

**Technical Appendix: Documentation of the Methodology Used to Calculate the  
Burden Associated with the Proposed Form 5500 21<sup>st</sup> Century Initiative  
July 21, 2016**

**1. Overview**

This technical appendix explains in detail the methodology and the data used to estimate the economic impacts of the proposal to modernize the Form 5500 and its schedules, instructions, and attachments (sometimes being referred to as the Form 5500 21<sup>st</sup> Century Initiative). It provides a general overview of the estimation process, detailed descriptions of data, basic calculation methods, and outputs. The results of estimated economic impacts are reported at the end of the appendix.

The burden calculation approach for the Form 5500 21<sup>st</sup> Century Initiative is built upon the approaches used in previous revisions of the Form 5500 Annual Return/Report of Employee Benefit Plan (Form 5500). Therefore, the methods used to estimate economic impacts of current revisions parallel those used in previous revisions in many cases. However, there are some occasions where the approaches used in the current revisions differ from previous approaches to better reflect the nature of the revisions. For example, in the past, burden hours were adjusted based on a formula that looked at the number of data elements in the forms, but did not take into account varying levels of complexity in the data elements. For this revision, the Department used its professional expertise to factor in varying levels of complexity. By taking the complexity of the changes into account, rather than merely counting the number of items added or deleted, the burden model can more accurately reflect the economic impacts of proposed rules. With the exception of this change, however, the burden calculation methodology for the 21<sup>st</sup> Century Initiative remains similar to previous calculation methodologies.

Calculating the burden for the 21<sup>st</sup> Century Initiative included the following steps. First, the Department created a baseline by estimating the burden under current rules. Second, the Department identified schedules and types of filers that are affected by the revisions and adjusted the burden hour counts and the filer counts in each schedule accordingly. Finally, the Department estimated economic burdens under proposed rules by multiplying the adjusted burden of hour counts by the affected filer counts. Tables at the end of this appendix summarize the estimated economic impacts by size and type of plans.

**2. Input to the Burden Model**

Baseline Schedule Counts

The baseline schedule counts rely on the number of plans currently filing the Form 5500 or the Form 5500-SF. These plan counts are queried from the Department's EFAST2 filing system. Schedule counts for the baseline rules reflect "best filings" from the 2013 Form 5500 filings, the most recent year available. Some filers are eligible to file the Form 5500-SF, but choose to file a Form 5500 and attach Schedule I and/or other schedules because they find it less burdensome to do so in their particular situation. In an effort to be conservative in estimating burden, counts of these filings are adjusted to reflect what they

would have filed if they had chosen to file the Form 5500-SF.

### Baseline Burden Hours per Schedule

Baseline burden hours are the average hours to fill out each schedule including the Form 5500 and the Form 5500-SF by plan type. Plan type is categorized by size, Large (generally 100 participants or more) or Small (generally fewer than 100 participants). Then plan type is categorized as Pension plans (Defined Benefit or Defined Contribution) or Welfare plans (non-Health or Health).

### Fractions of Burden per Agency and per Entity by Schedule

The baseline fractions of burden per agency are the shares across agencies (DOL, IRS and PBGC) from 2009 revisions. These baseline fractions are further broken down to burden by type of entity (service provider to plan or plan sponsor v. plan sponsor or plan).

### Schedule Counts after Revisions

Schedule counts for the revisions are adjusted to closely reflect the nature of proposed rules. For instance, the number of Schedule I (Financial Information—Small Plan) filers are removed from Schedule I and added to Schedule H (Financial Information) filers, because under proposed rules Schedule I is eliminated and Schedule I filers are required to file Schedule H instead. Schedules concerning health plans such as the proposed Schedule J (Group Health Plan Information) are newly adopted under proposed rules. Because many health plans are not currently required to file the Form 5500 or the Form 5500-SF, the number of health plans currently filing the Form 5500 is not a good indicator to count plans affected by proposed rules. Instead, the number of health plans that will be required to file all or some of the Form 5500 and Schedule J and other schedules, as applicable, is estimated using data from the Medical Expenditure Panel Survey, Insurance Component (MEPS-IC) and Census of Business data.

### Burden Hours per Schedule after Revisions

To gauge the extent to which burden hours are increased or decreased after revisions, the Department's economists carefully reviewed revised items and consulted with the Department's legal and accounting staff in EBSA's Office of Regulations and Interpretations and Office of Chief Accountant. These staff had many years of experience advising the public on how to file the Form 5500 and some had filed Form 5500 as part of prior private sector work experience. In the case of the restoration of the Schedule E (Employee Stock Ownership Plan Information), the burden from the previous Schedule E was used as a reference.

### Fractions of Burden per Agency and per Entity by Schedule after Revisions

For forms and schedules already in existence, few changes were made to the assignment of burden across agencies and entities (service provider vs. plan sponsor). The assignment of burden for the Schedule E was made consistent with its pre-2009 status. The Schedule J was assigned entirely to the Department of Labor. To assign burden for the Schedule J to

service providers and plan sponsors, a weighted average of the fractions for Schedule A (Insurance Information) and Schedule C (Service Provider Information) was created. These Schedules were selected because they are the most similar to Schedule J.

### Labor Costs

To estimate cost changes in real dollar terms, the Department applied an hourly labor cost rate of \$98.25 per hour to sponsors in the baseline year and also after revisions to reflect the cost of work performed “in-house.” For a description of the Department’s methodology for calculating wage rates, see <http://www.dol.gov/ebsa/pdf/labor-cost-inputs-used-in-ebsa-opr-ria-and-pra-burden-calculations-march-2016.pdf>. The Department applied an hourly cost rate of \$114.95 per hour to service providers in the baseline year and also after revisions. This rate reflects a 17 percent premium on the cost of performing work “in-house” to include profits and administrative costs that would be included in a service provider’s bill to a plan for performing the work. This rate is consistent with the Department’s review of publicly available data on profit margins and hourly billing rates in the accounting industry.<sup>1</sup>

### **3. Burden Model Aggregates**

To estimate the economic impacts of the Form 5500 21<sup>st</sup> Century Initiative, we first aggregate the baseline burden hours per schedule by multiplying plan counts by burden hours for each schedule. The aggregated total burden hours are estimated by size, type and by entity (service provider v. plan sponsor). Then total costs per entity are estimated by multiplying total burden hours of each entity by respective wage rates. Next, we aggregate the total burden hours per schedule under the proposed rules by multiplying projected plan counts by projected burden hours for each schedule. Then these burden hours are converted to total costs by multiplying the aggregate total hours per schedule and per entity by respective wage rates of each entity. The difference between the total costs under the proposed rules and under the current rules are the economic impacts of the revisions.

The tables at the end of this appendix report show each step described above. Total burden hours per schedule under current and proposed rules are summarized in Tables TA\_1 and TA\_2 respectively. Tables TA\_3 and TA\_4 present total costs per entity under current rules and under proposed rules. The outputs applicable to Executive Order 12866 and the Regulatory Flexibility Act are presented in Tables TA\_5 and TA\_6 respectively. Total burden hours and total costs by size (small v. large plans) under current and proposed rules are reported in Tables TA\_7 and TA\_8.

The following list summarizes significant changes and their implications on the economic burden.

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<sup>1</sup> See <https://blog.accountants.intuit.com/intuit-news/get-it-here-first-2013-intuit-rate-survey-results/>, <http://www.aicpa.org/InterestAreas/ForensicAndValuation/Membership/DownloadableDocuments/accounting-firmscpas.pdf>, and US General Services Administration Schedule Contracts.

## Removal of Schedule I and the Changes in Schedule H

Under the proposal, Schedule I would be removed. Those small plans that are not eligible to file the Form 5500-SF instead, which currently file the Form 5500, will be required to attach Schedule H instead of the Schedule I. Schedule H contains several revisions under the proposal. One of the biggest changes to Schedule H is proposed revisions to the Schedule H, Line 4i Schedules of Assets which further break out (i) assets held for investment and (ii) assets disposed of during plan year. Additionally the revised Schedule H contains new compliance questions on disclosure, leveraged investment acquisition, evaluation of annual fair market value, and nondiscrimination and questions about plan termination, terminated plans' transfer to financial institution and transfers from other plans.

