

## **Technical Appendix: Documentation of Form 5500 Revision Burden Model**

### **1. Overview**

This technical appendix describes the logic and data underlying the burden model used for estimating the impact of proposed Plan Year 2008 revisions of Form 5500 and associated schedules.<sup>1</sup> After a general description of the process, detailed material is presented associated with the impact model input data, and the basic calculations and outputs, associated with the version of the model contained in the spreadsheet “Burden Model 20050901 r1.xls”.

The burden model builds on work done by Mathematica Policy Research (MPR) in support of ERISA Form 5500 regulatory revisions from 1995 through 2004. During that period, MPR developed detailed estimates of the time required by sponsors and providers for performing Form 5500 related tasks based on extensive interviews with filers and their consultants. The processes and results are described in MPR’s report to the Department of Labor’s Office of Policy and Research of the Employee Benefits Security Administration, “Estimates of the Burden for Filing Form 5500: The Change in Burden from the 1997 to the 1999 Forms,” May 25, 1999.

The first step in modeling the impact of the proposed revisions to the Form 5500 and associated schedules was to produce a “Current Rule” summary of hours by type of filer, consistent with the MPR analyses. Aggregate baseline burden was then estimated, consistent with those hours and total filings (also consistent with historical MPR estimates).

The second step in the impact modeling was to examine which schedules would be modified, which sets of respondents would no longer have to file particular schedules, and which sets of respondents would face new filing obligations. Where changes were proposed in the information to be collected, the hours required per respondent were adjusted, consistent with the underlying assumptions of the previous MPR model.

The final step in the impact modeling was to calculate aggregate estimates of total burdens under the revised system by multiplying the new filing counts by the revised burden hours, and converting to dollars by multiplying by wage rates per burden hour. The calculations were performed by size and type of filer.

Summary tables from the spreadsheet implementation of the model are in Tables TA\_1 to TA\_6, at the end of this appendix. TA\_1 and TA\_2 show the full current rules and future rules matrices. Total counts of filings are shown in the top block of each table, broken by schedule by filer type. The current estimate of hours per schedule for each type of filer is shown in the second block. The third block gives the total burden hours, which is the product of the entries in the first and second blocks. Tables TA\_3 and TA\_4 give the burdens under the current rules and the future rules, converted to dollars. They also show

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<sup>1</sup> When the project was started, the Form 5500 Revisions described here were proposed for 2007.

the relative burden incurred directly by sponsors and indirectly through service providers. Approximately 85% of the burden dollars are associated with costs which pass through service providers. Table TA\_5 gives the burden associated with small plans, allocated across the revisions. Table TA\_6 gives the burden for all plans, also allocated across the revisions.

## **2. Inputs to Burden Model**

### Burden Hours Per Schedule

The first step in developing the model inputs was to divide the total Form 5500 burden hours from “[Final Burden Model Dec 2004.xls]74. Composite Report” by plan volumes from “Final to OPR Burden Hours Summary-2”, to get hours per 5500 for large and small plans. Similarly, the aggregate hours per schedule were divided by corresponding schedule volumes to get hours per schedule for large and small plans.

The next step was to partition the hours per schedule (including 5500s) by plan type (defined benefit, defined contribution, and welfare). The starting point was the matrix of aggregate hours by schedule for detailed plan types from MPR. For large plans, there are 30 plan types, and there are 8 for small plans. Aggregate hours by plan type were collapsed for each schedule and size to get total hours for each schedule by the 3 plan types. Plan volumes (5500 filers) were also collapsed for plan types that may have filled out a particular schedule. (Model pages have sections shaded in black for schedule/ plan type combinations that MPR considered not possible.) Dividing aggregate hours by plan volumes resulted in hours per plan for each schedule by DC, DB, and welfare. This allowed the calculation of ratios of these hours per plan by schedule for a particular plan type to overall hours per plan by schedule. These ratios were multiplied by hours per schedule to get estimates of average burden hours per schedule for DB, DC, and welfare plans separately. These average hours per schedule by plan type were used as inputs to the burden model.

### 2002 Fractions of Burden Per Agency By Schedule

The 2002 fractions of burden per agency for each schedule do not appear in the spreadsheets, although they were calculated in supporting sheets of the full burden model. They were calculated by dividing each schedule’s burden for a given agency by that schedule’s total burden hours. Fractions of burden per agency for each schedule were calculated separately for large and small plans. Data was from “Final to OPR Burden Hours Summary-2.”

### 2002 Service Provider/ Sponsor Fraction of Burden By Schedule

The 2002 fractions of burden for service providers and sponsors by schedule were based on inputs to “[Final Burden Model Dec 2004.xls]69. Report Work Grid.” Service provider hours were those from service providers when service providers file and from

accountants and actuaries when service providers or sponsors file. Sponsor hours were sponsor hours when service providers or sponsors file. Aggregate service provider hours for each schedule were divided by aggregate hours for that schedule to get the fraction of hours for a schedule that was incurred by service providers. The 2002 fractions of burden for service providers and sponsors by schedule were calculated separately for large and small plans.

