

## **Technical Appendix: Documentation of the 2009 Form 5500 Model**

### **1. Overview**

This technical appendix describes the logic and data underlying the burden model used for estimating the impact of the final Plan Year 2009 revisions of the Form 5500 and associated schedules. 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 'Form\_5500\_Model\_Final\_Reg\_2009.xls'.

The burden model builds on work done by Mathematica Policy Research (MPR) in support of Form 5500-related regulatory revisions from 1995 through 2005. 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 a report by William S. Borden, submitted on behalf of MPR 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 final revisions to the Form 5500 and associated schedules was to produce a "Baseline/Current Rule" scenario (Baseline). This was intended to characterize current filing requirements and to create a baseline model to which models that incorporate the proposed or final revisions can be compared to. First, a summary of hours per schedule by type of filer was prepared. Then, aggregate Baseline burden was estimated, consistent with those hours and total filings.

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.

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\_8, appearing at the end of this appendix. Tables TA\_1 and TA\_2 show the full Baseline rules and final rules matrices, respectively. Total counts of filings are shown in the top block of each table, broken down by schedule by filer type. The Baseline 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 Baseline rules and the final rules, respectively, converted to dollars. They also show 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 (Regulatory Flexibility Act), allocated across the revisions. Table TA\_6 gives the burden for all plans (Executive Order 12866), also allocated across the revisions. Table TA\_7 and TA\_8 show the Paperwork Reduction Act burden numbers of the Baseline and the final rule.

## **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 by the number of plan filings to get hours per Form 5500 for large and small plans. Similarly, the aggregate hours per schedule were divided by the corresponding number of schedule filings to get hours per schedule for large and small plans.

The next step was to calculate hours per schedule (including the Form 5500) by plan type (defined benefit, defined contribution, and welfare). These average hours per schedule by plan type were used as inputs to the burden model. In some cases, we used internal information as well as comments from the PBGC to change the burden hours where we concluded that the level of burden hours was no longer accurate.

In the cases where the 2009 annual report has schedules for a particular plan type and size but the annual reports considered by MPR did not, hours per schedule from other comparable-sized plans were used. Large multiemployer (ME) plans were assumed to take 2 hours to fill out Schedule R. Welfare plans are not required to file Schedule R, so hours per Schedule R for welfare plans were assumed to be zero.

### Baseline Fractions of Burden Per Agency By Schedule

The Baseline fractions of burden per agency for each schedule (including the Form 5500) 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.

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

The Baseline fractions of burden for service providers and sponsors by schedule were based on MPR's modeling efforts. Aggregate service provider hours for each schedule (including the Form 5500) were divided by aggregate hours for that schedule to get the fraction of hours for a schedule that was incurred by service providers. The Baseline fractions of burden for service providers and sponsors by schedule were calculated separately for large and small plans.

## Schedule Counts

Schedule counts for the Baseline rules reflect “best filings” from the 2003 Form 5500 filings. They were adjusted in two primary ways: 1) to model a more accurate large/small split of 403(b) plans, and 2) to zero-out certain schedule counts for filer types that were not required to file those schedules. For example, small plans are not required to file Schedule C, so every instance of a non-zero count of Schedules C for a small filer type was set to zero.

## 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 (based on MPR’s 2005 model update). This was done either as a factor applied to the Baseline 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 Baseline total 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 one schedule were moved to a different schedule, or items were added to a schedule that 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 Baseline hours for the schedule.

The burden hour estimate for the new Form 5500-SF (Short Form 5500) required both transfers of items from existing schedules and development of estimates for new items. The final estimate of the Short Form 5500’s average burden per filer is 2 hours, 32 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 5500. It also includes an estimate of burden attributable to several new data elements on the Short Form 5500.

Average burden hours per small filer for each source were based on MPR’s September 2005 model update. Using a mock-up of the Short Form 5500, data elements were identified and located on the current Form 5500 and schedules. To obtain the weights, the number of Short Form 5500 elements from each source was divided by the total number of elements from that source. Three items on the Short Form 5500 were not found on current schedules. These items are included in the “Compliance Questions” portion of the Short Form 5500, a section that is otherwise taken from Schedule I. It was assumed that each of these three new elements would have the same burden as an average Schedule I element. Thus, the Short Form 5500 burden was increased by the burden of the three elements and this results in a total burden estimate for the Short Form 5500 of 2 hours and 32 minutes (rounded up to the next whole minute), or 2.53 hours.

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

A macro was written to sum, for each agency, entity (sponsor, service provider), and final 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 \$86/hour was applied to the service provider change in hours, and a rate of \$59/hour was applied to the sponsor hours. The sponsor hour costs are based on the National Occupational Employment Survey (May 2005, Bureau of Labor Statistics) and the Employment Cost Index (Sept. 2006, Bureau of Labor Statistics). No reliable data was available on what service provider charge plans for their services to file the Form 5500. As an approximation, we assumed that service providers charge 145% of the labor rates of sponsors, similar to the relationship in the earlier models. The resulting changes in cost for both service providers and sponsors were summed to obtain the total change in cost. The outputs applicable to Executive Order 12866 and the Regulatory Flexibility Act are summarized in Tables TA\_5 and TA\_6, respectively.