### *Number of Affected Filers*

The affected filers are current Schedule I filers - small pension and welfare plans that are not eligible to file the Form 5500-SF. In addition, the current Schedule H filers are also affected due to several revisions in Schedule H.

### *Change in Burden Hours*

For the plans currently filing Schedule I, burden hours are estimated as net changes of burden hours – combining decreases in burden hours due to removal of Schedule I and increases associated with filing Schedule H. For the plans currently filing Schedule H, burden hours are estimated after reviewing revisions and consulting with Departmental experts.

## Changes in Schedule C

Under current rules, small pension and welfare plans that are ineligible for filing the Form 5500-SF are not required to attach Schedule C. The proposed rules will require small pension plans and welfare plans that provide group health benefits with fewer than 100 participants that are funded with a trust to file Schedule C. In addition, Schedule C contains several revisions. The proposed revisions to Schedule C would eliminate “eligible indirect compensation;” all indirect compensation received by service providers would be required to be reported by the plans. The proposed revisions are intended to harmonize Schedule C with the Department’s regulation under ERISA section 408b-2.

### *Number of Affected Filers*

Affected filers include small pension plans and welfare plans that provide group health benefits with fewer than 100 participants that are funded with a trust that are newly required to attach Schedule C under proposed rules. The number of these small plans is estimated using ratios between the number of large plans filing Schedule C and the total number of large plans filing the Form 5500. Current large Form 5500 filers do not need to complete the Schedule C if (1) the plan sponsor pays all direct compensation and no service provider received indirect compensation of \$5,000 or more; (2) no service provider received compensation, direct or indirect of \$5,000 or more; or (3) the only funding vehicle of the plan was a fully allocated contract. We generally assumed that approximately the same percentage of small pension plan filers that are not eligible to file the Form 5500-SF and welfare plan filers that provide group health benefits with fewer than 100 participants would

be required to file the Schedule C as large plans are required to file the Schedule C. This may actually over-estimate the number of small pension plan filers that are affected. Small pension plans generally have lower total assets and therefore, more small pension plans than large would have a small enough amount in assets that no service provider would have received \$5,000 or more in compensation during the plan year.

Current Schedule C filers are also affected as some requirements (such as removal of eligible indirect compensation) change under proposed rules.

#### *Change in Burden Hours*

For small plans that are newly required to attach Schedule C, estimated burden hours resemble those of large plans that are already attaching Schedule C under current rules. Burden hours are further adjusted to reflect several revisions in Schedule C after consulting with Departmental experts.

#### Restoration of Schedule E

Schedule E was removed as part of the revisions to the Form 5500 series for the 2009 plan year. Therefore, under current rules, ESOPs do not attach Schedule E. Instead they answer only the Part IV of Schedule R (Retirement Plan Information). Under proposed rules, however Schedule E is restored and ESOP plans are now required to file Schedule E. The new Schedule E is based on the previous Schedule E and Part IV of Schedule R.

#### *Number of Affected Filers*

ESOP plans are the affected filers. ESOP plans are identified by the Form 5500 filings.

#### *Change in Burden Hours*

Estimated burden hours are based on burden hours of the Schedule E prior to 2009. The Department determined that the differences between the questions in the pre-2009 Schedule E and the proposed Schedule E have no net effect on burden.

#### Revisions to Group Health Reporting Including Addition of Schedule J

Under proposed rules, all welfare plans that provide group health benefits are required to file a Form 5500 and attach a Schedule J, in addition to other schedules, as applicable. Welfare plans that provide group health benefits with 100 or more participants and welfare plans that provide group health benefits with fewer than 100 participants that are unfunded, combination unfunded/fully insured, or funded with a trust are required to answer all questions on the Form 5500 and Schedule J. Welfare plans that provide group health benefits with fewer than 100 participant that are fully insured are required to answer a subset of questions on the Form 5500 and Schedule J. Currently, most welfare plans that provide group health benefits with fewer than 100 participants do not file the Form 5500.

#### *Number of Affected Filers*

The number of affected filers is the number of welfare plans that provide group health benefits. Data from the Medical Expenditure Panel Survey, Insurance Component (MEPS-IC) and Census of Business were used to estimate the number of welfare plans that provide group health benefits.

### *Change in Burden Hours*

To estimate burden hours to attach Schedule J, we reviewed Schedule J and consulted with Departmental experts. The burden hours associated with filing the Form 5500 for Schedule J filers are based on burden hours of other filers that are currently filing the Form 5500.

### Changes in Schedule D

Under current rules, plans that invest in direct filing entities (DFEs) themselves are required to attach Schedule D. The proposed rules limit the Schedule D filing requirement to DFEs. Plans that invest in DFEs will no longer be required to attach a Schedule D. In addition, the revised Schedule D will only contain reporting on participating plan information.

### Number of Affected Filers

The affected filers are current Schedule D filers.

### Change in Burden Hours

For plans that are no longer required to attach Schedule D, the estimated burden reduction is the estimated burden of the existing Schedule D. Burden hours for DFEs are adjusted to reflect revisions after consulting with Departmental experts.

### Miscellaneous Revisions

Miscellaneous revisions are applied to Schedules A, G (Financial Transaction Schedules), and R, and to the Form 5500 and the Form 5500-SF.

Form 5500:

- Add questions whether the plan has a default investment alternative (DIA), whether a defined contribution pension plan offers investment education or advice, whether a rollover from a plan is used to start up the business (ROBS) sponsoring the plan, whether the plan is an eligible combined plan under Code section 414(x), and whether the plan is a ROTH plan
- Add questions reporting the number of participants with account balances, and the number who terminated employment during the plan year and had their entire account balance distributed

Schedule A:

- Report any overdue premium payments
- Report any delinquencies during the plan year of premium payments
- Report if the policy or contract reported on Schedule A was issued by an insurance company that is wholly owned by the plan or plan sponsor
- Report the approximate number of persons – participants, beneficiaries, and dependents – covered by each benefit type at the end of the policy or contract year

Schedule G:

- Indicate the nature of the fixed income obligation and the nature of the nonexempt transaction
- Report if the nonexempt transaction was corrected; how it was corrected

#### Schedule R:

- Moved the part about ESOP to the new Schedule E
- Add questions about defined contribution pension plans such as participation rates and employer matches etc.
- Add questions about nondiscrimination requirements for 401(k) plans

#### Form 5500-SF:

- Add new plan asset breakout questions
- Add questions about whether the plan is a participant-directed individual account plan subject to the requirements in 29 CFR 2550.404a-5, whether the plan offers a brokerage window, self-directed brokerage account, or similar plan arrangements that enabled participants to select investments beyond those designated by the plan, and whether the plan offers a designated investment manager
- Add compliance questions such as disclosure, leveraged investment acquisition, evaluation of annual fair market value
- Add questions about plan termination, terminated plans' transfer to financial institution and transfers from other plans
- Add IRS compliance questions such as nondiscrimination requirement

#### *Number of Affected Filers*

All plans and DFEs filing Schedule A, G, R, Form 5500 or Form 5500-SF, are affected.

#### *Change in Burden Hours*

The change in burden hours is estimated by taking the difference in the tabulation of hours, pre- and post-revisions, for the affected filers.

