

# PUBLIC SUBMISSION

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Extension of Comment Period - Proposed Revision of Annual Information Return/Reports

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Annual Information Return/Reports

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The proposed requirements set forth the proposed new schedule J related to self-funded health plans are overly burdensome and will without a doubt increase the costs and time commitment associated with annual reporting.

The average self-funded plan sponsor relies on third party administrators to track the bulk of this information. In order to obtain information at this level, it is likely that most third party administrators will charge additional reporting fees in order to summarize the necessary data. Additionally, the self-funded employer is then left to create and submit the 5500 and supporting documentation. The amount of data being requested in proposed schedule J clearly will mean increased staff time in preparing the documents for submittal.

Given that employers sponsoring health plans have already been burdened with the overly complicated annual ACA 1094/1095 reporting (both in terms of costs for outside vendors to generate the statements, as well as staff time to review, audit, and edit statements prior to release), the additional reporting requirements in proposed schedule J are not viewed favorably by employers.

The amount of reporting requirements that have been layered on employers with self-funded plans is already at an all-time high, thanks to the ACA. Complying with all of these requirements means more costs for everyone - employers, third party administrators, government, and indirectly the employee/consumer as those costs are passed on through higher plan premiums. If reporting this information achieved some sort of beneficial outcome for all, I think most employers would be happy to comply. To date, we have not seen much in the way of information that points to the real usefulness of assembling and submitting this data. The costs associated with the reporting exercise do not appear to be balanced by quantifiable gains to be realized.

Please consider the larger impacts of such a proposal on the average employer and make revision to ease the reporting burden!