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

#### Removal of Schedules E and SSA

The change in burden due to the removal of Schedules E and SSA was tabulated in isolation, as if none of the other final revisions had taken place.

##### *Number of Affected Filers*

The number of filers affected by the removal of Schedules E and SSA is estimated using the number of Schedules SSA filed.

##### *Change in Burden Hours*

The decrease in burden hours resulting from the removal of Schedules E 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 elimination of the IRS schedules in place. This avoids double-counting of the burden hours associated with the IRS schedules. Additionally, the Short Form 5500 burden calculation adjusts for a provision from the 403(b) plan revision: as most, if not all, all single-employer (SE) small 403(b) plans will be eligible to file the Short Form 5500, all were counted as Short Form 5500-eligible.

### *Number of Affected Filers*

The number of filers affected by the introduction of a Short Form 5500 is estimated at 95% of all single-employer, non-403(b) small 5500 filers (both pension and welfare plans), and 100% of small, single-employer 403(b) 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, except Schedule B, was subtracted from the total number of hours required to complete the Short Form 5500. If the Short Form 5500 burden was smaller than the Baseline burden, the change was considered to be negative (a reduction in burden hours). Schedule B was excluded from the calculation because it will still be required for small Short Form 5500-eligible defined benefit (DB) plans and some money-purchase defined contribution (DC) plans.

### 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 were not required to report participant data; therefore, a large/small split of 403(b) plans had to be estimated.

### *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 (from Table TA\_1), 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) (from Table TA\_2).

### Single-Employer Schedule B Filers File Schedule SB

### *Number of Affected Filers*

The number of affected filers, by proxy, is the number of Schedules B filed by the following plan types: DB-SE-Large, DB-SE-Very Large, DB-SE-Small-SF eligible, DB-SE-Small-SF ineligible.

### *Change in Burden Hours*

This revision reduced Schedule B unit burden by 82 minutes for large plans and by 71 minutes for small plans. The change in burden hours is calculated by subtracting the total number of hours spent on Schedule B by the affected plans, pre-revision, from the total number of hours that will be spent on Schedule SB by the affected plan, post-revision.

## Multiemployer Schedule B Filers File Schedule MB

### *Number of Affected Filers*

The number of affected filers, by proxy, is the number of Schedules B filed by the following plan types: DB-ME-Large and Small, DB-ME-Very Large, DC.<sup>1</sup>

### *Change in Burden Hours*

This revision increased Schedule B unit burden by 21 minutes for large and small plans. The change in burden hours is calculated by subtracting the total number of hours spent on Schedule B by the affected plans, pre-revision, from the total number of hours spent on Schedule MB by the affected plan, post-revision.

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

### *Number of Affected Filers*

The number of filers affected by the 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. Additionally, due to the clarification of Schedule C filing requirements for certain welfare plans, as discussed in more detail in the preamble of the Notice of adoption of revisions to annual return/report forms, a reduction in the number of welfare plans filing Schedule C was applied.<sup>2</sup>

### *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, pre-revision, from the total number of Schedule C hours for affected plans post-revision.

## Schedule R

Numerous revisions were applied to Schedule R:

	ESOP Questions 10- 12	Questions 13- 17	Question 18	Question 19 (asset allocation)	Deletion of Question 9
DB-ME-L		+62.1 m	+0.1 m		-1.0 m
DB-ME-VL		+62.1 m	+0.1 m	+2.0 hr	-1.0 m
DB-SE-L			+0.5 m		-1.0 m
DB-SE-VL			+0.5 m	+2.0 hr	-1.0 m
DC-L	+1.2 m				-1.0 m

<sup>1</sup> Only certain DC plans (money purchase plans) have to file Schedule B/MB.

<sup>2</sup> More detail can be found in the preamble under section B. Discussion of the Public Comments, 5. Schedule C, b. Miscellaneous Schedule C Issues.

DB-ME-S		+62.2 m	+0.2 m		-1.0 m
DB-SE-S			+4.33 m		-1.0 m
DC-S	+2.64 m				-1.0 m

*Number of Affected Filers*

The number of filers affected by the new questions on Schedule R is the number of Schedules R filed by large DC plans, large and very large DB plans, and small Short Form 5500-ineligible DB and DC plans.

*Change in Burden Hours*

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

Miscellaneous Technical Revisions

Miscellaneous revisions were applied to Schedules A, H, and I, and to the Form 5500:

Schedule A: Identify insurers that fail to supply information (3 items added)

Schedule H:

- Large plan failures to pay benefits due (1 item added)
- Schedule of delinquent participant contributions (6 items added)
- Questions on blackout compliance (2 items added)
- Reporting of mutual fund dividends (1 item added)

Schedule I

- Small plan failures to pay benefits due (1 item added)
- Questions on blackout compliance (2 items added)
- Separate Disclosure of Fees Paid to Administrative Service Providers (1 item added)

Form 5500:

- New pension plan characteristics codes (1/2 item added)
- Question on number of contributing employers (1 minute added to multiemployer plans)

*Number of Affected Filers*

All filers who filed Schedule A, H, or I, or the Form 5500, are affected. Short Form 5500-eligible filers are not affected.