**Table TA\_1: Number of 5500s and Schedules Filed with Burden Estimates, Current Rules**  
by Filer Type

Filer Type	Total Form 5500 +SF	Form 5500	Schedule A	Schedule MB	Schedule SB	Schedule C	Schedule D	Schedule G	Schedule H	Schedule I	Schedule R	Short Form 5500	Schedule E	Schedule J	Subset of Form 5500 & Snc J
<b>Schedules (Total)</b>	816,271	191,513	265,411	1,315	41,328	82,408	61,090	653	88,297	26,838	84,454	624,758	0	0	0
<b>Large Plans</b>	148,545	148,545	247,620	1,275	7,541	80,580	48,355	629	78,889	1,525	73,155	0	0	0	0
DB/ME/100-1,000 LARG (Non ESOP)	535	535	124	480	0	532	258	6	534	1	530	0	0	0	0
DB/ME/1,000+ LARG (Non ESOP)	791	791	333	763	0	791	641	45	791	0	783	0	0	0	0
DB/SE/100-1,000 LARG (Non ESOP)	4,782	4,782	1,319	0	4,759	4,199	2,444	41	4,738	41	4,752	0	0	0	0
DB/SE/1,000+ LARG (Non ESOP)	2,788	2,788	883	0	2,782	2,431	2,181	73	2,787	0	2,784	0	0	0	0
DC/ME LARG (100+ Partic.) (Non ESOP)	1,105	1,105	493	32	0	1,081	678	14	1,101	2	850	0	0	0	0
DC/SE LARG (100+ Partic.) (ESOP)	2,892	2,892	428	0	0	1,535	739	35	2,636	256	2,853	0	0	0	0
DC/SE LARG (100+ Partic.) (Non ESOP)	62,161	62,161	34,849	0	0	58,753	40,759	183	61,150	984	60,603	0	0	0	0
Welfare/LARGE (Health)	47,928	47,928	179,083	0	0	9,455	525	144	3,916	167	0	0	0	0	0
Welfare/ME LARG (Non Health)	776	776	401	0	0	519	13	7	586	2	0	0	0	0	0
Welfare/SE LARG (Non Health)	24,787	24,787	29,707	0	0	1,284	117	81	650	72	0	0	0	0	0
<b>Small Eligible</b>	622,447	0	0	7	33,228	0	0	0	0	0	0	622,447	0	0	0
DB/SF ELIGIBLE (Small plans) (Non ESOP)	41,069	0	0	0	33,228	0	0	0	0	0	0	41,069	0	0	0
DC/SF ELIGIBLE (small plans) (Non ESOP)	580,703	0	0	7	0	0	0	0	0	0	0	580,703	0	0	0
Welfare/SF ELIGIBLE (small plans) Non Health	675	0	0	0	0	0	0	0	0	0	0	675	0	0	0
<b>Small Ineligible</b>	35,870	33,559	16,150	33	559	0	3,327	0	25,313	11,288	2,311	0	0	0	0
DB/ME SF INELIGIBLE (small Plans) (Non ESOP)	45	11	33	0	0	0	8	0	45	0	0	0	0	0	0
DB/SE SF INELIGIBLE (small Plans) (Non ESOP)	905	905	455	0	559	0	210	0	651	847	0	0	0	0	0
DC/ME SF INELIGIBLE (small plans) (ESOP)	1	1	0	0	0	0	0	0	1	0	0	0	0	0	0
DC/ME SF INELIGIBLE (small plans) (Non ESOP)	133	133	35	0	0	0	31	0	130	74	0	0	0	0	0
DC/SE SF INELIGIBLE (small plans) (ESOP)	3,766	3,766	179	0	0	0	149	0	3,301	3,078	0	0	0	0	0
DC/SE SF INELIGIBLE (small plans) (Non ESOP)	21,473	21,473	2,929	0	0	0	2,904	0	20,888	7,247	0	0	0	0	0
Welfare/SMALL Health (Fully Insured)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Welfare/SMALL Health (Unfunded, combination unfunded/fully insured & funded with a trust)	6,199	3,888	9,191	0	0	0	16	0	134	0	2,311	0	0	0	0
Welfare/ME SF INELIGIBLE (small plans) Non Health	140	140	52	0	0	0	0	0	98	0	0	0	0	0	0
Welfare/SE SF INELIGIBLE (small plans) Non Health	3,208	3,208	3,298	0	0	0	9	0	55	0	0	0	0	0	0
<b>DFEs</b>	9,409	9,409	1,641	0	0	1,828	9,408	24	9,408	0	11	0	0	0	0
Master Trust Investment Account	1,592	1,592	779	0	0	1,259	1,591	17	1,590	7	0	0	0	0	0
Common Collective Trust	4,024	4,024	8	0	0	5	4,024	0	4,024	0	0	0	0	0	0
Pooled Separate Account	3,213	3,213	19	0	0	14	3,213	0	3,213	0	4	0	0	0	0
103-12 Investment Entity	489	489	13	0	0	472	489	7	489	0	0	0	0	0	0
Group Insurance Arrangement	91	91	822	0	0	78	91	0	90	0	0	0	0	0	0

  

Filer Type	Form 5500	Schedule A	Schedule MB	Schedule SB	Schedule C	Schedule D	Schedule G	Schedule H	Schedule I	Schedule R	Short Form 5500	Schedule E	Schedule J	Subset of Form 5500 & Snc J
<b>Hours/Schedule</b>														
<b>Large Plans</b>														
DB/ME/100-1,000 LARG (Non ESOP)	2.03	2.87	8.54	0.00	4.09	1.67	17.53	8.61	2.16	3.07	0.00	0.00	0.00	0.00
DB/ME/1,000+ LARG (Non ESOP)	2.03	2.87	8.60	0.00	4.09	1.67	17.53	8.61	2.16	5.07	0.00	0.00	0.00	0.00
DB/SE/100-1,000 LARG (Non ESOP)	2.02	2.87	0.00	6.63	4.09	1.67	17.53	8.61	2.16	2.04	0.00	0.00	0.00	0.00
DB/SE/1,000+ LARG (Non ESOP)	2.02	2.87	0.00	6.63	4.09	1.67	17.53	8.61	2.16	4.04	0.00	0.00	0.00	0.00
DC/ME LARG (100+ Partic.) (Non ESOP)	1.83	2.87	3.33	0.00	2.70	1.65	11.09	8.61	2.10	2.05	0.00	0.00	0.00	0.00
DC/SE LARG (100+ Partic.) (ESOP)	1.82	2.87	3.33	0.00	2.70	1.65	11.09	7.53	2.10	1.55	0.00	0.00	0.00	0.00
DC/SE LARG (100+ Partic.) (Non ESOP)	1.82	2.87	3.33	0.00	2.70	1.65	11.09	7.53	2.10	1.55	0.00	0.00	0.00	0.00
Welfare/LARGE (Health)	1.75	3.66	0.00	0.00	3.64	1.87	10.99	8.61	1.94	0.00	0.00	0.00	0.00	0.00
Welfare/ME LARG (Non Health)	1.77	3.66	0.00	0.00	3.64	1.87	10.99	8.61	1.94	0.00	0.00	0.00	0.00	0.00
Welfare/SE LARG (Non Health)	1.75	3.66	0.00	0.00	3.64	1.87	10.99	8.61	1.94	0.00	0.00	0.00	0.00	0.00
<b>Small Eligible</b>														
DB/SF ELIGIBLE (Small plans) (Non ESOP)	1.30	2.75	0.00	6.82	0.00	0.33	0.00	8.61	2.16	1.55	2.59	0.00	0.00	0.00
DC/SF ELIGIBLE (small plans) (Non ESOP)	1.30	2.75	3.33	0.00	0.00	0.33	0.00	7.53	2.10	1.05	2.59	0.00	0.00	0.00
Welfare/SF ELIGIBLE (small plans) Non Health	1.23	2.60	0.00	0.00	0.00	0.33	0.00	8.61	1.94	0.00	2.59	0.00	0.00	0.00
<b>Small Ineligible</b>														
DB/ME SF INELIGIBLE (small Plans) (Non ESOP)	1.33	2.87	8.35	0.00	0.00	0.33	0.00	8.61	2.16	2.57	0.00	0.00	0.00	0.00
DB/SE SF INELIGIBLE (small plans) (Non ESOP)	1.31	2.87	0.00	6.82	0.00	0.33	0.00	8.02	2.16	1.61	0.00	0.00	0.00	0.00
DC/ME SF INELIGIBLE (small plans) (ESOP)	1.33	2.87	3.33	0.00	0.00	0.33	0.00	7.53	2.10	1.08	0.00	0.00	0.00	0.00
DC/ME SF INELIGIBLE (small plans) (Non ESOP)	1.33	2.87	3.33	0.00	0.00	0.33	0.00	7.53	2.10	1.08	0.00	0.00	0.00	0.00
DC/SE SF INELIGIBLE (small plans) (ESOP)	1.31	2.87	3.33	0.00	0.00	0.33	0.00	7.53	2.10	1.08	0.00	0.00	0.00	0.00
DC/SE SF INELIGIBLE (small plans) (Non ESOP)	1.31	2.87	3.33	0.00	0.00	0.33	0.00	7.53	2.10	1.08	0.00	0.00	0.00	0.00
Welfare/SMALL Health (Fully Insured)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welfare/SMALL Health (Unfunded, combination unfunded/fully insured & funded with a trust)	1.23	2.71	0.00	0.00	0.00	0.33	0.00	8.02	1.94	0.00	2.59	0.00	0.00	0.00
Welfare/ME SF INELIGIBLE (small plans) Non Health	1.24	2.71	0.00	0.00	0.00	0.33	0.00	8.02	1.94	0.00	0.00	0.00	0.00	0.00
Welfare/SE SF INELIGIBLE (small plans) Non Health	1.23	2.71	0.00	0.00	0.00	0.33	0.00	8.02	1.94	0.00	0.00	0.00	0.00	0.00
<b>DFEs</b>														
Master Trust Investment Account	1.84	2.90	1.39	3.46	3.06	1.50	12.68	8.15	2.11	2.27	0.23	0.00	0.00	0.00
Common Collective Trust	1.50	2.79	3.12	0.45	1.06	0.80	4.37	7.62	2.10	1.35	1.64	0.00	0.00	0.00
Pooled Separate Account	1.40	2.77	3.25	0.11	0.53	0.58	2.19	7.55	2.09	1.15	2.06	0.00	0.00	0.00
103-12 Investment Entity	1.69	2.84	3.37	1.87	2.20	1.09	9.26	8.10	2.12	2.52	1.07	0.00	0.00	0.00
Group Insurance Arrangement	1.47	3.06	1.87	0.12	1.53	0.97	4.69	7.86	1.99	0.63	1.36	0.00	0.00	0.00