### Controlling Schedule Counts to MPR

For each schedule (including 5500s) current estimates of 2002 large plan schedule counts were multiplied by the ratio of MPR's 2001 large plan schedule count to current estimates of the 2001 large plan schedule count. This was done to maintain consistency with the underlying MPR data. (Newer counts of filings suggest the original model may somewhat overstate total volumes of schedules, in which case the resulting estimates are conservative). The same procedure was used to estimate schedule counts for small plans.

### Burden Hours per Schedule After Revisions

The change in burden associated with the revised filing requirements was estimated based on the number of items added to or deleted from a schedule, and the underlying estimated burden associated with the original form. This was done either as a factor applied to the current burden for the schedule, or as an add-on number of hours. For revisions where the change was adding items to a schedule, the impact on hours per schedule was calculated by multiplying the current estimated hours for the schedule by the ratio of the number of items on the schedule after the change to the number of items on the schedule currently. For revisions where parts of another schedule were moved to a different schedule, or items were added to a schedule which were similar to items on another schedule, the burden associated with the revision was estimated by adding the associated hours for the new parts to the current hours for the schedule.

The burden hour estimate for the new short form required both transfers of items from existing schedules and development of estimates for new items. The final estimate of the proposed Short Form 5500's average burden per filer is 2 hours, 5 minutes. This is an average of burden hours per small filer for the Form 5500, Schedule I, Schedule R, and Schedule A, weighted by the proportion of elements from each of these sources that were "donated" to the Short Form. It also includes an estimate of burden attributable to several new data elements on the Short Form. Average burden hours per small filer for each source were taken from Mathematica's Burden Model Composite Burden Hours ('Final Burden Model Dec 2004.xls', tab '74. Composite Report'). Using a mock-up of the proposed Short Form, data elements were identified and located on the current Form 5500 and Schedules. To obtain the weights, the number of Short Form elements from each source was divided by the total number of elements from that source. Three items on the proposed Short Form were not found on current schedules. These items are included in the "Compliance Questions" portion of the Short Form, a section that is otherwise taken from Schedule I. Therefore, it was assumed that these three new elements would have the same burden as an average Schedule I element. The Schedule I

burden of 2.84 hours was divided by the number of Schedule I elements (58), and multiplied by 3 to obtain a burden of 0.147 hours for the three new elements. Adding this burden to the 1.925 figure results in a total burden estimate for the Short Form of 2 hours and 5 minutes (rounded up to the next whole minute), or 2.08 hours.

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

A macro was written to sum, for each agency, entity (sponsor, service provider), and proposed revision, the number of affected filers, the number of hours spent by those filers pre-revision, and the number of hours post-revision. For each revision, the change in hours was then calculated by subtracting the pre-revision hours from the post-revision hours. In order to calculate the change in cost in dollar terms, a labor rate of \$84/hour was applied to the service provider change in hours, and a rate of \$59/hour was applied to the sponsor hours. The service provider labor cost is consistent with the rate used in the underlying MPR model (\$75 in June, 2001 updates for 1999 levels), projected to 2002 at 4% per year (consistent with MPR update estimates from October 12, 2004). The sponsor hours costs are derived from wage and compensation data from the BLS ([www.bls.gov/news.release/ocwage.t01.htm](http://www.bls.gov/news.release/ocwage.t01.htm) and [www.bls.gov/news.release/archives/ecec\\_09152004.pdf](http://www.bls.gov/news.release/archives/ecec_09152004.pdf)), projected to 2002 and loaded for overhead. The resulting changes in cost for both service providers and sponsors were summed to obtain the total change in cost. The output applicable to the Executive Order and Regulatory Flexibility is displayed on tabs 'ExecOrder' and 'RegFlex', respectively, from 'Burden Model 20050901 r1.xls'. Summaries are shown below, in Tables TA\_5 and TA\_6.

The tabulations for the proposed revisions were carried out sequentially. The following list explains the details and underlying assumptions for each tabulation.

#### Removal of IRS Schedules

The change in burden due to the removal of IRS schedules was tabulated in isolation, as if none of the other proposed revisions had taken place.

#### *Number of Affected Filers*

The number of filers affected by the removal of schedules E, P, and SSA is estimated using the sum of 1) the number of pension plans (including both Short Form-eligible and ineligible) and 2) the number of Schedules P filed by large welfare plans and small welfare plans.

While the number of schedules filed by plan type constitutes a major component of the Burden Model, counts of filers that file a particular schedule were not explicitly retained in the Model. In general, the counts of filers and counts of schedules should be the same for all schedules except schedules A, P, and R. In the case of pension plans, the implicit assumption is that all pension plans file at least one of the Schedules E, P, or SSA. Welfare plans can file Schedule P but neither E nor SSA, so the number of Schedules P

filed by welfare plans was used as an approximation for the number of affected welfare filers.

#### *Change in Burden Hours*

The decrease in burden hours resulting from the removal of schedules E, P, and SSA is calculated by summing the hours required to complete each schedule for all pension and welfare plans.