*Change in Burden Hours*

The change in burden hours is estimated by taking the difference in the tabulation of hours, pre- and post-revision, for the affected filers.

Impact of all Final Revisions

*Number of Affected Filers*

All filers are affected by at least one of the final revisions

*Change in Burden Hours*

The change in burden hours is estimated by taking the difference in the tabulation of hours, pre- and post-revisions.



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

Filer Type	Total	5500	Sch A	Sch MB	Sch SB	Sch C	Sch D	Sch E	Sch G	Sch H	Sch I	Sch P	Sch R	Sch SSA
<b>Schedules</b>	<b>780,450</b>	<b>780,450</b>	<b>445,661</b>	<b>2,324</b>	<b>42,163</b>	<b>45,007</b>	<b>208,365</b>	<b>8,008</b>	<b>3,330</b>	<b>80,675</b>	<b>361,631</b>	<b>0</b>	<b>377,782</b>	<b>198,420</b>
<b>Large Plans</b>	<b>151,753</b>	<b>151,753</b>	<b>218,459</b>	<b>1,624</b>	<b>10,277</b>	<b>45,007</b>	<b>41,534</b>	<b>2,774</b>	<b>3,330</b>	<b>80,094</b>	<b>515</b>	<b>0</b>	<b>66,713</b>	<b>35,240</b>
DB/ME/100-1,000	642	642	202	602	0	558	191	0	6	633	0	0	575	364
DB/ME/1,000+	876	876	488	862	0	771	486	0	46	867	1	0	826	332
DB/SE/100-1,000	7,006	7,006	2,087	0	6,892	4,754	3,561	0	56	6,966	5	0	6,862	3,792
DB/SE/1,000+	3,432	3,432	1,064	0	3,385	2,611	2,442	1	78	3,416	0	0	3,361	639
DC/ME/non-403b	1,740	1,740	1,101	43	0	1,322	870	28	92	1,877	5	0	1,522	616
DC/ME/403b	82	82	9	0	0	0	0	0	0	0	2	0	1	0
DC/SE/non-403b	57,357	57,357	31,870	114	0	20,314	33,099	2,744	2,790	56,896	99	0	53,515	29,472
DC/SE/403b	7,230	7,230	802	3	0	12	18	1	2	22	155	0	52	24
Welfare/ME	4,148	4,148	9,206	0	0	2,536	166	0	53	2,749	8	0	0	0
Welfare/SE	69,240	69,240	171,630	0	0	12,129	701	0	207	6,668	240	0	0	0
<b>Small Eligible</b>	<b>593,628</b>	<b>593,628</b>	<b>214,505</b>	<b>539</b>	<b>30,269</b>	<b>0</b>	<b>157,767</b>	<b>4,929</b>	<b>0</b>	<b>506</b>	<b>340,537</b>	<b>0</b>	<b>293,748</b>	<b>154,176</b>
DB/ME	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DB/SE	34,299	34,299	9,384	0	30,269	0	2,516	4	0	29	32,972	0	32,432	3,650
DC/ME/non-403b	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DC/ME/403b	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DC/SE/non-403b	544,378	544,378	199,503	535	0	0	154,698	4,924	0	412	301,385	0	261,254	150,496
DC/SE/403b	8,836	8,836	980	3	0	0	22	2	0	27	189	0	63	30
Welfare/ME	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Welfare/SE	6,114	6,114	4,637	0	0	0	532	0	0	38	5,990	0	0	0
<b>Small Ineligible</b>	<b>35,069</b>	<b>35,069</b>	<b>12,697</b>	<b>162</b>	<b>1,617</b>	<b>0</b>	<b>9,063</b>	<b>304</b>	<b>0</b>	<b>75</b>	<b>20,580</b>	<b>0</b>	<b>17,319</b>	<b>9,004</b>
DB/ME	176	176	42	126	0	0	11	0	0	1	164	0	149	52
DB/SE	1,833	1,833	501	0	1,617	0	124	0	0	2	1,762	0	1,733	195
DC/ME/non-403b	3,188	3,188	890	7	0	0	624	41	0	21	1,903	0	1,479	756
DC/ME/403b	101	101	11	0	0	0	0	0	0	2	0	0	1	0
DC/SE/non-403b	29,084	29,084	10,659	29	0	0	8,265	263	0	22	16,102	0	13,958	8,041
DC/SE/403b	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Welfare/ME	361	361	346	0	0	0	3	0	0	27	327	0	0	0
Welfare/SE	327	327	248	0	0	0	28	0	0	2	320	0	0	0
<b>Hours/Schedule</b>														
<b>Large Plans</b>														
DB/ME/100-1,000	2.00	2.75	8.00	0.00	3.14	1.67	0.00	17.53	8.00	2.00	0.00	2.00	2.00	8.06
DB/ME/1,000+	2.00	2.75	8.00	0.00	3.14	1.67	0.00	17.53	8.00	2.00	0.00	2.00	2.00	8.06
DB/SE/100-1,000	2.00	2.75	0.00	8.00	3.14	1.67	0.00	17.53	8.00	2.00	0.00	2.00	2.00	8.06
DB/SE/1,000+	2.00	2.75	0.00	8.00	3.14	1.67	0.00	17.53	8.00	2.00	0.00	2.00	2.00	8.06
DC/ME/non-403b	1.80	2.75	3.33	0.00	2.06	1.65	3.30	11.09	8.00	1.95	0.00	2.00	1.50	6.14
DC/ME/403b	0.52	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
DC/SE/non-403b	1.80	2.75	3.33	0.00	2.06	1.65	3.30	11.09	7.00	1.95	0.00	1.50	1.50	6.14