  

Filer Type	Total	Form 5500	Schedule A	Schedule MB	Schedule SB	Schedule C	Schedule D	Schedule G	Schedule H	Schedule I	Schedule R	Short Form 5500	Schedule E	Schedule J	Subset of Form 5500 & Snc J
<b>Total Burden Hours</b>	4,273,257	310,421	920,274	11,066	280,424	239,203	81,116	8,018	610,082	56,230	199,340	1,617,082	0	0	0
<b>Large Plans</b>	2,270,880	267,065	875,930	10,788	49,997	239,203	80,018	8,018	610,082	3,161	126,638	0	0	0	0
DB/ME/100-1,000 LARG (Non ESOP)	14,479	1,088	356	4,099	0	1,176	432	105	4,596	2	1,627	0	0	0	0
DB/ME/1,000+ LARG (Non ESOP)	24,998	1,606	956	6,562	0	3,235	1,073	789	6,808	0	3,970	0	0	0	0
DB/SE/100-1,000 LARG (Non ESOP)	117,543	9,660	3,786	0	31,552	17,174	4,092	719	40,778	88	9,694	0	0	0	0
DB/SE/1,000+ LARG (Non ESOP)	76,719	5,632	2,534	0	18,445	9,943	3,651	1,280	23,987	0	11,247	0	0	0	0
DC/ME LARG (100+ Partic.) (Non ESOP)	18,958	2,022	1,415	107	0	2,919	1,118	155	9,476	4	1,743	0	0	0	0
DC/SE LARG (100+ Partic.) (ESOP)	37,042	5,263	1,228	0	0	4,145	1,219	388	19,840	537	4,422	0	0	0	0
DC/SE LARG (100+ Partic.) (Non ESOP)	997,272	113,133	100,017	0	0	158,633	67,206	2,030	460,256	2,063	93,935	0	0	0	0
Welfare/LARGE (Health)	810,367	83,913	655,444	0	0	34,416	984	1,583	3						



Table TA 2: Number of 5500s and Schedules Filed with Burden Estimates, Proposed Rules (21st Century Initiative)

by Filer Type																
Filer Type	Total Form 5500+S	Form 5500	Schedule A	Schedule MB	Schedule SB	Schedule C	Schedule D	Schedule G	Schedule H	Schedule I	Schedule R	Short Form 5500	Schedule E	Schedule J	Subset of Form 5500 & Sch J	
<b>Schedules (Total)</b>	2,967,515	476,068	265,138	1,315	41,328	100,172	8,851	647	114,578	0	84,452	622,447	6,659	336,928	1,869,000	
<b>Large Plans</b>	148,545	148,545	247,620	1,275	7,541	80,580	0	629	80,414	0	73,155	0	2,892	47,328	0	
DB/ME/100-1,000 LARGE (Non ESOP)	535	535	124	480	0	532	0	6	535	0	530	0	0	0	0	
DB/ME/1,000+ LARGE (Non ESOP)	791	791	333	763	0	791	0	45	791	0	783	0	0	0	0	
DB/SE/100-1,000 LARGE (Non ESOP)	4,782	4,782	1,319	0	4,759	4,199	0	41	4,779	0	4,752	0	0	0	0	
DB/SE/1,000+ LARGE (Non ESOP)	2,788	2,788	883	0	2,782	2,431	0	73	2,787	0	2,784	0	0	0	0	
DC/ME LARGE (100+ Partic.) (Non ESOP)	1,105	1,105	493	32	0	1,081	0	14	1,103	0	850	0	0	0	0	
DC/SE LARGE (100+ Partic.) (ESOP)	2,892	2,892	428	0	0	1,535	0	35	2,892	0	2,853	0	2,892	0	0	
DC/SE LARGE (100+ Partic.) (Non ESOP)	62,161	62,161	34,849	0	0	58,753	0	183	62,134	0	60,603	0	0	0	0	
Welfare/LARGE (Health)	47,928	47,928	179,083	0	0	9,455	0	144	4,083	0	0	0	0	47,928	0	
Welfare/ME LARGE (Non Health)	776	776	401	0	0	519	0	7	588	0	0	0	0	0	0	
Welfare/SE LARGE (Non Health)	24,787	24,787	29,707	0	0	1,284	0	81	722	0	0	0	0	0	0	
<b>Small Eligible</b>	622,447	0	0	7	33,228	0	0	0	0	0	0	622,447	0	0	0	
DB/SF ELIGIBLE (small plans) (Non ESOP)	41,069	0	0	0	33,228	0	0	0	0	0	0	41,069	0	0	0	
DC/SF ELIGIBLE (small plans) (Non ESOP)	580,703	0	0	7	0	0	0	0	0	0	0	580,703	0	0	0	
Welfare/SF ELIGIBLE (small plans) Non Health	675	0	0	0	0	0	0	0	0	0	0	675	0	0	0	
<b>Small Ineligible</b>	2,187,671	318,671	16,150	33	559	18,204	0	0	25,313	0	11,288	0	3,767	289,000	1,869,000	
DB/ME SF INELIGIBLE (small Plans) (Non ESOP)	45	45	11	33	0	24	0	0	45	0	42	0	0	0	0	
DB/SE SF INELIGIBLE (small plans) (Non ESOP)	905	905	455	0	559	491	0	0	651	0	847	0	0	0	0	
DC/ME SF INELIGIBLE (small plans) (ESOP)	1	1	0	0	0	1	0	0	1	0	0	1	0	0	0	
DC/ME SF INELIGIBLE (small plans) (Non ESOP)	133	133	35	0	0	72	0	0	130	0	74	0	0	0	0	
DC/SE SF INELIGIBLE (small plans) (ESOP)	3,766	3,766	179	0	0	2,043	0	0	3,301	0	3,078	0	3,766	0	0	
DC/SE SF INELIGIBLE (small plans) (Non ESOP)	21,473	21,473	2,929	0	0	11,648	0	0	20,898	0	7,247	0	0	0	0	
Welfare/SMALL Health (Fully Insured)	1,869,000	0	0	0	0	0	0	0	0	0	0	0	0	0	1,869,000	
Welfare/SMALL Health (Unfunded, combination unfunded/fully insured & funded with a trust)	289,000	289,000	9,191	0	0	2,109	0	0	134	0	0	0	0	289,000	0	
Welfare/ME SF INELIGIBLE (small plans) Non Health	140	140	52	0	0	76	0	0	98	0	0	0	0	0	0	
Welfare/SE SF INELIGIBLE (small plans) Non Health	3,208	3,208	3,298	0	0	1,740	0	0	55	0	0	0	0	0	0	
<b>DFEs</b>	8,852	8,852	1,368	0	0	1,387	8,851	18	8,851	0	9	0	0	0	0	
Master Trust Investment Account	1,035	1,035	506	0	0	818	1,034	11	1,035	0	5	0	0	0	0	
Common Collective Trust	4,024	4,024	8	0	0	5	4,024	0	4,024	0	0	0	0	0	0	
Pooled Separate Account	3,213	3,213	19	0	0	14	3,213	0	3,213	0	4	0	0	0	0	
103-12 Investment Entity	489	489	13	0	0	472	489	7	489	0	0	0	0	0	0	
Group Insurance Arrangement	91	91	822	0	0	78	91	0	90	0	0	0	0	0	0	

