

2019 FORM M-1 BULLETIN



U.S. Department of Labor
Employee Benefits Security Administration

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EXECUTIVE SUMMARY

The Department of Labor (the Department) requires multiple employer welfare arrangements (MEWAs) and entities claiming exception (ECEs) (together, “entities”) that provide medical benefits to report information on their entities through the Form M-1. This important information helps both the Department and state insurance regulators protect consumers by identifying new entrants in states, entity growth, solvency risks, and other relevant concerns.

The 2019 Form M-1 Bulletin focuses on MEWAs and ECEs that provided benefits during and/or started operations in 2019 and draws some distinctions between them. The various tables and graphs presented in this bulletin provide a snapshot of Statistical Year 2019 Form M-1 filings, which the Department defines as:

- Entities indicating they began operations and submitted their Form M-1 during 2019;
- Entities indicating a change in their filings that occurred during 2019; and
- Entities indicating having operated from January 1 to December 31, 2019, or in a fiscal year with at least 6 continuous months in 2019.

For this bulletin, the Department used the same criteria to define the time period of the filing population as the criteria used in the 2018 Bulletin, which allows for comparisons between the two years. Statistics in this report include the number of unique filers, reasons for filing, total participants covered, states in which entities are operating, funding (i.e., fully insured or not fully insured), and the types of service providers. Included for the first time in the 2019 Bulletin are several tables that present information about Plan MEWAs, Non-Plan MEWAs, and ECEs that filed both an annual Form M-1 filing and a Form 5500 for the same period.

The key statistics regarding the 2019 Form M-1 population are:

- There were 973 Form M-1s included in the 2019 Statistical Year population, the vast majority of which were filings for Plan MEWAs. Consistent with the annual report’s March 1 filing deadline, 54 percent of the total filings were submitted in February and March of 2020, though filings that referenced Statistical Year 2019 were submitted as early as January 2019 and as late as November 2021.¹
- Entities may file multiple Form M-1s in a given year to meet their M-1 annual report filing requirement or to notify the Department of new or changing service providers, expansions into new states, a substantially different number of participants, mergers with other entities, and other material changes. While most entities (78 percent) submitted a single filing, 22 percent submitted multiple filings, including one MEWA that submitted five Form M-1s for Statistical Year 2019. As a result, the 973 filings are comprised of only 775 unique entities, of which 715 (92 percent) were Plan MEWAs.
- Entities may also indicate multiple reasons for filing the Form M-1. For all Statistical Year 2019 filings, 80 percent indicated annual reports as their filing reason, and 18 percent indicated MEWA Registrations as the reason.

¹ Annual reports for 2019 submitted after the filing deadline are included in this report.

- While MEWAs and ECEs that filed Form M-1s during the period covered by this report operated in all states and U.S. territories, these entities were most often headquartered in California, Texas, or Washington state. There were 74 entities that indicated operating in a new state in Statistical Year 2019, with Alabama and Tennessee having the most entities indicating “new state.”²
- Most MEWAs that submitted an annual report indicated they were fully insured in 2019, with 76 percent of Plan MEWAs and nearly 59 percent of Non-Plan MEWAs indicating being fully insured in all states. ECEs were also likely to be fully insured in all states, with 75 percent of ECEs reporting that funding status. Of entities that indicated they were not fully insured in at least some states, 81 percent reported having stop-loss insurance, and 65 percent reported that an actuary provided their entity services.
- MEWAs and ECEs reported a total of nearly 2.6 million participants on their annual reports in Statistical Year 2019. Approximately 88 percent of these participants were in Plan MEWAs. However, while MEWAs are required to file each year, ECEs are generally only required to file for their first 3 years of operation; thus, the total number of participants in all ECEs is not reported in this bulletin. While there were far fewer ECE filings, the average number of ECE participants was nearly three times as many as the average number of Plan MEWA participants.
- The Department was able to identify 484 entities that filed a Statistical Year 2019 Form M-1 Annual Report and the Form 5500 for the same period, a 70 percent match rate with the 693 entities that filed a Form M-1 Annual Report.
- Nearly all matched Plan MEWAs (96 percent) that the Department identified as being fully insured from filing characteristics on their Form 5500 filings reported being fully insured on their Form M-1 as well.

² The Department determined the count of entities operating in new states through a tabulation of entities that specified at least one state as being a “new state” in Part II Question 17 of the Form M-1.

NOTABLE TRENDS FROM 2018 TO 2019

- Total filings for Plan MEWAs and Non-Plan MEWAs increased by nearly 12 percent and almost 9 percent, respectively, while ECE filings decreased by nearly 53 percent.³
- Using the largest number of participants reported on all entities' Form M-1 filings in a given year, MEWAs and ECEs reported 2,686,508 participants in 2019, a 17 percent increase from 2018.
- The number of Non-Plan MEWAs that reported not being fully insured increased by 25 percent from 2018 to 2019, while not fully insured Plan MEWAs and ECEs declined by 3 percent and 75 percent, respectively.⁴

Table 1: Form M-1 Filing Highlights, Statistical Years 2018 and 2019

Entity Type	2018	2019	Percent Change
Unique Entity Counts, Total Filings			
Plan MEWA	640	715	11.7%
Non-Plan MEWA	47	51	8.5%
ECE	19	9	-52.6%
Total	706	775	9.8%
Participants, Total Filings			
Plan MEWA	2,005,057	2,385,330	19.0%
Non-Plan MEWA	169,330	216,764	28.0%
ECE	113,567	84,414	-25.7%
Total	2,287,974	2,686,508	17.4%
Not Fully Insured, Annual Reports			
Plan MEWA	145	140	-3.4%
Non-Plan MEWA	16	20	25.0%
ECE	8	2	-75.0%
Total	169	162	-4.1%

³ ECEs are only required to file upon origination and in each of the 3 years thereafter. The occurrence of an ECE origination event (began operating, 50 percent increase in covered employees, or merger) will restart the 3-year filing period. ECEs must also file to indicate special events (merger or expanding coverage to another state), but only if those events occur during a 3-year period following an origination event. Special filing events themselves do not restart the 3-year filing time period for ECEs.

⁴ Because ECEs only have to file for the first 3 years following an origination event, there are a relatively small number of ECE filings submitted each year. This small number of ECE filings means that relatively few ECEs dropping out of the filing population can cause large percentage changes.

TERMINOLOGY

- **Additional Filings:** The Form M-1 and its instructions require entities to submit multiple filings during a plan year based on the occurrence of certain events. In this report, the Department identified any subsequent filings, regardless of the purpose, as additional filings.
- **Employer Identification Number (EIN):** An EIN is a unique identification number assigned to an entity by the Internal Revenue Service. Several sections of the Form M-1 require EIN reporting for identification purposes.
- **Entity:** Entity refers to all types of filers of the Form M-1, including Plan MEWAs, Non-Plan MEWAs, and ECEs.
- **Entity Claiming Exception (ECE):** An entity that claims it is not a MEWA on the basis that the entity is established or maintained pursuant to one or more agreements that the U.S. Secretary of Labor finds to be collective bargaining agreements within the meaning of the Employee Retirement Income Security Act of 1974 (ERISA) section 3(40)(A)(i) and accompanying regulations at 29 CFR 2510.3–40.
- **Filing:** In this report, the Department identified individual filings by their unique Form ID number. Each Form M-1 filing is assigned a unique Form ID number.
- **Filing Date:** The calendar day an entity submits a Form M-1 filing.
- **Filing Purpose:** There are seven purposes for filing the Form M-1, and a single filing may satisfy multiple purposes. Additionally, ECE Originations, ECE Special Filings, and MEWA Registrations could require supplemental information for certain underlying events. The seven filing purposes are:
 - **Annual:** An annual report is the annual filing MEWAs and certain ECEs are required to submit by March 1. For ECEs, the annual filing is required for the first 3 years after an origination.
 - **Amended:** MEWAs and ECEs submit an amended report to correct errors and/or omissions on a previously filed Form M-1.
 - **Extension:** The Department may grant a one-time extension and provides the filer 60 days beyond the deadline to complete and submit the Form M-1. The extension request form must include responses to the purpose of filing as well as information about the administrator and sponsor in the “Custodial and Financial Information” section of the Form M-1.
 - **ECE Origination:** A filing submitted 30 days before the ECE begins operating or within 30 days of the ECE merging with another ECE or increasing participant numbers by 50 percent or more since the end of the previous calendar year.
 - **ECE Special Filing:** A filing submitted within 30 days of a special event, which includes knowingly operating in any additional state or experiencing a material change.
 - **MEWA Registration:** A filing submitted 30 days before the MEWA begins operating or within 30 days after the MEWA merges with another MEWA, expands coverage into a new state, experiences an increase in the number of participants by 50 percent or more since the end of the previous calendar year, or undergoes a material change.
 - **Final Report:** A final report filing generally indicates that the MEWA or ECE does not intend to file the Form M-1 in the following year due to entity termination. Alternatively, an ECE may indicate a final filing on its third annual report filing following an ECE origination filing. In that instance, absent a change in circumstances, the ECE is no longer required to file an annual Form M-1 while it continues to operate.
- **Form 5500 (Annual Return/Report):** An annual report filed with the Department by employee benefit plans that contains information on a plan’s assets, contributions, the number of participants, service providers, and insurance contracts, among other attributes. Plan MEWAs are required to file a Form 5500 in addition to the Form M-1.

- **Form Year:** The Form M-1 is updated and released annually. The form year is the year designated on the Form M-1 (e.g., 2019 Form M-1).
- **Fully Insured:** In this report, the Department identified entities as fully insured when they report all states listed in Part II 17a as fully insured in Part II 17g for each state.⁵ (See Table 2A in [Appendix A](#))
- **Headquarters:** The geographic location of the address the MEWA or ECE reports on the Form M-1, in Part II 1a, which the Department interprets as the entity’s headquarters.
- **Insurance Provider:** The company that provides insurance to the entity. Entities report insurance providers for each state in Part II 17.
- **Medical Benefits:** Coverage for the diagnosis, cure, mitigation, treatment, or prevention of disease, or amounts paid for the purpose of affecting any structure or function of the body as well as transportation primarily for and essential to the actions listed above.⁶
- **Multiple Employer Welfare Arrangement (MEWA):** An employee welfare benefit plan or other arrangement that provides welfare benefits to the employees of two or more unrelated employers as defined in ERISA section 3(40)(A).⁷
- **Non-Plan MEWA:** A MEWA that does not meet the ERISA definition of an “employee welfare benefit plan” under section 3(1) of ERISA. Typically, Non-Plan MEWAs cover a collection of separate employee welfare benefit plans maintained by individual employers.
- **Participant:** ERISA section 3(7) defines “participant” as “any employee or former employee of an employer, or any member or former member of an employee organization, who is or may become eligible to receive a benefit of any type from an employee benefit plan.”
- **Plan MEWA:** A MEWA that meets the ERISA definition of “employee welfare benefit plan” under section 3(1) of ERISA.⁸
- **Plan Number (PN):** The PN is a three-digit number that is self-assigned by the plan administrator for the entity. On the Form M-1, the PN is reported in Part II 1d to distinguish among different plans that use the same EIN.
- **Statistical Year:** The 2019 Statistical Year refers to the specific time period of filings included in this bulletin. The time period criteria are slightly different for the annual vs. non-annual report filings, because timing requirements for filings vary depending on the specific filing purpose. For “Began Operating” or other registration, origination, or special filings, the reference period is all filings submitted during calendar year 2019. For annual reports, an entity has a 2019 Statistical Year if it files for the January 1 to December 31, 2019 time frame, which would be appropriate for entities with a calendar year plan year or for entities that operate on a fiscal year, but choose to report on a calendar year basis.⁹ For entities that choose to report on their specific fiscal year, they are considered a 2019 Statistical Year filer if they operate for at least six continuous months in 2019. The following table shows examples of potential operating years and the associated statistical year.

⁵ See Form M-1 Report for MEWAs and ECEs, <https://www.dol.gov/sites/dolgov/files/ebsa/employers-and-advisers/plan-administration-and-compliance/reporting-and-filing/forms/m1-2019.pdf>

⁶ See 29 C.F.R. § 2590.701-2, <https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XXV/subchapter-L/part-2590/subpart-B/section-2590.701-2>.

⁷ See 29 U.S.C. § 1002(40). Section 3(40) sets forth certain exceptions from this definition.

⁸ See 29 U.S.C. § 1002(1).

⁹ See Form M-1 Report for MEWAs and ECEs, <https://www.dol.gov/sites/dolgov/files/ebsa/employers-and-advisers/plan-administration-and-compliance/reporting-and-filing/forms/m1-2019.pdf>, Section 2: When to file, pg. 8.

If, for example, the entity follows:	Then the statistical year is:
Calendar Year Jan. 1–Dec. 31, 2019	2019
Fiscal Year Apr. 1, 2018–Mar. 31, 2019	2018
Fiscal Year July 1, 2018–June 30, 2019	2019
Fiscal Year Apr. 1, 2019–Mar. 31, 2020	2019

Because Form M-1 Annual Reports are required for all MEWAs that provide medical benefits and some ECEs (depending on the origination event date), the annual report statistics for the 2019 Statistical Year give an indication of the number of entities that actively provided benefits for six continuous months or more during the period from January 1 to December 31, 2019.

- **Underlying Events:** Refers to certain events that more specifically describe what prompts an entity to submit a MEWA Registration, ECE Origination, or ECE Special Filing. Filers are asked to provide information about these underlying events when submitting the Form M-1. The possible events are: (1) began operating; (2) began operating in any additional state; (3) merged with another MEWA/ECE; (4) 50 percent greater increase in participants receiving medical benefits; and (5) material change.

INTRODUCTION

Multiple employer welfare arrangements (MEWAs) are entities that offer or provide welfare benefits (for example, health, disability, or life insurance benefits) to the employees of two or more employers (including one or more self-employed individuals), or to their beneficiaries, except that the term does not include any such plan or other arrangement that is established or maintained under or pursuant to one or more agreements that the Secretary finds to be collective bargaining agreements, by a rural electric cooperative, or by a rural telephone cooperative association. See section 3(40) of the Employee Retirement Income Security Act of 1974 (ERISA). Administrators of MEWAs that provide medical benefits must electronically file the Form M-1 with the Department of Labor (the Department) annually and following certain events, such as expansion into a new state, regardless of whether the entity is a group health plan.

An entity claiming exception (ECE) is an entity that claims it is not a MEWA on the basis that the entity is established or maintained pursuant to one or more agreements that the Secretary of Labor (the Secretary) finds to be collective bargaining agreements. Under section 3(40)(A)(i) of ERISA, the term MEWA does not include any plan or arrangement that is established or maintained under or pursuant to one or more such collective bargaining agreements.¹⁰ Administrators of ECEs that provide medical benefits must file for the first 3 years after origination events, which include beginning operations, participant increases of 50 percent or more, or mergers with other entities. ECE administrators also must file to indicate expansion into a new state or other material change, if those occur within the 3-year filing period.¹¹

Form M-1 reporting is required under the authority of sections 101(g), 104(a), 505, and 734 of ERISA, as amended, and 29 C.F.R. §§ 2520.101-2 and 103-1. The Form M-1 collects important information about individuals and entities that are responsible for:

1. sponsoring or managing operations of MEWAs or ECEs that offer medical benefits, and
2. providing services to a MEWA or ECE that offers medical benefits, including benefits administration, actuarial services, and asset management services.