DC/SE/403b	0.52	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
Welfare/ME	1.75	3.51	0.00	0.00	3.14	1.87	0.00	10.99	8.00	1.80	0.00	0.00	0.00	0.00
Welfare/SE	1.75	3.51	0.00	0.00	3.14	1.87	0.00	10.99	8.00	1.80	0.00	0.00	0.00	0.00
<b>Small Eligible</b>	<b>1.30</b>	<b>2.75</b>	<b>8.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.33</b>	<b>0.00</b>	<b>0.00</b>	<b>8.00</b>	<b>2.00</b>	<b>0.00</b>	<b>1.50</b>	<b>1.50</b>	<b>1.70</b>
DB/ME	1.30	2.75	0.00	8.00	0.00	0.33	0.00	0.00	8.00	2.00	0.00	1.50	1.50	1.70
DB/SE	1.30	2.75	0.00	8.00	0.00	0.33	0.00	0.00	8.00	2.00	0.00	1.50	1.50	1.70
DC/ME/non-403b	1.30	2.75	3.33	0.00	0.00	0.33	3.30	0.00	7.00	1.95	0.00	1.00	1.00	1.70
DC/ME/403b	0.52	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
DC/SE/non-403b	1.30	2.75	3.33	0.00	0.00	0.33	3.30	0.00	7.00	1.95	0.00	1.00	1.00	1.70
DC/SE/403b	0.52	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
Welfare/ME	1.23	2.60	0.00	0.00	0.00	0.33	0.00	0.00	8.00	1.80	0.00	0.00	0.00	0.00
Welfare/SE	1.23	2.60	0.00	0.00	0.00	0.33	0.00	0.00	8.00	1.80	0.00	0.00	0.00	0.00
<b>Small Ineligible</b>	<b>1.30</b>	<b>2.75</b>	<b>8.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.33</b>	<b>0.00</b>	<b>0.00</b>	<b>8.00</b>	<b>2.00</b>	<b>0.00</b>	<b>1.50</b>	<b>1.50</b>	<b>1.70</b>
DB/ME	1.30	2.75	0.00	8.00	0.00	0.33	0.00	0.00	8.00	2.00	0.00	1.50	1.50	1.70
DB/SE	1.30	2.75	0.00	8.00	0.00	0.33	0.00	0.00	8.00	2.00	0.00	1.50	1.50	1.70
DC/ME/non-403b	1.30	2.75	3.33	0.00	0.00	0.33	3.30	0.00	7.00	1.95	0.00	1.00	1.00	1.70
DC/ME/403b	0.52	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
DC/SE/non-403b	1.30	2.75	3.33	0.00	0.00	0.33	3.30	0.00	7.00	1.95	0.00	1.00	1.00	1.70
DC/SE/403b	0.52	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
Welfare/ME	1.23	2.60	0.00	0.00	0.00	0.33	0.00	0.00	8.00	1.80	0.00	0.00	0.00	0.00
Welfare/SE	1.23	2.60	0.00	0.00	0.00	0.33	0.00	0.00	8.00	1.80	0.00	0.00	0.00	0.00
<b>Total Burden Hours</b>	<b>5,319,130</b>	<b>1,072,448</b>	<b>1,356,886</b>	<b>15,144</b>	<b>337,304</b>	<b>118,013</b>	<b>123,865</b>	<b>26,400</b>	<b>38,090</b>	<b>587,657</b>	<b>705,214</b>	<b>0</b>	<b>434,727</b>	<b>503,381</b>
<b>Large Plans</b>	<b>2,243,564</b>	<b>262,518</b>	<b>735,593</b>	<b>12,235</b>	<b>82,216</b>	<b>118,013</b>	<b>68,819</b>	<b>9,148</b>	<b>38,090</b>	<b>583,680</b>	<b>661</b>	<b>0</b>	<b>108,565</b>	<b>228,026</b>
DB/ME/100-1,000	17,982	1,284	556	4,816	0	1,754	320	0	105	5,064	0	0	1,150	2,934
DB/ME/1,000+	25,300	1,752	1,342	6,896	0	2,423	814	0	807	6,936	2	0	1,652	2,676
DB/SE/100-1,000	196,802	14,012	5,739	0	55,136	14,942	5,962	0	982	55,728	10	0	13,724	30,567
DB/SE/1,000+	89,734	6,864	2,926	0	27,080	8,207	4,088	0	1,368	27,328	0	0	6,722	5,151
DC/ME/non-403b	33,429	3,132	3,028	143	0	2,728	1,435	92	1,021	15,016	10	0	3,044	3,781
DC/ME/403b	43	43	0	0	0	0	0	0	0	0	0	0	0	0
DC/SE/non-403b	987,411	103,243	87,643	380	0	41,911	54,575	9,055	30,949	398,272	193	0	80,273	180,917
DC/SE/403b	3,760	3,760	0	0	0	0	0	0	0	0	0	0	0	0
Welfare/ME	70,416	7,259	32,294	0	0	7,963	311	0	583	21,992	14	0	0	0
Welfare/SE	818,687	121,170	602,066	0	0	38,085	1,314	0	2,276	53,344	432	0	0	0
<b>Small Eligible</b>	<b>2,903,000</b>	<b>764,464</b>	<b>586,496</b>	<b>1,783</b>	<b>242,151</b>	<b>0</b>	<b>52,056</b>	<b>16,249</b>	<b>0</b>	<b>3,423</b>	<b>664,427</b>	<b>0</b>	<b>309,902</b>	<b>262,049</b>
DB/ME	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DB/SE	434,442	44,623	25,805	0	242,151	0	830	0	0	235	65,945	0	48,648	6,205
DC/ME/non-403b	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DC/ME/403b	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DC/SE/non-403b	2,433,155	707,756	548,634	1,783	0	0	51,050	16,249	0	2,884	587,701	0	261,254	255,844
DC/SE/403b	4,595	4,595	0											