  

Filer Type	Form 5500	Schedule A	Schedule MB	Schedule SB	Schedule C	Schedule D	Schedule G	Schedule H	Schedule I	Schedule R	Short Form 5500 SF	Schedule E	Schedule J	Subset of Form 5500 & Sch J
<b>Hours/Schedule</b>														
<b>Large Plans</b>														
DB/ME/100-1,000 LARGE (Non ESOP)	2.05	2.91	8.54	0.00	4.95	0.00	17.61	12.77	0.00	3.20	0.00	0.00	0.00	0.00
DB/ME/1,000+ LARGE (Non ESOP)	2.05	2.91	8.60	0.00	4.95	0.00	17.61	12.77	0.00	5.20	0.00	0.00	0.00	0.00
DB/SE/100-1,000 LARGE (Non ESOP)	2.04	2.91	0.00	6.63	4.95	0.00	17.61	12.77	0.00	2.19	0.00	0.00	0.00	0.00
DB/SE/1,000+ LARGE (Non ESOP)	2.04	2.91	0.00	6.63	4.95	0.00	17.61	12.77	0.00	4.19	0.00	0.00	0.00	0.00
DC/ME LARGE (100+ Partic.) (Non ESOP)	1.85	2.91	3.33	0.00	3.28	0.00	11.17	12.77	0.00	2.25	0.00	0.00	0.00	0.00
DC/SE LARGE (100+ Partic.) (ESOP)	1.84	2.91	3.33	0.00	3.28	0.00	11.17	11.69	0.00	0.92	0.00	3.30	0.00	0.00
DC/SE LARGE (100+ Partic.) (Non ESOP)	1.84	2.91	3.33	0.00	3.28	0.00	11.17	11.69	0.00	1.75	0.00	0.00	0.00	0.00
Welfare/LARGE (Health)	1.77	3.70	0.00	0.00	4.42	0.00	11.07	12.77	0.00	0.00	0.00	0.00	3.50	0.00
Welfare/ME LARGE (Non Health)	1.79	3.70	0.00	0.00	4.42	0.00	11.07	12.77	0.00	0.00	0.00	0.00	0.00	0.00
Welfare/SE LARGE (Non Health)	1.77	3.70	0.00	0.00	4.42	0.00	11.07	12.77	0.00	0.00	0.00	0.00	0.00	0.00
<b>Small Eligible</b>														
DB/SF ELIGIBLE (small plans) (Non ESOP)	1.32	2.79	0.00	6.82	0.00	0.00	0.00	8.61	0.00	1.55	2.90	0.00	0.00	0.00
DC/SF ELIGIBLE (small plans) (Non ESOP)	1.32	2.79	3.33	0.00	0.00	0.00	0.00	7.53	0.00	1.05	2.90	0.00	0.00	0.00
Welfare/SF ELIGIBLE (small plans) Non Health	1.24	2.64	0.00	0.00	0.00	0.00	0.00	8.61	0.00	0.00	2.90	0.00	0.00	0.00
<b>Small Ineligible</b>														
DB/ME SF INELIGIBLE (small Plans) (Non ESOP)	1.35	2.91	8.35	0.00	4.95	0.00	0.00	9.27	0.00	2.70	0.00	0.00	0.00	0.00
DB/SE SF INELIGIBLE (small plans) (Non ESOP)	1.33	2.91	0.00	6.82	4.95	0.00	0.00	8.68	0.00	1.76	0.00	0.00	0.00	0.00
DC/ME SF INELIGIBLE (small plans) (ESOP)	1.35	2.91	3.33	0.00	3.27	0.00	0.00	8.19	0.00	0.45	0.00	3.30	0.00	0.00
DC/ME SF INELIGIBLE (small plans) (Non ESOP)	1.35	2.91	3.33	0.00	3.27	0.00	0.00	8.19	0.00	1.28	0.00	0.00	0.00	0.00
DC/SE SF INELIGIBLE (small plans) (ESOP)	1.33	2.91	3.33	0.00	3.27	0.00	0.00	8.19	0.00	0.45	0.00	3.30	0.00	0.00
DC/SE SF INELIGIBLE (small plans) (Non ESOP)	1.33	2.91	3.33	0.00	3.27	0.00	0.00	8.19	0.00	1.28	0.00	0.00	0.00	0.00
Welfare/SMALL Health (Fully Insured)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.33
Welfare/SMALL Health (Unfunded, combination unfunded/fully insured & funded with a trust)	1.24	2.75	0.00	0.00	4.42	0.00	0.00	8.68	0.00	0.00	0.00	0.00	3.50	0.00
Welfare/ME SF INELIGIBLE (small plans) Non Health	1.26	2.75	0.00	0.00	4.42	0.00	0.00	8.68	0.00	0.00	0.00	0.00	0.00	0.00
Welfare/SE SF INELIGIBLE (small plans) Non Health	1.24	2.75	0.00	0.00	4.42	0.00	0.00	8.68	0.00	0.00	0.00	0.00	0.00	0.00
<b>DFEs</b>														
Master Trust Investment Account	1.86	2.94	1.39	3.46	3.71	0.75	12.76	12.32	2.11	2.27	0.23	0.00	0.00	0.00
Common Collective Trust	1.51	2.83	3.12	0.45	1.31	0.40	4.45	11.79	2.10	1.35	1.64	0.00	0.00	0.00
Pooled Separate Account	1.70	2.88	3.37	1.87	2.68	0.55	9.33	12.27	2.12	2.52	1.07	0.00	0.00	0.00
103-12 Investment Entity	1.48	3.10	1.87	0.12	1.87	0.49	4.77	12.02	1.99	0.63	1.36	0.00	0.00	0.00
Group Insurance Arrangement														

  

Filer Type	Total	Form 5500	Schedule A	Schedule MB	Schedule SB	Schedule C	Schedule D	Schedule G	Schedule H	Schedule I	Schedule R	Short Form 5500 SF	Schedule E	Schedule J	Subset of Form 5500 & Sch J
<b>Total Burden Hours</b>	7,196,636	667,688	931,265	11,066	280,424	354,975	0	8,065	1,164,833	0	151,077	1,803,021	21,975	1,179,248	623,000
<b>Large Plans</b>	2,787,562	269,541	886,248	10,768	49,997	290,042	0	8,065	956,927	0	138,684	0	9,544	167,748	0
DB/ME/100-1,000 LARGE (Non ESOP)	16,830	1,095	351	4,099	0	2,633	0	106	6,834	0	1,693	0	0	0	0
DB/ME/1,000+ LARGE (Non ESOP)	28,028	1,619	970	6,562	0	3,914	0	792	10,104	0	4,068	0	0	0	0
DB/SE/100-1,000 LARGE (Non ESOP)	138,083	9,739	3,840	0	31,552	20,778	0	722	61,044	0	10,407	0	0	0	0
DB/SE/1,000+ LARGE (Non ESOP)	87,273	5,678	2,571	0	18,445	12,029	0	1,286	35,599	0	11,665	0	0	0	0
DC/ME LARGE (100+ Partic.) (Non ESOP)	23,284	2,041	1,435	107	0	3,540	0	156	14,089	0	1,916	0	0	0	0
DC/SE LARGE (100+ Partic.) (ESOP)	57,964	5,312	1,246	0	0	5,027	0	391	33,817	0	2,627	0	9,544	0	0
DC/SE LARGE (100+ Partic.) (Non ESOP)	1,242,959	114,169	101,469	0	0	192,416	0	2,044	726,554	0	106,308	0	0	0	0
Welfare/LARGE (Health)	1,010,857	84,712	662,906	0	0	41,744	0	1,594	52,154	0	0	0			