Information provided through the Form M-1 includes custodial and financial information, the number of participants covered, the states the entity operates in, insurance carriers, and compliance with various health regulations. Form M-1 reporting provides critically important information that helps both the Department and state insurance regulators protect consumers by identifying new entrants in states, growth in these entities, solvency risks, and other relevant concerns.

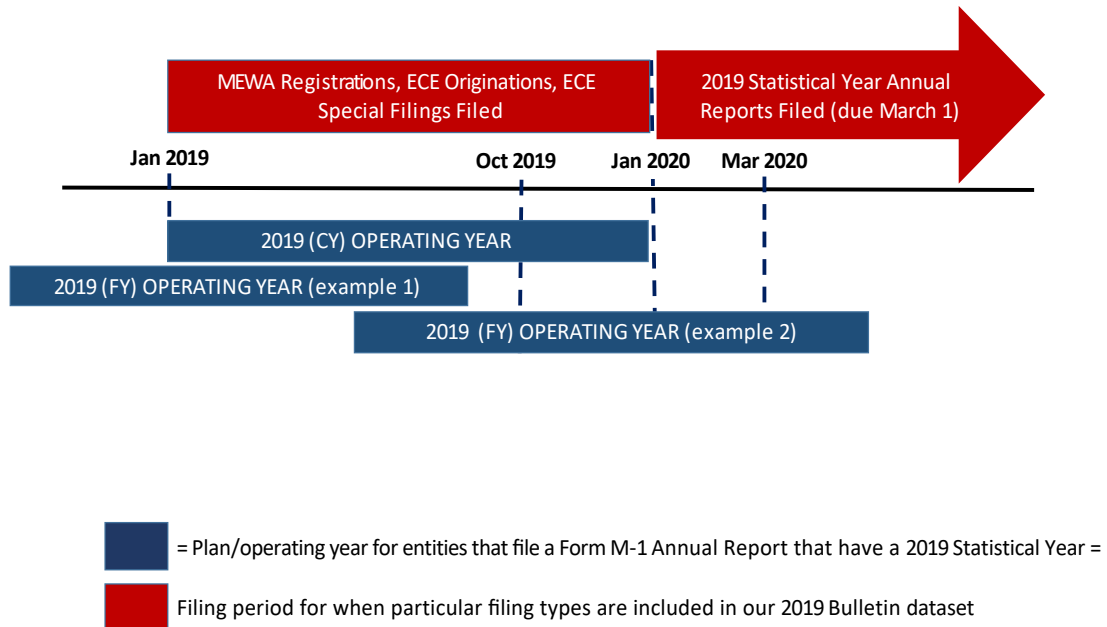
This bulletin provides a snapshot of MEWAs and ECEs that filed the Form M-1 regarding Statistical Year 2019. For the 2018 Form M-1 Bulletin, the Department revised the filing time period covered by the bulletin for non-annual reports to better reflect the operating year those filings referenced and to capture the newly formed MEWAs and ECEs that indicated their intention to begin operations in 2018. The 2019 Form M-1

¹⁰ The Department issued a regulation setting forth criteria that represent a finding by the Secretary whether an arrangement is an employee welfare benefit plan established or maintained under or pursuant to one or more collective bargaining agreements. See 29 C.F.R. § 2510.3-40.

¹¹ If an ECE undergoes an origination event (began operating, 50 percent increase in covered enrollees, or merger), the 3-year filing period restarts.

Bulletin uses the same methodology, and therefore is comparable to the 2018 Bulletin.¹² Figure 1 below depicts the filing periods for the 2019 Statistical Year Form M-1 filings using the current methodology.

Figure 1: Filing Periods Captured by the 2019 Form M-1 Bulletin



A 2019 Form M-1 Annual Report, though filed in 2020, provides information pertaining to the 2019 operating year for MEWAs and ECEs. For consistency, this bulletin reports on registration, origination, and special filing events that occurred during the 2019 operating year (see Section I: Total Filings, Number of Filings, and Filing Purposes for more information about the required timing of these filing events). For example, if a MEWA had a 50 percent or greater increase in participants in June of its 2019 operating year, the MEWA would be required to notify the Department of this change within 30 days of it occurring, so a registration filing would need to occur no later than July 2019. By limiting special filing event filings to those submitted during 2019, this bulletin captures the activity of entities with a 2019 Statistical Year.

The Form M-1 filings required by entities that express an intent to begin operations are harder to link directly to the activity of entities that are operating during 2019. “Began Operating” filings (as they are referred to throughout the report) are not required to indicate when the entity will begin offering health benefits, so the timing of the filing is only an approximation of when an entity will begin its operating year. However, information about MEWAs and ECEs that are newly forming are included in this report, with the criteria that they submitted their “Began Operating” filing during calendar year 2019.

¹² The 2017 Form M-1 used a different methodology, and therefore isn’t comparable to the 2018 and 2019 Bulletins.

Because a unique MEWA or ECE may submit multiple Form M-1s in a single year, looking only at the number of filings or most recent filings might overstate the number of these entities and mask changes in their funding type, state distributions, and the number of participants. Also, because ECEs are not required to file every year, this bulletin significantly understates the total number of ECEs and participants in entities that qualify as ECEs. The Department made clear in this bulletin when it has deviated from simply reporting filings.

All sections of this bulletin present statistics about the Statistical Year 2019 Form M-1 filing population. Section I of this bulletin presents the total number of filings and the number of unique entities. Section II focuses on entities that indicated they began operating. Section III presents information on MEWA Registrations, ECE Originations, ECE Special Filings, and entities indicating material changes. Section IV describes annual reports, including information on service providers, funding, participant counts, and Form 5500 matches.

SECTION I: TOTAL FILINGS

The different types of entities that are required to file the Form M-1—Plan MEWAs, Non-Plan MEWAs, and certain ECEs¹³—have different requirements for filing. Administrators of MEWAs that provide medical benefits must file the Form M-1 annually. The administrator of an ECE that provides medical benefits must file the Form M-1 in each of the first 3 years after the ECE originates. Additional filings for either MEWAs or ECEs might be required due to structural changes, expansion into new states, substantial changes in the number of participants, switching service providers, or other material changes.

In 2019, there were 973 Form M-1 filings, a 4 percent increase from 2018. Plan MEWAs submitted the vast majority (92 percent) of total filings. Non-Plan MEWAs and ECEs represented nearly 7 percent and 1 percent of filings, respectively. From 2018 to 2019, filings by Plan MEWAs increased by 7 percent and Non-Plan MEWAs increased by nearly 5 percent, while ECEs decreased by 71 percent.¹⁴ See Table 2B in [Appendix B](#).

Table 2: Form M-1 Filings by Entity Type, Total Filings for Statistical Year 2019

Entity Type	Filing Count	Share
Plan MEWA	897	92.2%
Non-Plan MEWA	66	6.8%
ECE	10	1.0%
Total	973	100.0%

¹³ See 29 C.F.R. § 2510.3–40.

¹⁴ Although the decrease in ECE filings was drastic, as described more fully below, ECEs are only required to file upon origination and in each of the 3 years thereafter, or due to a special filing event. Eleven of the 19 ECEs that were present in 2018 are no longer present in 2019: three fulfilled the filing requirements and weren't required to file; one shouldn't be in the 2019 population due to a filing error; and seven are related entities that the Department is following up with.

NUMBER OF FILINGS AND FILING PURPOSES

While there are several different events that require filing the Form M-1, a single filing may be submitted for multiple filing purposes in cases in which the single filing can be made in accordance with the timing requirements for each purpose. This situation can occur, for instance, if an entity is submitting its annual report and has also changed service providers.

All MEWAs and certain ECEs that provide medical benefits are required to file a Form M-1 Annual Report.¹⁵ In addition to the annual report filing requirement, MEWAs also must file the Form M-1:

1. Thirty days prior to operating in any state.
2. Within 30 days of knowingly operating in any additional state or states that were not indicated on a previous Form M-1 filing.
3. Within 30 days of operating with regard to the employees of an additional employer (or employers, including one or more self-employed individuals) after a merger with another MEWA.
4. Within 30 days of increasing the number of employees receiving medical coverage by at least 50 percent relative to the number of such employees on the last day of the previous calendar year.
5. Within 30 days of experiencing a material change as defined in the Form M-1 instructions.

Administrators of ECEs are required to submit the Form M-1:

1. Thirty days prior to operating.
2. Within 30 days of operating following a merger with another ECE (unless all of the ECEs that participate in the merger previously were last originated at least 3 years prior to the merger).
3. Within 30 days of increasing the number of employees receiving medical coverage by at least 50 percent relative to the number of such employees on the last day of the previous calendar year (unless the increase is due to a merger with another ECE and all merging ECEs were last originated at least 3 years prior to the merger).

The second and third events listed above will extend or restart the 3-year filing period for ECEs. If either of these two events occur, then an ECE must file the Form M-1 even if it falls outside of the 3-year period.

¹⁵ For a general discussion of the filing requirements, see Multiple Employer Welfare Arrangements under the Employee Retirement Income Security Act (ERISA): A Guide to Federal and State Regulation, <https://www.dol.gov/sites/dolgov/files/ebsa/about-ebsa/our-activities/resource-center/publications/mewa-under-erisa-a-guide-to-federal-and-state-regulation.pdf>.

ECEs must also update the Form M-1 within 30 days of experiencing a special filing event, which is defined as a material change or knowingly beginning to operate in any additional state that was not reported on a previous Form M-1 filing. Only these special filing events that occur during the 3-year origination period need to be reported on the Form M-1, and their occurrence does not restart the 3-year filing period clock.

Part I Question A of the Form M-1 asks filers to identify the purpose or type of filing, for which there are four possible responses—annual report, MEWA Registration, ECE Origination, and ECE Special Filing. As shown in Table 3, the majority of all filings were submitted with the purpose of fulfilling the annual reporting requirement. From 2018 to 2019, the number of annual reports (5 percent) and registrations (0.6 percent) increased, while originations and special filings declined by 58 percent and 18 percent, respectively. See Table 3B in the [Appendix B](#)

Table 3: Form M-1 Filings by Filing Purpose, Total Filings for Statistical Year 2019

Filing Purpose	Filing Count	Share
Annual Report	779	80.1%
MEWA Registration	178	18.3%
ECE Origination	11	1.1%
ECE Special Filing	5	0.5%

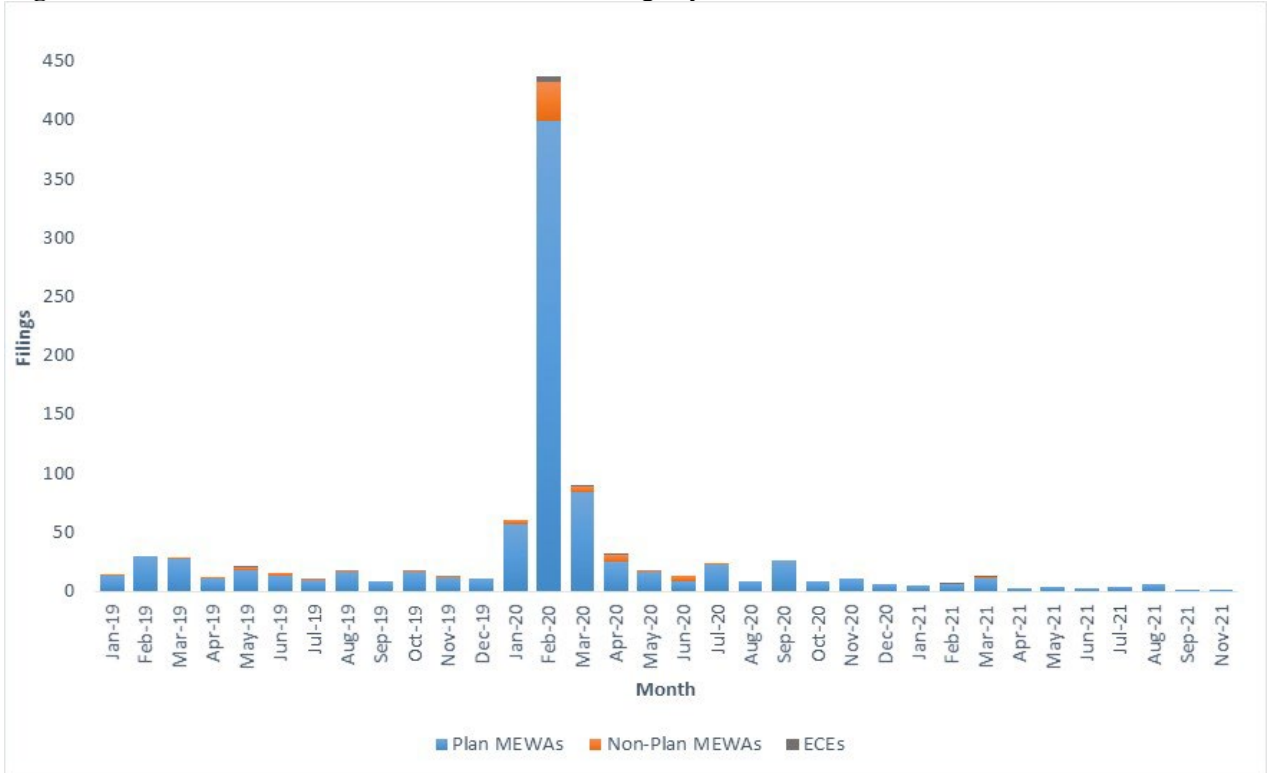
There are several other filing purposes not listed in Table 3 that may be indicated on a Form M-1 submission, but these are always done in conjunction with one of the four purposes described above and listed in Table 3. Specifically, a MEWA or ECE may signify that the filing is a final report if the administrator does not intend to file the Form M-1 next year, an amended report may be filed if errors need to be corrected from a previously filed Form M-1, or an entity may file a request for a one-time extension. Included in this report are 81 filings that checked “amended,” 46 that checked “extension” and 2 that checked both. The vast majority of extensions are associated with annual reports and are filed in February or March.

The Department has determined that a significant number of filers indicate submitting a final report while continuing to file in subsequent years. Because of the ambiguity in the final report numbers, the Department did not include statistics on the final report numbers in this bulletin.

TIMING OF FILINGS

Figure 2 displays the submission months for all 2019 Statistical Year Form M-1 filings, the vast majority of which were submitted between February and March of 2020.

Figure 2: Statistical Year 2019 Form M-1 Total Filings by Month of Submission, 2019–2021



Note: Months with zero filings are omitted from the above figure.

