

2022 FORM M-1 BULLETIN



U.S. Department of Labor
Employee Benefits Security Administration

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EXECUTIVE SUMMARY

The Department of Labor requires multiple employer welfare arrangements (MEWAs) and entities claiming exception (ECEs) (together, “entities”) that provide medical benefits to report important information through the Form M-1. This information helps both the Department and state insurance regulators protect consumers by identifying new entrants in states, entity growth, solvency risks, and other relevant concerns.

The 2022 Form M-1 Bulletin focuses on MEWAs and ECEs that provided benefits during and/or started operations in 2022 and draws some distinctions between them. The various tables and graphs presented in this bulletin provide a snapshot of Statistical Year 2022 Form M-1 filings, which the Department defines as entities indicating:

- they began operations and submitted their Form M-1 during 2022;
- a material change that occurred during 2022; and
- having operated from January 1 to December 31, 2022, or in a fiscal year with at least 6 continuous months in 2022.

The Department has used the same criteria to define the time period of the filing population for all Form M-1 bulletins spanning 2018 through 2022, allowing for comparisons between prior years. Statistics in this report include the number of unique filers, reasons for filing, total participants covered, states in which entities are operating, funding (i.e., fully insured or not fully insured), and the types of service providers. It also includes several tables with information about Plan MEWAs, Non-Plan MEWAs, and ECEs that filed both an annual Form M-1 filing and a Form 5500 for the same period.

The key statistics regarding the 2022 Statistical Year Form M-1 population are:

- There were 953 Form M-1s, the vast majority of which were filings for Plan MEWAs. Consistent with the M-1 annual report’s March 1 filing deadline, 67 percent of the total filings were submitted in February and March of 2023, though filings that referenced Statistical Year 2022 were submitted as early as February 2022 and as late as January 2025.¹
- Entities may file multiple Form M-1s in a given year to meet their M-1 annual report filing requirement as well as to notify the Department of new or changing service providers, expansions into new states, a substantially different number of participants, mergers with other entities, and other material changes. While most entities (84 percent) submitted a single filing, nearly 16 percent submitted multiple filings, including three MEWAs that each submitted four Form M-1s. As a result, the 953 filings are composed of only 805 unique entities, of which 745 (nearly 93 percent) were Plan MEWAs.
- Entities may also indicate multiple reasons for filing the Form M-1. Among the filings, 90 percent indicated annual reports as their filing reason, and 10 percent indicated MEWA Registrations as the reason.

¹ Annual reports for 2022 submitted after the filing deadline are included in this report.

- While MEWAs and ECEs that filed Form M-1s during the period covered by this report operated in all states and U.S. territories, these entities were most often headquartered in California, Texas, or Washington. There were 181 entities (22 percent) that indicated operating in a new state in 2022, with Texas and New York having the most entities indicating “new state.”² The percent of entities indicating “new state” in Statistical Year 2021 was nearly identical to the percent of those indicating “new state” in Statistical Year 2022.
- Most MEWAs that submitted an annual report indicated they were fully insured in 2022, with 80 percent of Plan MEWAs and nearly 59 percent of Non-Plan MEWAs indicating being fully insured in all states. All but two ECEs reported being fully insured in all states. Of entities that indicated they were not fully insured in at least some states, nearly 80 percent reported having stop-loss insurance, and 68 percent reported that an actuary provided their entity services.
- MEWAs and ECEs reported a total of 2.7 million participants on their annual reports. Approximately 84 percent of these participants were in Plan MEWAs. While there were far fewer Non-Plan MEWA filings, the average number of Non-Plan MEWA participants was twice as many as the average number of Plan MEWA participants. Though MEWAs are required to file each year, ECEs are generally only required to file for their first 3 years of operation (if an ECE undergoes certain events, a new 3-year filing period begins). Thus, the total number of participants in all ECEs is not reported in this bulletin.
- The Department identified 581 entities that filed both a Statistical Year 2022 Form M-1 Annual Report and a Form 5500 for the same period, or nearly 74 percent of the 788 unique entities that filed a Form M-1 Annual Report.
- Nearly all matched entities (96 percent) that the Department identified as being fully insured from filing characteristics on their Form 5500 filings reported being fully insured on their Form M-1 as well.
- From 2018 to 2022, the number of unique entities increased nearly 14 percent, with the total number of participants in those entities increasing nearly 21 percent.

² The Department determined the count of entities operating in new states through a tabulation of entities that specified at least one state as being a “new state” in Part II Question 17 of the Form M-1.

NOTABLE CHANGES FROM 2021 TO 2022

- Unique entity filings for all entity types increased; Plan MEWAs and Non-Plan MEWAs increased by 6 percent and 2 percent, respectively. ECEs increased by one entity.
- Using the largest number of participants reported on all entities' Form M-1 filings in a given year, MEWAs and ECEs reported nearly 2.8 million participants in 2022, a roughly 1 percent increase from 2021. While the number of participants in Non-Plan MEWAs and ECEs grew by 8 percent and 737 percent respectively, Plan MEWA participants declined by nearly 4 percent.³
- All entity types reported an increase between 2021 and 2022 in the number of entities indicating not being fully insured, though the share of entities that indicated not being fully insured remained unchanged. Non-Plan MEWAs that reported not being fully insured increased by 5 percent, while Plan MEWAs increased by roughly 2 percent. The number of ECEs that reported not being fully insured increased by two entities.

Table 1: Form M-1 Filing Highlights, Statistical Years 2021 and 2022

Entity Type	2021	2022	Percent Change
Unique Entity Counts, Total Filings			
Plan MEWA	701	745	6.3%
Non-Plan MEWA	50	51	2.0%
ECE	8	9	12.5%
Total	759	805	6.1%
Participants, Total Filings			
Plan MEWA	2,414,652	2,327,995	-3.6%
Non-Plan MEWA	335,059	361,552	7.9%
ECE	10,582	88,588	737.2%
Total	2,760,293	2,778,135	0.6%
Not Fully Insured, Annual Reports			
Plan MEWA	134	136	1.5%
Non-Plan MEWA	20	21	5.0%
ECE	0	2	N/A
Total	154	159	3.3%

³Unique filings by ECEs and their participants increased from 2021 to 2022. This increase occurred due to an annual report filed by just one ECE that was excluded from the Statistical Year 2021 analysis dataset. In the 2020 bulletin, this ECE reported a July 1, 2020-June 1, 2021, plan year, which, because it didn't operate for a full 6 months in 2021, was considered a 2020 filing. Its subsequent filing had a revised plan year end date, reporting a July 1, 2021- June 30, 2022, plan year. With this change, the reported plan year now meets the definition of inclusion for 2022, not 2021 (the Department classifies based on the latest year in which 6 months of the plan year occurred). This was the largest ECE in Statistical Year 2020 and accounted for 82 percent of ECE participants, so its exclusion greatly affected the number of ECE participants. Since this ECE is now included for Statistical Year 2022, there is a large increase in ECE participants in this year's bulletin. Because ECEs only have to file for the first 3 years following an origination event, there are a relatively small number of ECE filings submitted each year. This small number of ECE filings means that relatively few ECEs dropping in and out of the filing population can cause large percentage changes.

TERMINOLOGY

- **Additional Filings:** The Form M-1 and its instructions require entities to submit multiple filings during a plan year based on the occurrence of certain events. In this report, the Department identified any subsequent filings, regardless of the purpose, as additional filings.
- **Employer Identification Number (EIN):** An EIN is a unique identification number assigned to an entity by the Internal Revenue Service. Several sections of the Form M-1 require EIN reporting for identification purposes.
- **Entity:** Entity refers to all types of filers of the Form M-1, including Plan MEWAs, Non-Plan MEWAs, and ECEs.
- **Entity Claiming Exception (ECE):** An entity that is exempted from the MEWA definition on the basis that the entity is established or maintained pursuant to one or more agreements that the U.S. Secretary of Labor finds to be collective bargaining agreements within the meaning of the Employee Retirement Income Security Act of 1974 (ERISA) section 3(40)(A)(i) and accompanying regulations at 29 CFR 2510.3–40.
- **Filing:** In this report, the Department identified individual filings by their unique Form ID number. Each Form M-1 filing is assigned a unique Form ID number.
- **Filing Date:** The calendar day an entity submits a Form M-1 filing.
- **Filing Purpose:** There are seven purposes for filing the Form M-1.
 - **Annual:** An annual report is the annual filing MEWAs and certain ECEs are required to submit by March 1. For ECEs, the annual filing is required for the first 3 years after an origination.
 - **Amended:** A filing submitted to correct errors and/or omissions on a previously filed Form M-1.
 - **Extension:** The Department may grant a one-time extension and provides the filer 60 days beyond the deadline to complete and submit the Form M-1. The extension request form must include responses to the purpose of filing as well as information about the administrator and sponsor in the “Custodial and Financial Information” section of the Form M-1.
 - **ECE Origination:** A filing submitted 30 days before the ECE begins operating or within 30 days of the ECE merging with another ECE or increasing participant numbers by 50 percent or more since the end of the previous calendar year.⁴
 - **ECE Special Filing:** A filing submitted within 30 days of a special event, which includes knowingly operating in any additional state or experiencing a material change.
 - **MEWA Registration:** A filing submitted 30 days before the MEWA begins operating or within 30 days after the MEWA merges with another MEWA, expands coverage into a new state, experiences an increase in the number of participants by 50 percent or more since the end of the previous calendar year, or undergoes a material change.
 - **Final Report:** A filing submitted to indicate that the MEWA or ECE does not intend to file the Form M-1 in the following year due to entity termination. Alternatively, an ECE may indicate a final filing on its third annual report filing following an ECE origination filing. In that instance, absent a change in circumstances, the ECE is no longer required to file an annual Form M-1 while it continues to operate.

⁴ See 29 CFR 2520.101-2(b)(9) which sets forth the details on certain exceptions from this definition.

A single filing may satisfy multiple purposes. Additionally, ECE Originations, ECE Special Filings, and MEWA Registrations could require supplemental information for certain underlying events.

- **Form 5500 (Annual Return/Report):** An annual report filed with the Department by employee benefit plans that contains information on a plan’s assets, contributions, the number of participants, service providers, and insurance contracts, among other attributes. Plan MEWAs are required to file a Form 5500 in addition to the Form M-1. ECEs that meet the definition of an employee benefit plan and are established or maintained under or pursuant to one or more collective bargaining agreements would also be required to file a Form 5500.
- **Form Year:** The Form M-1 is updated and released annually. The form year is the year designated on the Form M-1 (e.g., 2022 Form M-1).
- **Fully Insured:** In this report, the Department identified entities as fully insured when they report all states listed in Part II 17a as fully insured in Part II 17g for each state.⁵ (See Table 2A in [Appendix A](#)).
- **Headquarters:** The geographic location of the address the MEWA or ECE reports in Part II 1a, which the Department interprets as the entity’s headquarters.
- **Insurance Provider:** The company that provides insurance to the entity. Entities report insurance providers for each state in Part II 17.
- **Medical Benefits:** Coverage for the diagnosis, cure, mitigation, treatment, or prevention of disease, or amounts paid for the purpose of affecting any structure or function of the body as well as transportation primarily for and essential to the actions listed above.⁶
- **Multiple Employer Welfare Arrangement (MEWA):** An employee welfare benefit plan or other arrangement that provides welfare benefits to the employees of two or more unrelated employers as defined in ERISA section 3(40)(A).⁷
- **Non-Plan MEWA:** A MEWA that does not meet the ERISA definition of an “employee welfare benefit plan” under section 3(1) of ERISA. Typically, Non-Plan MEWAs cover a collection of separate employee welfare benefit plans maintained by individual employers.
- **Participant:** ERISA section 3(7) defines “participant” as “any employee or former employee of an employer, or any member or former member of an employee organization, who is or may become eligible to receive a benefit of any type from an employee benefit plan.”
- **Plan MEWA:** A MEWA that meets the ERISA definition of “employee welfare benefit plan” under section 3(1) of ERISA.⁸
- **Plan Number (PN):** The PN is a three-digit number that is self-assigned by the plan administrator for the entity. The PN is reported in Part II 1d to distinguish among different plans that use the same EIN.

⁵ See Form M-1 Report for MEWAs and ECEs, <https://www.dol.gov/sites/dolgov/files/EBSA/employers-and-advisers/plan-administration-and-compliance/reporting-and-filing/forms/m1-2023.pdf>

⁶ See 29 C.F.R. § 2590.701-2, <https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XXV/subchapter-L/part-2590/subpart-B/section-2590.701-2>.

⁷ See 29 U.S.C. § 1002(40). Section 3(40) sets forth certain exceptions from this definition.

⁸ See 29 U.S.C. § 1002(1).

- **Professional Employer Organization (PEO):** An organization that contracts with client employers to provide a range of human resource management, payroll, administrative, and employee benefit services to client employers and the employees of the client employers. A PEO plan or arrangement that offers or provides health coverage to employees of two or more client employers, or employees of both the PEO and one or more client employers, is a MEWA under Section 3(40) because it offers or provides benefits to employees of two or more employers.⁹
- **Statistical Year:** The 2022 Statistical Year refers to the specific time period of filings included in this bulletin. The time period criteria are slightly different for the annual vs. non-annual report filings, because timing requirements for filings vary depending on the specific filing purpose.
 - For “Began Operating” or other registration, origination, or special filings, the reference period is all filings submitted during calendar year 2022.
 - For annual reports, an entity has a 2022 Statistical Year if it files for the January 1 to December 31, 2022, time frame, which would be appropriate for entities with a calendar year plan year or for entities that operate on a fiscal year but choose to report on a calendar year basis.¹⁰

For entities that choose to report on their specific fiscal year, they are considered a 2022 Statistical Year filer if they operate for at least 6 continuous months in 2022. The following table shows examples of potential operating years and the associated statistical year.