**Table TA\_3**  
**Burden Summaries for NPRM**  
**Current Rules**

Filer Type	Total Hours	Provider Hours	Sponsor Hours	Total Cost	Provider Cost	Sponsor Cost
<b>Large Plans</b>	<b>2,270,880</b>	<b>1,754,134</b>	<b>516,746</b>	<b>\$252,412,413</b>	<b>\$201,642,093</b>	<b>\$50,770,320</b>
DB/ME/100-1,000 LARGE (non ESOP)	14,479	10,843	3,636	\$1,603,711	\$1,246,487	\$357,224
DB/ME/1,000+ LARGE (non ESOP)	24,998	18,784	6,214	\$2,769,821	\$2,159,256	\$610,565
DB/SE/100-1,000 LARGE (non ESOP)	117,543	87,276	30,267	\$13,006,294	\$10,032,584	\$2,973,710
DB/SE/1,000+ LARGE (non ESOP)	76,719	56,586	20,132	\$8,482,768	\$6,504,750	\$1,978,018
DC/ME LARGE (100+ Partic.) (non ESOP)	18,958	12,585	6,373	\$2,072,842	\$1,446,681	\$626,162
DC/SE/ LARGE (100+Partic.) (ESOP)	37,042	24,389	12,654	\$4,046,753	\$2,803,543	\$1,243,210
DC/SE/ LARGE (100+Partic.) (non ESOP)	997,272	669,711	327,561	\$109,167,810	\$76,984,986	\$32,182,824
Welfare/LARGE Health	810,367	723,435	86,932	\$91,701,774	\$83,160,682	\$8,541,091
Welfare/ME LARGE Non Health	9,879	6,845	3,034	\$1,084,953	\$786,900	\$298,053
Welfare/SE LARGE Non Health	163,622	143,679	19,944	\$18,475,686	\$16,516,225	\$1,959,462
<b>Small Eligible</b>	<b>1,837,739</b>	<b>1,512,212</b>	<b>325,526</b>	<b>\$205,815,541</b>	<b>\$173,832,576</b>	<b>\$31,982,965</b>
DB/SF ELIGIBLE (small plans) (non ESOP)	332,915	294,574	38,342	\$37,629,036	\$33,861,973	\$3,767,064
DC/SF ELIGIBLE (small plans) (non ESOP)	1,503,076	1,216,225	286,851	\$167,991,237	\$139,808,095	\$28,183,142
Welfare/SF ELIGIBLE (small plans) Non Health	1,747	1,414	333	\$195,267	\$162,508	\$32,759
<b>Small Ineligible</b>	<b>164,639</b>	<b>135,958</b>	<b>28,681</b>	<b>\$18,446,592</b>	<b>\$15,628,671</b>	<b>\$2,817,921</b>
DB/ME SF INELIGIBLE (small Plans) (non ESOP)	575	484	91	\$64,535	\$55,612	\$8,923
DB/SE SF INELIGIBLE (small plans) (non ESOP)	9,141	7,751	1,390	\$1,027,533	\$890,955	\$136,578
DC/ME SF INELIGIBLE (small plans) (ESOP)	3	3	1	\$383	\$318	\$65
DC/ME SF INELIGIBLE (small plans) (non ESOP)	640	514	127	\$71,463	\$59,031	\$12,432
DC/SE SF INELIGIBLE (small plans) (ESOP)	15,742	12,321	3,420	\$1,752,420	\$1,416,362	\$336,058
DC/SE SF INELIGIBLE (small plans) (non ESOP)	89,137	71,493	17,644	\$9,951,850	\$8,218,334	\$1,733,516
Welfare/SMALL Health (Fully Insured)	0	0	0	\$0	\$0	\$0
Welfare/SMALL Health (Unfunded, combination unfunded/fully insured & funded with a trust)	35,920	31,571	4,348	\$4,056,444	\$3,629,221	\$427,224
Welfare/ME SF INELIGIBLE (small plans) Non Health	504	421	83	\$56,588	\$48,448	\$8,141
Welfare/SE SF INELIGIBLE (small plans) Non Health	12,977	11,399	1,577	\$1,465,376	\$1,310,391	\$154,985
<b>DFEs</b>	<b>105,283</b>	<b>66,056</b>	<b>39,227</b>	<b>\$11,447,390</b>	<b>\$7,593,348</b>	<b>\$3,854,043</b>
Master Trust Investment Account	24,626	16,147	8,479	\$2,689,204	\$1,856,135	\$833,070
Common Collective Trust	39,945	24,234	15,711	\$4,329,360	\$2,785,779	\$1,543,581
Pooled Separate Account	30,688	18,650	12,039	\$3,326,637	\$2,143,836	\$1,182,801
103-12 Investment Entity	6,460	4,068	2,392	\$702,629	\$467,638	\$234,992
Group Insurance Arrangement	3,564	2,957	607	\$399,560	\$339,960	\$59,599

Filer Type	Total Hours	Provider Hours	Sponsor Hours	Total Cost	Provider Cost	Sponsor Cost
Large Pension	1,287,012	880,175	406,837	\$141,150,000	\$101,178,286	\$39,971,714
Small Pension	1,951,229	1,603,364	347,865	\$218,488,458	\$184,310,679	\$34,177,779
<b>All Pension</b>	<b>3,238,241</b>	<b>2,483,539</b>	<b>754,702</b>	<b>\$359,638,458</b>	<b>\$285,488,965</b>	<b>\$74,149,492</b>
Large Welfare	983,869	873,959	109,909	\$111,262,413	\$100,463,807	\$10,798,606
Small Welfare	51,148	44,806	6,342	\$5,773,676	\$5,150,568	\$623,108
<b>All Welfare</b>	<b>1,035,017</b>	<b>918,765</b>	<b>116,252</b>	<b>\$117,036,088</b>	<b>\$105,614,374</b>	<b>\$11,421,714</b>
Large Total	2,270,880	1,754,134	516,746	\$252,412,413	\$201,642,093	\$50,770,320
Small Total	2,002,377	1,648,170	354,207	\$224,262,133	\$189,461,247	\$34,800,887
<b>All DFEs</b>	<b>105,283</b>	<b>66,056</b>	<b>39,227</b>	<b>\$11,447,390</b>	<b>\$7,593,348</b>	<b>\$3,854,043</b>
<b>All Total</b>	<b>4,378,541</b>	<b>3,468,360</b>	<b>910,181</b>	<b>\$488,121,937</b>	<b>\$398,696,688</b>	<b>\$89,425,249</b>