UNIQUE FILERS

Due to the existence of multiple filings by individual entities, looking only at the number of Form M-1 filings per plan year overstates the universe of MEWAs and ECEs. In order to better estimate the number of unique MEWAs and ECEs, the Department developed a phased methodology to match filings across 2019 and identify “unique entities.”

The Department relied on a hierarchy of four key variables—Entity Name, Entity Address, EIN, and PN—to match across filings. While the Department largely relied on this methodology to automatically generate matches, it used manual review in instances where there was ambiguity. For more details on the Entity Identification process, please see [Appendix A](#).

Table 4 displays the unique number of filings by entity type. While the vast majority of entities submitted a single filing, one Plan MEWA submitted five Form M-1s for Statistical Year 2019. Plan MEWAs submitted the most filings, with 78 percent of Plan MEWAs submitting one filing, nearly 19 percent submitting two, and almost 3 percent submitting three or more times.

Roughly three-fourths of Non-Plan MEWAs submitted one filing, while nearly a quarter submitted two, and 2 percent submitted four times. ECEs filed the least, a total of nine filings, with 89 percent filing once and 11 percent filing twice.

Table 4: Unique Entities by Number of Filings, Total Filings for Statistical Year 2019

Entity Type	Filings					Total
	1	2	3	4	5	
Plan MEWA	560 (78.3%)	134 (18.7%)	16 (2.2%)	4 (0.6%)	1 (0.01%)	715(100.0%)
Non-Plan MEWA	38 (74.5%)	12 (23.5%)	0 (0.0%)	1 (2.0%)	0 (0.0%)	51 (100.0%)
ECE	8 (88.9%)	1 (11.1%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	9 (100.0%)
Total	606	147	16	5	1	775

For Statistical Year 2019, a total of 775 unique entities submitted the Form M-1, an almost 12 percent increase from 2018.

Plan MEWAs were the most common entity type, representing roughly 92 percent of all entities filing the Form M-1. This finding is consistent with the distribution of filings, suggesting that the different types of entities filed in a proportionate manner. Non-Plan MEWAs were the next largest type of entity, with almost 7 percent, and ECEs represented 1 percent of all entities.

From 2018 to 2019, Plan MEWAs increased by 12 percent and Non-Plan MEWAs nearly 11 percent, while ECEs decreased by almost 53 percent.¹⁶ See Table 5B in [Appendix B](#).

Table 5: Unique Entities by Entity Type, Total Filings for Statistical Year 2019

Entity Type	Entity Count	Share
Plan MEWA	715	92.3%
Non-Plan MEWA	51	6.6%
ECE	9	1.2%
Total	775	100.0%

Note: Percentages will not total 100% due to rounding.

¹⁶ ECEs are only required to file upon origination and in each of the 3 years thereafter, or due to a special filing event.

HEADQUARTERS BY STATE

While entities may operate in multiple states, the Form M-1 requires administrators to report the name and address of the MEWA or ECE, which the Department interprets as the entity's headquarters.¹⁷ Table 6 displays the top headquartered states by entity type, and Figure 3 displays a map of the total filings of entities headquartered in each state. California, Texas, and Washington continued to have the most MEWA and ECE headquarters in Statistical Year 2019. California had the most Plan MEWAs, while New York had the most Non-Plan MEWAs.¹⁸ See Table 3A in [Appendix A](#) for further details and a full list of states.

Statistical Year 2019 reveals a shift in the top headquartered states when compared to 2018. In 2018, Florida, Indiana, and Ohio were among the top headquartered states. In 2019, Illinois, Alabama, and Georgia were among the top headquartered states. Of the top headquartered states, New York and Tennessee were the only states with declines in Plan MEWAs, while Non-Plan MEWAs decreased in California, New York, and Washington. See Table 6B in [Appendix B](#).

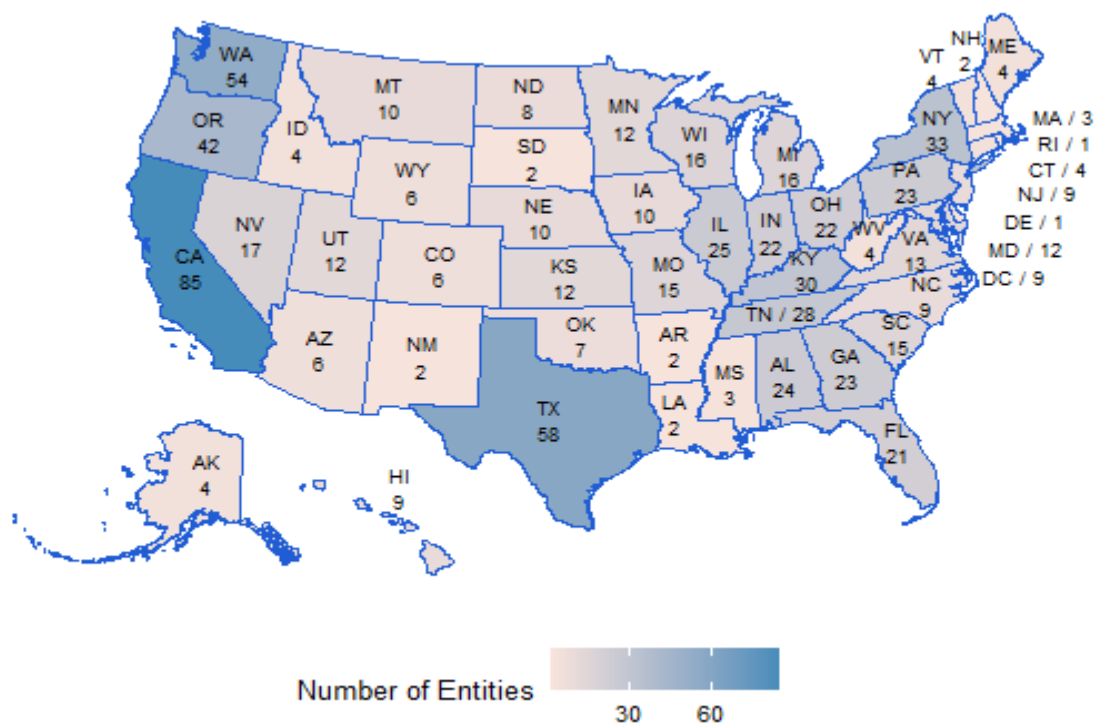
Table 6: Top Headquartered States by Entity Type, Total Filings for Statistical Year 2019

State	Plan MEWA	Non-Plan MEWA	ECE	Total
California	78	6	1	85
Texas	53	4	1	58
Washington	53	0	1	54
Oregon	42	0	0	42
New York	22	11	0	33
Kentucky	29	1	0	30
Tennessee	27	1	0	28
Illinois	25	0	0	25
Alabama	23	1	0	24
Georgia	20	2	1	23
Pennsylvania	22	1	0	23

¹⁷ Two entities had multiple headquarters listed in multiple filings; the Department used the most recent for both.

¹⁸ Because ECEs generally do not have to file after their first 3 years, the most commonly headquartered states for ECEs only represent the filings that were submitted for Statistical Year 2019.

Figure 3: Entity Headquarters by State, Total Filings for Statistical Year 2019



Administrators are also required to list all states where the employers (of the employees receiving coverage) are domiciled and indicate whether a state is “new” to this entity (i.e., not included on a previous Form M-1 filing). This can be of particular interest to researchers and regulators as it can be indicative of expansion into new markets.

Some entities filing to begin operations might include all states that they intend to have a presence in, but that ultimately might not happen. Although the Form M-1 instructions require it, entities might also neglect to check the “new state” box when submitting their filings. As such, this reporting might not accurately reflect the number of states that MEWAs and ECEs expanded into during Statistical Year 2019.

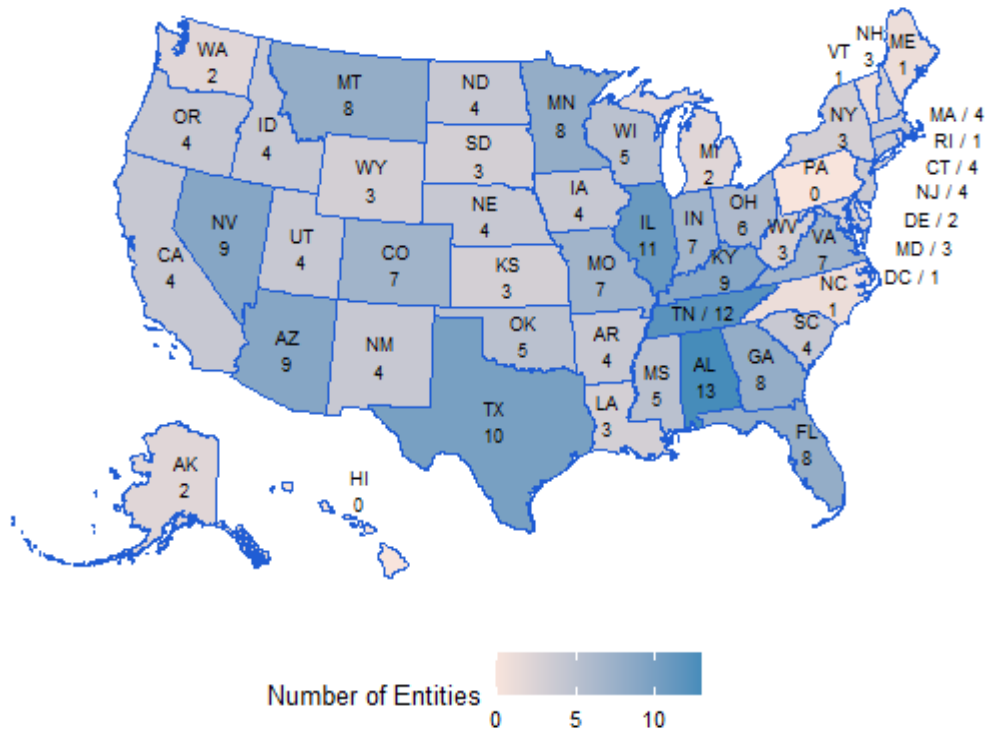
Table 7 shows the top states with entities that indicated “new state,” while Figure 4 displays all the states where entities checked “new state.” Seventy-four entities indicated operating in a new state in 2019, with Alabama and Tennessee having the most entities indicating “new state.”¹⁹ In 2018, Florida and Massachusetts were the states with the most entities indicating “new state.” See Table 7B in [Appendix B](#).

¹⁹ Since Table 7 accounts for all the occurrences of “new state” boxes being checked, there will be considerably more check boxes than there are entities that check the “new state” box at least once. This is due to some entities indicating that they are newly operating in more than one state.

Table 7: Top States of Entities Indicating “New State” by Entity Type, Total Filings for Statistical Year 2019

State	Plan MEWA	Non-Plan MEWA	ECE	Total
Alabama	13	0	0	13
Tennessee	11	1	0	12
Illinois	11	0	0	11
Texas	9	1	0	10
Nevada	9	0	0	9
Kentucky	9	0	0	9
Arizona	8	1	0	8
Florida	8	0	0	8
Georgia	8	0	0	8
Minnesota	8	0	0	8
Montana	8	0	0	8

Figure 4: Entities Indicating “New State,” Total Filings for Statistical Year 2019



PARTICIPANTS

The Form M-1 requires entities to report the total number of participants receiving medical benefits. In the case of multiple filings, the reported information might indicate growth or decline in MEWA or ECE participation. In this section, the Department counted the largest number of participants reported on all of an entity's Statistical Year 2019 filings.²⁰ See [Appendix A](#) for further details.

During Statistical Year 2019, MEWAs and ECEs reported 2,686,508 participants, a 17 percent increase from 2018.²¹ Plan MEWAs, which comprise 92 percent of filings, accounted for nearly 90 percent of reported participants.

The average number of participants in ECEs increased by 57 percent in 2019, with the average ECE reporting almost three times as many participants as the average Plan MEWA. Filings indicate that, on average, ECEs were the largest entities, followed by Non-Plan MEWAs, and then Plan MEWAs. See Table 8B in [Appendix B](#).

Table 8: Total Participants by Entity Type and Size, Total Filings for Statistical Year 2019

Entity Type	Entity Counts	Participant Counts	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	715	2,385,330	88.8%	3,336	581	1	274,462
Non-Plan MEWA	51	216,764	8.1%	4,250	1,453	151	32,371
ECE	9	84,414	3.1%	9,379	761	101	68,293
Total	775	2,686,508	100.0%	3,466	618	1	274,462

²⁰ In contrast, Section IV: Annual Reports presents the number of participants reported in the annual filing, the total of which is slightly lower than the largest participant count reported on all the entities' Form M-1 filing included in the Statistical Year 2019.

²¹ The participant count is determined using the largest number of participants reported on all entities' Form M-1 filings in a given year.

SECTION II: “BEGAN OPERATING” FILINGS

NUMBER OF FILINGS AND FILING PURPOSES

A MEWA or ECE must submit a Form M-1 filing that indicates its intent to begin operating 30 days prior to the event. This filing alerts the Department as well as state insurance regulators to new entrants into insurance markets, which can give states and regulators time to communicate with these new entities before they begin operation. The statistics presented throughout the remainder of this section concern only entities that indicated an intent to begin operating in a filing submitted in 2019.

Plan MEWAs submitted nearly 95 percent of the 117 filings indicating an intent to begin operations during 2019. “Began Operating” filings increased by 3 percent from 2018, with Plan MEWA filings increasing 13 percent, while Non-Plan MEWA filings remained unchanged. See Table 9B in [Appendix B](#). Non-Plan MEWAs comprised 5 percent of these filings, while ECEs had none.