#### Short Form 5500/Small 403(b) Plans

The change in burden resulting from the introduction of the Short Form 5500 for eligible small plans was calculated with the proposed elimination of the IRS schedules in place. This avoids double-counting of the burden hours associated with the IRS schedules. Additionally, the Short Form revision includes a provision from the 403(b) plan revision, in that all small 403(b) plans were counted as Short Form-eligible.

#### *Number of Affected Filers*

The number of filers affected by the proposed introduction of a Short Form 5500 is estimated at 90% of all small 5500 filers (both pension and welfare plans).

#### *Change in Burden Hours*

In order to estimate the change in burden hours, the total number of hours required by eligible plans to complete the Form 5500 and all schedules was subtracted from the total number of hours required to complete the Short Form 5500.

#### Schedule B: Asset Allocation Questions

#### *Number of Affected Filers*

The number of filers affected by the proposed new asset allocation questions on Schedule B is the number of defined benefit plans with more than 1,000 participants.

#### *Change in Burden Hours*

The change in burden hours is calculated by subtracting the total number of hours spent on Schedule B for the affected plans in 2002 (“pre-revision”) from the total number of Schedule B hours for affected plans in 2008 (“post-revision”).

#### Schedule C: Additional Questions for Fiduciaries and certain other Service Providers

#### *Number of Affected Filers*

The number of filers affected by the proposed additional questions on Schedule C is estimated by taking the number of Schedules C filed by large pension and welfare plans. The number of schedules filed is considered a reasonable proxy for the number of filers because only one Schedule C is to be filed per plan.

### *Change in Burden Hours*

The change in burden hours is calculated by subtracting the total number of hours spent on Schedule C for the affected plans in 2002 (“pre-revision”) from the total number of Schedule C hours for affected plans in 2008 (“post-revision”).

### Questions for Multiemployer Plans on Form 5500 and Schedule R

#### *Number of Affected Filers*

The number of filers affected by the introduction of new questions for multiemployer plans is estimated using the number of large multiemployer pension and welfare plans. The Burden Model does not track counts of small multiemployer plans.

#### *Change in Burden Hours*

The change in burden hours is calculated by subtracting the total number of hours spent by large multiemployer plans on the Form 5500, pre-revision, from the total number of hours post-revision. To this, the difference in hours needed to complete the Schedule R for large defined benefit multiemployer plans is then added.

### Miscellaneous Revisions

Several questions are proposed to be added to the 2008 Form 5500, Schedule A, Schedule H, Schedule I, and Schedule R.

#### *Number of Affected Filers*

The number of filers affected by the miscellaneous revisions is all large pension and welfare plans and all small, Short Form-ineligible pension and welfare plans.

#### *Change in Burden Hours*

The change in burden hours is calculated as the difference between hours required, pre-revision and post-revision, to complete the Form 5500 and Schedules A, H, I, and R.

### Elimination of Special Treatment for Large 403(b) Plans

Estimates of the impact of elimination of special treatment for 403(b) plans were calculated with all previously discussed revisions in place. This means that small 403(b)s were modeled as if they all filed the Short Form 5500; only large 403(b) plans figure into the 403(b) revision burden estimate.

#### *Number of Affected Filers*

The number of affected filers is the number of large 403(b) plans. Due to limited reporting requirements, 403(b) plans do not have to report participant data; therefore, the large/small split of 403(b) plans was estimated using outside data.

#### *Change in Burden Hours*

The change in burden hours is calculated as the number of hours required for large 403(b) plans to complete the Form 5500 only, subtracted from the number of hours required for

large 403(b) plans to fully complete the Form 5500 and all relevant Schedules (including the applicable revisions discussed above).