**Table TA\_4**  
**Burden Summaries for NPRM**  
**Proposed Rules**

Filer Type	Total Hours	Provider Hours	Sponsor Hours	Total Cost	Provider Cost	Sponsor Cost
<b>Large Plans</b>	<b>2,787,562</b>	<b>2,122,653</b>	<b>664,908</b>	<b>\$309,331,560</b>	<b>\$244,004,305</b>	<b>\$65,327,255</b>
DB/ME/100-1,000 LARGE (non ESOP)	16,820	12,312	4,509	\$1,858,245	\$1,415,246	\$442,999
DB/ME/1,000+ LARGE (non ESOP)	28,028	20,743	7,285	\$3,100,239	\$2,384,481	\$715,758
DB/SE/100-1,000 LARGE (non ESOP)	138,083	100,124	37,958	\$15,238,948	\$11,509,527	\$3,729,422
DB/SE/1,000+ LARGE (non ESOP)	87,273	63,367	23,906	\$9,632,961	\$7,284,184	\$2,348,778
DC/ME LARGE (100+ Partic.) (non ESOP)	23,284	15,300	7,984	\$2,543,229	\$1,758,804	\$784,425
DC/SE/ LARGE (100+Partic.) (ESOP)	57,964	39,528	18,436	\$6,355,152	\$4,543,859	\$1,811,293
DC/SE/ LARGE (100+Partic.) (Non ESOP)	1,242,959	823,981	418,978	\$135,883,253	\$94,718,697	\$41,164,556
Welfare/LARGE Health	1,010,857	890,954	119,903	\$114,197,807	\$102,417,365	\$11,780,442
Welfare/ME LARGE Non Health	12,750	8,576	4,175	\$1,395,966	\$985,813	\$410,153
Welfare/SE LARGE Non Health	169,544	147,768	21,775	\$19,125,759	\$16,986,330	\$2,139,430
<b>Small Eligible</b>	<b>2,029,660</b>	<b>1,667,506</b>	<b>362,153</b>	<b>\$227,265,594</b>	<b>\$191,684,015</b>	<b>\$35,581,579</b>
DB/SF ELIGIBLE (small plans) (non ESOP)	345,578	304,820	40,758	\$39,044,309	\$35,039,809	\$4,004,500
DC/SF ELIGIBLE (small plans) (non ESOP)	1,682,126	1,361,104	321,022	\$188,002,756	\$156,462,339	\$31,540,417
Welfare/SE SF ELIGIBLE (small plans) Non Health	1,955	1,582	373	\$218,528	\$181,866	\$36,662
<b>Small Ineligible</b>	<b>2,379,415</b>	<b>1,938,005</b>	<b>441,410</b>	<b>\$266,147,041</b>	<b>\$222,778,470</b>	<b>\$43,368,571</b>
DB/ME SF INELIGIBLE (small Plans) (non ESOP)	1,019	738	281	\$112,488	\$84,857	\$27,631
DB/SE SF INELIGIBLE (small plans) (non ESOP)	15,910	11,740	4,170	\$1,759,230	\$1,349,543	\$409,687
DC/ME SF INELIGIBLE (small plans) (ESOP)	15	10	4	\$1,605	\$1,163	\$442
DC/ME SF INELIGIBLE (small plans) (non ESOP)	1,677	1,090	587	\$183,009	\$125,330	\$57,679
DC/SE SF INELIGIBLE (small plans) (ESOP)	53,066	37,269	15,797	\$5,836,245	\$4,284,201	\$1,552,044
DC/SE SF INELIGIBLE (small plans) (non ESOP)	255,675	163,923	91,753	\$27,857,998	\$18,843,305	\$9,014,693
Welfare/SMALL Health (Fully Insured)	623,000	504,104	118,896	\$69,629,544	\$57,947,997	\$11,681,547
Welfare/SMALL Health (Unfunded, combination unfunded/fully insured & funded with a trust)	1,406,328	1,200,762	205,566	\$158,227,481	\$138,030,646	\$20,196,835
Welfare/ME SF INELIGIBLE (small plans) Non Health	1,505	1,009	496	\$164,745	\$115,974	\$48,771
Welfare/SE SF INELIGIBLE (small plans) Non Health	21,219	17,359	3,860	\$2,374,695	\$1,995,453	\$379,242
<b>DFEs</b>	<b>130,910</b>	<b>80,655</b>	<b>50,255</b>	<b>\$14,209,054</b>	<b>\$9,271,491</b>	<b>\$4,937,562</b>
Master Trust Investment Account	20,118	13,024	7,094	\$2,194,148	\$1,497,185	\$696,963
Common Collective Trust	55,172	33,176	21,996	\$5,974,801	\$3,813,706	\$2,161,095
Pooled Separate Account	43,195	25,964	17,231	\$4,677,617	\$2,984,681	\$1,692,937
103-12 Investment Entity	8,467	5,285	3,181	\$920,142	\$607,569	\$312,573
Group Insurance Arrangement	3,957	3,204	753	\$442,345	\$368,350	\$73,995

Filer Type	Total Hours	Provider Hours	Sponsor Hours	Total Cost	Provider Cost	Sponsor Cost
Large Pension	1,594,411	1,075,355	519,056	\$174,612,028	\$123,614,797	\$50,997,230
Small Pension	2,355,067	1,880,695	474,372	\$262,797,641	\$216,190,548	\$46,607,092
<b>All Pension</b>	<b>3,949,478</b>	<b>2,956,050</b>	<b>993,428</b>	<b>\$437,409,668</b>	<b>\$339,805,346</b>	<b>\$97,604,323</b>
Large Welfare	1,193,151	1,047,298	145,853	\$134,719,533	\$120,389,508	\$14,330,025
Small Welfare	2,054,008	1,724,816	329,191	\$230,614,994	\$198,271,937	\$32,343,057
<b>All Welfare</b>	<b>3,247,158</b>	<b>2,772,114</b>	<b>475,044</b>	<b>\$365,334,527</b>	<b>\$318,661,445</b>	<b>\$46,673,082</b>
Large Total	2,787,562	2,122,653	664,908	\$309,331,560	\$244,004,305	\$65,327,255
Small Total	4,409,075	3,605,511	803,564	\$493,412,635	\$414,462,485	\$78,950,150
<b>All DFEs</b>	<b>130,910</b>	<b>80,655</b>	<b>50,255</b>	<b>\$14,209,054</b>	<b>\$9,271,491</b>	<b>\$4,937,562</b>
<b>All Total</b>	<b>7,327,547</b>	<b>5,808,819</b>	<b>1,518,727</b>	<b>\$816,953,249</b>	<b>\$667,738,282</b>	<b>\$149,214,967</b>

**Table TA\_5: Burden Estimates for the Regulatory Flexibility Act**

	All	Elimination of Sch I & Change in Sch H	Schedule I Removed	Schedule H	Schedule C	Direct Filing Entity Changes	Schedule E	Schedule J	GHP 5500 Filers	Subset of Form 5500 & Sch J	Miscellaneous
All											
Number of Filers Under Current Rule	658,317	25,313	25,313	0	0	3,327	0	0	6,199	0	687,039
Number of Filers Under Proposed Rule	2,810,118	25,313	0	25,313	18,204	0	3,767	289,000	289,000	1,869,000	683,712
Change in Hours	2,406,697	154,837	-53,069	207,906	64,933	-1,098	12,431	1,011,500	348,315	623,000	192,779
Change in Cost	\$269,150,501	16,506,349	-\$5,927,472	\$22,433,821	\$7,170,504	-\$117,039	\$1,410,111	\$114,073,909	\$38,929,400	\$69,629,544	\$21,547,722
Service Providers											
Change in Hours	1,957,341	77,450	-42,715	120,165	47,348	-549	11,301	879,751	281,841	504,104	156,095
Change in Cost	\$225,001,238	8,903,028	-\$4,910,197	\$13,813,224	\$5,442,826	-\$63,104	\$1,299,078	\$101,129,528	\$32,398,327	\$57,947,997	\$17,943,558
Plan Sponsors											
Change in Hours	449,356	77,387	-10,354	87,741	17,585	-549	1,130	131,749	66,474	118,896	36,684
Change in Cost	\$44,149,263	7,603,322	-\$1,017,275	\$8,620,596	\$1,727,678	-\$53,935	\$111,032	\$12,944,381	\$6,531,073	\$11,681,547	\$3,604,164

**Table TA\_6: Burden Estimates for Executive Order**

	All	Elimination of Sch I & Change in Sch H	Schedule I Removed	Schedule H	Schedule C	Direct Filing Entity Changes	Schedule E	Schedule J	GHP 5500 Filers	Subset of Form 5500 & Sch J	Miscellaneous
All											
Number of Filers Under Current Rule	816,271	115,135	26,838	88,297	82,408	61,090	0	0	54,127	0	1,076,698
Number of Filers Under Proposed Rule	2,967,515	114,578	0	114,578	100,172	8,851	6,659	336,928	336,928	1,869,000	1,024,178
Change in Hours	2,949,006	535,398	-56,230	591,629	116,563	-94,199	21,975	1,179,248	349,114	623,000	217,906
Change in Cost	\$328,831,312	\$57,558,309	-\$6,280,579	\$63,838,888	\$12,871,985	-\$10,064,095	\$2,492,680	\$132,971,617	\$39,018,665	\$69,629,544	\$24,352,606
Service Providers											
Change in Hours	2,340,459	296,687	-45,260	341,947	84,997	-48,441	19,977	1,024,428	282,487	504,104	176,221
Change in Cost	\$269,041,594	\$34,104,951	-\$5,202,704	\$39,307,655	\$9,770,579	-\$5,568,432	\$2,296,406	\$117,760,509	\$32,472,538	\$57,947,997	\$20,257,045
Plan Sponsors											
Change in Hours	608,547	238,711	-10,971	249,682	31,566	-45,757	1,998	154,820	66,627	118,896	41,685
Change in Cost	\$59,789,718	\$23,453,358	-\$1,077,875	\$24,531,234	\$3,101,406	-\$4,495,664	\$196,274	\$15,211,108	\$6,546,127	\$11,681,547	\$4,095,560