Table 9: Form M-1 Filings by Entity Type, “Began Operating” Filings for Statistical Year 2019

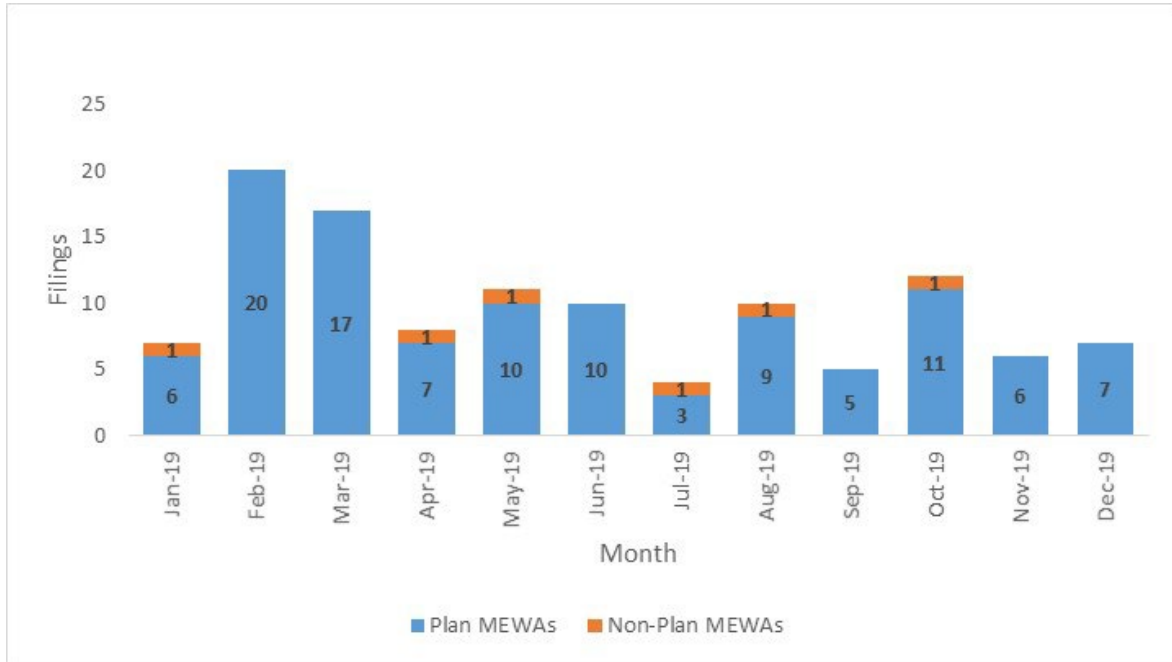
Entity Type	Filing Count	Share
Plan MEWA	111	94.9%
Non-Plan MEWA	6	5.1%
ECE	0	0.0%
Total	117	100.0%

TIMING OF FILINGS

Although the filing time period for this bulletin’s “Began Operating” filings was January 1 through December 31, 2019, this section looks more closely at which months entities submitted these “Began Operating” filings. The Department expects entities to submit registration filings with a reason of “Began Operating” 30 days before an entity begins its operating year. Because the majority of entities operate from January 1 to December 31, the Department expects that most newly formed entities should register as “Began Operating” no later than December 1 of the prior year.

Figure 5 shows the distribution of the “Began Operating” subset of registration and origination filings for Statistical Year 2019. February and March had the most “Began Operating” filings, all of which were Plan MEWAs -- thirty-two percent of all MEWA “Began Operating” filings were filed in February and March. Non-Plan MEWA filings with this underlying reason were submitted throughout the year, with one filing occurring in January and the latest in October.

Figure 5: Entity Type by Month of Submission, “Began Operating” Filings for Statistical Year 2019



UNIQUE FILERS

Table 10 displays the unique number of entities submitting “Began Operating” filings. Plan MEWAs submitted the most filings, with 94 percent submitting one filing, and nearly 6 percent submitting two filings. All Non-Plan MEWAs submitted just one filing.

Table 10: Unique Entities by Number of Filings, “Began Operating” Filings for Statistical Year 2019

Entity Type	Filings		Total
	1	2	
Plan MEWA	99 (94.3%)	6 (5.7%)	105 (100.0%)
Non-Plan MEWA	6 (100.0%)	0 (0.0%)	6 (100.0%)
ECE	0 (0.0%)	0 (0.0%)	0 (0.0%)
Total	105	6	111

For Statistical Year 2019, a total of 111 unique entities submitted filings indicating “Began Operating,” a 12 percent increase from 2018. Plan MEWAs were the most common entity type, representing nearly 95 percent of “Began Operating” filings, with Non-Plan MEWAs representing 5 percent. In 2018, ECEs were the second most common type of entity, after Plan MEWAs, with 8 percent of “Began Operating” filings. However, there were no “Began Operating” filings for ECEs in 2019. See Table 11B in [Appendix B](#).

Table 11: Unique Entities by Entity Type, “Began Operating” Filings for Statistical Year 2019

Entity Type	Entity	Share
Plan MEWA	105	94.6%
Non-Plan MEWA	6	5.4%
ECE	0	0.0%
Total	111	100%

HEADQUARTERS BY STATE

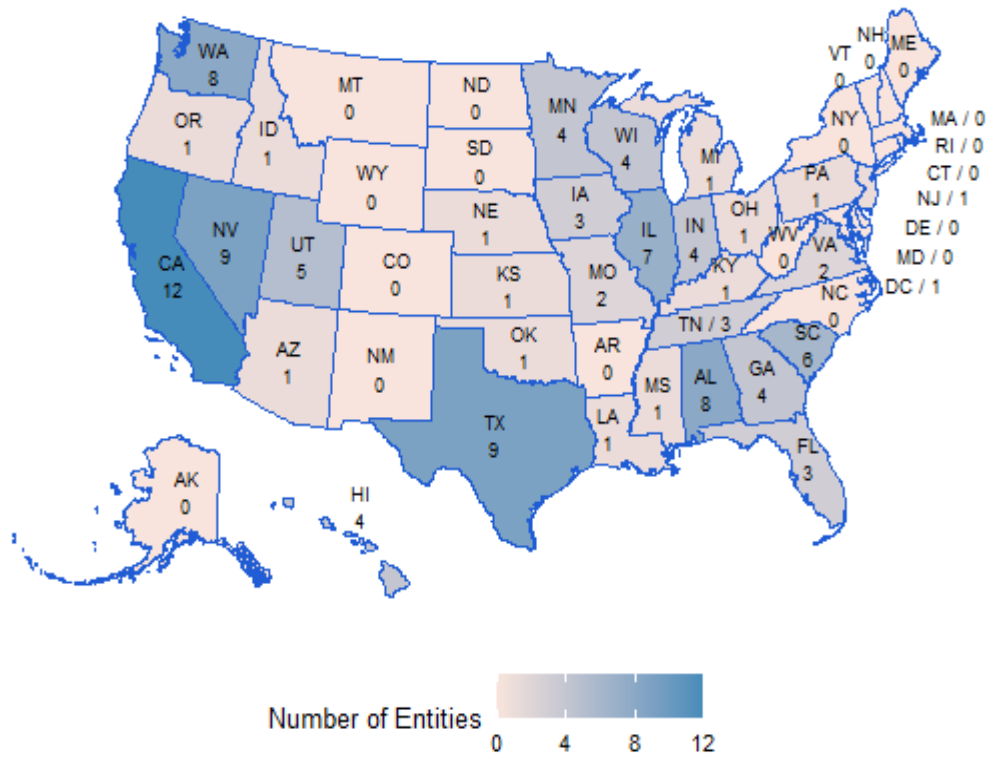
Table 12 displays the top headquartered states by entity type for “Began Operating” filings. Among the top, California, Nevada, and Texas had the most Plan MEWA headquarters in Statistical Year 2019, while Georgia and Indiana had the most Non-Plan MEWAs.

Table 12: Top Headquartered States by Entity Type, “Began Operating” Filings for Statistical Year 2019

State	Plan MEWA	Non-Plan MEWA	ECE	Total
California	12	0	0	12
Nevada	9	0	0	9
Texas	9	0	0	9
Alabama	8	0	0	8
Washington	8	0	0	8
Illinois	7	0	0	7
South Carolina	6	0	0	6
Utah	5	0	0	5
Georgia	3	1	0	4
Hawaii	4	0	0	4
Indiana	2	2	0	4
Minnesota	4	0	0	4
Wisconsin	4	0	0	4

Figure 6 displays the state headquarters of entities that submitted a “Began Operating” filing in Statistical Year 2019. Thirty-two states were home to entities that filed a “Began Operating” filing in Statistical Year 2019, with California, Nevada, and Texas most frequently reported.

Figure 6: Entity Headquarters by State, “Began Operating” Filings for Statistical Year 2019



SECTION III: REGISTRATION, ORIGATION, AND SPECIAL FILINGS

NUMBER OF FILINGS AND FILING PURPOSES

After annual reports, the second most common purpose for filing the Form M-1 was MEWA Registrations (18 percent); the third most common was ECE Originations (1 percent). MEWAs and ECEs are required to submit a registration, origination, or special filing in the event of a merger, expansion into a new state, a 50 percent or more increase in participants, or other material changes.

This section presents statistics on all MEWA Registrations, ECE Originations, and ECE Special Filings. “Began Operating” filings, while technically a subset of registrations and originations, are discussed separately above, and are not included in the statistics throughout the Section III tables. Rather, this bulletin presents statistics and findings related to “Began Operating” filings separately in Section II, because these types of filings represent a significantly different stage in the life of a MEWA/ECE (using the Form M-1 to express an intent to operate, rather than to report on a change for an existing entity).

In Statistical Year 2019, 79 filings indicated either a registration, origination, or a special filing, a 10 percent decline from 2018.²² Plan MEWAs submitted 73 filings, 6 percent fewer filings than in 2018. Of the share of all registration, origination, and special filings, Plan MEWAs accounted for the majority at 92 percent, with Non-Plan MEWAs and ECEs accounting for 6 percent and 1 percent of filings, respectively. See Table 13B in [Appendix B](#).

Table 13: Form M-1 Filings by Entity Type, MEWA Registrations, ECE Originations and Special Filings for Statistical Year 2019

Entity Type	Filing Count	Share
Plan MEWA	73	92.4%
Non-Plan MEWA	5	6.3%
ECE	1	1.3%
Total	79	100.0%

Note: Excludes filings that indicated “Began Operating.”

When filing non-annual report filings, administrators are instructed to specify which event has triggered the filing requirement to the Department.²³ The Form M-1 groups the events into MEWA Registrations, ECE Originations, and ECE Special Filings (for a screenshot of this section of the Form M-1, see [Appendix A](#)). Table 14 displays the possible responses under each filing purpose. This section refers to the specific information requested about the reason for filing a registration, origination, or special filing as the “underlying event.”

²² This decline doesn’t include “Began Operating” filings. If “Began Operating” filings were included, the decline would be 3 percent.

²³ The Department determined that some of the filings provide a combination of underlying filing events that do not appear to be consistent (e.g., a MEWA Registration filed for Began Operating and a 50 percent increase in participants). Reported events in Table 15 appear as in the filings with no revisions.

Table 14: Underlying Event Possibilities for Each Filing Purpose on the Form M-1

Type of Filing	Material Change	Began Operating in Additional State	50% Increase in Covered Employees	Merger
MEWA Registrations	✓	✓	✓	✓
ECE Originations			✓	✓
ECE Special Filings	✓	✓		

In Statistical Year 2019, as reflected in the above chart, “material change” was the most likely underlying event to require a registration, origination, or special filing. The Form M-1 does not ask filers to specify the exact material change that prompted the need to file, but the Form M-1 instructions provide that reasons can include anything that has changed regarding the custodial or financial information for the entity.

All underlying events declined in 2019, except Special Filings that “began operating in an additional state,” which remained unchanged from 2018.²⁴ See Table 15B in [Appendix B](#).

Table 15: Types of Filings by Underlying Events, MEWA Registrations, ECE Originations, and ECE Special Filings for Statistical Year 2019

Type of Filing	Material Change	Began Operating in Additional State	50% Increase in Covered Employees	Merger
MEWA Registrations	17	12	9	1
ECE Originations	0	0	0	0
ECE Special Filings	3	1	0	0
Total	20	13	9	1

Note: Excludes filings that indicate “Began Operating.”

²⁴ One entity was a Plan MEWA that selected ECE Special Filing with a reason of “began operating in an additional state.” Two entities were Plan MEWAs, but selected ECE Special Filing with a material change as the underlying event.

TIMING OF FILINGS

The Department requires entities to submit registration and origination filings within 30 days of a merger, a 50 percent or more increase in the employees covered since the prior calendar year, knowingly operating in a new state, or another material change. These filings may occur throughout the year, as shown in Figure 7, but for Statistical Year 2019, MEWA Registrations were more likely to occur in the months of February, March, and May. ECE Originations were more prominent in April, and ECE Special Filings were more likely to occur throughout the year.

Figure 7: Form M-1 Filings by Month of Submission, MEWA Registrations, ECE Originations, and ECE Special Filings for Statistical Year 2019



Note: Excludes filings that indicated “Began Operating.”

UNIQUE FILERS

While the majority of entities submitted a single filing indicating registration, origination, or special filing, one Plan MEWA submitted four Form M-1s for Statistical Year 2019. Plan MEWAs submitted 58 of the 63 filings, with 79 percent of Plan MEWAs submitting one filing, 17 percent submitting two, and 3 percent filing three or more times. Three-fourths of Non-Plan MEWA filings were submitted by entities with a single filing, while a quarter were submitted by entities filing twice. ECEs filed the least, with only one filing.

Table 16: Unique Entities by Number of Filings, MEWA Registrations, ECE Originations, and Special Filings for Statistical Year 2019

Entity Type	Filings				Total
	1	2	3	4	
Plan MEWA	46 (79.3%)	10 (17.2%)	1 (1.7%)	1 (1.7%)	58 (100.0%)
Non-Plan MEWA	3 (75.0%)	1 (25.0%)	0 (0.0%)	0 (0.0%)	4 (100.0%)
ECE	1 (100.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	1 (100.0%)
Total	50	11	1	1	63

Note: Excludes filings that indicated “Began Operating.” Percentages will not total 100% due to rounding.

For Statistical Year 2019, a total of 63 unique entities submitted filings indicating registration, origination, or special filing, an 11 percent decrease from 2018. Plan MEWAs were the most common entity type, representing 92 percent of the entities. Non-Plan MEWAs were the next largest type of entity with nearly 6 percent, followed by ECEs representing under 2 percent.

From 2018 to 2019, the number of Plan MEWAs and ECEs submitting these types of filings declined by 8 percent and 83 percent, respectively, while the number of Non-Plan MEWAs that filed doubled from two entities to four. See Table 17B in [Appendix B](#).

Table 17: Unique Entities by Entity Type, MEWA Registrations, ECE Originations, and Special Filings for Statistical Year 2019

Entity Type	Entity Count	Share
Plan MEWA	58	92.1%
Non-Plan MEWA	4	6.3%
ECE	1	1.6%
Total	63	100.0%

SECTION IV: ANNUAL REPORTS

NUMBER OF FILINGS AND FILING PURPOSES

Annual reports are consistently the most commonly reported purpose for a MEWA or ECE to submit the Form M-1. For Statistical Year 2019, 779 filings indicated they were annual reports, up 5 percent from 2018. This increase occurred due to a 7 percent increase in annual reports for Plan MEWAs, while Non-Plan MEWAs remained unchanged, and ECEs declined by 50 percent.

The vast majority of annual report filings, nearly 92 percent, were for Plan MEWAs, with Non-Plan MEWAs accounting for 7 percent of filings, and ECEs comprising just 1 percent. See Table 18B in [Appendix B](#).

Table 18: Form M-1 Filings by Entity Type, Annual Report Filings for Statistical Year 2019

Entity Type	Filing Count	Share
Plan MEWA	715	91.8%
Non-Plan MEWA	55	7.1%
ECE	9	1.2%
Total	779	100.0%

Note: Percentages will not total 100% due to rounding.