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

Filer Type	Total Hours	Provider Hours	Sponsor Hours	Total Cost	Provider Cost	Sponsor Cost
<b>Large Plans</b>	<b>2,243,564</b>	<b>1,658,957</b>	<b>584,607</b>	<b>\$177,162,091</b>	<b>\$142,670,289</b>	<b>\$34,491,802</b>
DB/ME/100-1,000	17,982	12,725	5,257	1,404,543	1,094,355	310,188
DB/ME/1,000+	25,300	18,474	6,826	1,991,476	1,588,734	402,742
DB/SE/100-1,000	196,802	139,554	57,248	15,379,279	12,001,653	3,377,625
DB/SE/1,000+	89,734	66,222	23,511	7,082,281	5,695,115	1,387,166
DC/ME/non-403b	33,429	21,620	11,809	2,556,066	1,859,360	696,707
DC/ME/403b	43	35	8	3,461	2,976	485
DC/SE/non-403b	987,411	623,442	363,968	75,090,167	53,616,026	21,474,141
DC/SE/403b	3,760	3,039	721	303,870	261,320	42,550
Welfare/ME	70,416	55,039	15,377	5,640,631	4,733,390	907,240
Welfare/SE	818,687	718,807	99,881	67,710,318	61,817,361	5,892,958
<b>Small Eligible</b>	<b>2,903,000</b>	<b>2,332,355</b>	<b>570,645</b>	<b>\$234,250,610</b>	<b>\$200,582,569</b>	<b>\$33,668,041</b>
DB/ME	0	0	0	0	0	0
DB/SE	434,442	373,193	61,249	35,708,292	32,094,586	3,613,706
DC/ME/non-403b	0	0	0	0	0	0
DC/ME/403b	0	0	0	0	0	0
DC/SE/non-403b	2,433,155	1,929,471	503,683	195,651,859	165,934,541	29,717,318
DC/SE/403b	4,595	3,718	877	371,517	319,775	51,742
Welfare/ME	0	0	0	0	0	0
Welfare/SE	30,808	25,973	4,835	2,518,942	2,233,667	285,275
<b>Small Ineligible</b>	<b>172,566</b>	<b>138,609</b>	<b>33,957</b>	<b>\$13,923,862</b>	<b>\$11,920,395</b>	<b>\$2,003,467</b>
DB/ME	1,936	1,654	282	158,879	142,233	16,646
DB/SE	23,211	19,939	3,272	1,907,782	1,714,713	193,069
DC/ME/non-403b	13,578	10,726	2,852	1,090,690	922,416	168,274
DC/ME/403b	52	42	10	4,232	3,642	589
DC/SE/non-403b	129,996	103,086	26,910	10,453,065	8,865,362	1,587,703
DC/SE/403b	0	0	0	0	0	0
Welfare/ME	2,147	1,775	372	174,635	152,691	21,944
Welfare/SE	1,646	1,388	258	134,579	119,338	15,241
Large Pension	1,354,460	885,111	469,349	\$103,811,142	\$76,119,538	\$27,691,604
Small Pension	3,040,965	2,441,829	599,136	\$245,346,315	\$209,997,268	\$35,349,047
<b>All Pension</b>	<b>4,395,425</b>	<b>3,326,940</b>	<b>1,068,486</b>	<b>\$349,157,457</b>	<b>\$286,116,806</b>	<b>\$63,040,651</b>
Large Welfare	889,104	773,846	115,258	\$73,350,949	\$66,550,751	\$6,800,198
Small Welfare	34,601	29,136	5,465	\$2,828,157	\$2,505,697	\$322,460
<b>All Welfare</b>	<b>923,705</b>	<b>802,982</b>	<b>120,723</b>	<b>\$76,179,106</b>	<b>\$69,056,448</b>	<b>\$7,122,658</b>
Large Total	2,243,564	1,658,957	584,607	\$177,162,091	\$142,670,289	\$34,491,802
Small Total	3,075,567	2,470,965	604,602	\$248,174,472	\$212,502,965	\$35,671,507
<b>All Total</b>	<b>5,319,130</b>	<b>4,129,922</b>	<b>1,189,209</b>	<b>\$425,336,563</b>	<b>\$355,173,254</b>	<b>\$70,163,309</b>