If, for example, the entity follows:	Then the statistical year is:
Calendar Year Jan. 1–Dec. 31, 2022	2022
Fiscal Year Apr. 1, 2021–Mar. 31, 2022	2021
Fiscal Year July 1, 2021–June 30, 2022	2022
Fiscal Year Apr. 1, 2022–Mar. 31, 2022	2022

Because Form M-1 Annual Reports are required for all MEWAs that provide medical benefits and some ECEs (depending on the origination event date), the annual report statistics for the 2022 Statistical Year give an indication of the number of entities that actively provided benefits for 6 continuous months or more during the period from January 1 to December 31, 2022.

- **Underlying Events:** Refers to certain events that more specifically describe what prompts an entity to submit a MEWA Registration, ECE Origination, or ECE Special Filing. Filers are asked to provide information about these underlying events when submitting the Form M-1. The possible events are:
 - (1) began operating
 - (2) began operating in any additional state
 - (3) merged with another MEWA/ECE
 - (4) 50 percent or greater increase in participants receiving medical benefits; and
 - (5) material change.

⁹ See Multiple Employer Welfare Arrangements under the Employee Retirement Income Security Act (ERISA): A Guide to Federal and State Regulation, <https://www.dol.gov/sites/dolgov/files/ebsa/about-ebsa/our-activities/resource-center/publications/mewa-under-erisa-a-guide-to-federal-and-state-regulation.pdf>.

¹⁰ See Form M-1 Report for MEWAs and ECEs, <https://www.dol.gov/sites/dolgov/files/EBSA/employers-and-advisers/plan-administration-and-compliance/reporting-and-filing/forms/m1-2023.pdf>, Section 2: When to file, pg. 8.

INTRODUCTION

Multiple employer welfare arrangements (MEWAs) are entities that offer or provide welfare benefits (for example, health, disability, or life insurance benefits) to the employees of two or more employers (including one or more self-employed individuals), or to their beneficiaries. However, the term does not include any such plan or other arrangement that is established or maintained 1) under or pursuant to one or more agreements that the Secretary of Labor finds to be collective bargaining agreements, 2) by a rural electric cooperative, or 3) by a rural telephone cooperative association.¹¹ Administrators of MEWAs that provide medical benefits must electronically file the Form M-1 with the Department of Labor annually and following certain events, such as expansion into a new state, regardless of whether the entity is a group health plan.

An entity claiming exception (ECE) is an entity that claims it is not a MEWA on the collective bargaining agreement basis mentioned above.¹² Administrators of ECEs that provide medical benefits must file for the first 3 years after origination events, which include beginning operations, participant increases of 50 percent or more, or mergers with other entities. ECE administrators must also file to indicate expansion into a new state or other material change, if those occur within the 3-year filing period.¹³

Form M-1 reporting is required under the authority of sections 101(g), 104(a), 505, and 734 of ERISA, as amended, and 29 C.F.R. §§ 2520.101-2 and 103-1. The Form M-1 collects important information about individuals and entities that are responsible for:

1. sponsoring or managing operations of MEWAs or ECEs that offer medical benefits, and
2. providing services to a MEWA or ECE that offers medical benefits, including benefits administration, actuarial services, and asset management services.

Information provided through the Form M-1 includes custodial and financial information, the number of participants covered, the states the entity operates in, insurance carriers, and compliance with various health regulations. Form M-1 reporting provides critically important information that helps both the Department and state insurance regulators protect consumers by identifying new entrants in states, growth in these entities, solvency risks, and other relevant concerns.

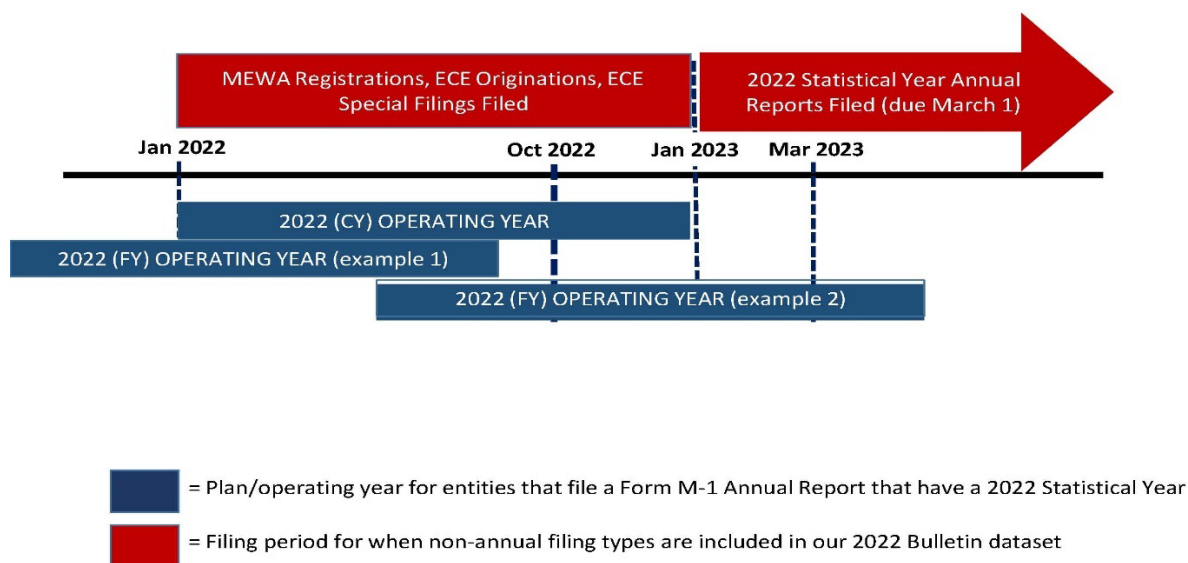
This bulletin provides a snapshot of MEWAs and ECEs that filed the Form M-1 regarding Statistical Year 2022. Beginning with the 2018 Form M-1 Bulletin, the Department has used a consistent methodology for defining the filing time period covered by the bulletins. Figure 1 below depicts the filing periods for the 2022 Statistical Year Form M-1 filings using the current methodology.

¹¹ See section 3(40) of the Employee Retirement Income Security Act of 1974 (ERISA).

¹² Under section 3(40)(A)(i) of ERISA, the term MEWA does not include any plan or arrangement that is established or maintained under or pursuant to one or more such collective bargaining agreements. The Department issued a regulation setting forth criteria that represent a finding by the Secretary whether an arrangement is an employee welfare benefit plan established or maintained under or pursuant to one or more collective bargaining agreements. See 29 C.F.R. § 2510.3-40.

¹³ If an ECE undergoes an origination event (began operating, 50 percent increase in covered enrollees, or merger), a new 3-year filing period starts.

Figure 1: Filing Periods Captured by the 2022 Form M-1 Bulletin



A 2022 Form M-1 Annual Report, though filed in 2023, provides information about the 2022 operating year for MEWAs and ECEs. For consistency, this bulletin reports on registration, origination, and special filing events that occurred during the 2022 operating year (see Section I: Total Filings, Number of Filings, and Filing Purposes for more information about the required timing of these filing events).

For example, if a MEWA had a 50 percent or greater increase in participants in June of its 2022 operating year, the MEWA would be required to notify the Department of this change within 30 days of it occurring. This means a registration filing would need to occur no later than July 2022. By limiting special filing event filings to those submitted during 2022, this bulletin captures the activity of entities with a 2022 Statistical Year.

The Form M-1 filings required by entities that express an intent to begin operations are harder to link directly to the activity of entities that are operating during 2022. “Began Operating” filings (as they are referred to throughout the report) are not required to indicate on the Form M-1 when the entity will begin offering health benefits. Therefore, the timing of the filing is only an approximation of when an entity will begin its operating year. However, information about MEWAs and ECEs that are newly forming are included in this report, with the criteria that they submitted their “Began Operating” filing during calendar year 2022.

Because a unique MEWA or ECE may submit multiple Form M-1s in a single year, looking only at the number of filings or most recent filings might overstate the number of these entities and mask changes in their funding type, state distributions, and the number of participants. Also, because ECEs are not required to file every year, this bulletin significantly understates the total number of ECEs and participants in entities that qualify as ECEs.

In general, this bulletin reports information as submitted in the 2022 Form M-1 filings, without corrections or edits. However, the Department makes clear when it deviates from this practice.

All sections of this bulletin present statistics about the Statistical Year 2022 Form M-1 filing population.

- Section I presents the total number of filings and the number of unique entities.
- Section II focuses on entities that indicated they began operating.
- Section III presents information on MEWA Registrations, ECE Originations, ECE Special Filings, and entities indicating material changes.
- Section IV describes annual reports, including information on service providers, funding, participant counts, and Form 5500 matches.
- Section V presents trends in unique entities by plan type, plan participants for total filings and the share of MEWAs that reported not being fully insured since 2018.

SECTION I: TOTAL FILINGS

The different types of entities that are required to file the Form M-1—Plan MEWAs, Non-Plan MEWAs, and certain ECEs¹⁴—have different requirements for filing. Administrators of MEWAs that provide medical benefits must file the Form M-1 annually. The administrator of an ECE that provides medical benefits must file the Form M-1 in each of the first 3 years after the ECE originates. Additional filings for either MEWAs or ECEs might be required due to structural changes, expansion into new states, substantial changes in the number of participants, switching service providers, or other material changes.

In Statistical Year 2022, there were 953 Form M-1 filings, a 2 percent increase from Statistical Year 2021. Plan MEWAs submitted the vast majority (nearly 92 percent) of total filings, while Non-Plan MEWAs and ECEs represented 8 percent of filings. From 2021 to 2022, filings by Plan MEWAs and Non-Plan MEWAs increased by 2 percent and 6 percent, respectively. See Table 2B in [Appendix B](#).

Table 2: Form M-1 Filings by Entity Type, Total Filings for Statistical Year 2022

Entity Type	Filing Count	Share
Plan MEWA	875	91.8%
Non-Plan MEWA	69	7.2%
ECE	9	0.9%
Total	953	100.0%

NUMBER OF FILINGS AND FILING PURPOSES

While there are several different events that require filing the Form M-1, a single filing may be submitted for multiple filing purposes in cases in which the single filing can be made in accordance with the timing requirements for each purpose. This situation can occur, for instance, if an entity submits its annual report and has also changed service providers.

All MEWAs and certain ECEs that provide medical benefits are required to file a Form M-1 Annual Report.¹⁵ In addition to the annual report filing requirement, MEWAs also must file the Form M-1:

1. Thirty days prior to operating in any state.
2. Within 30 days of knowingly operating in any additional state or states that were not indicated on a previous Form M-1 filing.
3. Within 30 days of operating with regard to the employees of an additional employer (or employers, including one or more self-employed individuals) after a merger with another MEWA.

¹⁴ See 29 C.F.R. § 2510.3–40.

¹⁵ For a general discussion of the filing requirements, see Multiple Employer Welfare Arrangements under the Employee Retirement Income Security Act (ERISA): A Guide to Federal and State Regulation, <https://www.dol.gov/sites/dolgov/files/ebsa/about-ebsa/our-activities/resource-center/publications/mewa-under-erisa-a-guide-to-federal-and-state-regulation.pdf>.

4. Within 30 days of increasing the number of employees receiving medical coverage by at least 50 percent relative to the number of such employees on the last day of the previous calendar year.
5. Within 30 days of experiencing a material change as defined in the Form M-1 instructions.

Administrators of ECEs are required to submit the Form M-1:

1. Thirty days prior to operating with regard to the employees of two or more employers.
2. Within 30 days of operating following a merger with another ECE (unless all of the ECEs that participate in the merger originated at least 3 years prior to the merger).
3. Within 30 days of increasing the number of employees receiving medical coverage by at least 50 percent relative to the number of such employees on the last day of the previous calendar year (unless the increase is due to a merger with another ECE and all merging ECEs originated at least 3 years prior to the merger).

The second and third events listed above will extend or restart the 3-year filing period for ECEs. If either event occurs, then an ECE must file the Form M-1 even if it falls outside of the 3-year period.

ECEs must also update the Form M-1 within 30 days of experiencing a special filing event, which is defined as a material change or knowingly beginning to operate in any additional state. Only these special filing events that occur during the 3-year origination period need to be reported on the Form M-1, and their occurrence does not restart the 3-year filing period clock.

Part I Question A of the Form M-1 asks filers to identify the purpose or type of filing, for which there are four possible responses—Annual Report, MEWA Registration, ECE Origination, and ECE Special Filing. As shown in Table 3, the majority of all filings were submitted with the purpose of fulfilling the annual reporting requirement. From Statistical Year 2021 to Statistical Year 2022, the number of annual reports increased by 5 percent, while the number of MEWA Registrations decreased by 5 percent. See Table 3B in the [Appendix B](#).