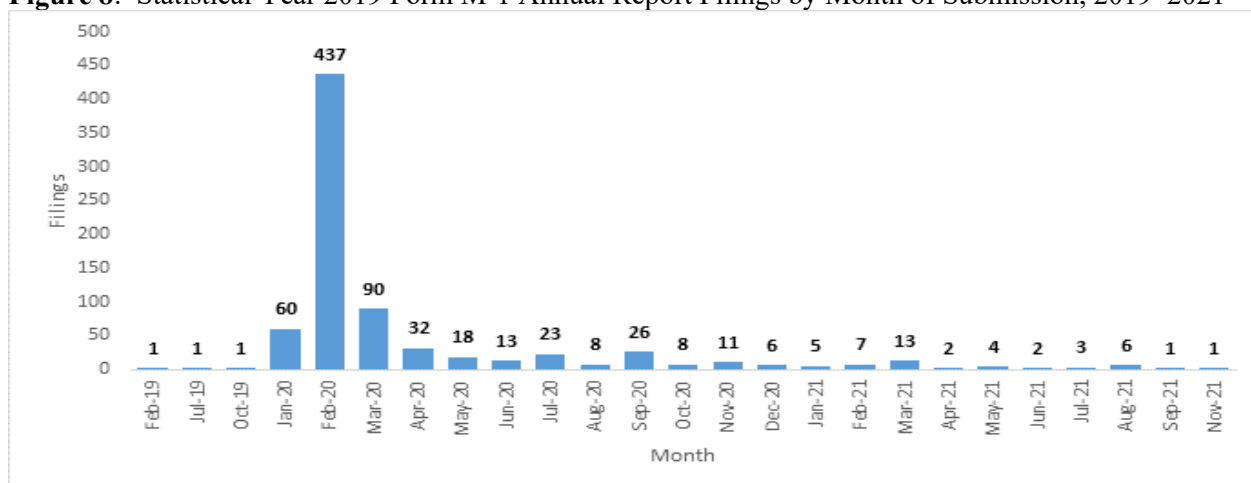
TIMING OF FILINGS

Annual reports are due March 1 of the calendar year following the year for which a filing is required. Therefore, the distribution of filings for a given statistical year is skewed toward February and March of the following year. For Statistical Year 2019, 68 percent of the annual filing submissions occurred during those months in 2020.

Despite the deadline, annual report filings might come in after that due date for various reasons (e.g., amending a previously submitted report, delinquent reports, etc.).²⁵

²⁵ When comparing the 2018 and 2019 annual reports for February and March, the Department did not see evidence of COVID-19 impacting the timing of filings. MEWAs and ECEs filed 527 2019 Annual Reports (68 percent of total) in February and March of 2020, while MEWAs and ECEs filed 488 2018 Annual Reports (63 percent of total) during the same months in 2019. However, this could be because the COVID-19 public health emergency didn't occur until March 2020. The 2020 Form M-1 Bulletin will be better poised to reflect potential impacts of COVID-19 on the timing of Form M-1 filings.

Figure 8: Statistical Year 2019 Form M-1 Annual Report Filings by Month of Submission, 2019–2021



Note: Months with zero filings are omitted from the above figure.

UNIQUE FILERS

Generally, entities are expected to submit only one annual report per year. However, some entities indicate “annual report” on multiple filings for a statistical year, which can be attributed to requesting an extension or submitting any number of amended/corrected filings. Even when submitting a request for an extension, filers are required to specify the type of filing for which the extension is being requested. As the only way to request an extension is by submitting a Form M-1, indicating a filing type (e.g., annual report), and checking the box that says, “Check here if this is a request for an extension”, these extension filings count towards the filing count included in this bulletin.

While most entities submitted a single annual report for Statistical Year 2019, entities can submit multiple filings. Plan MEWAs submitted 636 of the 693 filings, with 88 percent submitting one filing, nearly 12 percent submitting two, and 0.4 percent submitting three or more times. Nearly 88 percent of Non-Plan MEWAs submitted a single annual report filing, while 12 percent filed twice. ECEs submitted a total of 8 annual report filings, with 88 percent filing only once.

Table 19: Unique Entities by Number of Filings, Annual Report Filings for Statistical Year 2019

Entity Type	Filings				Total
	1	2	3	4	
Plan MEWA	560 (88.1%)	74 (11.6%)	1 (0.2%)	1 (0.2%)	636 (100.0%)
Non-Plan MEWA	43 (87.8%)	6 (12.2%)	0 (0.0%)	0 (0.0%)	49 (100.0%)
ECE	7 (87.5%)	1 (12.5%)	0 (0.0%)	0 (0.0%)	8 (100.0%)
Total	610	81	1	1	693

For Statistical Year 2019, a total of 693 unique entities submitted an annual report, a 9 percent increase from 2018. Plan MEWAs were the most common entity type, representing almost 92 percent of all annual report filers. Non-Plan MEWAs were the next largest entity type at 7 percent, and ECEs represented 1 percent of annual report filers.

From 2018 to 2019, the number of unique Plan MEWA and Non-Plan MEWA annual filers increased 11 percent and 6 percent, respectively, while ECEs decreased by almost 47 percent.²⁶ See Table 20B in [Appendix B](#).

Table 20: Unique Entities by Entity Type, Annual Report Filings for Statistical Year 2019

Entity Type	Entity Count	Share
Plan MEWA	636	91.8%
Non-Plan MEWA	49	7.1%
ECE	8	1.2%
Total	693	100.0%

Note: Percentages will not total 100% due to rounding.

FUNDING STATUS

The Form M-1 requires an entity to self-identify its funding status (i.e., fully insured or not fully insured) for each state in which it operates. The Form M-1, however, does not explicitly ask if an entity is self-insured in each state.

An entity that reported being fully insured in all states listed is reported in this bulletin as “Fully Insured - All States.” If an entity reported being fully insured in some states and not fully insured in others, the entity is reported as “Fully Insured - Some States.” For MEWAs and ECEs that did not indicate the entity was fully insured in any state, the entity is reported as “Not Fully Insured.” All other entities are reported as “Undetermined.” For more details, please see [Appendix A](#).

Entities were generally consistent in how they were funded across states, though the funding varied by entity type. Most MEWAs that submitted an annual report indicated they were fully insured in 2019, with 76 percent of Plan MEWAs and nearly 59 percent of Non-Plan MEWAs indicating being fully insured in all states. ECEs were also likely to be fully insured in all states, with 75 percent of ECEs reporting that funding status.

The number of Plan MEWAs that were fully insured in all states increased nearly 16 percent in 2019, and Plan MEWAs that were not fully insured in any state decreased by 3 percent. Non-Plan MEWAs that were fully insured in all states remained unchanged in 2019; however, those that were not fully insured in any state increased by 25 percent. See Table 21B in [Appendix B](#).

²⁶ ECEs are only required to file upon origination and in each of the 3 years thereafter, or due to a special filing event.

Table 21: Entities by Entity Type and Funding Status, Annual Report Filings for Statistical Year 2019

Entity Type	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Undetermined	Total
Plan MEWA	483(75.9%)	10(1.6%)	140(22.0%)	3(0.5%)	636(100%)
Non-Plan MEWA	29 (59.2%)	0 (0.0%)	20(40.8%)	0(0.0%)	49(100%)
ECE	6(75.0%)	0 (0.0%)	2(25.0%)	0 (0.0%)	8(100%)
Total	518	10	162	3	693

SERVICE PROVIDERS

In addition to identifying the filing purpose, the Form M-1 requires filers to provide information on various service providers, including an actuary, third-party administrator (TPA), marketing agent, financial institution, insurer (if fully insured), and the stop-loss provider. While not all entities use every type of service provider, the Department and state insurance regulators use this information to determine which services entities generally report using, identify common service providers across entities, and learn if certain entities frequently change service providers. For more details, please see [Appendix A](#).

Table 22 displays types of service providers used by entities as reported through their annual reports.²⁷ Consistent with 2018, the most commonly reported service providers were TPAs and marketing agents. A total of 334 entities reported using TPAs, 199 of which were fully insured in all states. Entities that weren't fully insured were more likely to report using an actuary or having stop-loss insurance. See Table 22B in [Appendix B](#).

²⁷ This section on service providers could understate the total number of entities that engaged with these types of service providers at any point during Statistical Year 2019 if changes occurred, but the annual report only referred to the status at the end of the filing year.

Table 22: Entities Reporting Various Service Providers by Funding Type, Annual Report Filings for Statistical Year 2019

Third-Party Administrators	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	187	5	111	303
Non-Plan MEWA	11	0	18	29
ECE	1	0	1	2
Total	199	5	130	334

Marketing Agent	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	267	2	74	343
Non-Plan MEWA	14	0	15	29
ECE	2	0	0	2
Total	283	2	89	374

Actuary	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	61	4	91	156
Non-Plan MEWA	4	0	15	19
ECE	1	0	1	2
Total	66	4	107	177

Stop-Loss Insurance	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	26	2	120	148
Non-Plan MEWA	4	0	17	21
ECE	0	0	0	0
Total	30	2	137	169

STATE COVERAGE

MEWAs and ECEs reported operating in all 50 states, the District of Columbia, certain U.S. territories, and several non-U.S. locations during Statistical Year 2019.

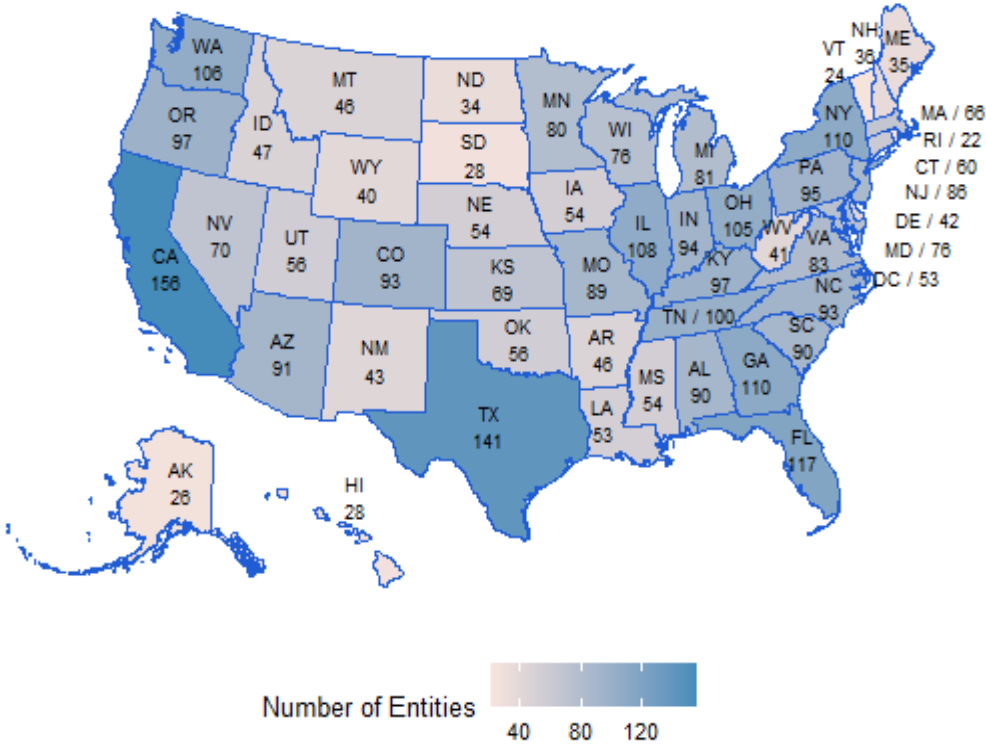
Table 23 shows the top states in which entities operated by entity type for annual report filings. California and Texas remained the states with the most entities reporting operating in their states. While all top states had declines in ECEs in 2019, most also had declines in Plan MEWAs, except for Illinois, Texas, and Washington. Growth in Non-Plan MEWAs remained unchanged for most states, while the number of Non-Plan MEWAs increased in Georgia, Tennessee, and Texas. See Table 23B in [Appendix B](#).

Figure 9 displays the total Plan MEWAs, Non-Plan MEWAs, and ECEs in each state, based on their annual reports.²⁸ Most of these entities provided coverage in California, Texas, Florida, New York, and Georgia. California had the most Plan MEWAs, while New York had the most Non-Plan MEWAs.

Table 23: Top States for Entities by Entity Type, Annual Report Filings for Statistical Year 2019

State	Plan MEWA	Non-Plan MEWA	ECE	Total
California	145	10	1	156
Texas	132	9	0	141
Florida	108	8	1	117
New York	93	17	0	110
Georgia	99	10	1	110
Illinois	98	1	1	108
Washington	100	6	0	106
Ohio	89	15	1	105
Tennessee	92	7	1	100
Kentucky	90	7	0	97
Oregon	89	7	1	97

Figure 9: Total Entities by State, Annual Report Filings for Statistical Year 2019



²⁸ The figure does not include entities in U.S. territories (44) or non-U.S. locations (which in 2019 is Canada (1), Germany (1), and Mexico (1)).

PARTICIPANTS

In order to account for entities that have different information reported on their multiple filings, when generating statistics about participant counts, the Department counted the largest number of participants reported on all entities' Statistical Year 2019 Annual Report filings. MEWAs and ECEs that submitted annual reports reported nearly 2.6 million participants for Statistical Year 2019, a 17 percent increase from 2018. Plan MEWA and Non-Plan MEWA participants increased by 17 percent and almost 29 percent, respectively, while ECE participants decreased by 4 percent.

Most participants (88 percent) were reported by Plan MEWAs, which tended to be the smallest entities, with an average size of 3,592 participants. On the other hand, ECEs reported the fewest participants (3 percent) but tended to be the largest entities, with an average size of 10,539 participants, nearly three times as many participants as the average Plan MEWA. Although the number of ECEs filing annual reports declined by 50 percent in 2019, the average entity size increased by 80 percent. Filings indicated that, on average, ECEs were the largest entities, followed by Non-Plan MEWAs, and then Plan MEWAs. See Table 24B in [Appendix B](#).

Table 24: Total Participants by Entity Type and Size, Annual Report Filings for Statistical Year 2019

Entity Type	Entity Count	Participant Count	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	636	2,284,290	88.4%	3,592	691	1	274,462
Non-Plan MEWA	49	214,935	8.3%	4,386	1,546	151	32,371
ECE	8	84,313	3.3%	10,539	2,081	133	68,293
Total	693	2,583,538	100.0%	3,728	756	1	274,462

FORM 5500 MATCHES

As noted above, some entities that file both Form M-1s and Form 5500s for the same period of time. The 2019 Form M-1 Bulletin introduces several new tables that present the match rate of Form M-1s to Form 5500s, reported assets for matched entities, concordance of reported and/or derived funding status between the two forms, benefits reported per the Form 5500 benefit codes, concordance of reported service providers, and participant comparisons between the two forms.²⁹

The Department matched Form M-1 filers to the Form 5500 through Question 11c on the Form 5500 (which is used to report the receipt confirmation code the plan received when it filed the Form M-1). As shown in Table 25, there were 484 entities that filed a Form M-1 Annual Report for which the Department could identify a Form 5500 for the same period, a 70 percent match rate with the 693 entities that filed a Form M-1 Annual Report for Statistical Year 2019.