**Table TA\_4**  
**Burden Summaries**  
**Final Rules, 2009**

Filer Type	Total Hours	Provider Hours	Sponsor Hours	Total Cost	Provider Cost	Sponsor Cost
<b>Large Plans</b>	<b>2,210,008</b>	<b>1,688,781</b>	<b>521,227</b>	<b>\$175,987,588</b>	<b>\$145,235,200</b>	<b>\$30,752,388</b>
DB/ME/100-1,000	16,791	12,701	4,090	1,333,610	1,092,284	241,326
DB/ME/1,000+	26,746	20,269	6,477	2,125,302	1,743,136	382,166
DB/SE/100-1,000	165,722	123,094	42,628	13,101,114	10,586,078	2,515,036
DB/SE/1,000+	91,314	67,415	23,899	7,207,755	5,797,694	1,410,061
DC/ME/non-403b	31,696	21,308	10,388	2,445,389	1,832,498	612,891
DC/ME/403b	1,366	910	456	105,174	78,283	26,891
DC/SE/non-403b	844,565	566,888	277,677	65,135,347	48,752,400	16,382,947
DC/SE/403b	108,655	72,917	35,738	8,379,398	6,270,839	2,108,559
Welfare/ME	74,243	57,868	16,376	5,942,772	4,976,613	966,160
Welfare/SE	848,909	745,411	103,497	70,211,726	64,105,376	6,106,351
<b>Small Eligible</b>	<b>1,711,953</b>	<b>1,408,373</b>	<b>303,580</b>	<b>\$139,031,257</b>	<b>\$121,120,036</b>	<b>\$17,911,221</b>
DB/ME	0	0	0	0	0	0
DB/SE	293,223	260,202	33,022	24,325,634	22,377,365	1,948,269
DC/ME/non-403b	0	0	0	0	0	0
DC/ME/403b	0	0	0	0	0	0
DC/SE/non-403b	1,380,855	1,117,524	263,330	111,643,582	96,107,089	15,536,493
DC/SE/403b	22,385	18,113	4,272	1,809,764	1,557,713	252,051
Welfare/ME	0	0	0	0	0	0
Welfare/SE	15,489	12,533	2,956	1,252,277	1,077,869	174,408
<b>Small Ineligible</b>	<b>159,821</b>	<b>130,677</b>	<b>29,145</b>	<b>\$12,957,719</b>	<b>\$11,238,184</b>	<b>\$1,719,535</b>
DB/ME	2,145	1,813	333	175,512	155,876	19,635
DB/SE	21,386	18,299	3,087	1,755,858	1,573,717	182,140
DC/ME/non-403b	12,660	10,193	2,466	1,022,128	876,606	145,522
DC/ME/403b	56	45	11	4,548	3,900	648
DC/SE/non-403b	119,611	97,024	22,587	9,676,686	8,344,050	1,332,636
DC/SE/403b	0	0	0	0	0	0
Welfare/ME	2,248	1,857	391	182,806	159,726	23,079
Welfare/SE	1,715	1,445	269	140,183	124,307	15,875
Large Pension	1,286,856	885,502	401,354	\$99,833,089	\$76,153,212	\$23,679,878
Small Pension	1,852,321	1,523,213	329,108	\$150,413,710	\$130,996,316	\$19,417,394
<b>All Pension</b>	<b>3,139,178</b>	<b>2,408,715</b>	<b>730,462</b>	<b>\$250,246,800</b>	<b>\$207,149,528</b>	<b>\$43,097,272</b>
Large Welfare	923,152	803,279	119,873	\$76,154,499	\$69,081,988	\$7,072,510
Small Welfare	19,452	15,836	3,616	\$1,575,266	\$1,361,903	\$213,363
<b>All Welfare</b>	<b>942,604</b>	<b>819,115</b>	<b>123,489</b>	<b>\$77,729,764</b>	<b>\$70,443,891</b>	<b>\$7,285,873</b>
Large Total	2,210,008	1,688,781	521,227	\$175,987,588	\$145,235,200	\$30,752,388
Small Total	1,871,774	1,539,049	332,725	\$151,988,976	\$132,358,219	\$19,630,757
<b>All Total</b>	<b>4,081,782</b>	<b>3,227,830</b>	<b>853,952</b>	<b>\$327,976,564</b>	<b>\$277,593,419</b>	<b>\$50,383,145</b>