Table 3: Form M-1 Filings by Filing Purpose, Total Filings for Statistical Year 2022

Filing Purpose	Filing Count	Share
Annual Report	858	90.0%
MEWA Registration	96	10.1%
ECE Origination	0	0.0%
ECE Special Filing	1	0.1%

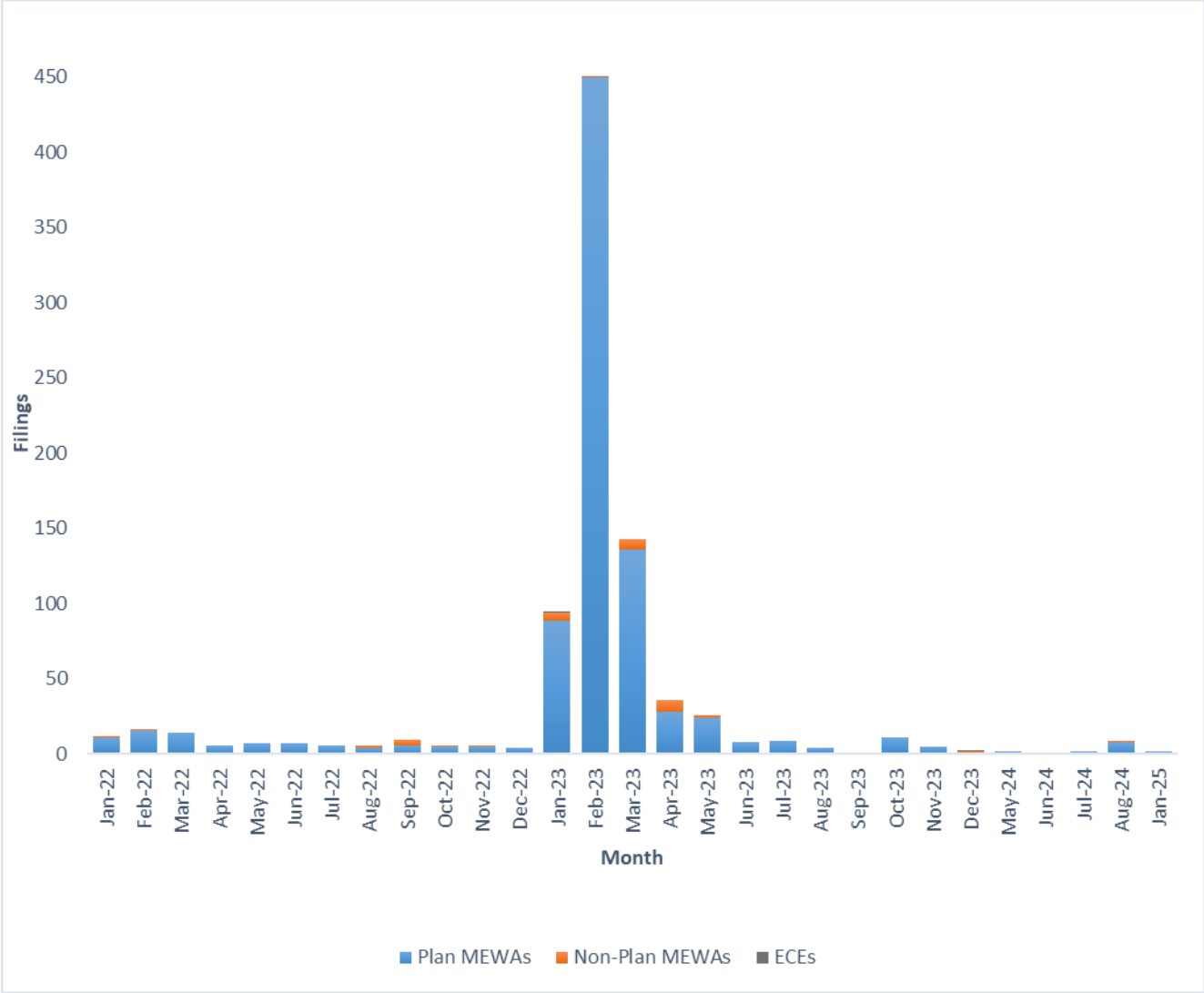
There are several other filing purposes not listed in Table 3 that may be indicated on a Form M-1 submission, but these are always done in conjunction with one of the four purposes described above. Specifically, a MEWA or ECE may file an amended report if errors need to be corrected from a previously filed Form M-1, file a request for a one-time extension, or signify that the filing is a final report if the administrator does not intend to file the Form M-1 next year. Included in this report are 36 filings that checked “amended” and 46 that checked “extension.” The vast majority of extensions are associated with annual reports and are filed in February or March.

The Department has determined that a significant number of filers indicate a submission is a final report while continuing to file in subsequent years. Because of the ambiguity in the final report numbers, the Department did not include statistics on the final report numbers in this bulletin.

TIMING OF FILINGS

Figure 2 displays the submission months for all 2022 Statistical Year Form M-1 filings, the vast majority of which were submitted between February and March of 2023.¹⁶

Figure 2: Statistical Year 2022 Form M-1 Total Filings by Month of Submission, 2022–2025



Note: Months with zero filings are omitted from the above figure.

¹⁶ Since annual reports comprise the majority of all filings and are due March 1 of the calendar year following the year for which a filing is required, annual reports are a major driver of total filing trends.

UNIQUE ENTITIES

Due to the existence of multiple filings by individual entities, looking only at the number of Form M-1 filings per plan year overstates the universe of MEWAs and ECEs. In order to better estimate the number of unique MEWAs and ECEs, the Department developed a phased methodology to match filings across 2022 and identify “unique entities.”

The Department relied on a combination of four key variables—EIN, PN, Entity Name, and Entity Address—to match across filings. While the Department largely relied on this methodology to automatically generate matches, it used manual review in instances where there was ambiguity. For more details on the Entity Identification process, please see [Appendix A](#).

Table 4 displays the number of filings submitted for each unique entity, shown by entity type. While the vast majority of entities submitted a single filing, three Plan MEWAs submitted four Form M-1s for Statistical Year 2022. Plan MEWAs submitted the most filings, 745, with 85 percent of Plan MEWAs submitting one filing, 12 percent submitting two, and 2 percent submitting three or more times.

Among the 51 Non-Plan MEWAs that filed, nearly 67 percent submitted one filing, and 33 percent submitted two or more times. ECEs filed the least: nine entities, with all submitting once.

Table 4: Unique Entities by Number of Filings, Total Filings for Statistical Year 2022

Entity Type	Filings				Total
	1	2	3	4	
Plan MEWA	636 (85.4%)	91 (12.2%)	15 (2.0%)	3 (0.4%)	745 (100.0%)
Non-Plan MEWA	34 (66.7%)	16 (31.4%)	1 (2.0%)	0 (0.0%)	51 (100.0%)
ECE	9 (100.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	9 (100.0%)
Total	679	107	16	3	805

Note: Percentages will not total 100% due to rounding.

For Statistical Year 2022, a total of 805 unique entities submitted the Form M-1, a 6 percent increase from Statistical Year 2021. Plan MEWAs were the most common entity type, representing nearly 93 percent of all entities filing the Form M-1. This finding is consistent with the distribution of filings, suggesting that the different types of entities filed in a proportionate manner. Non-Plan MEWAs were the next largest type of entity, with 6 percent, and ECEs represented 1 percent of all entities.

From Statistical Year 2021 to Statistical Year 2022, Plan MEWAs and Non-Plan MEWAs increased by 6 percent and 2 percent, respectively. See Table 5B in [Appendix B](#).

Table 5: Unique Entities by Entity Type, Total Filings for Statistical Year 2022

Entity Type	Entity Count	Share
Plan MEWA	745	92.6%
Non-Plan MEWA	51	6.3%
ECE	9	1.1%
Total	805	100.0%

HEADQUARTERS BY STATE

While entities may operate in multiple states, the Form M-1 requires administrators to report the name and address of the MEWA or ECE, which the Department interprets as the entity's headquarters. Table 6 displays the top headquartered states by entity type, and Figure 3 displays a map of unique entities headquartered in each state. California, Texas, and Washington continued to have the most MEWA and ECE headquarters in Statistical Year 2022. Texas had the most Plan MEWAs, while New York had the most Non-Plan MEWAs.¹⁷ See Table 3A in [Appendix A](#) for further details and a full list of states.

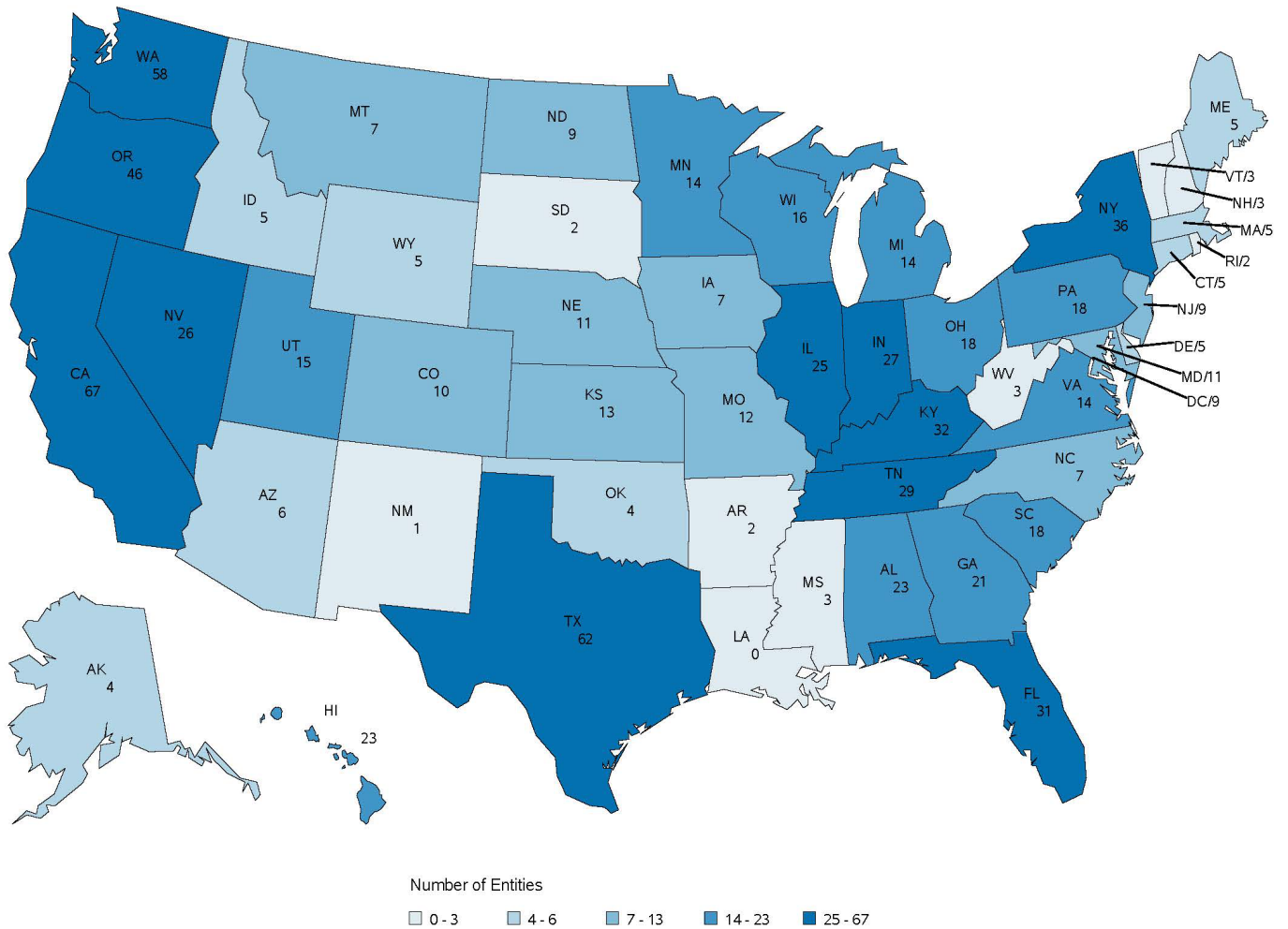
The list of top headquartered states for Statistical Year 2022 is similar to those in Statistical Year 2021. Of the top headquartered states, Washington was the only state with a decline in Plan MEWAs from Statistical Year 2021. California had the most ECE headquarters in both Statistical Years 2021 and 2022. See Table 6B in [Appendix B](#).

Table 6: Top Headquartered States by Entity Type, Total Filings for Statistical Year 2022

State	Plan MEWA	Non-Plan MEWA	ECE	Total
California	54	7	6	67
Texas	59	3	0	62
Washington	58	0	0	58
Oregon	46	0	0	46
New York	24	11	1	36
Kentucky	34	1	0	32
Florida	30	1	0	31
Tennessee	29	0	0	29
Indiana	26	1	0	27
Nevada	26	0	0	26

¹⁷ Because ECEs generally do not have to file after their first 3 years, the most commonly headquartered states for ECEs only represent the filings that were submitted for Statistical Year 2022.

Figure 3: Entity Headquarters by State, Total Filings for Statistical Year 2022



Administrators are also required to list all states where the employers (of the employees receiving coverage) are domiciled and indicate whether a state is “new” to this entity (i.e., not included on a previous Form M-1 filing). The “new state” filing indicator occurs on both newly formed MEWAs as well as existing MEWAs expanding operation into new states. The data from this attribute can be of particular interest to researchers and regulators as it may indicate expansion into new markets.

Some entities filing to begin operations might include all states that they intend to have a presence in but may not ultimately operate in all states listed. Entities might also neglect to check the “new state” box when submitting their filings, though the Form M-1 instructions require it. As such, this reporting might not accurately reflect the number of states that MEWAs and ECEs expanded into during Statistical Year 2022.