²⁹ Entities that file the Form M-1 and also are required to file the Form 5500 are instructed not to use the Form 5500-Short Form (SF), which does not include a field for filers to indicate a Form M-1 confirmation number. Thus, none of the reported matched entities in this section include SF filers.

In examining further why entities that filed a Form M-1 may not match with a Form 5500, apart from not having a requirement to file (e.g., Non-Plan MEWAs), the Department found the following explanations:

- a. Filers entered a matching confirmation code, but the timing of the filings for did not match – they were not the same year,
- b. Filers did not indicate the correct Receipt Confirmation Codes (2019 Form 5500 confirmation codes were not the same as M-1 codes (from 2018, 2019, or 2020), and/or
- c. Filers left the code blank – they did not indicate any Receipt Confirmation Codes in the Form 5500 filing.

For more information about the matching process, see the Form 5500 Matches section of Appendix A.

Table 25: 2019 Form M-1 Entities by Entity Type – Annual only Matched M-1 and Form 5500 Filings

Entity Type	Matched Entities	Unique Entities	Match Rate
Plan MEWA	453	636	71.2%
Non-Plan MEWA	27	49	55.1%
ECE	4	8	50.0%
Total	484	693	69.8%

For Statistical Year 2019, 484 entities filed both the Form M-1 and the Form 5500. Not all Form 5500 filings reported all information. For example, only 259 of the matched entities reported assets on the Form 5500.³⁰ Among those, the average reported assets across all entity types were \$8.7 million, with median assets at \$2.2 million.

Table 26: Assets – Matched Unique Entity, Statistical Year 2019

Entity Type	Entity Count	Sum	Average Assets	Median Assets	Min	Max
Plan MEWA	237	\$2,076,797,331	\$8,762,858	\$2,432,647	\$0	\$226,841,892
Non-Plan MEWA	21	\$167,659,571	\$7,983,789	\$989,609	\$0	\$58,403,254
ECE	1	\$997,825	\$997,825	\$997,825	\$997,825	\$997,825
Total	259	\$2,245,454,727	\$8,669,709	\$2,237,304	\$0	\$226,841,892

In addition to summarizing information that MEWAs and ECEs report on the Form 5500, this bulletin compares the consistency of information across forms. While this can be informative, it is important to note that the Form M-1 only asks about medical benefits whereas Form 5500 filings allow welfare plans to report on multiple benefit types in a single filing. As a result, some level of inconsistency across filing types is to be expected.

³⁰ Assets reported in Table 26 are for all non-blank entries on the Schedule I or Schedule H. Matched entities might not have filed a Schedule I or Schedule H if they are fully insured or do not have assets in a trust.

In particular, funding status is self-reported on the Form M-1 (as fully insured in all states, fully insured in some states, and not fully insured) but assigned by the Department to Form 5500 filings (as fully insured, mixed-insured or self-insured) based on certain reported characteristics.³¹ While the Form M-1 and the Form 5500’s funding options do not map directly to each other and there is the possibility that other benefits, such as life insurance or vision, are funded differently than health, one would still expect that Plan MEWAs that were assigned fully insured on the Form 5500 would identify as fully insured in all states on the Form M-1. As shown in Table 27, this is the case for 96 percent of the 303 fully insured Form 5500 filings. Alternatively, we would expect a weaker correlation between Plan MEWAs with a Form 5500 indicating some element of self-insurance and those that identify as being not fully insured in some or all states on their Form M-1 filings, given the Form 5500 funding status could be capturing other types of benefits. This is the case for 73 percent of the 139 Form 5500 filings that the Department classified as having at least some element of self-insurance.

Table 27: Funding Status Concordance by Form, Plan MEWAs for Statistical Year 2019

Form 5500	Form M-1		
	Not Fully Insured	Fully Insured – Some States	Fully Insured – All States
Self-Insured	92	0	22
Mixed Insured	7	2	16
Fully Insured	10	2	291
Not Determinable ³²	2	0	9

Table 28 depicts the number of entities indicating various benefit types on their Form 5500 filings. This additional information about benefit types helps to inform the full set of benefits offered by MEWAs and ECEs, because the Form M-1 does not ask filers for this information.

Among the 484 matched entities, nearly 80 percent reported on their Form 5500 filing that they offer benefits in addition to health, mostly some combination of vision, dental, and non-health welfare benefits.

Ten entities reported offering only non-health benefits, meaning they offer some combination of vision, dental, life, disability, or “other health” benefits but not health benefits specifically. Because MEWAs and ECEs are not required to file the Form M-1 if they do not offer health benefits, the Department flagged these 10 entities for follow-up to confirm that there is no confusion about the filing requirements.

³¹ The Form 5500 does not explicitly ask health plans if they are self-insured or fully insured, so the Department use an algorithm to determine the likelihood of self-insurance for group health plans that file a Form 5500. Based largely on reporting characteristics that demonstrate evidence of insurance contracts or evidence of trusts, plans that indicate they offer health benefits on their Form 5500 are labeled “fully insured,” “self-insured,” or “mixed insured” (which suggests some plan options are fully insured while other are self-insured). More information about this algorithm can be found in Appendix B, Self-Insured Report: Form 5500 filings of health benefit plans. See pg. 14 of the report for a depiction of the algorithm and how it classifies plans by funding status, <https://www.dol.gov/sites/dolgov/files/EBSA/researchers/statistics/retirement-bulletins/annual-report-on-self-insured-group-health-plans-2022-appendix-b.pdf>.

³² There were 453 Plan MEWAs that filed both the Form M-1 and the Form 5500. However, the funding status of 11 of these Plan MEWAs could not be identified by the Form 5500 data and thus are shown as Not Determinable in Table 27. Of these 11 Plan MEWAs, 10 did not provide medical care benefits and one was a small plan not required to file the Form 5500.

Table 28: Benefit Types Reported on the Form 5500, All Entity Types for Statistical Year 2019

Benefit Type	
Health Benefits Only	80
Health and Other Benefits	386
Health and Dental	16
Health and Vision	7
Health and Non-Health	15
Health, Dental, and Vision	64
Health, Dental, and Non-Health	25
Health, Vision, and Non-Health	13
Health, Dental, Vision, and Non-Health	246
Non-health benefits	10
No Benefit Codes	8

Table 29 shows the concordance of service provider types listed on the Form M-1 and Form 5500 among entities that filed both forms. The green boxes indicate where a given service provider type was reported on both forms. Although Table 29 demonstrates some inconsistency in the type of service providers reported, there are several explanations for these differences:

1. The Form 5500 filing instructions state that plans do not have to list service providers on the Schedule who receive less than \$5,000 in direct and indirect compensation.
2. The Form 5500 states that plans do not have to report stop-loss policies if the employer, rather than the plan, owns the policy.
3. The Form 5500 Schedule C allows services provided that do not fall into one of the standard codes to be identified using an “other” or catch-all code.³³

The rate of inconsistency in service provider reporting between the Form 5500 and Form M-1 for the 2019 Statistical Year ranged from 14 percent for stop-loss insurance to 42 percent for marketing agents.

³³ Service codes used from the Form 5500 Schedule C to identify the various service provider types are: TPA (12, 13, 14, 15), Marketing Agent (22), and Actuary (11).

Table 29: Form M-1 to Form 5500 Matches by Service Providers, All Entity Types for Statistical Year 2019

Third-Party Administrators	Form M-1	
Form 5500	Yes	No
Yes	160	39
No	83	202

Marketing Agent	Form M-1	
Form 5500	Yes	No
Yes	70	17
No	186	211

Actuary	Form M-1	
Form 5500	Yes	No
Yes	47	
No	80	351

Stop-Loss Insurance	Form M-1	
Form 5500	Yes	No
Yes	74	7
No	59	344

Table 30 reports total participants of the 456 matched entities that filed both the Form M-1 and Form 5500.³⁴ Examining the participant counts reported on the Form M-1 and the Form 5500 might not allow for a meaningful comparison, due to the fact that the participant counts reported on the Form M-1 should pertain only to individuals who are receiving health benefits through the MEWA or ECE, while the Form 5500 may include participants in non-health benefits as well.

Of the 456 matched entities, the Form M-1 contained 1.6 million total participants, while the Form 5500 had nearly three times more participants. This is largely driven by one plan that reported 2.7 million more participants on its Form 5500 than its Form M-1.³⁵ Table 30B in [Appendix B](#) displays the total participants with Form M-1 to Form 5500 matches without the above referenced plan.

³⁴ Only includes entities with more than zero participants in both the Form M-1 and the Form 5500. Of the 28 entities dropped for this comparison, three reported zero participants on the Form M-1 only, 21 reported zero participants on the Form 5500 only, and four reported zero participants on both the Form M-1 and Form 5500. Among the Form 5500 zero participant filers, 12 checked the Final Filing indicator.

³⁵ The one matched Form 5500 filing with 2.7 million participants demonstrates the need to caution in interpretation of participant matches. While the plan lists 2.7 million participants, within the plan’s Schedule A filing, it appears that the majority of participants are enrolled in the life insurance plan, with a much smaller percentage enrolled in the health insurance plan. For entities that offer more than just medical benefits, the participant counts between the Form M-1 and Form 5500 filings may not be entirely comparable.

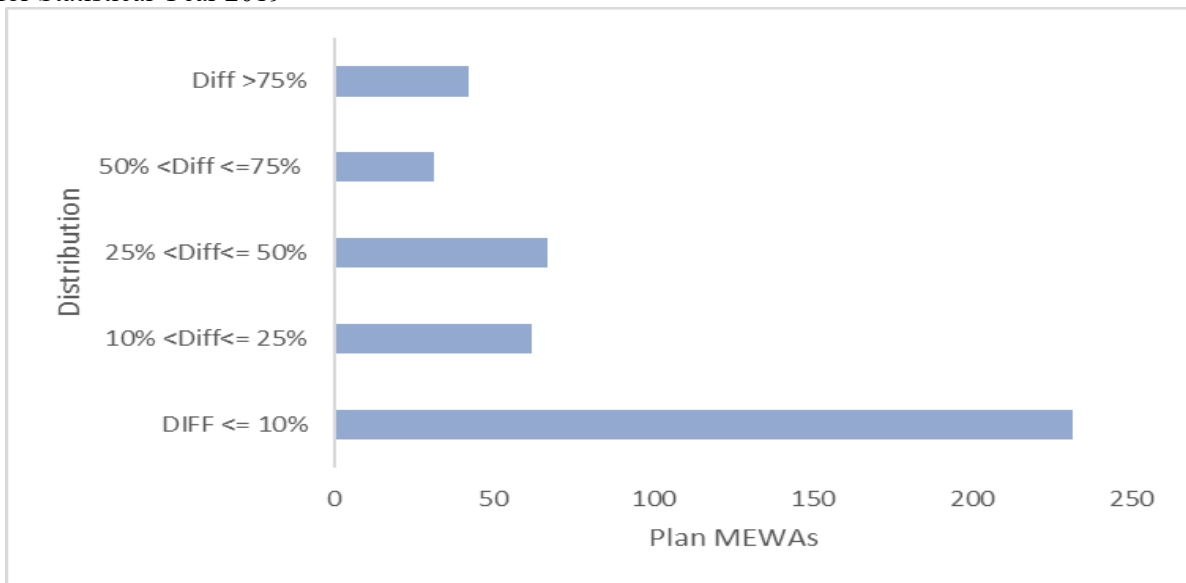
Table 30: Form M-1 to Form 5500 Matches, Total Participants by Entity Type and Size, All Entity Types for Statistical Year 2019

Form M-1					
Entity Type	Entity Count	Participant Count	% Total	Average	Median
Plan MEWA	434	1,534,597	94.8%	3,536	905
Non-Plan MEWA	18	79,898	4.9%	4,439	1,873
ECE	4	4,897	0.3%	1,224	716
Total	456	1,619,392	100.0%	3,551	952

Form 5500					
Entity Type	Entity Count	Participant Counts	% Total	Average	Median
Plan MEWA	434	4,389,376	98.2%	10,114	975
Non-Plan MEWA	18	74,526	1.7%	4,140	1,358
ECE	4	4,062	0.1%	1,016	472
Total	456	4,467,964	100.0%	9,798	998

Figure 10 displays the distribution of the 434 Plan MEWAs that had more than zero participants reported on both the Form M-1 and the Form 5500. Of the matched Plan MEWAs, 14 percent had exact participant matches on both forms and 53 percent had participant counts that closely matched (differed by less than 10 percent).

Figure 10: Participant Count Difference Distribution between Form 5500 & Form M-1, Plan MEWAs for Statistical Year 2019



CONCLUSION

This bulletin reports Statistical Year 2019 Form M-1 filing information for the following categories:

- all filers,
- those indicating Began Operating,
- those indicating MEWA Registrations, ECE Originations, ECE Special Filings, or material changes, and
- annual reports.

The bulletin includes statistics on the number of unique filing entities, reasons for filing, participants covered, states where operating, funding, and service providers, as well as additional information on a subset of entities that could also be matched to their Form 5500 filing. It is intended to provide a snapshot of the 2019 filing population, as reported by its administrators.

For Statistical Year 2019, 775 unique entities submitted Form M-1 filings, a nearly 10 percent increase from 2018. Most were fully insured Plan MEWAs, though those entities tended to be smaller than Non-Plan MEWAs or ECEs. These entities operated in all 50 states, the District of Columbia, certain U.S. territories, and several non-U.S. locations, and they covered more than 2.6 million participants.³⁶

³⁶ The participant count comes from looking at the largest number of participants reported on all of an entity's Statistical Year 2019 filings. For additional details, see [Appendix A](#), "Participants" section.

APPENDIX A: DATA PREPARATION DETAILS

This appendix provides details on the data preparation steps used to create the various descriptive statistics.

2019 FORM M-1 FILING POPULATION:

- The research dataset for this bulletin consists of Form M-1 filings for MEWAs or ECEs that filed a Form M-1 during the relevant period and were in operation during the 2019 Statistical Year, operating from January 1 to December 31, 2019, or operating during a fiscal year with at least six continuous months in 2019.
- The Department constructed the research dataset by starting with 2019 Form M-1 Annual Report filings that indicated the submission was for a calendar year MEWA or ECE.
- The 2019 Bulletin includes fiscal year filings if the annual report filings indicated the MEWA or ECE operated during a fiscal year with at least six continuous months in 2019. If the MEWA or ECE's fiscal year operated for exactly six months spanning two different years, the Department categorized the filings as being in the 2019 Statistical Year if the fiscal year end date occurred in 2019.³⁷
- In order to capture all the filings for special events that occurred in 2019, the Department separately added 2018 Form M-1 registration, origination, or special filings submitted between January 1 and December 31, 2019.

ENTITY IDENTIFICATION:

An entity may file multiple Form M-1s for a single operating year for a number of reasons, including, but not limited to, amending a previous filing from that operating year, expanding coverage to additional states, and increasing participants by 50 percent or more. This bulletin attempts to determine the number of entities that submitted those filings in a given statistical year. This task is somewhat complex, because an entity might have data entry inconsistencies across its additional filings. Examples of possible inconsistencies include transposed numbers in EINs, omitted PNs, and typographical errors in MEWA or ECE names.