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

Filer Type	Total <sup>4</sup>	5500	Sch A	Sch B	Sch C	Sch D	Sch E	Sch G	Sch H	Sch I	Sch P	Sch R	Sch SSA
<b>Schedules</b>	<b>832,683</b>	<b>832,683</b>	<b>468,505</b>	<b>59,171</b>	<b>79,771</b>	<b>208,314</b>	<b>6,087</b>	<b>132,147</b>	<b>178,647</b>	<b>652,134</b>	<b>773,233</b>	<b>437,502</b>	<b>191,134</b>
5500 Large Plans	188,620	188,620	234,214	21,273	78,920	176,724	2,642	131,844	177,463	538	120,816	127,558	156,622
DB, ME, 100-1,000	827	827	230	1,102	1,051	822	0	382	1,474	1	1,087	1,173	1,620
DB, ME, > 1,000	1,106	1,106	570	1,555	1,475	2,068	0	2,635	1,983	0	1,610	1,653	1,465
DB, SE, 100-1,000	8,889	8,889	2,281	12,424	8,478	15,711	0	2,483	15,848	7	10,704	13,555	17,093
DB, SE, > 1,000	4,190	4,190	1,094	5,892	4,453	10,262	2	3,056	7,479	0	5,369	6,367	2,690
DC, ME, non-403(b)	2,315	2,315	1,157	75	2,297	3,686	27	3,514	4,100	5	3,115	2,893	2,734
DC, ME, 403(b)	382	382	38	0	1	4	0	1	2	8	36	5	7
DC, SE, non-403(b)	70,043	70,043	33,482	199	35,292	140,240	2,611	106,563	124,283	99	93,126	101,709	130,816
DC, SE, 403(b)	8,557	8,557	844	7	12	93	1	33	56	174	804	117	153
Welfare, ME	5,718	5,718	11,225	2	4,833	686	0	2,903	6,488	10	1,663	6	4
Welfare, SE	86,594	86,594	183,293	17	21,029	3,152	1	10,274	15,749	234	3,303	80	40
5500 Small Eligible 3/	579,856	579,856	210,862	34,108	766	28,431	3,101	273	1,066	586,437	587,175	278,590	31,061
DB	30,838	30,838	8,149	33,511	204	483	4	2	43	30,806	32,378	23,298	833
DC, non-403(b)	533,021	533,021	196,560	589	308	27,841	3,094	268	931	548,479	553,326	255,571	30,216
DC, 403(b) 2/	8,773	8,773	1,026	6	9	5	1	1	32	225	687	62	11
Welfare1/	7,024	7,024	5,127	2	245	101	2	2	60	6,927	784	19	1
5500 Small Ineligible	64,406	64,406	23,429	3,790	85	3,159	345	30	118	65,160	65,242	30,994	3,451
DB	4,037	4,037	1,605	3,712	10	41	0	0	7	4,085	4,059	3,298	95
DC, non-403(b) 2/	60,225	60,225	21,715	78	55	3,116	344	30	101	60,952	61,152	27,693	3,356
DC, 403(b)	0	0	0	0	0	0	0	0	0	0	0	0	0
Welfare1/	145	145	109	0	20	1	0	0	10	123	31	4	0
<b>Hours/Schedule</b>	<b>16.17</b>												
5500 Large Plans	49.47	21.42	3.76	26.21	3.23	1.24	1.11	11.50	5.96	1.61	0.82	0.34	4.21
DB, ME, 100-1,000	117.51	43.92	1.91	26.22	3.14	0.94	1.11	17.53	6.60	2.84	1.00	1.00	5.40
DB, ME, > 1,000	151.46	43.92	1.91	26.22	3.14	0.94	1.11	17.53	6.60	2.84	1.00	1.00	5.40
DB, SE, 100-1,000	114.42	43.92	1.91	26.22	3.14	0.94	1.11	17.53	6.60	2.84	1.00	0.30	5.40
DB, SE, > 1,000	116.70	43.92	1.91	26.22	3.14	0.94	1.11	17.53	6.60	2.84	1.00	0.30	5.40
DC, ME, non-403(b)	79.79	39.85	2.47	26.22	2.06	1.20	1.11	11.09	5.64	2.83	0.79	1.00	4.01
DC, ME, 403(b)	0.52	0.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DC, SE, non-403(b)	80.47	39.85	2.47	26.22	2.06	1.20	1.11	11.09	5.64	2.83	0.79	0.30	4.01
DC, SE, 403(b)	0.52	0.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welfare, ME	31.94	5.33	4.05	26.22	4.97	4.82	1.11	10.99	7.09	2.24	0.83	1.00	4.27