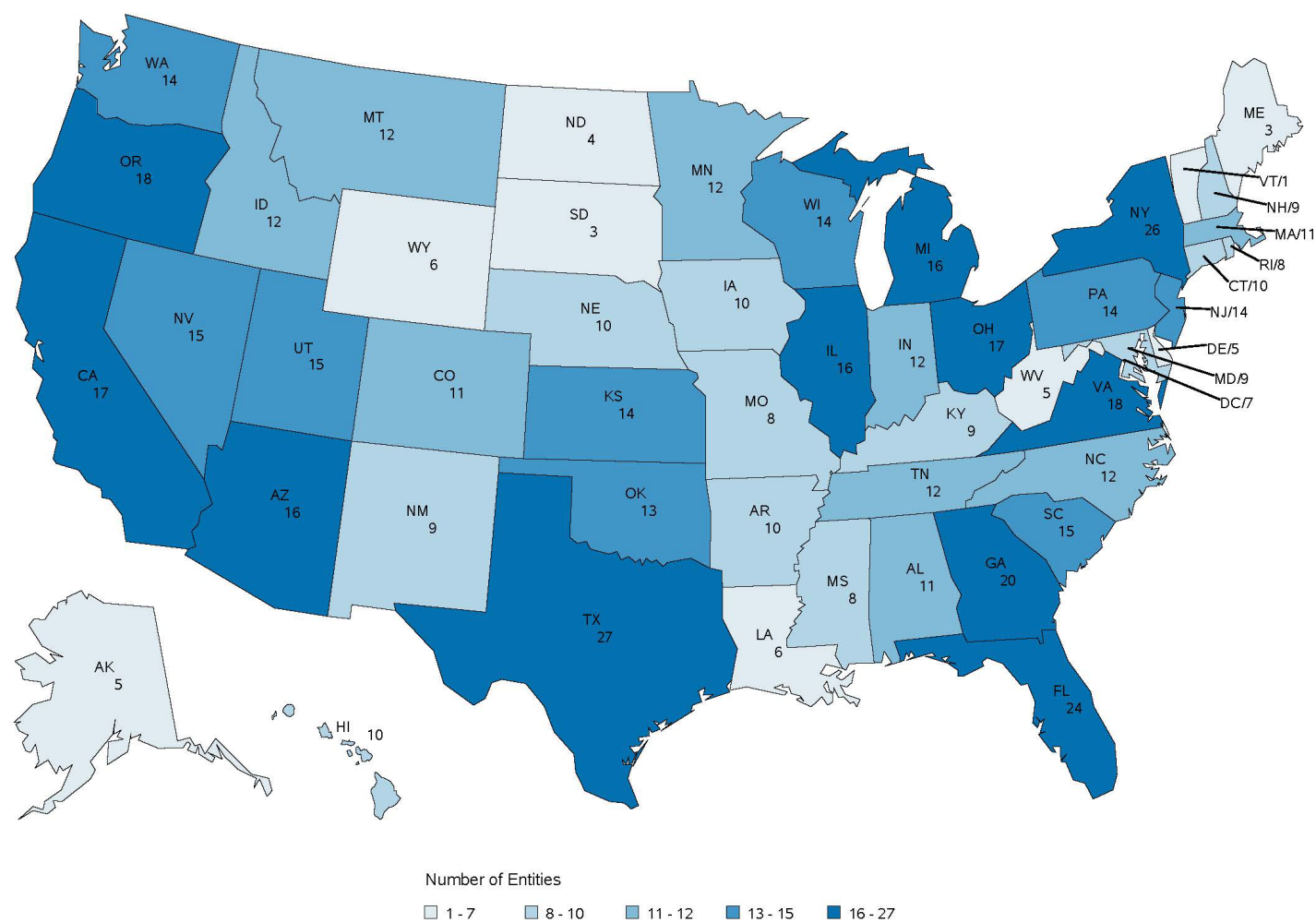
Table 7 shows the top states with entities that indicated “new state,” while Figure 4 displays all the states where entities checked “new state.” Slightly more entities, but a smaller share, indicated operating in a new state in Statistical Year 2022 than Statistical Year 2021. Of the 805 unique entities, 181 (22 percent) indicated operating in a new state in 2022.¹⁸ In 2021, of the 759 unique entities, 177 (23 percent) indicated operating in a new state. Texas had the most entities indicating “new state” in 2021 and 2022. See Table 7B in [Appendix B](#).

Table 7: Top States of Entities Indicating “New State” by Entity Type, Total Filings for Statistical Year 2022

State	Plan MEWA	Non-Plan MEWA	ECE	Total
Texas	27	0	0	27
New York	23	3	0	26
Florida	24	0	0	24
Georgia	20	0	0	20
Oregon	17	1	0	18
Virginia	18	0	0	18
California	17	0	0	17
Ohio	15	2	0	17
Arizona	16	0	0	16
Illinois	16	0	0	16
Michigan	16	0	0	16

¹⁸ Because Table 7 accounts for all the occurrences of “new state” boxes being checked, there will be considerably more check boxes than there are entities that check the “new state” box at least once. This is due to some entities indicating that they are newly operating in more than one state.

Figure 4: Entities Indicating “New State,” Total Filings for Statistical Year 2022



PARTICIPANTS

The Form M-1 requires entities to report the total number of participants receiving medical benefits. In the case of multiple filings, the reported information might indicate growth or decline in MEWA or ECE participation. In this section, the Department counted the largest number of participants reported on all entities' Statistical Year 2022 filings.¹⁹ See [Appendix A](#) for further details.

During Statistical Year 2022, MEWAs and ECEs reported 2.8 million participants, a nearly 1 percent increase from Statistical Year 2021.²⁰ Plan MEWAs, which comprise 92 percent of filings and include Professional Employer Organization (PEO) benefit arrangements, accounted for nearly 84 percent of reported participants.²¹ The average Plan MEWA reported 3,125 participants. Excluding the three largest Plan MEWAs, which the Department classifies as PEO benefit plans based on researching publicly available information about the entities, the average Plan MEWA had 2,070 participants.

Non-Plan MEWAs reported fewer total participants than Plan MEWAs but were generally larger than Plan MEWAs, with an average size of 7,089 participants, twice as many participants as the average Plan MEWA. In 2022, filings indicate that, on average, ECEs were the largest entities, followed by Non-Plan MEWAs, and then Plan MEWAs. See Table 8B in [Appendix B](#).

Table 8: Total Participants by Entity Type and Size, Total Filings for Statistical Year 2022

Entity Type	Entity Counts	Participant Counts	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	745	2,327,995	83.8%	3,125	624	0	331,023
Non-Plan MEWA	51	361,552	13.0%	7,089	1,716	0	52,714
ECE	9	88,588	3.2%	9,843	516	0	68,495
Total	805	2,778,135	100.0%	3,451	669	0	331,023

¹⁹ In contrast, Section IV: Annual Reports presents the number of participants reported in the annual filing, the total of which is slightly lower than the largest participant count reported on all entities' Form M-1 filings included in the Statistical Year 2022.

²⁰ The participant count is determined using the largest number of participants reported on all entities' Form M-1 filings in a given year.

²¹ Depending on the facts, a PEO-sponsored MEWA may be an arrangement that provides benefits, similar to an insurance company, to a collection of separate ERISA-covered single employer plans sponsored by the individual client employers, or the PEO-sponsored MEWA may itself be an ERISA-covered multiple employer plan (see <https://www.dol.gov/sites/dolgov/files/ebsa/about-ebsa/our-activities/resource-center/publications/mewa-under-erisa-a-guide-to-federal-and-state-regulation.pdf> pg. 23). This section doesn't purport to determine whether a PEO MEWA is a plan or not but rather observes whether Plan MEWA filings are submitted by sponsors that appear to be PEOs.

SECTION II: “BEGAN OPERATING” FILINGS

NUMBER OF FILINGS AND FILING PURPOSES

A MEWA or ECE must submit a Form M-1 filing that indicates its intent to begin operating 30 days prior to the event. This filing alerts the Department and state insurance regulators to new entrants into insurance markets, which can give states and regulators time to communicate with these new entities before they begin operation. The statistics presented throughout this section concern only entities that indicated an intent to begin operating in a filing submitted in 2022.

Plan MEWAs submitted 98 percent of the 51 filings indicating an intent to begin operations during Statistical Year 2022. “Began Operating” filings decreased by 10 percent from Statistical Year 2021, while filings by Plan MEWAs remained unchanged. Filings by Non-Plan MEWAs and ECEs decreased from 2021 to 2022, from two to one for Non-Plan MEWAs and from five to zero for ECEs. See Table 9B in [Appendix B](#).

Table 9: Form M-1 Filings by Entity Type, “Began Operating” Filings for Statistical Year 2022

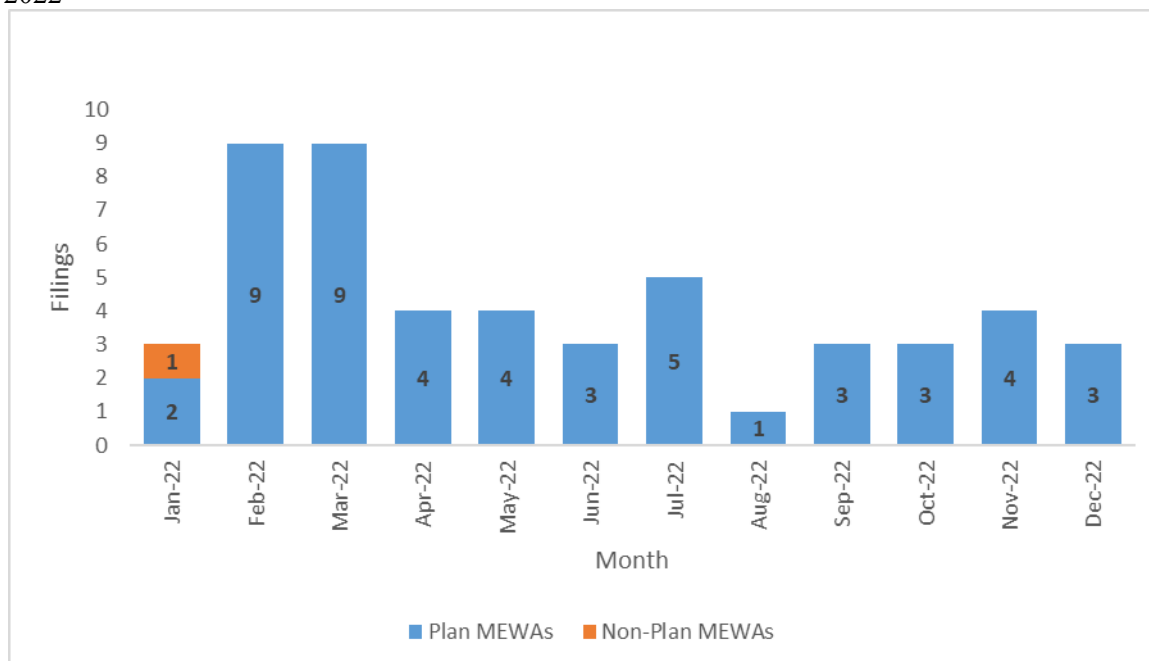
Entity Type	Filing Count	Share
Plan MEWA	50	98.0%
Non-Plan MEWA	1	2.0%
ECE	0	0.0%
Total	51	100.0%

TIMING OF FILINGS

Although the filing time period for this bulletin’s “Began Operating” filings was January 1 through December 31, 2022, this section looks more closely at which months entities submitted these “Began Operating” filings. The Department expects entities to submit these filings 30 days before an entity begins its operating year. Because the majority of entities operate from January 1 to December 31, the Department expects that most newly formed entities should register as “Began Operating” no later than December 1 of the prior year.

Figure 5 shows the distribution of the “Began Operating” subset of registration and origination filings for Statistical Year 2022. February and March had the most “Began Operating” filings, all of which were Plan MEWAs -- 36 percent of all Plan MEWA “Began Operating” filings were filed in these months. One Non-Plan MEWA filing with this underlying reason was submitted in January 2022. No ECEs submitted any “Began Operating” filings.

Figure 5: Entity Type by Month of Submission, “Began Operating” Filings for Statistical Year 2022



Note: No ECEs submitted a “Began Operating” filing.

UNIQUE ENTITIES

Table 10 displays the number of unique entities that indicated “Began Operating” in their filings. Plan MEWAs submitted the most of these types of filings, with all but four of the 47 entities submitting one filing.²² One Non-Plan MEWA submitted a filing with this underlying reason.

Table 10: Unique Entities by Number of Filings, “Began Operating” Filings for statistical Year 2022

Entity Type	Filings		Total
	1	2	
Plan MEWA	42 (91.3%)	4 (8.7%)	46 (100.0%)
Non-Plan MEWA	1 (100.0%)	0 (0.0%)	1 (100.0%)
ECE	0 (0.0%)	0 (0.0%)	0 (100.0%)
Total	43	4	47

For Statistical Year 2022, a total of 47 unique entities submitted filings indicating “Began Operating,” a 4 percent decrease from Statistical Year 2021. Plan MEWAs were the most common entity type, representing nearly 98 percent of these filings, with Non-Plan MEWAs comprising 2 percent. See Table 11B in [Appendix B](#).

²² Though most entities submitting “Began Operating” filings do so only once, it is possible that a second such filing may be needed to amend or add to previously submitted information. A review of the four Plan MEWAs with two “Began Operating” filings confirms this is the case.

Table 11: Unique Entities by Entity Type, “Began Operating” Filings for Statistical Year 2022

Entity Type	Entity Count	Share
Plan MEWA	46	97.9%
Non-Plan MEWA	1	2.1%
ECE	0	0.0%
Total	47	100.0%

HEADQUARTERS BY STATE

Table 12 displays the top headquartered states by entity type for “Began Operating” filings. Hawaii was the headquarters of the most Plan MEWAs that indicated they were beginning operations in Statistical Year 2022, while none of the top states for filings that indicated they began operating, were headquarters for any Non-Plan MEWAs.²³ The only Non-Plan MEWA that submitted a “Began Operating” filing was headquartered in Ohio.

