE CORPORATION, is responsible for supervising PLAN CONFIDENCE CORPORATION’s investment advisor services and programming the software. The main reports and documents the software reviews are Client Profiles, the fund lineup available in a plan and Morningstar Reports.

Item 6 Performance Based Fees and Side-By-Side Management

PLAN CONFIDENCE CORPORATION does not conduct any performance-based fee advisory business or activities.

Item 7 Types of Clients

PLAN CONFIDENCE CORPORATION generally provides investment advice to the following:

- Individuals
- Businesses and Business Owners
- Defined Contribution Plans (401k, 403b, 457, SIMPLE, etc.) and Plans Participants
- Other Retirement Plans and Plan Participants

Plan Confidence™ Fee Minimum- PLAN CONFIDENCE CORPORATION has a minimum fee for Plan Confidence™ services of \$5 per month per account.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis –

Plan Confidence uses a proprietary scoring methodology created to review the available investment options for each Client. The Client may select any given model available or may complete a questionnaire that reviews the risk tolerance, age, other available assets and other information necessary to be recommended to an Asset Allocation Model.

- A. Asset Allocation Model Selection** - is the implementation of an investment strategy that attempts to balance risk versus reward by adjusting the percentage of each asset in an investment portfolio according to the investor's risk tolerance, goals and investment time frame. The client will also state whether they prefer a **Strategic Asset Allocation – based on Modern Portfolio Theory**; or a **Semi-Tactical Asset Allocation – based on Momentum Investing**.

I. Strategic Asset Allocation – based on Modern Portfolio Theory

Strategic Asset Allocation - A portfolio strategy that involves setting target allocations for various asset classes, and periodically rebalancing the portfolio allocations when they deviate significantly from the initial settings due to differing returns from various assets or a change in the overall asset classes for the model.

Modern Portfolio Theory (MPT) is a mathematical framework for assembling a portfolio of assets such that the expected return is maximized for a given level of risk, defined as variance. Its key insight is that an asset's risk and return should not be assessed by itself, but by how it contributes to a portfolio's overall risk and return. The Strategic Asset Allocation Models will be reviewed no less than quarterly.

If the client chooses a strategic model, they will have the option of choosing which Asset Allocation Categories they prefer not to receive any recommendations on. Once this process has been completed, the appropriate asset allocation model will be “overlaid” over their available investment options and the final output will display the recommended percentage of each investment to use. Proxy investments will be assigned for any missing asset categories. The client will be notified when and why a proxy is being used in their recommendations.

- a. MPT Models
 - i. A variety of MPT “models” will be uploaded into PC database
 - ii. The model(s) provided will best “mirror” a Nationally Recognized Investment Management firm
 - iii. 5 models will be available (Income, Conservative, Moderate, Aggressive and 100% Equity)
 - iv. Each model will be reviewed by Kevin T Clark, RFTM prior to use
- b. Investment Management Firm(s) models will be reviewed Quarterly (Jan, Apr, Jul, Oct) for “rebalance” advice

II. Tactical Asset Allocation – based on Momentum Investing

Tactical Asset Allocation (TAA) is a dynamic investment strategy that actively adjusts a portfolio's asset allocation. The goal of a TAA strategy is to improve the risk-adjusted returns of passive management investing.

Momentum Investing is a system of buying securities that have had high returns over the past three to twelve months, and selling those that have had poor returns over the same period. The Tactical Asset Allocation Models will be reviewed daily.

- a. 3 Models will be available (Moderate, Aggressive and 100% Equity%)
- b. The S&P 500 Category will be reviewed as an overall proxy for equity portions of the model
- c. S&P 500 index (via www.stockcharts.com) will be reviewed for “buy”, “hold” and “sell” signals and the volatility index (VIX) (via www.cnbc.com) will be reviewed each day the NYSE is open for business.
- d. (when necessary) Model Changes uploaded will go “live” the following trading day at 9am EST.

B. Investment Strategies for Future Dollars (money that has not been added to the account yet). A **Dollar Cost Averaging Methodology** (DCA) will be used. DCA is the technique of buying a fixed dollar amount of a particular investment on a regular schedule, regardless of the share price. More shares are purchased when prices are low, and fewer shares are bought when prices are high.

- a. Reviewed Monthly
- b. One to Three Morningstar Asset Classes selected – Asset Class(es) selected that are losing momentum and believed to remain flat or decrease in value over the next 30-60 days.

Risk of Loss – There are risks inherent in all financial decisions and transactions. PLAN CONFIDENCE CORPORATION cannot guarantee the current or future performance of investment recommendations, client accounts performance, or the success of any investment decision or strategy that PLAN CONFIDENCE CORPORATION may recommend to a client.

Item 9 Disciplinary Information

PLAN CONFIDENCE CORPORATION has no disciplinary information history to disclose. PLAN CONFIDENCE CORPORATION IARs have no disciplinary information history to disclose.