Welfare, SE	17.93	5.33	4.05	26.22	4.97	4.82	1.11	10.99	7.09	2.24	0.83	0.30	4.27
5500 Small Eligible 3/	6.48	1.30	2.74	5.88	3.26	0.51	4.72	11.09	5.59	2.88	0.58	0.46	2.03
DB	12.21	1.30	2.72	5.88	3.14	0.38	4.72	17.53	6.60	2.84	0.50	0.46	2.03
DC, non-403(b)	6.26	1.31	2.74	5.88	2.06	0.51	4.72	11.09	5.64	2.83	0.58	0.46	2.03
DC, 403(b) 2/	0.52	0.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welfare1/	6.12	1.23	3.24	5.88	4.97	0.95	4.72	10.99	7.09	2.24	0.58	0.46	2.03
5500 Small Ineligible	6.49	1.30	2.74	5.88	2.88	0.51	4.72	11.09	5.82	2.83	0.58	0.46	2.03
DB	11.61	1.30	2.72	5.88	3.14	0.38	4.72	17.53	6.60	2.84	0.50	0.46	2.03
DC, non-403(b) 2/	6.15	1.30	2.74	5.88	2.06	0.51	4.72	11.09	5.64	2.83	0.58	0.46	2.03
DC, 403(b)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welfare1/	6.89	1.23	3.24	5.88	4.97	0.95	4.72	10.99	7.09	2.24	0.58	0.46	2.03
<b>Total Burden Hours</b>	<b>13,508,400</b>	<b>4,875,477</b>	<b>1,523,111</b>	<b>780,395</b>	<b>257,479</b>	<b>234,933</b>	<b>19,183</b>	<b>1,519,328</b>	<b>1,064,531</b>	<b>1,843,543</b>	<b>477,039</b>	<b>183,915</b>	<b>729,465</b>
5500 Large Plans	9,331,368	4,039,469	881,758	567,588	254,740	218,791	2,932	1,515,965	1,057,888	865	99,121	42,763	659,488
DB, ME, 100-1,000	97,156	36,311	439	28,900	3,304	775	0	6,697	9,727	3	1,086	1,173	8,742
DB, ME, > 1,000	167,463	48,557	1,088	40,770	4,636	1,949	0	46,211	13,085	0	1,609	1,653	7,904
DB, SE, 100-1,000	1,017,096	390,382	4,351	325,751	26,648	14,811	0	43,532	104,549	20	10,695	4,125	92,233
DB, SE, > 1,000	489,006	184,014	2,086	154,498	13,996	9,674	2	53,578	49,342	0	5,364	1,938	14,514
DC, ME, non-403(b)	184,711	92,258	2,854	1,963	4,739	4,433	30	38,979	23,109	14	2,468	2,893	10,972
DC, ME, 403(b)	199	199	0	0	0	0	0	0	0	0	0	0	0
DC, SE, non-403(b)	5,636,220	2,791,511	82,618	5,205	72,814	168,646	2,899	1,182,091	700,497	281	73,772	30,952	524,934
DC, SE, 403(b)	4,450	4,450	0	0	0	0	0	0	0	0	0	0	0
Welfare, ME	182,663	30,464	45,492	46	24,034	3,309	0	31,915	45,973	22	1,382	6	19
Welfare, SE	1,552,404	461,323	742,828	457	104,570	15,195	1	112,961	111,605	525	2,745	24	171
5500 Small Eligible 3/	3,758,721	752,279	577,159	200,523	2,494	14,531	14,626	3,027	5,954	1,657,997	340,122	127,034	62,978
DB	376,501	40,120	22,139	197,048	641	185	17	35	282	87,605	16,126	10,612	1,690
DC, non-403(b)	3,334,647	698,991	538,401	3,461	636	14,249	14,597	2,969	5,245	1,554,857	323,541	116,413	61,287
DC, 403(b) 2/	4,562	4,562	0	0	0	0	0	0	0	0	0	0	0
Welfare1/	43,011	8,605	16,619	14	1,217	97	12	22	426	15,535	455	9	2
5500 Small Ineligible	418,311	83,728	64,194	22,284	245	1,612	1,626	336	689	184,682	37,796	14,118	7,000
DB	46,865	5,251	4,361	21,825	32	16	0	0	47	11,616	2,021	1,502	194
DC, non-403(b) 2/	370,448	78,300	59,479	459	113	1,595	1,625	336	571	172,791	35,757	12,614	6,806
DC, 403(b)	0	0	0	0	0	0	0	0	0	0	0	0	0
Welfare1/	999	177	354	0	101	1	0	0	70	275	18	2	0