Table 12: Top Headquartered States by Entity Type, “Began Operating” Filings for Statistical Year 2022

State	Plan MEWA	Non-Plan MEWA	ECE	Total
Hawaii	8	0	0	8
Florida	5	0	0	5
Utah	4	0	0	4
Colorado	3	0	0	3
Minnesota	3	0	0	3

Figure 6 displays the state headquarters of entities that submitted a “Began Operating” filing in Statistical Year 2022. Twenty-two states were home to entities that filed a “Began Operating” filing in Statistical Year 2022, with Hawaii and Florida most frequently reported.

²³ One MEWA filed seven of the “Began Operating” filings.

Number of Entities

Number of Entities	States
0-0	OR, ID, WY, ND, SD, NE, KS, MO, IA, IL, IN, OH, WV, VA, NC, SC, GA, MS, LA, AR, OK, NM, AZ, TX, ME, VT, NH, MA, RI, CT, DE, MD, DC
1-1	WA, MT, WI, MI, NY, PA, OH, KY, WV, VA, NC, SC, GA, and AK
2-2	CA, NV, TN, and AL
3-3	HI, TX, MN, CO, and FL
4-8	UT

SECTION III: REGISTRATION, ORIGATION, AND SPECIAL FILINGS

NUMBER OF FILINGS AND FILING PURPOSES

After annual reports, the second most common purpose for filing the Form M-1 was MEWA Registrations (10 percent) while the third most common was ECE Special Filings (0.1 percent). MEWAs and ECEs are required to submit a registration, origination, or special filing in the event of a merger, expansion into a new state, a 50 percent or more increase in participants, or other material changes.

This section presents statistics on all MEWA Registrations, ECE Originations, and ECE Special Filings.²⁴ “Began Operating” filings, while technically a subset of registrations and originations, are discussed separately in Section II and are not included in the statistics throughout the Section III tables because these types of filings represent a significantly different stage in the life of a MEWA/ECE (using the Form M-1 to express an intent to operate, rather than to report on a change for an existing entity).

When submitting non-annual report filings, administrators are instructed to specify which event has triggered the filing requirement. The Form M-1 groups the events into MEWA Registrations, ECE Originations, and ECE Special Filings (for a screenshot of this section of the Form M-1, see [Appendix A](#)). Table 13 displays the possible responses under each filing purpose. This section refers to the specific information requested about the reason for filing a registration, origination, or special filing as the “underlying event.”

Table 13: Underlying Event Possibilities for Each Filing Purpose on the Form M-1

Type of Filing	Material Change	Began Operating in Additional State	50% Increase in Covered Employees	Merger
MEWA Registrations	✓	✓	✓	✓
ECE Originations			✓	✓
ECE Special Filings	✓	✓		

In Statistical Year 2022, Plan MEWAs and Non-Plan MEWAs submitted a total of 48 registrations, originations or special filings, a decline of nearly 24 percent from Statistical Year 2021.²⁵ Plan MEWAs submitted 39 filings, nearly 32 percent fewer filings than in 2021, and Non-Plan MEWAs submitted 9 filings, 50 percent more than in 2021. ECEs submitted none. Of the share of registration filings, Plan MEWAs accounted for the majority at 81 percent, with Non-Plan MEWAs accounting for nearly 19 percent of filings. See Table 13B in [Appendix B](#).

²⁴ According to the Form M-1, an ECE Origination occurs when an ECE begins operating, has a 50 percent increase in covered employees, or merges with another entity. These three events are grouped together as an “origination” because they all prompt the 3-year filing requirement to start anew for ECEs. For this section, the Department summarizes ECE Origination filing data for the non-“Began Operating” filing reasons.

²⁵ This decline doesn’t include “Began Operating” filings. If “Began Operating” filings were included, the decline would be 17 percent.

Table 14: Form M-1 Filings by Entity Type, MEWA Registrations, ECE Originations and Special Filings for Statistical Year 2022

Entity Type	Filing Count	Share
Plan MEWA	39	81.3%
Non-Plan MEWA	9	18.8%
ECE	0	0.0%
Total	48	100.0%

Note: Excludes filings that indicated “Began Operating.” Percentages will not total 100% due to rounding.

The Form M-1 does not ask filers to specify the exact material change that prompted the need to file. However, the Form M-1 instructions provide that any custodial or financial information in Part II that is different from the information provided in the most recently filed Form M-1 is considered a material change.

Table 15 displays the prevalence of the reported underlying events for registration, origination, and special filings, by entity type. Among MEWA filings in Statistical Year 2022, “Material Change” was the most common event to require a registration filing, followed by “Began Operating in an Additional State,” and “50% Increase in Covered Employees,” with “Merger” being the least common. In 2022, Plan MEWAs experienced increases in all of the most common underlying events referenced above. See Table 15B in [Appendix B](#).

Table 15: Registration, Origination, and Special Filings by Entity Type and Underlying Events, for Statistical Year 2022

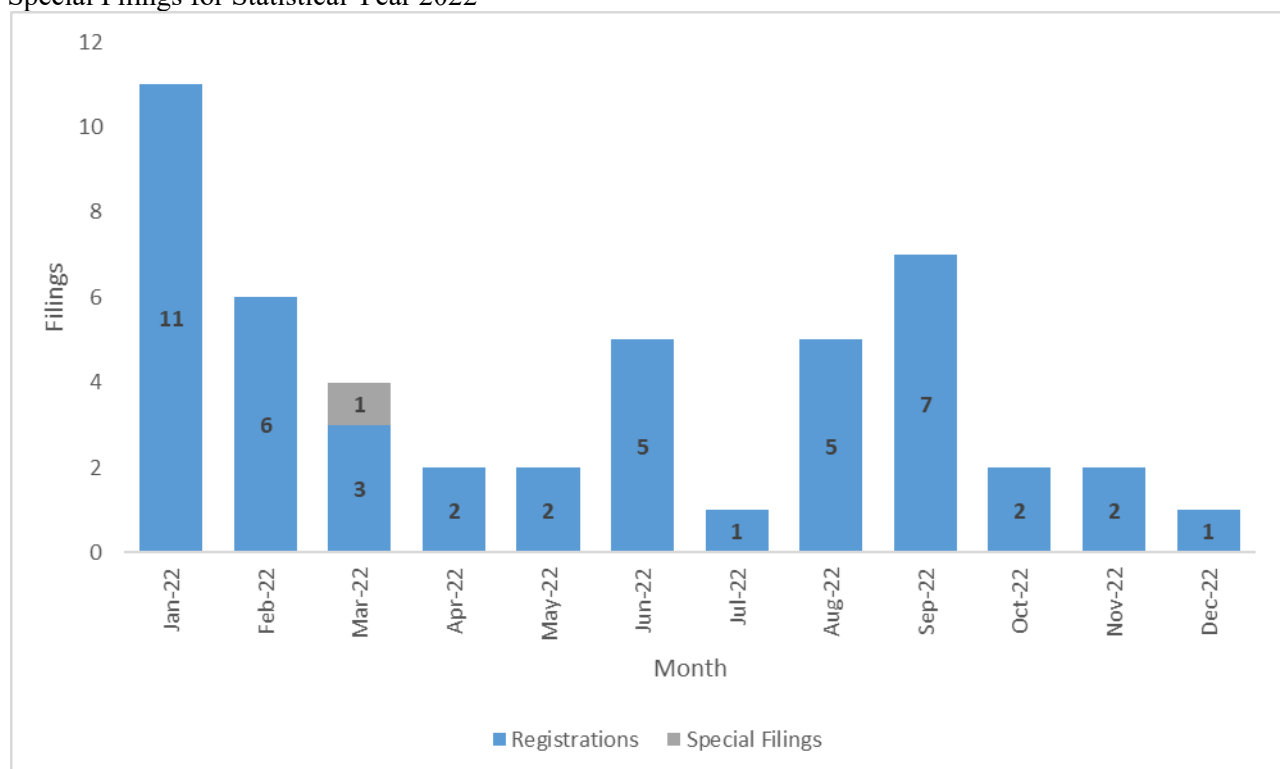
Entity Type	Material Change	Began Operating in Additional State	50% Increase in Covered Employees	Merger
Plan MEWA	17	16	5	1
Non-Plan MEWA	8	0	1	0
ECE	0	0	0	0
Total	25	16	6	1

Note: Excludes filings that indicate “Began Operating.”

TIMING OF FILINGS

The Department requires entities to submit registration and origination filings within 30 days of a merger, a 50 percent or more increase in the employees covered since the prior calendar year, knowingly operating in a new state, or another material change. These filings may occur throughout the year, as shown in Figure 7, but for Statistical Year 2022, MEWA Registrations were more likely to occur in the months of January, February, and September.

Figure 7: Form M-1 Filings by Month of Submission, MEWA Registrations, ECE Originations, and ECE Special Filings for Statistical Year 2022²⁶



Note: Excludes filings that indicated “Began Operating.”

UNIQUE ENTITIES

While the majority of entities submitted a single filing indicating a registration, two Plan MEWAs submitted four Form M-1s for Statistical Year 2022. Plan MEWAs accounted for 26 of the 34 unique entities that submitted filings, with 69 percent of Plan MEWAs submitting one filing, 19 percent submitting two, and nearly 12 percent filing three or more times. Eight unique Non-Plan MEWAs filed once, while one filed twice. No ECE origination or special filings were submitted in 2022.

²⁶ Figure 7 represents the filings that checked MEWA Registration, ECE Origination, and/or ECE Special Filing; it is not based on entity type. For Statistical Year 2022, Table 14 reports no ECEs. However, Figure 7 displays ECE Special Filings because the filing system permitted entities to select that they were a MEWA and a special filing.

Table 16: Unique Entities by Number of Filings, MEWA Registrations, ECE Originations, and Special Filings for Statistical Year 2022

Entity Type	Filings				Total
	1	2	3	4	
Plan MEWA	18 (69.2%)	5 (19.2%)	1 (3.8%)	2 (7.7%)	26 (100.0%)
Non-Plan MEWA	7 (87.5%)	1 (12.5%)	0 (0.0%)	0 (0.0%)	8 (100.0%)
ECE	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
Total	25	6	1	2	34

Note: Excludes filings that indicated “Began Operating.” Percentages will not total 100% due to rounding.

For Statistical Year 2022, a total of 34 unique entities submitted filings indicating a registration, a 29 percent decrease from Statistical Year 2021. Plan MEWAs were the most common entity type, representing nearly 77 percent of the entities, though this was 38 percent less than in 2021. Non-Plan MEWAs were the next largest type of entity with nearly 24 percent, though this represented a slight increase, from 6 unique filers in 2021 to 8 in 2022. There were no origination or special filings submitted by ECEs. See Tables 16B and 17B in [Appendix B](#).

Table 17: Unique Entities by Entity Type, MEWA Registrations, ECE Originations, and Special Filings for Statistical Year 2022

Entity Type	Entity Count	Share
Plan MEWA	26	76.5%
Non-Plan MEWA	8	23.5%
ECE	0	0.0%
Total	34	100.0%

Note: Excludes filings that indicated “Began Operating.”

SECTION IV: ANNUAL REPORTS

NUMBER OF FILINGS AND FILING PURPOSES

Annual reports are consistently the most commonly reported purpose for a MEWA or ECE to submit the Form M-1. This section presents statistics on all 2022 Statistical Year Form M-1 filings that indicated filing for the purpose of meeting their annual reporting requirements.

For Statistical Year 2022, 858 filings indicated they were annual reports, up 5 percent from Statistical Year 2021. This increase occurred due to a 5 percent increase in annual reports for Plan MEWAs, and a nearly 4 percent increase for Non-Plan MEWAs.

The vast majority of annual report filings, 92 percent, were for Plan MEWAs, with Non-Plan MEWAs accounting for nearly 7 percent of filings, and ECEs comprising 1 percent. See Table 18B in [Appendix B](#).