Item 10 Other Financial Industry Activities and Affiliations

PLAN CONFIDENCE CORPORATION is not registered as a broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor and will not become registered in any of these capacities.

No PLAN CONFIDENCE CORPORATION IAR is an associate of a futures commission merchant, commodity pool operator or commodity trading advisor. PLAN CONFIDENCE CORPORATION's IARs will not become registered or associated in any of these capacities.

No PLAN CONFIDENCE CORPORATION IAR is currently licensed as a representative or affiliated with a broker-dealer, or another a registered investment adviser.

No PLAN CONFIDENCE CORPORATION IAR is currently licensed as an insurance agent or affiliated with an insurance agency or insurance company.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

PLAN CONFIDENCE CORPORATION adopted the following "Code of Ethics" governing the conduct of personal securities trading by persons associated with it (Associates). The purpose of this Code of Ethics is to foster compliance with applicable federal and state statutes and regulatory requirements and to eliminate transactions suspected of being in conflict with the best interests of PLAN CONFIDENCE CORPORATION's clients.

- PLAN CONFIDENCE CORPORATION does not recommend securities to clients in which PLAN CONFIDENCE CORPORATION or Associates have a material financial interest.
- PLAN CONFIDENCE CORPORATION does not recommend individual securities to clients or buys or sells individual securities for client accounts.

Conflicts of Interest – PLAN CONFIDENCE CORPORATION must disclose any potential or actual conflicts of interest when dealing with clients.

PLAN CONFIDENCE CORPORATION Obligations – PLAN CONFIDENCE CORPORATION and its investment adviser representatives are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice; and
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances based on client's risk profile; and a duty to be loyal to the client.

If you have any questions regarding PLAN CONFIDENCE CORPORATION's Code of Ethics please contact PLAN CONFIDENCE CORPORATION by e-mail at support@planconfidence.com.

Item 12 Brokerage Practices

PLAN CONFIDENCE CORPORATION does not select, direct or recommend broker-dealers or custodians for client plans, accounts or transactions. PLAN CONFIDENCE CORPORATION does not determine the reasonableness of broker-dealer or custodian compensation. In addition, PLAN CONFIDENCE CORPORATION does not receive any research or soft dollar benefits from broker-dealers, custodians or other third parties.

Item 13 Review of Accounts

PLAN CONFIDENCE CORPORATION will rescore all accounts any time a participant provides us a new fund line up or at a minimum twice per year. The Strategic and Strategic/Blend Asset Allocation Models will be reviewed no less than quarterly. The Semi-Tactical Asset Allocation will be reviewed every day the United States New York Stock Exchange is open for normal business. Participants will be notified via email as a primary source of communication to log in to their active Plan Confidence account to review. Participants may also download the iOS (Apple) and/or the Android (Google) app from the Plan Confidence website or the iTunes Store (Apple) or Google Play Store (Google).

Item 14 Client Referrals and Other Compensation

PLAN CONFIDENCE CORPORATION does not use third party solicitors under SEC rule 206(4)-3. No third party provides an economic benefit to PLAN CONFIDENCE CORPORATION for providing investment advice or other advisory services to PLAN CONFIDENCE CORPORATION clients.

However, PLAN CONFIDENCE CORPORATION may compensate Co-Advisers for providing advice to clients in determining the suitability of the Plan Confidence™ services for their accounts and assisting clients in establishing and maintaining Plan Confidence™ services accounts under our “legacy agreements”. Under these “legacy agreements”, PLAN CONFIDENCE CORPORATION paid Co-Advisers any amounts above \$12.00 of the net fees received by PLAN CONFIDENCE CORPORATION from the co-advised clients. Co-Advisers are independent contractors and not affiliated with PLAN CONFIDENCE CORPORATION. Co-Adviser Agreements entered into between PLAN CONFIDENCE CORPORATION and Co-Advisers will at all times be in compliance with the rules and regulations under the Investment Advisers Act of 1940 and corresponding state rules and regulations on investment adviser activities.

Item 15 Custody

PLAN CONFIDENCE CORPORATION has limited custody of client assets solely due to our ability to receive a recurring monthly fee. Clients should receive account statements from the custodians or debit/credit card providers that fee is paid. Clients should carefully review those statements with the statements from PLAN CONFIDENCE CORPORATION.

Item 16 Investment Discretion

PLAN CONFIDENCE CORPORATION has no discretionary authority over client accounts or assets, and does not provide any discretionary advisory services.

Item 17 Voting Client Securities

PLAN CONFIDENCE CORPORATION will not exercise proxy-voting authority over the securities held in client accounts or Qualified Retirement Plans. The obligation to vote client proxies shall at all times rest with the clients.

Item 18 Financial Information

Since PLAN CONFIDENCE CORPORATION has no financial situations which may impair our ability to conduct business PLAN CONFIDENCE CORPORATION has no financial information to report.