1/ Small welfare plan counts are restricted to those that "must file", that is, indicated "trust" as method of funding or payment of benefits, or attached Schedule I.

2/ All small 403(b) plans are eligible for the Short Form. Therefore, some 403(b)'s that were flagged as ineligible were moved up to the "Eligible" block.

3/ Short Form eligible plans are fixed at 90% of all small plans.

4/ Total column is based on Number of Filers rather than Number of Forms Filed from "Burden Model 20050901 r1.xls" sheet "2002 Controlled to MPR"

**Table TA\_2: Number of 5500s and Schedules Filed with Burden Estimates, Proposed Rules  
by Filer Type**

Filer Type	Total <sup>1</sup>	5500	Sch A	Sch B	Sch C	Sch D	Sch E	Sch G	Sch H	Sch I	Sch P	Sch R	Sch SSA	Short Form
<b>Schedules</b>	<b>832,683</b>	<b>253,027</b>	<b>261,220</b>	<b>59,164</b>	<b>83,584</b>	<b>199,068</b>	<b>0</b>	<b>148,645</b>	<b>193,559</b>	<b>65,516</b>	<b>0</b>	<b>171,684</b>	<b>0</b>	<b>579,656</b>
5500 Large Plans	188,620	188,620	237,791	21,266	83,499	195,909	0	148,615	193,441	356	0	140,690	0	0
DB, ME, 100-1,000	827	827	230	1,102	1,051	822	0	382	1,474	1	0	1,173	0	0
DB, ME, > 1,000	1,106	1,106	570	1,555	1,475	2,068	0	2,635	1,983	0	0	1,653	0	0
DB, SE, 100-1,000	8,889	8,889	2,281	12,424	8,478	15,711	0	2,483	15,848	7	0	13,555	0	0
DB, SE, > 1,000	4,190	4,190	1,094	5,892	4,453	10,262	0	3,056	7,479	0	0	6,367	0	0
DC, ME, non-403(b)	2,315	2,315	1,157	75	2,297	3,686	0	3,514	4,100	5	0	2,893	0	0
DC, ME, 403(b)	382	382	191	0	196	825	0	719	686	0	0	567	0	0
DC, SE, non-403(b)	70,043	70,043	33,482	199	35,292	140,240	0	106,563	124,283	99	0	101,709	0	0
DC, SE, 403(b)	8,557	8,557	4,268	0	4,395	18,458	0	16,087	15,350	0	0	12,688	0	0
Welfare, ME	5,718	5,718	11,225	2	4,833	686	0	2,903	6,488	10	0	6	0	0
Welfare, SE	86,594	86,594	183,293	17	21,029	3,152	0	10,274	15,749	234	0	80	0	0
5500 Small Eligible	579,656	0	0	34,108	0	0	0	0	0	0	0	0	0	579,656
DB	30,838	0	0	33,511	0	0	0	0	0	0	0	0	0	30,838
DC, non-403(b)	533,021	0	0	589	0	0	0	0	0	0	0	0	0	533,021
DC, 403(b)	8,773	0	0	6	0	0	0	0	0	0	0	0	0	8,773
Welfare2	7,024	0	0	2	0	0	0	0	0	0	0	0	0	7,024
5500 Small Ineligible	64,406	64,406	23,429	3,790	85	3,159	0	30	118	65,160	0	30,994	0	0
DB	4,037	4,037	1,605	3,712	10	41	0	0	7	4,085	0	3,298	0	0
DC, non-403(b)	60,225	60,225	21,715	78	55	3,116	0	30	101	60,952	0	27,693	0	0
DC, 403(b)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Welfare2	145	145	109	0	20	1	0	0	10	123	0	4	0	0

Hours/Schedule	13.48													
5500 Large Plans	50.17	23.47	3.92	27.10	3.68	1.24		11.46	6.33	2.43		0.36		0.00
DB, ME, 100-1,000	108.89	44.47	1.99	26.22	3.90	0.94		17.53	7.03	2.84		1.67		0.00
DB, ME, > 1,000	149.76	44.47	1.99	28.72	3.90	0.94		17.53	7.03	2.84		1.67		0.00
DB, SE, 100-1,000	104.75	44.31	1.99	26.22	3.90	0.94		17.53	7.03	2.84		0.30		0.00
DB, SE, > 1,000	117.47	44.31	1.99	28.72	3.90	0.94		17.53	7.03	2.84		0.30		0.00
DC, ME, non-403(b)	75.72	40.38	2.57	26.22	2.57	1.20		11.09	6.01	2.83		1.00		0.00
DC, ME, 403(b)	78.69	40.38	2.57	26.22	2.57	1.20		11.09	6.01	2.83		1.00		0.00
DC, SE, non-403(b)	73.22	40.21	2.57	26.22	2.57	1.20		11.09	6.01	2.83		0.31		0.00
DC, SE, 403(b)	77.51	40.21	2.57	26.22	2.57	1.20		11.09	6.01	2.83		0.31		0.00
Welfare, ME	33.07	5.49	4.23	26.22	5.37	4.82		10.99	7.56	2.24		1.00		0.00
Welfare, SE	18.44	5.33	4.23	26.22	5.37	4.82		10.99	7.56	2.24		0.30		0.00
5500 Small Eligible	2.42	0.00	0.00	5.78	0.00	0.00		0.00	0.00	0.00		0.00		2.08
DB	8.47	0.00	0.00	5.88	0.00	0.00		0.00	0.00	0.00		0.00		2.08
DC, non-403(b)	2.08	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00		0.00		2.08
DC, 403(b)	2.08	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00		0.00		2.08
Welfare2	2.08	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00		0.00		2.08
5500 Small Ineligible	5.98	1.31	2.86	5.88	2.88	0.51		11.09	5.82	2.98		0.46		0.00
DB	11.27	1.31	2.83	5.88	3.14	0.38		17.53	6.60	2.99		0.46		0.00
DC, non-403(b)	5.62	1.31	2.86	5.88	2.06	0.51		11.09	5.64	2.98		0.47		0.00
DC, 403(b)	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00		0.00		0.00
Welfare2	6.97	1.23	3.38	5.88	4.97	0.95		10.99	7.09	2.36		0.46		0.00