Table 18: Form M-1 Filings by Entity Type, Annual Report Filings for Statistical Year 2022

Entity Type	Filing Count	Share
Plan MEWA	790	92.1%
Non-Plan MEWA	59	6.9%
ECE	9	1.1%
Total	858	100.0%

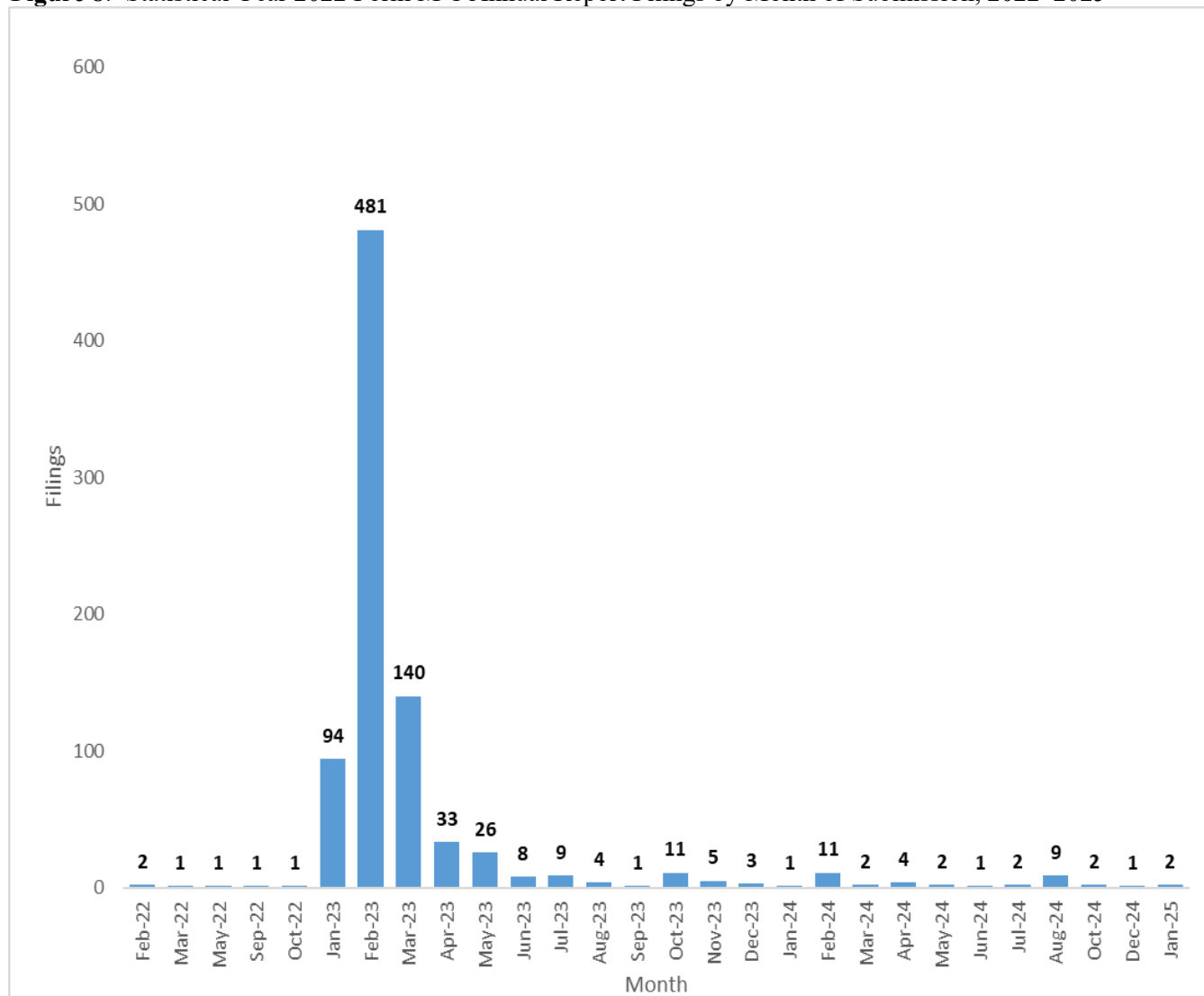
Note: Percentages will not total 100% due to rounding.

TIMING OF FILINGS

Annual reports are due March 1 of the calendar year following the year for which a filing is required. Therefore, the distribution of filings for a given statistical year is skewed toward February and March of the following year. For Statistical Year 2022, 72 percent of the annual filing submissions occurred during those months in 2022.

Despite the deadline, annual report filings might come in after that due date for various reasons, such as amending a previously submitted report, delinquent reports, etc.

Figure 8: Statistical Year 2022 Form M-1 Annual Report Filings by Month of Submission, 2022–2025



Note: Months with zero filings are omitted from the above figure.

UNIQUE ENTITIES

Generally, entities are expected to submit only one annual report per year. However, some entities indicate “annual report” on multiple filings for a statistical year, which can be attributed to requesting an extension or submitting amended/corrected filings. Even when submitting a request for an extension, filers are required to specify the type of filing for which the extension is being requested. The only way to request an extension is to submit a Form M-1, indicate a filing type (e.g., annual report), and check the box that says, “Check here if this is a request for an extension.” Therefore, these extension filings count toward the filing totals included in this bulletin.

The majority of entities submitted a single annual report for Statistical Year 2022. Unique Plan MEWAs submitted 728 of the 788 filings, with 92 percent submitting one filing, and nearly 8 percent submitting two or more times.

Of the 51 unique Non-Plan MEWAs, 84 percent submitted a single annual report filing, while the remaining nearly 16 percent filed two times. Nine unique ECEs submitted annual report filings, with all filing only once.

Table 19: Unique Entities by Number of Filings, Annual Report Filings for Statistical Year 2022

Entity Type	Filings			Total
	1	2	3	
Plan MEWA	670 (92.0%)	54 (7.4%)	4 (0.5%)	728 (100.0%)
Non-Plan MEWA	43 (84.3%)	8 (15.7%)	0 (0.0%)	51 (100.0%)
ECE	9 (100.0%)	0 (0.0%)	0 (0.0%)	9 (100.0%)
Total	722	62	4	788

Note: Percentages will not total 100% due to rounding.

For Statistical Year 2022, a total of 788 unique entities submitted an annual report, a 6 percent increase from Statistical Year 2021. Plan MEWAs were the most common entity type, representing 92 percent of all annual report filers. Non-Plan MEWAs were the next largest entity type at nearly 7 percent, and ECEs represented 1 percent of annual report filers.

From 2021 to 2022, the number of unique Plan MEWAs and Non-Plan MEWAs filing annual reports increased by 6 percent and 4 percent, respectively. See Table 20B in [Appendix B](#).

Table 20: Unique Entities by Entity Type, Annual Report Filings for Statistical Year 2022

Entity Type	Entity Count	Share
Plan MEWA	728	92.4%
Non-Plan MEWA	51	6.5%
ECE	9	1.1%
Total	788	100.0%

FUNDING STATUS

The Form M-1 requires an entity to self-identify its funding status (i.e., fully insured or not fully insured) for each state in which it operates. However, the Form M-1 does not explicitly ask if an entity is self-insured in each state.

An entity that reported being fully insured in all states listed is reported in this bulletin as “Fully Insured - All States.” If an entity reported being fully insured in some states and not in others, the entity is reported as “Fully Insured - Some States.” For MEWAs and ECEs that indicated the entity was not fully insured in any state, the entity is reported as “Not Fully Insured.” For more details, please see [Appendix A](#).

Entities were generally consistent in how they were funded across states, though the funding varied by entity type. Most MEWAs that submitted an annual report indicated they were fully insured in Statistical Year 2022, with 80 percent of Plan MEWAs and nearly 59 percent of Non-Plan MEWAs indicating being fully insured in all states. ECEs were also likely to be fully insured in all states, with seven out of nine entities reporting that funding status, while the remaining two entities indicating not being fully insured.

While the total number of unique entities filing annual reports increased between 2021 and 2022, the overall mix of funding status remained largely the same. The number of Plan MEWAs and Non-Plan MEWAs that were fully insured in all states increased in 2022 by nearly 8 percent and 3 percent, respectively. The number of Plan MEWAs and Non-Plan MEWAs that were not fully insured in any state also increased by almost 2 percent and 5 percent, respectively. See Table 21B in [Appendix B](#).

Table 21: Entities by Entity Type and Funding Status, Annual Report Filings for Statistical Year 2022

Entity Type	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	585 (80.4%)	7 (1.0%)	136 (18.7%)	728 (100%)
Non-Plan MEWA	30 (58.8%)	0 (0.0%)	21 (41.2%)	51 (100%)
ECE	7 (77.8%)	0 (0.0%)	2 (22.2%)	9 (100%)
Total	622	7	159	788

Note: Percentages will not total 100% due to rounding.

SERVICE PROVIDERS

The Form M-1 requires filers to provide information on various service providers, including an actuary, third-party administrator (TPA), marketing agent, financial institution, insurer (if fully insured), and stop-loss provider. While not all entities use every type of service provider, the Department and state insurance regulators use this information to determine which services entities generally report using, identify common service providers across entities, and learn if certain entities frequently change service providers. For more details, please see [Appendix A](#).

Table 22 displays types of service providers used by entities as reported through their annual reports.²⁷ Consistent with Statistical Year 2021, the most commonly reported service providers were TPAs and marketing agents. A total of 361 entities reported using TPAs, 233 of which were fully insured in all states. Entities that weren't fully insured were more likely to report using an actuary or having stop-loss insurance. There were 225 entities that did not report any service providers on their Form M-1 filing. See Table 22B in [Appendix B](#).

²⁷ This section on service providers could understate the total number of entities that engaged with these types of service providers at any point during Statistical Year 2022 if changes occurred, but the annual report only referred to the status at the end of the filing year.

Table 22: Entities Reporting Various Service Providers by Funding Type, Annual Report Filings for Statistical Year 2022

Third-Party Administrators	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	220	2	104	326
Non-Plan MEWA	9	0	20	29
ECE	4	0	2	6
Total	233	2	126	361

Marketing Agent	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	3	4	66	406
Non-Plan MEWA	14	0	17	31
ECE	4	0	2	6
Total	354	4	85	443

Actuary	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	61	2	93	156
Non-Plan MEWA	3	0	18	21
ECE	1	0	0	1
Total	65	2	111	178

Stop-Loss Insurance	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	34	1	112	147
Non-Plan MEWA	3	0	19	22
ECE	0	0	0	0
Total	37	1	131	169

Stop-loss insurance protects plans that are not fully insured when submitted health care claims in a given year exceed expected claims by providing those plans with a pre-established maximum cost. Another form of risk mitigation involves the plan hiring an actuary to establish appropriate premiums, ensuring that the plan is adequately funded. Not having either stop-loss or an actuary could signal risk of potential insolvency.

Table 23 summarizes reporting of stop-loss insurance and actuary services for MEWAs filing annual reports that weren't fully insured. Of the not fully insured MEWAs in 2022, 104 (66 percent) entities reported both an actuary and stop-loss insurance, 19 (12 percent) reported neither, 7 (nearly 5 percent) reported an actuary but no stop-loss insurance, and 27 (17 percent) reported stop-loss insurance but no actuary.

Table 23: Not Fully Insured MEWAs Reporting Stop-Loss Insurance and Actuary, Annual Report Filings for Statistical Year 2022

MEWA, Not Fully Insured	Actuary	
	Yes	No
Stop-Loss		
Yes	104	27
No	7	19

STATE COVERAGE

MEWAs and ECEs reported operating in all 50 states, the District of Columbia, and certain U.S. territories during Statistical Year 2022.

Table 24 shows, by type, the top states in which entities reported operating in their annual report filings. California and Texas remained the states with the most entities reporting operating. Nine out of 10 of the top states showed increases in Plan MEWAs in Statistical Year 2022.²⁸ California, Florida, Washington, and Ohio experienced increases in the number of Non-Plan MEWAs. See Table 24B in [Appendix B](#).

Table 24: Top States for Entities by Entity Type, Annual Report Filings for Statistical Year 2022

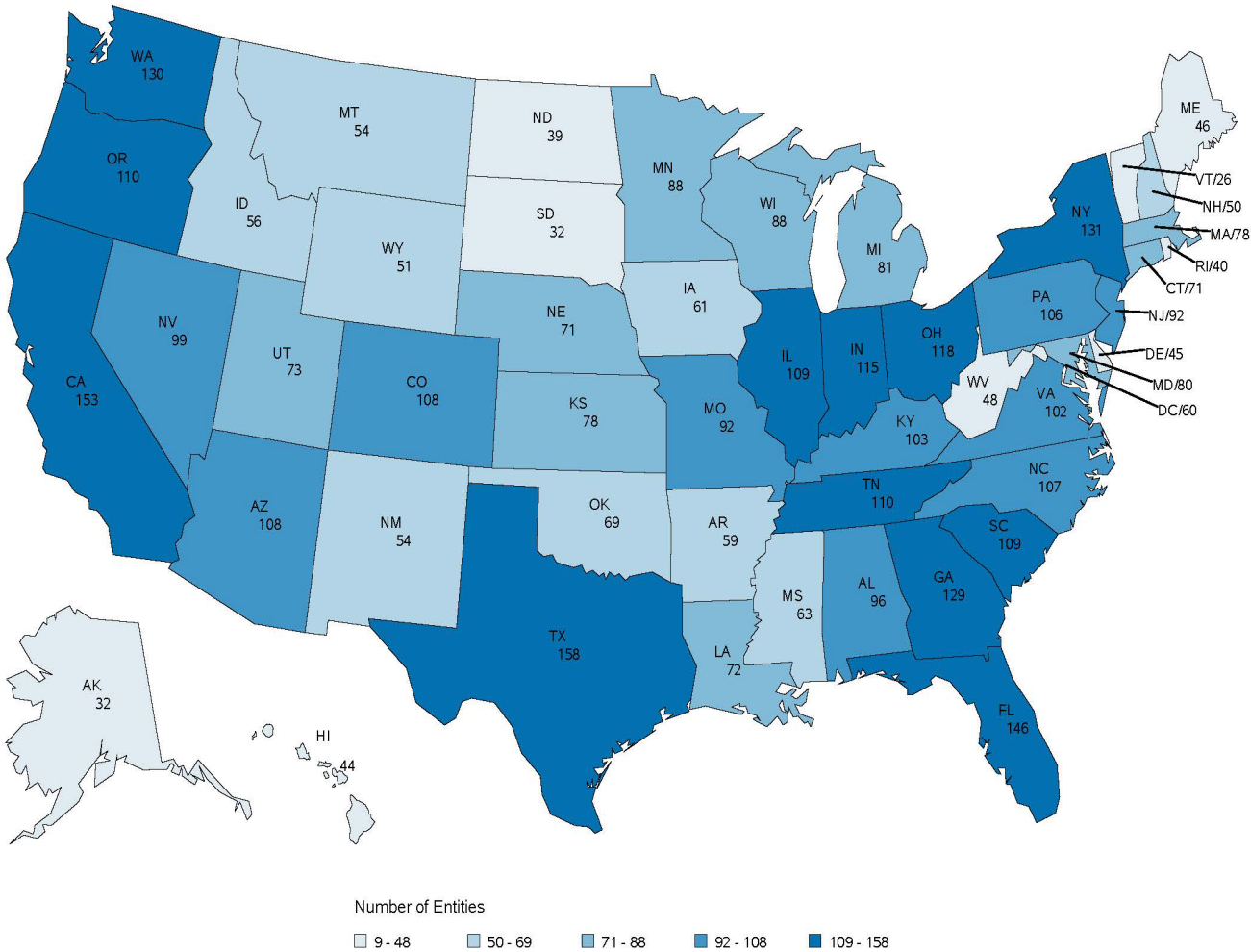
State	Plan MEWA	Non-Plan MEWA	ECE	Total
Texas	147	9	2	158
California	141	11	1	153
Florida	136	9	1	146
New York	113	17	1	131
Washington	122	8	0	130
Georgia	119	9	1	129
Ohio	101	16	1	118
Indiana	107	7	1	115
Oregon	104	5	1	110
Tennessee	105	4	1	110

Figure 9 displays the total Plan MEWAs, Non-Plan MEWAs, and ECEs in each state, based on their annual reports.²⁹ Most of these entities provided coverage in Texas, California, Florida, New York, Washington, and Georgia. Texas had the most Plan MEWAs, while New York had the most Non-Plan MEWAs.