Disclosure Brochure Supplement (DBS)
March 24, 2021

DBS Item 1 Cover Page

Kevin T. Clark, RFTM, CEO and CCO
PLAN CONFIDENCE CORPORATION
CRD # 2973609

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This Disclosure Brochure Supplement provides information about Kevin Clark, RFTM that supplements the PLAN CONFIDENCE CORPORATION Disclosure Brochure referenced above. If you have any questions about the contents of the PLAN CONFIDENCE CORPORATION Disclosure Brochure and Disclosure Brochure Supplement, please contact Kevin Clark, RFTM by phone at 312-373-0772 or e-mail at support@PlanConfidence.com. Additional information about Kevin Clark, RFTM is available on the SEC's website at: www.adviserinfo.sec.gov.

DBS Item 2 Educational Background and Business Experience

- **Year of Birth: 1973**
- **Education: Beloit College – Beloit WI, Bachelor of Arts, Pre-Law/Sociology, August 1991 – May 1995**
- **Business Background over the last five years:**
 - PLAN CONFIDENCE CORPORATION, Investment Adviser, President & CCO, March 2016 to present
 - NEXT Financial Group, Inc. Broker-Dealer/ Investment Adviser, Registered Representative and Insurance Sales, Doing Business As (DBA) Quintessential Retirement Services, Inc., President, March 2005 to December 2017
 - Reddark Technologies, Inc. Software Sales and Service, CEO/Co-Owner, November 2011 to December 2019
- **Professional Designations and Professional Licenses**
 - Investment Company Products/Variable Contract Representative Examination, November 1997
 - Uniform Securities Agent State Law Examination, Series 63, January 1998
 - Uniform Combined State Law Examination, Series 65, September 1998
 - Registered Fiduciary (RFTM) - The RFTM certification identifies financial professionals that have achieved pertinent academic qualifications and licenses, learned required practices, have passed a background check, completed a certification test and continue ongoing education. January 2016

DBS Item 3 Disciplinary Information

- Kevin Clark, RFTM has no disciplinary information history to disclose.

DBS Item 4 Other Business Activities

- **Broker-Dealer and Other Investment Adviser** - No current affiliations.
- **Insurance** - No current affiliations.
- **Other** - No current affiliations.

DBS Item 5 Additional Compensation

Kevin Clark, RFTM has no other additional compensation.

DBS Item 6 Supervision

Kevin Clark, RFTM is the Chief Compliance Officer and Supervisor for PLAN CONFIDENCE CORPORATION. You may contact him by e-mail at: kevin@planconfidence.com.

Plan Confidence Corporation Privacy Policy

March 25, 2021

Plan Confidence™ Services is an “internet only” service provided by Plan Confidence Corporation (and herein after referred to as the "site"). Plan Confidence Corporation values and respects the privacy of all its users. By accessing, browsing and using the site you agree that you have read and understood and agree to be bound by our Terms and Conditions and Privacy Policy.

Plan Confidence Corporation collects basic and minimum information needed to set up an account on the site. The only information that is required to set up your account on our site is:

- Your Name
- Your Date of Birth
- Your residential address
- Your email address
- Phone Number
- Available investment options of your plan
- Your plan name(s) and plan website URL(s) (optional)

We do NOT store your password or credit card information in our data. You may change your password at any time on the site. We do use "logs" when you access our site. Our servers automatically record certain information in an industry standard way. The "logs" record the date/ time you access the site, your current assigned risk profile, the date/time you took the Risk Assessment and selected a "risk profile" and the date/ time you "Agreed to" our Agreement Terms and Conditions, Form ADV Part 2A Disclosure Brochure, Form ADV Part 2B Disclosure Brochure Supplement and Privacy Policy.

Plan Confidence Corporation does not disclose any of your personal information to any company that is not affiliated with us outside of unaffiliated service providers and vendors that perform technical, administrative, consulting or legal services for us. However, our contractual arrangements with these service providers require them to treat your information as confidential.

We do not sell information about current or former clients to third parties, nor is it our practice to disclose such information to third parties unless requested to do so by a client or client representative or, if necessary, in order to process a transaction, service an account or as permitted by law.

Your information may be disclosed to an auditor or examiner if selected during our routine annual audits as required by the Department of Labor (DOL), the Securities Exchange Commission (SEC), state regulator, and/ or the Financial Industry Regulatory Authority (FINRA). Your information may be disclosed in the event of a legal proceeding or if ordered by the Government.

We take appropriate security measures to protect your data. In order to protect your personal information, we maintain physical, electronic and procedural safeguards to protect your personal information. Only authorized personnel have access to our database through a password protected site.

This Privacy Policy may change from time to time. If any significant change occurs to this Privacy Policy, you will be notified by having it "pop up" on the site which will have to be "Agreed to" prior to continuing use of the site.

If you have any questions regarding our Privacy Policy, please contact us at support@planconfidence.com.