

PUBLIC SUBMISSION

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Extension of Comment Period - Proposed Revision of Annual Information
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Annual Reporting and Disclosure

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General Comment

I have owned a TPA in Missouri since 1989 and have always helped my 30 client employers maintain legal and reporting compliance. The additional information proposed in 5500 Schedule J would be very difficult for us to collect and impossible for employers of 25-500 covered employees. It could take years to put new computer programs, logging systems and reporting procedures in place. We barely are meeting ACA requirements after six years of work. I urge the EBSA to extend this requirement for at least three years, or delete the appeals, reversals and any other claims reporting other than total paid claims for the year. Thank you for listening to someone who has 39 years experience in claims administration and 5500 reporting.