²⁸ Oregon is in the top 10 states in Statistical Year 2022 but wasn't in the list of top states in Statistical Year 2021.

²⁹ The figure does not include entities in U.S. territories (44).

Figure 9: Total Entities by State, Annual Report Filings for Statistical Year 2022



PARTICIPANTS

When generating statistics about participant counts, the Department counted the largest number of participants reported on any 2022 Form M-1 filing for a given entity to account for entities that have different information reported on their multiple filings. In this section, the Department restricted the reporting source to the entities' Statistical Year 2022 Annual Report filings. MEWAs and ECEs that submitted annual reports reported 2.7 million participants for Statistical Year 2022, an increase of less than 1 percent from Statistical Year 2021.

The number of Plan MEWA participants actually decreased by nearly 4 percent, while the number of Non-Plan MEWA participants increased by 7 percent. Most participants (84 percent) were reported by Plan MEWAs, which tended to be the smallest entities, with an average size of 3,164 participants.³⁰

ECEs reported the fewest participants (3 percent) but tended to be the largest entities, with an average of 9,843 participants, three times as many participants as the average Plan MEWA. Filings indicated that, on average, ECEs were the largest entities, followed by Non-Plan MEWAs and then Plan MEWAs. See Table 24B in [Appendix B](#).

Table 25: Total Participants by Entity Type and Size, Annual Report Filings for Statistical Year 2022

Entity Type	Entity Count	Participant Count	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	728	2,303,416	84.1%	3,164	624	0	331,023
Non-Plan MEWA	51	346,042	12.6%	6,785	1,630	0	52,714
ECE	9	88,588	3.2%	9,843	516	0	68,495
Total	788	2,738,046	100.0%	3,475	670	0	331,023

Note: Percentages will not total 100% due to rounding.

FORM 5500 MATCHES

Some entities file both a Form M-1 Annual Report and a Form 5500 for the same time period. This section presents tables for such entities and displays the following:

- the match rate of Form M-1 Annual Reports to Form 5500s,
- reported assets for matched entities,
- concordance of reported and/or derived funding status between the two forms,
- benefits reported per the Form 5500 benefit codes,
- concordance of reported service providers between the two forms, and
- participant comparisons between the two forms.³¹

The Department matched Form M-1 Annual Report filers to the Form 5500 through Question 11c on the Form 5500, which is used to report the receipt confirmation code the plan received when it filed the Form M-1. As shown in Table 26, there were 581 entities that filed a Form M-1 Annual Report for which the Department could identify a Form 5500 for the same period, a nearly 74 percent match rate with the 788 entities that filed a Form M-1 Annual Report for Statistical Year 2022. This was a slight increase over 2021, which saw a 73 percent match rate between Form M-1 Annual Reports and Form 5500 filings. See Table 26B in [Appendix B](#).

³⁰ Despite Plan MEWAs having an average size of about 3,200 participants overall, the three largest Plan MEWAs, all of which were Professional Employer Organizations (PEOs), reported over 200,000 participants each.

³¹ Entities that file the Form M-1 and also required to file the Form 5500 are instructed not to use the Form 5500-Short Form (SF), which does not include a field for filers to indicate a Form M-1 confirmation number. Thus, none of the reported matched entities in this section include SF filers.

Table 26: 2022 Form M-1 Entities by Entity Type – Annual only Matched M-1 and Form 5500 Filings

Entity Type	Matched Entities	Unique Entities	Match Rate
Plan MEWA	546	728	75.0%
Non-Plan MEWA	28	51	54.9%
ECE	7	9	77.8%
Total	581	788	73.7%

In examining why entities that filed a Form M-1 may not match with a Form 5500, apart from not having a requirement to file (e.g., Non-Plan MEWAs³²), the Department found the following explanations:

- Filers entered a matching Receipt Confirmation Code, but the timing of the filings did not match (i.e., they were not the same year).
- Filers entered a Receipt Confirmation Code, but it did not match (possibly a typing error).
- Filers left the code blank (i.e., they did not indicate any Receipt Confirmation Codes in the Form 5500 filing).

For more information about the matching process, see the Form 5500 Matches section of Appendix A.

Included in the 581 matched entities are arrangements that are not required to file a Form 5500 but are included in these summary tables due to their size. While Non-Plan MEWAs aren't required to file a Form 5500, nine of the larger Non-Plan MEWAs filed Forms 5500 as 103-12 Investment Entities (103-12 IE).^{33,34} Entities that file the Form 5500 as 103-12 IEs are not required and generally do not report plan characteristic codes that indicate what type of benefits are offered, nor do they have to report the number of participants in the arrangement. They are, however, required to report insurance contract, service provider, and financial information. Because these Non-Plan MEWAs contain a large amount of assets and appear to be growing in participation, the Department opted to include these 103-12 Form 5500 matches in this bulletin to the extent they include information on the data elements presented in this Form 5500 match section.³⁵

In addition, the Department included in its matched tables a few dozen MEWAs that filed a Form 5500 as a Group Insurance Arrangement (GIA), which is another type of direct filing entity available for arrangements that provide benefits to the employees of two or more unaffiliated employers. A GIA fully insures one or more welfare plans of each participating employer, uses a trust or other entity as the holder of the insurance contracts, and uses a trust to pay premiums to the insurance company.

³² Although Non-Plan MEWAs are not required to file a Form 5500 those that did were included in this analysis. Of the 28 Non-Plan MEWAs that did match with a Form 5500 for Statistical Year 2022, 11 filed as Group Insurance Arrangements (GIAs), nine filed as 103-12 investment entities, and eight filed as multiple employer welfare plans.

³³ DOL Regulation 2520.103-12 provides a method of reporting for plans that invest in an entity (other than other types of direct filing entities) whose underlying assets include “plan assets” within the meaning of 29 CFR 2510.3-101 of two or more plans that are not members of a “related group” of employee benefit plans. Eight out of nine of the Non-Plan MEWAs that filed as 103-12s attached financial reports to their Form 5500 filings that identified them as Voluntary Employees’ Beneficiary Associations (“VEBAs”) under Section 501(c)(9) of the Internal Revenue Code.

³⁴ See the 2022 Instructions for Form 5500, <https://www.dol.gov/sites/dolgov/files/ebsa/employers-and-advisers/plan-administration-and-compliance/reporting-and-filing/form-5500/2022-instructions.pdf>, p.11.

³⁵ Though the Department didn't expressly exclude the entities filed as 103-12 IE and GIA from any of the tables in the Form 5500 match section of this report, they represent some of the 38 entities that are excluded from the participant table due to having reported zero participants on either the Form M-1 or Form 5500.

GIA must report insurance contracts, service providers, and financial information as applicable, along with the number of participants and relevant plan characteristic codes.³⁶

Table 27 illustrates the entity type breakout of MEWAs for which the Department identified a Form 5500 match that filed as a direct filing entity. Among the 40 direct filing entity matches, 20 Plan MEWAs and 11 Non-Plan MEWAs filed as GIAs and nine Non-Plan MEWAs filed as 103-12 IEs.

Table 27: Direct Filing Entity Form 5500 filings, by Entity Type for Statistical Year 2022

Entity Type	GIA	103-12 IE	Total
Plan MEWA	20	0	20
Non-Plan MEWA	11	9	20
Total	31	9	40

Not all of the 581 entities that filed both a Form M-1 and a Form 5500 for Statistical Year 2022 reported all information. For example, only 273 of the matched entities reported assets on the Form 5500.³⁷ Among those, the average reported assets across all entity types were nearly \$8.7 million, a nearly 7 percent decrease from 2021.³⁸ Median assets were \$1.7 million, a 5 percent decrease from 2021. Average reported assets for Plan MEWAs and Non-Plan MEWAs decreased by nearly 11 percent and nearly 20 percent from 2021, respectively. See Table 28B in [Appendix B](#).

Table 28: Assets – Matched Unique Entity, Statistical Year 2022

Entity Type	Entity Count	Sum	Average Assets	Median Assets	Min	Max
Plan MEWA	245	\$1,910,388,936	\$7,797,506	\$1,744,399	\$0	\$127,739,724
Non-Plan MEWA	21	\$314,151,984	\$14,959,618	\$1,724,605	\$0	\$113,343,632
ECE	7	\$145,865,810	\$20,837,973	\$200,640	\$28,992	\$140,176,598
Total	273	\$2,370,406,730	\$8,682,809	\$1,724,605	\$0	\$140,176,598

In addition to summarizing information that MEWAs and ECEs report on the Form 5500, this bulletin compares the consistency of information reported across these forms. While this data can be informative, the Form M-1 only asks about medical benefits, whereas Form 5500 filings allow welfare plans to report on multiple benefit types in a single filing. As a result, some level of inconsistency across filing types is to be expected.

³⁶ When a GIA files a Form 5500 for all the plans in the group, each plan that is part of the group insurance arrangement is exempt from the requirement to file a Form 5500.

³⁷ Assets reported in Table 28 are for all non-blank entries on the Form 5500 Schedule I or Schedule H. Matched entities might not have filed a Schedule I or Schedule H if they are fully insured or do not have assets in a trust.

³⁸ The decrease in assets is in line with the decline in the stock market performance in 2022. S&P Dow Jones Indices LLC, S&P 500 [SP500], retrieved from FRED, Federal Reserve Bank of St. Louis, <https://fred.stlouisfed.org/series/SP500>, April 10, 2025.

Funding status is self-reported on the Form M-1 (as fully insured in all states, fully insured in some states, and not fully insured), but the Department assigns funding type to health plan Form 5500 filers (as fully insured, mixed-insured or self-insured) based on certain reported characteristics on the Form 5500.³⁹

Because the Form M-1 and the Form 5500's funding options do not map directly to each other, there is the possibility that other benefits, such as life insurance or vision, are funded differently from health benefits. However, one would still expect that MEWAs and ECEs that were assigned fully insured status on the Form 5500 would identify as fully insured in all states on the Form M-1. As shown in Table 29, this is the case for 96 percent of the 395 fully insured Form 5500 filings.

One would expect a weaker correlation between MEWAs and ECEs with a Form 5500 indicating some element of self-insurance and those that identify as being not fully insured in some or all states on their Form M-1 filings, given the Form 5500 funding status could be capturing other types of benefits. This is the case for nearly 63 percent of the 160 Form 5500 filings that the Department classified as having at least some element of self-insurance.

Table 29: Funding Status Concordance by Form, MEWAs and ECEs for Statistical Year 2022⁴⁰

Form 5500	Form M-1		
	Not Fully Insured	Fully Insured – Some States	Fully Insured – All States
Self-Insured	95	0	27
Mixed Insured	4	1	33
Fully Insured	13	2	380

Table 30 depicts the number of entities indicating various benefit types on their Form 5500 filings. This additional information about benefit types helps portray the full set of benefits offered by MEWAs and ECEs, because the Form M-1 does not ask filers for this information.

Among the 581 matched entities, nearly 79 percent reported on their Form 5500 filing that they offer benefits in addition to health benefits, mostly some combination of vision, dental, and other non-health welfare benefits.

It is worth noting that the Department included in this analysis 25 MEWAs that did not indicate on their Form 5500 that they offered health benefits either through omission of a welfare benefit plan characteristic code or a code that signals a welfare benefit, but not health specifically.

³⁹ The Form 5500 does not explicitly ask health plans if they are self-insured or fully insured, so the Department uses an algorithm to determine the likelihood of self-insurance for group health plans that file a Form 5500. Based largely on reporting characteristics that demonstrate evidence of insurance contracts or evidence of trusts, plans that indicate they offer health benefits on their Form 5500 are labeled “fully insured,” “self-insured,” or “mixed insured” (which suggests some plan options are fully insured while other are self-insured). More information about this algorithm can be found in Appendix B, Self-Insured Report: Form 5500 filings of health benefit plans. See pg. 15 of the report for a depiction of the algorithm and how it classifies plans by funding status, <https://www.dol.gov/sites/dolgov/files/EBSA/researchers/statistics/retirement-bulletins/annual-report-on-self-insured-group-health-plans-2025-appendix-b.pdf>.

⁴⁰ There were 581 MEWAs and ECEs that filed both the Form M-1 and the Form 5500. However, the funding status of 25 MEWAs could not be identified by the Form 5500 data. These filings either have blank welfare codes or listed non-health plan codes but were included because they had a Form 5500 match to a Form M-1.

The eight Form 5500 matches with blank codes can be attributed to the previously discussed 103-12 IE Non-Plan MEWA filings.⁴¹ Seventeen entities reported offering only non-health benefits, meaning they offer some combination of vision, dental, life, disability, or “other health” benefits but not health benefits specifically. Because MEWAs and ECEs are not required to file the Form M-1 if they do not offer health benefits, the Department flagged these 17 entities for follow-up to ensure that there is no confusion about the filing requirements.