The process of counting entities for the purpose of this bulletin necessitated that the Department develop a process for reviewing all filings in the population and determining whether each filing could be matched to other filings as either the same entity or an additional filing by an entity. Focusing on four key identifying variables (EIN, PN, entity name, and entity address), the Department looked for matching and non-matching variables across all filings to identify entities and categorize additional filings of entities.

The Department took a phased approach, detailed in the table below, with each phase looking for matching and non-matching combinations to help identify possible additional filings by entities. During each phase, the Department manually reviewed possible additional filings and categorized them as either a unique entity or additional filings of an already identified entity.

³⁷ The rule to classify July 1, 2019, through June 30, 2020, fiscal year filers as needing to file a 2019 Form M-1 comes from the publicly available Department of Labor document titled "10 Tips For Filing Form M-1 For Association Health Plans And Other MEWAs That Provide Medical," <https://www.dol.gov/sites/dolgov/files/ebsa/employers-and-advisers/plan-administration-and-compliance/reporting-and-filing/forms/m1-filing-tips.pdf>.

If a review of the four identifying variables did not produce a clear category for the potentially related filings, the Department reviewed additional information from the filings to ascertain whether the filings were entities not yet identified or possible additional filings of an already identified entity.

After the Department categorized all filings with any matching data in the four identifying variables as entities or additional filings, it designated all remaining filings from the population as entities.

Finally, this report assumes that a filing that matches no other filing across the four identifying variables is an entity with only one filing.

Table 1A: Phased Approach for Counting Entities

Entity Identifying Variables			
1	EIN	3	Entity Name
2	PN	4	Entity Address

Phase	Match	Description
Phase 1	1, 2, 3, and 4	Baseline for removal of unique MEWA duplicates.
Phase 2	1, 3, and 4; not 2	Identifies EIN, Name, and Address matches with no PN or incorrect PN entries.
Phase 3	1, 2, and 3; not 4	Identifies EIN, PN, and Name matches with likely incorrect or missing Address entries or unique Address with duplicate EIN, PN, and Names.
Phase 4	1, 2, and 4; not 3	Identifies EIN, PN, and Address matches with likely incorrect Name entries, or unique Name entries with duplicate EIN, PN, and/or Address.
Phase 5	2, 3, and 4; not 1	Identifies PN, Name, and Address matches with likely incorrect or missing EIN entries, or unique EIN entries with duplicate EIN, PN, and/or Address.
Phase 6	1 and 2; not 3 or 4	Identifies EIN and PN matches with likely incorrect Name or Address entries, or unique Name and Address entries with duplicate EIN and PNs.
Phase 7	1; not 2, 3, or 4	Identifies EIN matches with unique, incorrect, or missing PN, Name, and/or Address.
Phase 8	3; not 1, 2, or 4	Identifies Name matches with unique, missing, or incorrect EIN, PN, and/or Address.
Phase 9	1, 2, and 3; not 4	Identifies EIN, PN, and Name matches with likely incorrect or missing Address entries or unique Address with duplicate EIN, PN, and Names.
Phase 10	Not 1, 2, 3, or 4	Identifies all filings with no matches in EIN, PN, Name, or Address.

Phase 11	N/A	Review of all filings flagged as possible entities and possible additional filings for further manual review.
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FUNDING STATUS:

On the Form M-1, Part II, Question 17, MEWAs and ECEs are requested to report on each state in which they provide medical coverage and the respective funding status (fully insured or not) of the medical coverage in that state. Because of the possibility of a single entity offering fully insured coverage in some states and not fully insured coverage in others, this bulletin includes four categories of funding status at the entity level: (1) fully insured - all states, (2) fully insured - some states, (3) not fully insured, and (4) undetermined.

To derive the funding status at the entity level, the Department aggregated all filings for an entity by each state coverage line-item question (Question 17g, “If no to 17e, is the entity fully insured?”). Through this process, a single entity could have specific states appear more than once due to multiple filings on which the entity filled out Question 17.

In the aggregate list, if an entity reported for all states a funding status of fully insured, the Department classified the entity as “Fully Insured - All States.” If an entity reported being fully insured in some states and not fully insured in others, then the Department classified the entity as “Fully Insured - Some States.” If MEWAs and ECEs did not indicate the entity was fully insured in any state, then the Department classified the entity as “Not Fully Insured.” If Question 17g was left blank on all of the line items associated with the specific entity, then the Department classified the entity as “Undetermined.”

SERVICE PROVIDERS:

An entity might report multiple service providers on the same filing or on multiple filings submitted in a given year.

After manually reviewing the data at the service provider level, the Department concluded that filers were reporting identifying information for their service providers too inconsistently to accurately classify a service provider as unique in this bulletin. Across multiple filings, the same service provider could have various names, EINs, and/or non-obvious spelling errors.

Instead, the Department decided to include service provider data by entity counts, where entities are broken down further by entity type and funding status. Therefore, the bulletin includes information on whether a MEWA or ECE ever reported having one of four different types of service providers (TPA, actuary, marketing agent, or stop-loss) on any of its 2019 Statistical Year filings. For example, TPAs are reported by 334 entities, 187 of which are “Fully Insured - All States” and identified as Plan MEWAs.

STATE COVERAGE:

In Part II, Question 17, entities report all states in which they provide benefits for medical coverage. For this purpose, entities list the state(s) where the employers (of the employees receiving coverage) are domiciled. Entities also indicate if a state was not included on previous M-1 filings by checking the “New State?” box. Additional information, as applicable, is submitted for the types of coverage provided for each state listed.

Table 2A: Part II, Question 17

17a	17b	17c	17d	17e	17f	17g	17h	17i	17j
Enter State where the MEWA or ECE is operating.	Is coverage provided?	State registration number.	Name of state agent or entity for service of process.	Is the entity a licensed health insurer in this State?	If yes to 17e, enter NAIC number.	If no to 17e, is the entity fully insured?	If yes to 17g, enter name and NAIC number of insurer.	Does the entity purchase stop loss coverage?	If yes to 17i, enter the name and NAIC number of insurer.

Because an entity may file multiple Form M-1s in a single plan year for different filing purposes, causing additional filings to be submitted for the same entity, the Department reviewed additional filings of entities for any discrepancies in Part II, Question 17’s state information. An entity can remove states or add states throughout a plan year, which could result in additional filings to amend this information.

This bulletin includes all entities that list a state on any filings submitted for the plan year in an effort to report all states that an entity operates in during any part of the plan year. However, the Department counted an entity once per state regardless of multiple filings in order to ensure that number of entities operating in each state is not overstated.

Table 3A: State Coverage by Entity Type, Total Filings for Statistical Year 2019

2019 Plan Year	Plan MEWA	Non-Plan MEWA	ECE	MEWA Headquarters	New State
AK	25	2	1	4	2
AL	90	6	2	24	13
AR	44	5	0	2	4
AS	1	0	0	0	0
AZ	89	7	1	6	9
CA	160	10	1	85	4
CD	1	0	0	1	0
CO	91	7	1	6	7
CT	53	7	0	4	4
DC	50	4	0	9	1
DE	37	6	0	1	2
FL	115	8	1	21	8
GA	109	10	1	23	8
GU	1	1	0	0	0
GY	1	0	0	0	0
HI	23	7	1	9	0

IA	54	4	0	10	4
ID	48	3	0	4	4
IL	104	9	1	25	11
IN	92	9	0	22	7
KS	66	5	0	12	3
KY	94	7	0	30	9
LA	48	6	0	2	3
MA	61	6	0	3	4
MD	72	6	0	12	3
ME	33	2	1	4	1
MI	79	8	0	16	2
MN	82	5	0	12	8
MO	83	10	1	15	7
MP	1	0	0	0	0
MS	53	5	0	3	5
MT	47	3	0	10	8
MX	1	0	0	0	0
NC	88	7	1	9	1
ND	35	1	0	8	4
NE	52	5	0	10	4
NH	34	3	0	2	3
NJ	83	6	0	9	4
NM	40	6	1	2	4
NV	78	6	0	17	9
NY	97	17	0	33	3
OH	94	15	1	22	6
OK	56	5	1	7	5
OR	97	7	1	42	4
PA	91	9	0	23	0
PR	8	2	0	3	1
RI	21	2	0	1	1
SC	86	8	1	15	4
SD	26	4	0	2	3
TN	99	7	1	28	12
TX	145	9	1	58	10
UT	57	5	0	12	4
VA	76	10	0	13	7
VI	4	0	0	0	0
VT	21	3	1	4	1
WA	109	6	0	54	2
WI	75	7	0	16	5
WQ	1	0	0	0	0
WV	36	6	1	4	3
WY	38	3	0	6	3

PARTICIPANTS:

This bulletin seeks to report all participants covered by Form M-1 entities for the 2019 Statistical Year. When an entity submitted additional filings, the Department counted the largest number of participants reported on all of an entity's 2019 Statistical Year filings. The Department considered discrepancies in the number of participants reported between an entity's filings and reviewed them to determine how different the results were using various methods.

To assess whether the largest number was the correct number to report for this bulletin, the Department looked at the last filings versus largest participant count filings and examined entities that had extension filings and/or amended reports for discrepancies.

Therefore, the Department decided to report the largest reported participants for all entities to be as inclusive as possible in reporting participants covered. This method resulted in 2,686,508 participants being reported by entities during Statistical Year 2019.

To calculate the participant count reported in Section IV: Annual Reports, the Department used the same method of choosing the largest reported participants, but it only looked across annual reports filed by entities.

FORM 5500 MATCHES:

For this bulletin, the Department performed the 2019 Form M-1 and Form 5500 filing matches using the following steps:

- The Department used Line 11c of the Form 5500 (which is used to report the receipt confirmation code the plan received when it filed the Form M-1) to match the Form M-1's confirmation number variable. The Form 5500 requires filers who report that they are subject to Form M-1 filing requirements to enter the Receipt Confirmation Code for the Form M-1 annual report for the parallel Form 5500 annual report. If the plan was not required to file the 2021 Form M-1 annual report during the Form 5500 reporting year, the filer is told to enter the Receipt Confirmation Code for the most recent Form M-1 that was required to be filed under the Form M-1 filing requirements.
- The Department subset the data for Form 5500 filings with plan year ending in between 2018 and 2020.
- If the filer entered the same Receipt Confirmation Code on multiple Form 5500s, the Department matched the same plan year dates as the Form 5500 and the Form M-1.

This method identified 484 entities that filed both a Form M-1 and Form 5500 for Statistical Year 2019. This is the first year the Department matched and analyzed two form filings for this bulletin series. Depending on interest, the Department might continue the two form data comparisons in future bulletins.

FORM M-1 LAYOUT FOR REGISTRATION, ORIGINATION, SPECIAL FILING SECTION:

The Form M-1 layout itself prescribes the way statistics regarding registrations, originations, and special filings are classified and presented in this bulletin.

Figure 10 below depicts the five underlying events that could be indicated when filing a MEWA registration; those same five events are split across the origination and special filing categories for ECEs.

Layout of Registration, Origination, and Special Filing Question from the 2019 Form M-1:

MEWA Registration
Enter MEWA registration date: MM/DD/YYYY
Reasons for filing Registration:
 50% Increase in Covered Employees
 Began Operating
 Began Operating in an Additional State
 Material Change
 Merger

ECE Origination
Enter ECE origination date: MM/DD/YYYY
Reasons for filing Origination:
 50% Increase in Covered Employees
 Began Operating
 Merger

ECE Special Filing
Enter ECE special filing date: MM/DD/YYYY
Reasons for filing Special Filing:
 Began Operating in an Additional State
 Material Change

As shown in the figure above, an entity may check “Began Operating” in both the MEWA registration and ECE origination sections of the form, regardless of the entity type. This bulletin only reports if an entity indicated it began operating at least once on a filing and does not report the total number of occurrences for each filing.

APPENDIX B: COMPARISONS BETWEEN STATISTICAL YEARS 2018 and 2019

Table 2B: Form M-1 Filings by Entity Type, Total Filings for Statistical Years 2018, 2019

Entity Type	2018		2019		2018-2019
	Filing Count	Share	Filing Count	Share	Percent Change
Plan MEWA	838	89.5%	897	92.2%	7.0%
Non-Plan MEWA	63	6.7%	66	6.8%	4.8%
ECE	35	3.7%	10	1.0%	71.4%
Total	936	100.0%	973	100.0%	4.0%

Table 3B: Form M-1 Filings by Filing Purpose, Total Filings for Statistical Years 2018, 2019

Filing Purpose	2018		2019	
	Filing Count	Share	Filing Count	Share
Annual Report	739	79.0%	779	80.1%
MEWA Registration	177	18.9%	178	18.3%
ECE Origination	26	2.8%	11	1.1%
ECE Special Filing	6	0.6%	5	0.5%

Table 4B: Unique Entities by Number of Filings, Total Filings for Statistical Years 2018, 2019

Filings	2018		2019	
	Entities	Share	Entities	Share
1	534	75.6%	606	78.2%
2	131	18.6%	147	19.0%
3	28	4.0%	16	2.1%
4	10	1.4%	5	0.6%
5	2	0.3%	1	0.1%
6	1	0.1%	N/A	N/A
Total	706	100.0%	775	100.0%

Table 5B: Unique Entities by Entity Type, Total Filings for Statistical Year 2019

Entity Type	2018		2019		2018-2019
	Entity Count	Share	Entity Count	Share	Percent Change
Plan MEWA	640	90.7%	715	92.3%	11.7%
Non-Plan MEWA	47	6.7%	51	6.6%	8.5%
ECE	19	2.7%	9	1.2%	-52.6%
Total	706	100.0%	775	100.0%	9.8%

Table 6B: Top Headquartered States by Entity Type, Total Filings for Statistical Years 2018, 2019

2018					2019				
State	Plan MEWA	Non-Plan MEWA	ECE	Total	State	Plan MEWA	Non-Plan MEWA	ECE	Total
California	69	7	7	83	California	78	6	1	85
Texas	41	3	2	46	Texas	53	4	1	58
Washington	43	1	2	46	Washington	53	0	1	54
Oregon	41	0	0	41	Oregon	42	0	0	42
New York	26	12	1	39	New York	22	11	0	33
Florida	29	0	0	29	Kentucky	29	1	0	30
Tennessee	28	1	0	29	Tennessee	27	1	0	28
Kentucky	22	0	0	22	Illinois	25	0	0	25
Ohio	15	7	0	22	Alabama	23	1	0	24
Indiana	20	0	0	20	Georgia	20	2	1	23
Pennsylvania	19	1	0	20	Pennsylvania	22	1	0	23

Table 7B: Top States of Entities Indicating “New State” by Entity Type, Total Filings for Statistical Years 2018, 2019