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

	All	E & SSA Removed	Short Form 5500	Large 403(b)	Sch MB	Sch SB	Sch C	Sch R	Miscellaneous
All									
Number of Filers	628,697	163,180	593,628	0	697	31,886	0	1,882	35,069
Change in Hours	-1,203,793	-294,607	-876,932	0	44	-37,732	0	672	4,762
Change in Cost	-\$96,185,496	-\$22,570,768	-\$70,895,152	\$0	\$3,698	-\$3,163,766	\$0	\$52,053	\$388,439
Service Providers									
Change in Hours	-931,916	-192,183	-709,488	0	41	-34,726	0	458	3,982
Change in Cost	-\$80,144,745	-\$16,527,707	-\$61,015,995	\$0	\$3,490	-\$2,986,403	\$0	\$39,429	\$342,439
Plan Sponsors									
Change in Hours	-271,877	-102,425	-167,443	0	4	-3,006	0	214	780
Change in Cost	-\$16,040,751	-\$6,043,061	-\$9,879,157	\$0	\$207	-\$177,363	\$0	\$12,623	\$46,000

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

	All	E & SSA Removed	Short Form 5500	Large 403(b)	Sch MB	Sch SB	Sch C	Sch R	Miscellaneous
All									
Number of Filers	780,450	198,420	593,628	7,312	2,318	42,163	47,774	90,987	186,822
Change in Hours	-1,237,348	-529,781	-876,932	100,054	557	-51,777	25,029	10,597	84,905
Change in Cost	-\$97,359,999	-\$39,338,083	-\$70,895,152	\$7,704,578	\$47,198	-\$4,356,141	\$1,969,508	\$827,904	\$6,680,189
Service Providers									
Change in Hours	-902,091	-299,295	-709,488	66,718	532	-48,196	18,251	7,507	61,881
Change in Cost	-\$77,579,835	-\$25,739,412	-\$61,015,995	\$5,737,709	\$45,754	-\$4,144,876	\$1,569,595	\$645,604	\$5,321,787
Plan Sponsors									
Change in Hours	-335,257	-230,486	-167,443	33,337	24	-3,581	6,778	3,090	23,024
Change in Cost	-\$19,780,164	-\$13,598,671	-\$9,879,157	\$1,966,869	\$1,444	-\$211,265	\$399,913	\$182,300	\$1,358,402

**Table TA 7: Burden summary for Paperwork Reduction Act (PRA), Baseline**

Total	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	885,111	469,349	1,354,460	\$76,119,538	\$27,691,604	\$103,811,142
Small Pension Plans	2,441,829	599,136	3,040,965	\$209,997,268	\$35,349,047	\$245,346,315
Large Welfare Plans	773,846	115,258	889,104	\$66,550,751	\$6,800,198	\$73,350,949
Small Welfare Plans	29,136	5,465	34,601	\$2,505,697	\$322,460	\$2,828,157
Large Plans	1,658,957	584,607	2,243,564	\$142,670,289	\$34,491,802	\$177,162,091
Small Plans	2,470,965	604,602	3,075,567	\$212,502,965	\$35,671,507	\$248,174,472
<b>Total Plans</b>	<b>4,129,922</b>	<b>1,189,209</b>	<b>5,319,130</b>	<b>\$355,173,254</b>	<b>\$70,163,309</b>	<b>\$425,336,563</b>
DOL	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	490,013	219,012	709,025	\$42,141,150	\$12,921,695	\$55,062,844
Small Pension Plans	1,217,435	235,049	1,452,485	\$104,699,443	\$13,867,913	\$118,567,356
Large Welfare Plans	753,520	101,742	855,262	\$64,802,722	\$6,002,755	\$70,805,477
Small Welfare Plans	21,391	3,549	24,940	\$1,839,618	\$209,381	\$2,048,999
Large Plans	1,243,533	320,753	1,564,287	\$106,943,872	\$18,924,450	\$125,868,322
Small Plans	1,238,826	238,598	1,477,424	\$106,539,061	\$14,077,294	\$120,616,355
<b>Total Plans</b>	<b>2,482,360</b>	<b>559,352</b>	<b>3,041,711</b>	<b>\$213,482,932</b>	<b>\$33,001,744</b>	<b>\$246,484,676</b>
PBGC	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	4,716	281	4,996	\$405,533	\$16,569	\$422,102
Small Pension Plans	15,597	1,907	17,504	\$1,341,349	\$112,511	\$1,453,861
Large Welfare Plans	107	32	139	\$9,199	\$1,878	\$11,077
Small Welfare Plans	39	9	48	\$3,370	\$548	\$3,919
Large Plans	4,822	313	5,135	\$414,733	\$18,447	\$433,180
Small Plans	15,636	1,916	17,553	\$1,344,720	\$113,060	\$1,457,779
<b>Total Plans</b>	<b>20,459</b>	<b>2,229</b>	<b>22,688</b>	<b>\$1,759,452</b>	<b>\$131,507</b>	<b>\$1,890,959</b>
IRS + SSA	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	390,382	250,057	640,439	\$33,572,855	\$14,753,340	\$48,326,196
Small Pension Plans	1,208,798	362,181	1,570,979	\$103,956,644	\$21,368,650	\$125,325,294
Large Welfare Plans	20,219	13,484	33,703	\$1,738,830	\$795,565	\$2,534,395
Small Welfare Plans	7,706	1,907	9,613	\$662,711	\$112,532	\$775,243
Large Plans	410,601	263,541	674,142	\$35,311,685	\$15,548,905	\$50,860,590
Small Plans	1,216,504	364,088	1,580,592	\$104,619,355	\$21,481,182	\$126,100,537
<b>Total Plans</b>	<b>1,627,105</b>	<b>627,629</b>	<b>2,254,734</b>	<b>\$139,931,040</b>	<b>\$37,030,087</b>	<b>\$176,961,128</b>