Total Burden Hours	11,250,207	4,512,101	997,966	795,538	307,939	243,591	0	1,702,725	1,224,947	195,099	0	64,614	0	1,205,685
5500 Large Plans	9,462,258	4,427,627	931,021	576,207	307,694	241,979	0	1,702,388	1,224,258	865	0	50,220	0	0
DB, ME, 100-1,000	90,029	36,773	458	28,900	4,098	775	0	6,697	10,371	3	0	1,954	0	0
DB, ME, > 1,000	165,586	49,175	1,135	44,658	5,751	1,949	0	46,211	13,951	0	0	2,756	0	0
DB, SE, 100-1,000	931,170	393,868	4,538	325,751	33,058	14,811	0	43,532	111,468	20	0	4,125	0	0
DB, SE, > 1,000	492,221	185,657	2,176	169,229	17,362	9,674	0	53,578	52,607	0	0	1,938	0	0
DC, ME, non-403(b)	175,276	93,467	2,977	1,963	5,912	4,433	0	38,979	24,639	14	0	2,893	0	0
DC, ME, 403(b)	30,094	15,441	491	0	506	992	0	7,975	4,122	0	0	567	0	0
DC, SE, non-403(b)	5,128,483	2,816,435	86,159	5,205	90,844	168,646	0	1,182,091	746,853	281	0	31,969	0	0
DC, SE, 403(b)	663,239	344,071	10,983	0	11,314	22,196	0	178,448	92,240	0	0	3,988	0	0
Welfare, ME	189,121	31,417	47,442	46	25,949	3,309	0	31,915	49,016	22	0	6	0	0
Welfare, SE	1,597,038	461,323	774,664	457	112,899	15,195	0	112,961	118,991	525	0	24	0	0
5500 Small Eligible	1,402,733	0	0	197,048	0	0	0	0	0	0	0	0	0	1,205,685
DB	261,191	0	0	197,048	0	0	0	0	0	0	0	0	0	64,144
DC, non-403(b)	1,108,683	0	0	0	0	0	0	0	0	0	0	0	0	1,108,683
DC, 403(b)	18,248	0	0	0	0	0	0	0	0	0	0	0	0	18,248
Welfare2	14,611	0	0	0	0	0	0	0	0	0	0	0	0	14,611
5500 Small Ineligible	385,216	84,474	66,945	22,284	245	1,612	0	336	689	194,234	0	14,395	0	0
DB	45,484	5,298	4,548	21,825	32	16	0	0	47	12,217	0	1,502	0	0
DC, non-403(b)	338,722	78,999	62,028	459	113	1,595	0	336	571	181,728	0	12,891	0	0
DC, 403(b)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Welfare2	1,010	177	369	0	101	1	0	0	70	289	0	2	0	0

<sup>1</sup>Total column is based on Number of Filers rather than Number of Forms Filed

<sup>2</sup>Small welfare plan counts are restricted to those that "must file", that is, indicated "trust" as method of funding or payment of benefits, or attached Schedule I. This table does not take into account the transfer of Schedule E items to Schedule R, which would affect ESOPs From "Burden Model 20050901 r1.xls" sheet "2007 Controlled to MPR"

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

Filer Type	Provider Hours	Sponsor Hours	Provider Cost	Total Cost
5500 Large Plans	7,193,638	2,137,730	\$604,265,619	\$730,391,671
DB, ME, 100-1,000	77,069	20,087	\$6,473,825	\$7,658,937
DB, ME, > 1,000	135,692	31,771	\$11,398,117	\$13,272,601
DB, SE, 100-1,000	808,121	208,975	\$67,882,132	\$80,211,686
DB, SE, > 1,000	399,353	89,653	\$33,545,683	\$38,835,208
DC, ME, non-403(b)	139,561	45,151	\$11,723,102	\$14,386,992
DC, ME, 403(b)	161	38	\$13,501	\$15,752
DC, SE, non-403(b)	4,181,140	1,455,080	\$351,215,769	\$437,065,470
DC, SE, 403(b)	3,596	854	\$302,094	\$352,455
Welfare, ME	140,433	42,229	\$11,796,385	\$14,287,921
Welfare, SE	1,308,512	243,892	\$109,915,011	\$124,304,649
5500 Small Eligible	3,052,917	705,804	\$256,445,010	\$298,087,438
DB	325,162	51,338	\$27,313,645	\$30,342,601
DC, non-403(b)	2,687,916	646,730	\$225,784,985	\$263,942,082
DC, 403(b)	3,692	871	\$310,100	\$361,471
Welfare1/	36,146	6,864	\$3,036,280	\$3,441,284
5500 Small Ineligible	339,760	78,551	\$28,539,863	\$33,174,355
DB	40,314	6,551	\$3,386,410	\$3,772,892
DC, non-403(b)	298,630	71,818	\$25,084,909	\$29,322,150
DC, 403(b)	0	0	\$0	\$0
Welfare1/	816	183	\$68,544	\$79,313
<hr/>				
Large Pension	5,744,693	1,851,608	\$482,554,223	\$591,799,100
Small Pension	3,355,715	777,308	\$281,880,049	\$327,741,196
Large Welfare	1,448,945	286,122	\$121,711,396	\$138,592,570
Small Welfare	36,962	7,047	\$3,104,824	\$3,520,597
Large Total	7,193,638	2,137,730	\$604,265,619	\$730,391,671
Small Total	3,392,677	784,355	\$284,984,873	\$331,261,793
<b>Total</b>	<b>10,586,315</b>	<b>2,922,084</b>	<b>\$889,250,492</b>	<b>\$1,061,653,464</b>

From "Burden Model 20050901 r1.xls" sheet "NPRM"

