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General Comment

The alteration to the PEP Audit rule needs to be reevaluated. Many small Plan Sponsors that have joined a PEP for the economies of scale and fiduciary protections would NOT have been subjected to a plan audit if they went to an off-the-rack (stand-alone) product without the built-in fiduciary protections.

The initial understanding was that if a PEP had not reached 1000 participants (and did not have a plan with over 100 participants), there would be no audit for the PEP. This needs to be reinstated.

PEP Audit quotes for PEPs range from \$15,000-\$80,000. This is incredibly alarming that there is no solid strategy for auditing firms to price these competitively.

Making a PEP with under 1000 participants and no plans over 100 participants subject to an audit adds undue costs to plan participants.