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To: [E-OHPSCAMEWARegistration.EBSA](#)
Subject: RIN 1210-AB51; MEWA Registration Proposed Regulation
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Ladies & Gentlemen,

We appreciate the opportunity to comment on the Department of Labor's proposed regulations relating to reporting requirements for multiple employer welfare arrangements ("MEWAs"). We represent MEWAs currently operating in Iowa. On behalf of these MEWAs we ask that the Department consider revising the proposed rules to eliminate the requirement that MEWAs submit a new M-1 within 30 days of a material change to the M-1 on file. As an initial matter, we believe the material change filing requirement is unnecessary given that MEWAs annually submit the Form M-1 and can report any changes on the next year's filing. In addition, given the additional information requested on the proposed Form M-1, we believe it would be unduly burdensome to require MEWAs to file a new M-1 within 30 days of a material change. A "material change" is defined by the M-1 as any information reported on the M-1 in response to custodial and financial information located in Part II. The proposed Form M-1 expands the information currently being reported in Part II to include agents/promoters, financial institutions, and individual trustees and officers. In addition, that section requests the total number of participants covered by the MEWA. Because the individual agents marketing a plan may change relatively frequently and the number of participants can change day to day, we believe it would be overly burdensome and unrealistic to require MEWAs to submit a new M-1 form each time the number of participants change or individuals marketing the plan leave employment. In the alternative, we suggest the proposed Form M-1 allow MEWAs to list an entity as the marketer/promoter of the plan rather than having to list each specific individual employed by that entity and revise number 19 to request the total number of participants covered by the entity on the last day of the plan year for which the M-1 is submitted rather than the total number of participants covered. We also wish to point out that many MEWAs hold plan assets in multiple financial institutions. To reduce the burden on MEWAs, we suggest the proposed form M-1 be revised to either establish a dollar threshold or in the alternative to modify the electronic filing system to allow filers to submit an attachment in response to 7a.

Thank you for the opportunity to comment and your consideration.



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