

# PUBLIC SUBMISSION

|  |
|--|
| <b>Received:</b> November 01, 2021<br><b>Tracking No.</b> kvh-fjhn-dpfg<br><b>Comments Due:</b> November 01, 2021<br><b>Submission Type:</b> API |
|--|

**Docket:** EBSA-2021-0006

PROPOSED IMPLEMENTATION OF SECURE ACT REVISIONS TO FORM 5500  
EMPLOYEE BENEFIT PLAN REPORTS

**Comment On:** EBSA-2021-0006-0002

Annual Information Return/Reports

---

## Submitter Information

**Organization:** Structura, Inc.

---

## General Comment

As a sponsor of a small retirement plan, I strongly support changing the CPA audit requirement so that it is based upon 100 participants with an account balance instead of 100 total participants including active employees who choose not to participate. The cost and work associated with the CPA audit is burdensome and discourages employers from offering retirement plans.