**Table TA 8: Burden summary for Paperwork Reduction Act (PRA), Final, 2009**

Total	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	885,502	401,354	1,286,856	\$76,153,212	\$23,679,878	\$99,833,089
Small Pension Plans	1,523,213	329,108	1,852,321	\$130,996,316	\$19,417,394	\$150,413,710
Large Welfare Plans	803,279	119,873	923,152	\$69,081,988	\$7,072,510	\$76,154,499
Small Welfare Plans	15,836	3,616	19,452	\$1,361,903	\$213,363	\$1,575,266
Large Plans	1,688,781	521,227	2,210,008	\$145,235,200	\$30,752,388	\$175,987,588
Small Plans	1,539,049	332,725	1,871,774	\$132,358,219	\$19,630,757	\$151,988,976
<b>Total Plans</b>	<b>3,227,830</b>	<b>853,952</b>	<b>4,081,782</b>	<b>\$277,593,419</b>	<b>\$50,383,145</b>	<b>\$327,976,564</b>
DOL	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	574,168	257,910	832,077	\$49,378,429	\$15,216,669	\$64,595,097
Small Pension Plans	708,414	164,086	872,500	\$60,923,634	\$9,681,051	\$70,604,685
Large Welfare Plans	781,644	105,407	887,051	\$67,221,385	\$6,219,031	\$73,440,415
Small Welfare Plans	9,101	1,996	11,097	\$782,688	\$117,768	\$900,456
Large Plans	1,355,812	363,317	1,719,129	\$116,599,813	\$21,435,699	\$138,035,513
Small Plans	717,515	166,082	883,597	\$61,706,322	\$9,798,819	\$71,505,142
<b>Total Plans</b>	<b>2,073,327</b>	<b>529,399</b>	<b>2,602,726</b>	<b>\$178,306,136</b>	<b>\$31,234,519</b>	<b>\$209,540,654</b>
PBGC	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	4,093	267	4,360	\$352,008	\$15,772	\$367,781
Small Pension Plans	10,348	927	11,275	\$889,893	\$54,701	\$944,594
Large Welfare Plans	108	33	141	\$9,287	\$1,920	\$11,206
Small Welfare Plans	4	1	5	\$346	\$57	\$404
Large Plans	4,201	300	4,501	\$361,295	\$17,692	\$378,987
Small Plans	10,352	928	11,280	\$890,239	\$54,759	\$944,998
<b>Total Plans</b>	<b>14,553</b>	<b>1,228</b>	<b>15,781</b>	<b>\$1,251,534</b>	<b>\$72,451</b>	<b>\$1,323,985</b>
IRS + SSA	Provider Hours	Sponsor Hours	Total Hours	Provider Costs	Sponsor Costs	Total Costs
Large Pension Plans	307,242	143,177	450,418	\$26,422,775	\$8,447,437	\$34,870,211
Small Pension Plans	804,451	164,096	968,547	\$69,182,800	\$9,681,643	\$78,864,442
Large Welfare Plans	21,527	14,433	35,960	\$1,851,317	\$851,560	\$2,702,877
Small Welfare Plans	6,731	1,619	8,350	\$578,868	\$95,538	\$674,406
Large Plans	328,769	157,610	486,379	\$28,274,092	\$9,298,997	\$37,573,088
Small Plans	811,182	165,715	976,897	\$69,761,668	\$9,777,181	\$79,538,849
<b>Total Plans</b>	<b>1,139,951</b>	<b>323,325</b>	<b>1,463,276</b>	<b>\$98,035,760</b>	<b>\$19,076,177</b>	<b>\$117,111,937</b>