**Table TA 7: Burden summary for Paperwork Reduction Act (PRA), Baseline 2014**

<b>Total</b>	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	880,175	406,837	1,287,012	\$101,178,286	\$39,971,714	\$141,150,000
Small Pension Plans	1,603,364	347,865	1,951,229	\$184,310,679	\$34,177,779	\$218,488,458
Large Welfare Plans	873,959	109,909	983,869	\$100,463,807	\$10,798,606	\$111,262,413
Small Welfare Plans	44,806	6,342	51,148	\$5,150,568	\$623,108	\$5,773,676
Large Plans	1,754,134	516,746	2,270,880	\$201,642,093	\$50,770,320	\$252,412,413
Small Plans	1,648,170	354,207	2,002,377	\$189,461,247	\$34,800,887	\$224,262,133
DFEs	66,056	39,227	105,283	\$7,593,348	\$3,854,043	\$11,447,390
<b>Total Plans</b>	<b>3,468,360</b>	<b>910,181</b>	<b>4,378,541</b>	<b>\$398,696,688</b>	<b>\$89,425,249</b>	<b>\$488,121,937</b>

<b>DOL</b>	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	595,837	270,077	865,915	\$68,492,992	\$26,535,081	\$95,028,074
Small Pension Plans	737,687	173,269	910,956	\$84,798,950	\$17,023,662	\$101,822,612
Large Welfare Plans	860,928	101,702	962,630	\$98,965,777	\$9,992,239	\$108,958,017
Small Welfare Plans	38,112	4,762	42,874	\$4,381,051	\$467,857	\$4,848,907
Large Plans	1,456,765	371,779	1,828,544	\$167,458,770	\$36,527,321	\$203,986,090
Small Plans	775,799	178,031	953,829	\$89,180,001	\$17,491,518	\$106,671,519
DFEs	45,566	25,991	71,557	\$5,237,874	\$2,553,627	\$7,791,502
<b>Total Plans</b>	<b>2,278,129</b>	<b>575,801</b>	<b>2,853,930</b>	<b>\$261,876,645</b>	<b>\$56,572,466</b>	<b>\$318,449,111</b>

<b>IRS</b>	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	281,224	136,540	417,764	\$32,327,402	\$13,415,019	\$45,742,420
Small Pension Plans	854,898	173,639	1,028,537	\$98,272,627	\$17,060,055	\$115,332,682
Large Welfare Plans	13,032	8,207	21,239	\$1,498,030	\$806,367	\$2,304,396
Small Welfare Plans	6,694	1,580	8,274	\$769,517	\$155,252	\$924,769
Large Plans	294,256	144,747	439,003	\$33,825,431	\$14,221,385	\$48,046,817
Small Plans	861,592	175,219	1,036,811	\$99,042,144	\$17,215,307	\$116,257,451
DFEs	20,436	13,217	33,653	\$2,349,205	\$1,298,551	\$3,647,755
<b>Total Plans</b>	<b>1,176,284</b>	<b>333,183</b>	<b>1,509,467</b>	<b>\$135,216,779</b>	<b>\$32,735,243</b>	<b>\$167,952,022</b>

<b>PBGC</b>	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	3,113	220	3,333	\$357,892	\$21,614	\$379,506
Small Pension Plans	10,779	957	11,737	\$1,239,102	\$94,061	\$1,333,163
Large Welfare Plans	0	0	0	\$0	\$0	\$0
Small Welfare Plans	0	0	0	\$0	\$0	\$0
Large Plans	3,113	220	3,333	\$357,892	\$21,614	\$379,506
Small Plans	10,779	957	11,737	\$1,239,102	\$94,061	\$1,333,163
DFEs	55	19	74	\$6,269	\$1,865	\$8,134
<b>Total Plans</b>	<b>13,947</b>	<b>1,196</b>	<b>15,144</b>	<b>\$1,603,263</b>	<b>\$117,540</b>	<b>\$1,720,803</b>

**Table TA 8: Burden summary for Paperwork Reduction Act (PRA), 21st Century Initiative**

<b>Total</b>	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	1,075,355	519,056	1,594,411	\$123,614,797	\$50,997,230	\$174,612,028
Small Pension Plans	1,880,695	474,372	2,355,067	\$216,190,548	\$46,607,092	\$262,797,641
Large Welfare Plans	1,047,298	145,853	1,193,151	\$120,389,508	\$14,330,025	\$134,719,533
Small Welfare Plans	1,724,816	329,191	2,054,008	\$198,271,937	\$32,343,057	\$230,614,994
Large Plans	2,122,653	664,908	2,787,562	\$244,004,305	\$65,327,255	\$309,331,560
Small Plans	3,605,511	803,564	4,409,075	\$414,462,485	\$78,950,150	\$493,412,635
DFEs	80,655	50,255	130,910	\$9,271,491	\$4,937,562	\$14,209,054
<b>Total Plans</b>	<b>5,808,819</b>	<b>1,518,727</b>	<b>7,327,547</b>	<b>\$667,738,282</b>	<b>\$149,214,967</b>	<b>\$816,953,249</b>

<b>DOL</b>	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	699,279	323,077	1,022,356	\$80,383,841	\$31,742,364	\$112,126,205
Small Pension Plans	901,480	250,935	1,152,415	\$103,627,334	\$24,654,367	\$128,281,700
Large Welfare Plans	1,028,665	133,486	1,162,152	\$118,247,664	\$13,115,038	\$131,362,702
Small Welfare Plans	1,577,826	294,235	1,872,061	\$181,375,086	\$28,908,555	\$210,283,641
Large Plans	1,727,944	456,564	2,184,508	\$198,631,504	\$44,857,402	\$243,488,907
Small Plans	2,479,306	545,170	3,024,476	\$285,002,420	\$53,562,922	\$338,565,342
DFEs	55,571	32,197	87,767	\$6,387,987	\$3,163,326	\$9,551,313
<b>Total Plans</b>	<b>4,262,821</b>	<b>1,033,930</b>	<b>5,296,751</b>	<b>\$490,021,911</b>	<b>\$101,583,651</b>	<b>\$591,605,562</b>

<b>IRS</b>	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	372,907	195,717	568,624	\$42,866,560	\$19,229,227	\$62,095,787
Small Pension Plans	968,402	222,455	1,190,857	\$111,320,273	\$21,856,163	\$133,176,437
Large Welfare Plans	18,632	12,366	30,999	\$2,141,844	\$1,214,986	\$3,356,831
Small Welfare Plans	146,990	34,957	181,947	\$16,896,851	\$3,434,502	\$20,331,353
Large Plans	391,539	208,084	599,623	\$45,008,404	\$20,444,213	\$65,452,618
Small Plans	1,115,392	257,411	1,372,804	\$128,217,124	\$25,290,665	\$153,507,790
DFEs	25,057	18,044	43,101	\$2,880,415	\$1,772,784	\$4,653,200
<b>Total Plans</b>	<b>1,531,989</b>	<b>483,539</b>	<b>2,015,527</b>	<b>\$176,105,944</b>	<b>\$47,507,663</b>	<b>\$223,613,607</b>

<b>PBGC</b>	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	3,170	261	3,431	\$364,397	\$25,639	\$390,036
Small Pension Plans	10,813	983	11,795	\$1,242,941	\$96,562	\$1,339,504
Large Welfare Plans	0	0	0	\$0	\$0	\$0
Small Welfare Plans	0	0	0	\$0	\$0	\$0
Large Plans	3,170	261	3,431	\$364,397	\$25,639	\$390,036
Small Plans	10,813	983	11,795	\$1,242,941	\$96,562	\$1,339,504
DFEs	27	15	42	\$3,089	\$1,452	\$4,541
<b>Total Plans</b>	<b>14,009</b>	<b>1,259</b>	<b>15,268</b>	<b>\$1,610,427</b>	<b>\$123,653</b>	<b>\$1,734,080</b>