2018					2019				
State	Plan MEWA	Non-Plan MEWA	ECE	Total	State	Plan MEWA	Non-Plan MEWA	ECE	Total
Florida	12	0	3	15	Alabama	13	0	0	13
Massachusetts	10	1	3	14	Tennessee	11	1	0	12
Texas	9	0	5	14	Illinois	11	0	0	11
Alabama	9	0	3	12	Texas	9	1	0	10
Michigan	9	0	3	12	Nevada	9	0	0	9
Georgia	8	0	3	11	Kentucky	9	0	0	9
Illinois	8	0	3	11	Arizona	8	1	0	8
Nebraska	8	0	3	11	Florida	8	0	0	8
Nevada	7	1	3	11	Georgia	8	0	0	8
Oklahoma	6	0	5	11	Minnesota	8	0	0	8
N/A	N/A	N/A	N/A	N/A	Montana	8	0	0	8

Table 8B: Total Participants by Entity Type and Size, Total Filings for Statistical Years 2018, 2019

2018							
Entity Type	Entity Counts	Participant Counts	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	640	2,005,057	87.6%	3,133	667	1	297,310
Non-Plan MEWA	47	169,350	7.4%	3,603	1,434	137	30,259
ECE	19	113,567	5.0%	5,977	1,513	4	68,276
Total	706	2,287,974	100.00%	3,241	716	1	297,310

2019							
Entity Type	Entity Counts	Participant Counts	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	715	2,385,330	88.8%	3,336	581	1	274,462
Non-Plan MEWA	51	216,764	8.1%	4,250	1,453	151	32,371
ECE	9	84,414	3.1%	9,379	761	101	68,293
Total	775	2,686,508	100.0%	3,466	618	1	274,462

2018-2019 Percent Change							
Entity Type	Entity Counts	Participant Counts	Average Entity Size	Median Entity Size	Min	Max	
Plan MEWA	11.7%	19.0%	6.5%	-12.9%	0.0%	-7.7%	
Non-Plan MEWA	8.5%	28.0%	18.0%	1.3%	10.2%	7.0%	
ECE	-52.6%	-25.7%	56.9%	-49.7%	2425.0%	0.0%	
Total	9.8%	17.4%	6.9%	-13.7%	0.0%	-7.7%	

Table 9B: Form M-1 Filings by Entity Type, “Began Operating” Filings for Statistical Years 2018, 2019

Entity Type	2018		2019		2018-2019
	Filing Count	Share	Filing Count	Share	Percent Change
Plan MEWA	98	86.0%	111	94.9%	13.3%
Non-Plan MEWA	6	5.3%	6	5.1%	0.0%
ECE	10	8.8%	0	0.0%	-100.0%
Total	114	100.0%	117	100.0%	2.6%

Table 10B: Unique Entities by Number of Filings, “Began Operating” Filings for Statistical Years 2018, 2019

Filings	2018			2019		
	Entities	Share		Filings	Entities	Share
1	88	88.9%		1	105	94.6%
2	8	8.1%		2	6	5.4%
3	2	2.0%		N/A	N/A	N/A
4	1	1.0%		N/A	N/A	N/A
Total	99	100.0%		3	111	100.0%

Table 11B: Unique Entities by Entity Type, “Began Operating” Filings for Statistical Years 2018, 2019

Entity Type	2018		2019		2018-2019
	Entity Count	Share	Entity Count	Share	Percent Change
Plan MEWA	85	85.9%	105	94.6%	23.5%
Non-Plan MEWA	6	6.1%	6	5.4%	0.0%
ECE	8	8.1%	0	0.0%	-100.0%
Total	99	100.0%	111	100.0%	12.1%

Table 12B: Top Headquartered States by Entity Type, “Began Operating” Filings for Statistical Years 2018, 2019

State	2018				2019				
	Plan MEWA	Non-Plan MEWA	ECE	Total	State	Plan MEWA	Non-Plan MEWA	ECE	Total
Nevada	10	1	0	11	California	12	0	0	12
California	4	0	6	10	Nevada	9	0	0	9
Oregon	10	0	0	10	Texas	9	0	0	9
Kentucky	9	0	0	9	Alabama	8	0	0	8
Tennessee	5	0	0	5	Washington	8	0	0	8
Texas	4	0	1	5	Illinois	7	0	0	7
Alabama	4	0	0	4	South Carolina	6	0	0	6
Utah	4	0	0	4	Utah	5	0	0	5
Washington	4	0	0	4	Georgia	3	1	0	4
N/A	N/A	N/A	N/A	N/A	Hawaii	4	0	0	4
N/A	N/A	N/A	N/A	N/A	Indiana	2	2	0	4

N/A	N/A	N/A	N/A	N/A	Minnesota	4	0	0	4
N/A	N/A	N/A	N/A	N/A	Wisconsin	4	0	0	4

Table 13B: Form M-1 Filings by Entity Type, MEWA Registrations, ECE Originations and Special Filings for Statistical Year 2019

Entity Type	2018		2019		2018-2019
	Filing Count	Share	Filing Count	Share	Percent Change
Plan MEWA	78	88.6%	73	92.4%	-6.4%
Non-Plan MEWA	3	3.4%	5	6.3%	66.7%
ECE	7	8.0%	1	1.3%	-85.7%
Total	88	100.0%	79	100.0%	-10.2%

Table 15B: Types of Filings by Underlying Events, MEWA Registrations, ECE Originations, and ECE Special Filings for Statistical Years 2018, 2019

Type of Filing	2018				2019			
	Material Change	Began Operating in Additional State	50% Increase in Covered Employees	Merger	Material Change	Began Operating in Additional State	50% Increase in Covered Employees	Merger
MEWA Registrations	28	17	11	1	17	12	9	1
ECE Originations	0	0	3	2	0	0	0	0
ECE Special Filings	5	1	0	0	3	1	0	0
Total	33	18	14	3	20	13	9	1

Table 16B: Unique Entities by Number of Filings, MEWA Registrations, ECE Originations, and Special Filings for Statistical Year 2018, 2019

Filings	2018		2019	
	Entities	Share	Entities	Share
1	60	84.5%	50	79.4%
2	8	11.3%	11	17.5%
3	0	0.0%	1	1.6%
4	3	4.2%	1	1.6%
Total	71	100.0%	63	100.0%

Table 17B: Unique Entities by Entity Type, MEWA Registrations, ECE Originations, and Special Filings for Statistical Years 2018, 2019

Entity Type	2018		2019		2018-2019
	Filing Count	Share	Filing Count	Share	Percent Change
Plan MEWA	63	88.7%	58	92.1%	-7.9%
Non-Plan MEWA	2	2.8%	4	6.3%	100.0%
ECE	6	8.5%	1	1.6%	-83.3%
Total	71	100.0%	63	100.0%	-11.3%

Table 18B: Form M-1 Filings by Entity Type, Annual Report Filings for Statistical Years 2018, 2019

Entity Type	2018		2019		2018-2019
	Filing Count	Share	Filing Count	Share	Percent Change
Plan MEWA	666	90.1%	715	91.8%	7.4%
Non-Plan MEWA	55	7.4%	55	7.1%	0.0%
ECE	18	2.4%	9	1.2%	-50.0%
Total	739	100.0%	779	100.0%	5.4%

Table 19B: Unique Entities by Number of Filings, Annual Report Filings for Statistical Years 2018, 2019

Filings	2018		2019	
	Entities	Share	Entities	Share
1	542	85.6%	610	88.0%
2	79	12.5%	81	11.7%
3	9	1.4%	1	0.1%
4	3	0.5%	1	0.1%
Total	633	100.0%	693	100.0%

Table 20B: Unique Entities by Entity Type, Annual Report Filings for Statistical Year 2018, 2019

Entity Type	2018		2019		2018-2019
	Entity Count	Share	Entity Count	Share	Percent Change
Plan MEWA	572	90.4%	636	91.8%	11.2%
Non-Plan MEWA	46	7.3%	49	7.1%	6.5%
ECE	15	2.4%	8	1.2%	-46.7%
Total	633	100.0%	693	100.0%	9.5%

Table 21B: Entities by Entity Type and Funding Status, Annual Report Filings for Statistical Year 2018, 2019

2018					
Entity Type	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Undetermined	Total
Plan MEWA	417 (72.9%)	8 (1.4%)	145 (25.3%)	2 (0.3%)	572 (100.0%)
Non-Plan MEWA	29 (63.0%)	0 (0.0%)	16 (34.8%)	1 (2.2%)	46 (100.0%)
ECE	7 (46.7%)	0 (0.0%)	8 (53.3%)	0 (0.0%)	15 (100.0%)
Total	453	8	169	3	633

2019					
Entity Type	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Undetermined	Total
Plan MEWA	483 (75.9%)	10 (1.6%)	140 (22.0%)	3 (0.5%)	636 (100.0%)
Non-Plan MEWA	29 (59.2%)	0 (0.0%)	20 (40.8%)	0 (0.0%)	49 (100.0%)
ECE	6 (75.0%)	0 (0.0%)	2 (25.0%)	0 (0.0%)	8 (100.0%)
Total	518	10	162	3	693

2018-2019 Percent Change					
Entity Type	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Undetermined	Total
Plan MEWA	15.8%	25.0%	-3.4%	50.0%	11.2%
Non-Plan MEWA	0.0%	N/A	25.0%	-100.0%	6.5%
ECE	-14.3%	N/A	-75.0%	N/A	-46.7%
Total	14.3%	25.0%	-4.1%	0.0%	9.5%

Table 22B: Entities Reporting Various Service Providers by Funding Type, Annual Report Filings for Statistical Years 2018, 2019

2018				
Third-Party Administrators	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	154	5	110	269
Non-Plan MEWA	10	0	14	24
ECE	3	0	7	10
Total	167	5	131	303

2019				
Third-Party Administrators	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	187	5	111	303
Non-Plan MEWA	11	0	18	29
ECE	1	0	1	2
Total	199	5	130	334

2018-2019 Percent Change				
Third-Party Administrators	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	21.4%	0.0%	0.9%	12.6%
Non-Plan MEWA	10.0%	N/A	28.6%	20.8%
ECE	-66.7%	N/A	-85.7%	-80.0%
Total	19.2%	0.0%	-0.8%	10.2%

2018				
Marketing Agent	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	196	2	69	267
Non-Plan MEWA	13	0	11	24
ECE	3	0	4	7
Total	212	2	84	298

Table 22B Continued: Entities Reporting Various Service Providers by Funding Type, Annual Report Filings for Statistical Years 2018, 2019

2019				
Marketing Agent	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	267	2	74	343
Non-Plan MEWA	14	0	15	29
ECE	2	0	0	2
Total	283	2	89	374

2018-2019 Percent Change				
Marketing Agent	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	36.2%	0.0%	7.2%	28.5%
Non-Plan MEWA	7.7%	N/A	36.4%	20.8%
ECE	-33.3%	N/A	-100.0%	-71.4%
Total	33.5%	0.0%	6.0%	25.5%

2018				
Actuary	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	45	5	91	141
Non-Plan MEWA	4	0	11	15
ECE	2	0	4	6
Total	51	5	106	162

2019				
Actuary	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	61	4	91	156
Non-Plan MEWA	4	0	15	19
ECE	1	0	1	2
Total	66	4	107	177

Table 22B Continued: Entities Reporting Various Service Providers by Funding Type, Annual Report Filings for Statistical Years 2018, 2019

2018-2019 Percent Change				
Actuary	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	35.6%	-20.0%	0.0%	10.6%
Non-Plan MEWA	0.0%	N/A	36.4%	26.7%
ECE	-50.0%	N/A	-75.0%	-66.7%
Total	29.4%	-20.0%	0.9%	9.3%

2018				
Stop-Loss Insurance	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	23	0	120	143
Non-Plan MEWA	4	0	13	17
ECE	1	0	0	1
Total	28	0	133	161

2019				
Stop-Loss Insurance	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	26	2	120	148
Non-Plan MEWA	4	0	17	21
ECE	0	0	0	0
Total	30	2	137	169

2018-2019 Percent Change				
Stop-Loss Insurance	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	13.0%	N/A	0.0%	3.5%
Non-Plan MEWA	0.0%	N/A	30.8%	23.5%
ECE	-100.0%	N/A	N/A	-100.0%
Total	7.1%	N/A	3.0%	5.0%

Table 23B: Top States for Entities by Entity Type, Annual Report Filings for Statistical Year 2019

2018					2019				
State	Plan MEWA	Non-Plan MEWA	ECE	Total	State	Plan MEWA	Non-Plan MEWA	ECE	Total
California	150	10	5	165	California	145	10	1	156
Texas	131	8	4	143	Texas	132	9	0	141
Florida	117	8	3	128	Florida	108	8	1	117
New York	103	17	2	122	New York	93	17	0	110
Georgia	105	9	3	117	Georgia	99	10	1	110
Ohio	96	14	2	112	Illinois	98	1	1	108
Tennessee	104	6	2	112	Washington	100	6	0	106
Washington	99	7	1	107	Ohio	89	15	1	105
Colorado	96	7	3	106	Tennessee	92	7	1	100
Illinois	90	9	2	101	Kentucky	90	7	0	97
N/A	N/A	N/A	N/A	N/A	Oregon	89	7	1	97

Table 24B: Total Participants by Entity Type and Size, Annual Report Filings for Statistical Years 2018, 2019

2018							
Entity Type	Entity Counts	Participant Counts	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	572	1,953,933	88.5%	3,416	715	1	297,310
Non-Plan MEWA	46	166,850	7.6%	3,627	1,431	137	30,259
ECE	15	87,821	4.0%	5,855	1,020	4	68,276
Total	633	2,208,604	100.0%	3,489	780	1	297,310

2019							
Entity Type	Entity Counts	Participant Counts	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	636	2,284,290	88.4%	3,592	691	1	274,462
Non-Plan MEWA	49	214,935	8.3%	4,386	1,546	151	32,371
ECE	8	84,313	3.3%	10,539	2,081	133	68,293
Total	693	2,583,538	100.0%	3,728	756	1	274,462

Table 24B Continued: Total Participants by Entity Type and Size, Annual Report Filings for Statistical Years 2018, 2019

2018-2019 Percent Change						
Entity Type	Entity Counts	Participant Counts	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	11.2%	16.9%	5.2%	-3.4%	0.0%	-7.7%
Non-Plan MEWA	6.5%	28.8%	20.9%	8.0%	10.2%	7.0%
ECE	-46.7%	-4.0%	80.0%	104.0%	3225.0%	0.0%
Total	9.5%	17.0%	6.9%	-3.1%	0.0%	-7.7%

Table 30B: Form M-1 to Form 5500 Matches, Total Participants by Entity Type, Statistical Year 2019

Entity Type	M-1 Participant Counts	% Total	F5500 Participant Counts	% Total
Plan MEWA	1,534,597	94.8%	1,628,792	95.4%
Non-Plan MEWA	79,898	4.9%	74,526	4.4%
ECE	4,897	0.3%	4,062	0.2%
Total	1,619,392	100.0%	1,707,380	100.0%