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I think a simple solution to the current electronic disclosure rules is to make them opt-out instead of opt-in. Have employers provide a onetime notice to employees at the point of employment stating how they will electronically distribute plan information or where it will be posted online. Then employees must provide a written request for paper information much like they would a full copy of a 5500 filing if they want paper copies.

This protects the small segment of the population that has no online access from any source but preserves the environment from unnecessary waste. We see many SPDs running over 4 inches of paper per employee these days. For documents that become obsolete quickly in the current environment that is a lot of wasted paper.

We ultimately have found that most employees cannot find their paper copies when they want to reference them and request an additional copy or go online to reference them.

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