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

Filer Type	Provider Hours	Sponsor Hours	Provider Cost	Total Cost
5500 Large Plans	7,498,469	1,963,790	\$629,871,385	\$745,734,966
DB, ME, 100-1,000	74,182	15,847	\$6,231,282	\$7,166,270
DB, ME, > 1,000	137,177	28,409	\$11,522,853	\$13,198,983
DB, SE, 100-1,000	769,976	161,194	\$64,678,000	\$74,188,449
DB, SE, > 1,000	408,127	84,094	\$34,282,696	\$39,244,250
DC, ME, non-403(b)	135,378	39,899	\$11,371,745	\$13,725,758
DC, ME, 403(b)	23,206	6,889	\$1,949,294	\$2,355,722
DC, SE, non-403(b)	3,947,667	1,180,816	\$331,604,041	\$401,272,170
DC, SE, 403(b)	511,901	151,338	\$42,999,666	\$51,928,622
Welfare, ME	144,934	44,187	\$12,174,441	\$14,781,463
Welfare, SE	1,345,921	251,117	\$113,057,367	\$127,873,281
5500 Small Eligible	1,156,935	245,798	\$97,182,570	\$111,684,627
DB	233,251	27,941	\$19,593,067	\$21,241,562
DC, non-403(b)	897,097	211,586	\$75,356,127	\$87,839,705
DC, 403(b)	14,765	3,482	\$1,240,285	\$1,445,752
Welfare1/	11,823	2,788	\$993,091	\$1,157,608
5500 Small Ineligible	317,591	67,624	\$26,677,661	\$30,667,505
DB	39,427	6,058	\$3,311,841	\$3,669,237
DC, non-403(b)	277,336	61,385	\$23,296,254	\$26,917,987
DC, 403(b)	0	0	\$0	\$0
Welfare1/	828	182	\$69,566	\$80,280
<hr/>				
Large Pension	6,007,614	1,668,486	\$504,639,577	\$603,080,222
Small Pension	1,461,876	310,452	\$122,797,573	\$141,114,244
Large Welfare	1,490,855	295,304	\$125,231,808	\$142,654,744
Small Welfare	12,651	2,970	\$1,062,658	\$1,237,888
Large Total	7,498,469	1,963,790	\$629,871,385	\$745,734,966
Small Total	1,474,527	313,422	\$123,860,231	\$142,352,131
<b>Total</b>	<b>8,972,995</b>	<b>2,277,212</b>	<b>\$753,731,616</b>	<b>\$888,087,098</b>

From "Burden Model 20050901 r1.xls" sheet "NPRM"

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

	IRS Forms	Short Form	Sch B	Sch C	Multis	Miscellaneous	403(b)	Total
All								
Num Filers	637,709	579,656	0	0	0	64,406	0	644,063
ChangeHrs	-464,148	-1,938,262	0	0	0	13,327	0	-2,389,083
Cost	-\$35,671,798	-\$154,298,708	\$0	\$0	\$0	\$1,060,834	\$0	-\$188,909,647
Provider								
Num Filers	637,709	579,656	0	0	0	64,406	0	644,063
ChangeHrs	-331,485	-1,597,650	0	0	0	10,984	0	-1,918,150
Cost	-\$27,844,740	-\$134,202,600	\$0	\$0	\$0	\$922,656	\$0	-\$161,124,600
Sponsor								
Num Filers	637,709	579,656	0	0	0	64,406	0	644,063
ChangeHrs	-132,662	-340,612	0	0	0	2,342	0	-470,933
Cost	-\$7,827,058	-\$20,096,108	\$0	\$0	\$0	\$138,178	\$0	-\$27,785,047

From "Burden Model 20050901 r1.xls" sheet "RegFlex"  
Small plans only.

**Table TA\_6: Burden Estimates for Executive Order 12866**

	IRS Forms	Short Form	Sch B	Sch C	Multis	Miscellaneous	403(b)	Total
All								
Num Filers	738,984	579,656	5,296	78,920	10,348	253,027	8,939	
ChangeHrs	-1,225,688	-1,938,262	18,618	41,136	3,545	153,776	688,685	-2,258,190
Cost	-\$90,075,542	-\$154,298,708	\$1,544,887	\$3,176,924	\$276,155	\$11,893,959	\$53,916,165	-\$173,566,160
Provider								
Num Filers	738,984	579,656	5,296	78,920	10,348	253,027	8,939	
ChangeHrs	-710,398	-1,597,650	17,857	29,996	2,680	112,847	531,350	-1,613,318
Cost	-\$59,673,432	-\$134,202,600	\$1,499,988	\$2,519,664	\$225,120	\$9,479,148	\$44,633,400	-\$135,518,712
Sponsor								
Num Filers	738,984	579,656	5,296	78,920	10,348	253,027	8,939	
ChangeHrs	-515,290	-340,612	761	11,140	865	40,929	157,335	-644,872
Cost	-\$30,402,110	-\$20,096,108	\$44,899	\$657,260	\$51,035	\$2,414,811	\$9,282,765	-\$38,047,448

From "Burden Model 20050901 r1.xls" sheet "ExecOrder"