Table 30: Benefit Types Reported on the Form 5500, All Entity Types for Statistical Year 2022

Benefit Type	
Health Benefits Only	100
Health and Other Benefits	456
Health and Dental	18
Health and Vision	8
Health and Non-Health	18
Health, Dental, and Vision	76
Health, Dental, and Non-Health	16
Health, Vision, and Non-Health	10
Health, Dental, Vision, and Non-Health	310
Non-health benefits	17
No Benefit Codes	8

Table 31 shows the concordance of service provider types listed on the Form M-1 and Form 5500 among entities that filed both forms. The green boxes indicate where a given service provider type was reported (or not reported) consistently on both forms. Although Table 31 demonstrates some inconsistency in the type of service providers reported, there are several explanations for these differences:

- The Form 5500 filing instructions for Schedule C, applicable to all large plan filers regardless of benefit type, capture fees from plan service providers that receive \$5,000 or more in direct and indirect compensation. The Form M-1 is specific to MEWA provided health benefits and the filing instructions are tailored to capture all fees for service providers related to such benefits, regardless of size.
- The Form 5500 Schedule C instructs filers to enter all applicable codes from a list of 55 codes with various services and provider types; the list includes several codes that describe services TPAs commonly provide as well as two “other” type categories for services and fees. Difficulty in mapping to Form M-1 information may occur if filers use an “other” code as a catch-all code.⁴²

The rate of inconsistency in service provider reporting between the Form 5500 and Form M-1 for the 2022 Statistical Year ranged from nearly 11 percent for stop-loss insurance to 47 percent for marketing agents.

⁴¹ While not required, one of the nine Non-Plan MEWAs that filed as a 103-12 IE did report welfare benefit codes.

⁴² For this bulletin, service codes used from the Form 5500 Schedule C to identify the various service provider types reported on the Form M-1 are as follows: Form 5500 codes 12, 13, 14, 15 map to Form M-1 TPA, Form 5500 code 22 maps to Marketing Agent, and Form 5500 code 11 maps to Actuary.

Table 31: Form M-1 to Form 5500 Matches by Service Providers,
All Entity Types for Statistical Year 2022

Third-Party Administrators	Form M-1	
Form 5500	Yes	No
Yes	164	33
No	108	276

Marketing Agent	Form M-1	
Form 5500	Yes	No
Yes	76	18
No	255	232

Actuary	Form M-1	
Form 5500	Yes	No
Yes	49	7
No	88	437

Stop-Loss Insurance	Form M-1	
Form 5500	Yes	No
Yes	77	8
No	55	441

Table 32 reports total participants for the 543 matched entities that filed both the Form M-1 and Form 5500 and reported participants on both forms.⁴³ Examining the participant counts reported on the Form M-1 and the Form 5500 might not allow for a meaningful comparison, due to the fact that the participant counts reported on the Form M-1 should pertain only to individuals who are receiving health benefits through the MEWA or ECE, while the Form 5500 may include participants in non-health benefits as well.

Of these 543 matched entities, the Form M-1 contained nearly 1.6 million total participants from the annual report filings, while the Form 5500 had 1.8 million participants.

Since the Form 5500 includes non-health plans, such as dental, vision, life, and accidental death & dismemberment plans, it is expected that the counts of participants on the Form 5500 would exceed the counts reported on the Form M-1 for matched entities.

Table 32: Form M-1 to Form 5500 Matches, Total Participants by Entity Type and Size, All Entity Types for Statistical Year 2022

Form M-1					
Entity Type	Entity Count	Participant Count	% Total	Average	Median
Plan MEWA	525	1,457,773	93.3%	2,777	763
Non-Plan MEWA	13	33,277	2.1%	2,560	1,630
ECE	5	72,198	4.6%	14,440	516
Total	543	1,563,248	100.0%	2,879	773

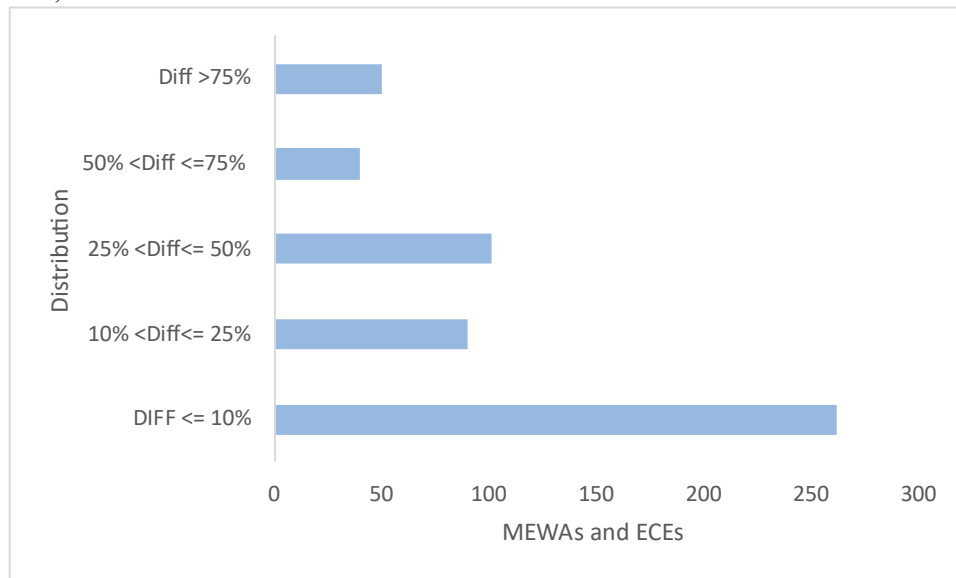
Form 5500					
Entity Type	Entity Count	Participant Counts	% Total	Average	Median
Plan MEWA	525	1,732,003	95.9%	3,299	738
Non-Plan MEWA	13	29,491	1.6%	2,269	1,499
ECE	5	44,104	2.4%	8,821	643
Total	543	1,805,598	100.0%	3,325	743

Note: Percentages will not total 100% due to rounding.

⁴³ Only includes entities with more than zero participants in both the Form M-1 and the Form 5500. Of the 38 entities dropped for this comparison, 27 reported zero participants on the Form 5500, three reported zero participants on the Form M-1, and eight reported zero participants on both for the Form 5500 and Form M-1.

Figure 10 displays the distribution of the 543 MEWAs and ECEs that had more than zero participants reported on both the Form M-1 and the Form 5500. Of the matched entities, nearly 16 percent had exact participant matches on both forms and 48 percent had participant counts that closely matched (differed by 10 percent or less).

Figure 10: Participant Count Difference Distribution between Form 5500 & Form M-1, MEWAs and ECEs for Statistical Year 2022



SECTION V: NOTABLE TRENDS SINCE 2018

With the 2018 Form M-1 Bulletin, the Department began using a standardized methodology for defining the filing period covered by the bulletin. This standardization allows for comparisons of statistics over time.⁴⁴

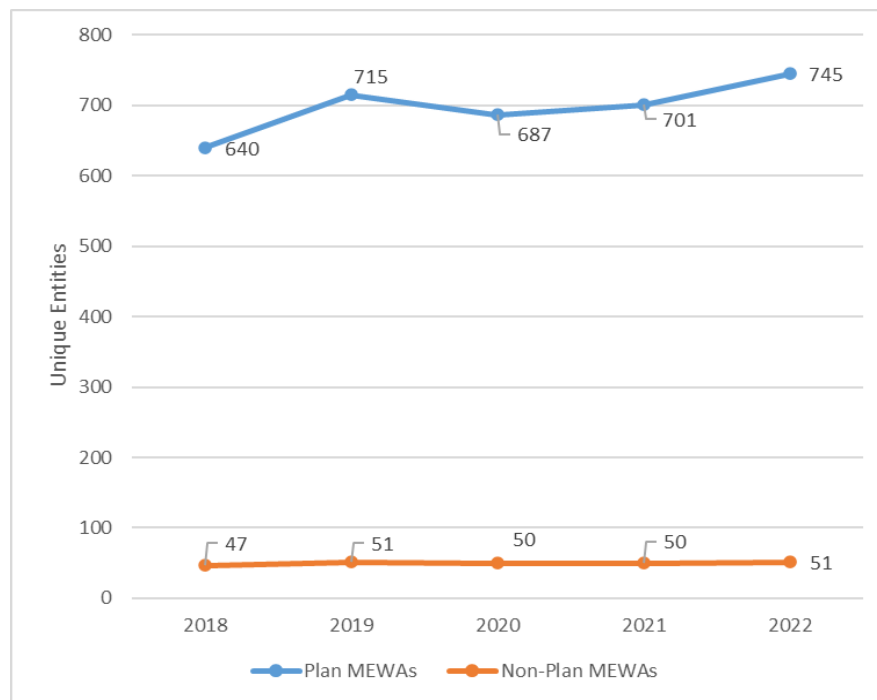
This section depicts trends in select high level statistics for MEWAs from the Form M-1 universe from Statistical Year 2018 through Statistical Year 2022.⁴⁵ Trends are displayed for total unique entities, total participants, and MEWAs that reported being not fully insured on their Annual Report.

UNIQUE ENTITIES

The number of unique entities increased by nearly 14 percent from Statistical Year 2018 to Statistical Year 2022. Plan MEWAs comprise the majority of entities and experienced the largest growth (16 percent) over the 5-year period.

After declining in 2020, the number of unique Plan MEWAs increased 2 percent in 2021 and 6 percent in 2022. Unique Non-Plan MEWAs increased by nearly 9 percent since 2018 but have been relatively flat since 2019.

Figure 11: Unique Entities by Entity Type, Total Filings for Statistical Years 2018 - 2022



⁴⁴ Data from Statistical Year 2017 are not included in the analysis since a different methodology was used to define the filing time period in the 2017 Form M-1 Bulletin.

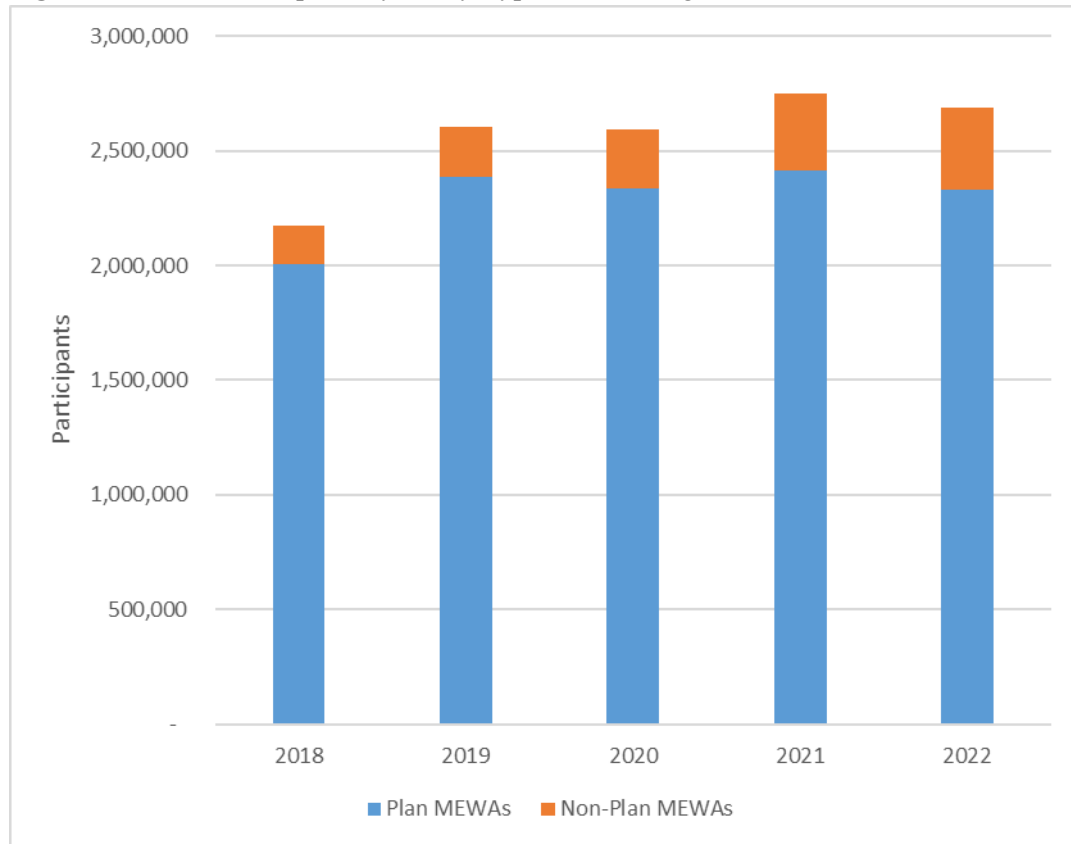
⁴⁵ Because ECEs only have to file for the first 3 years following an origination event, there are a relatively small number of ECE filings submitted each year. So, this bulletin significantly understates the total number of ECEs and participants in entities that qualify as ECEs. It also means that relatively few ECEs dropping in and out of the filing population can cause large percentage changes. Year over year changes are therefore omitted throughout this report.

PARTICIPANTS

Total participants increased by nearly 21 percent from Statistical Year 2018 to Statistical Year 2022. Plan MEWAs make up the largest share of participants, followed by Non-Plan MEWAs and then ECEs.

The number of Plan MEWA participants increased by nearly 17 percent over the 5-year period, increasing the most (19 percent) in 2019, while declining by 2 percent in 2020 and by nearly 4 percent in 2022. The number of Non-Plan MEWA participants experienced double-digit growth in all 5 years except for 2022, with the largest growth (31 percent) occurring in 2021.

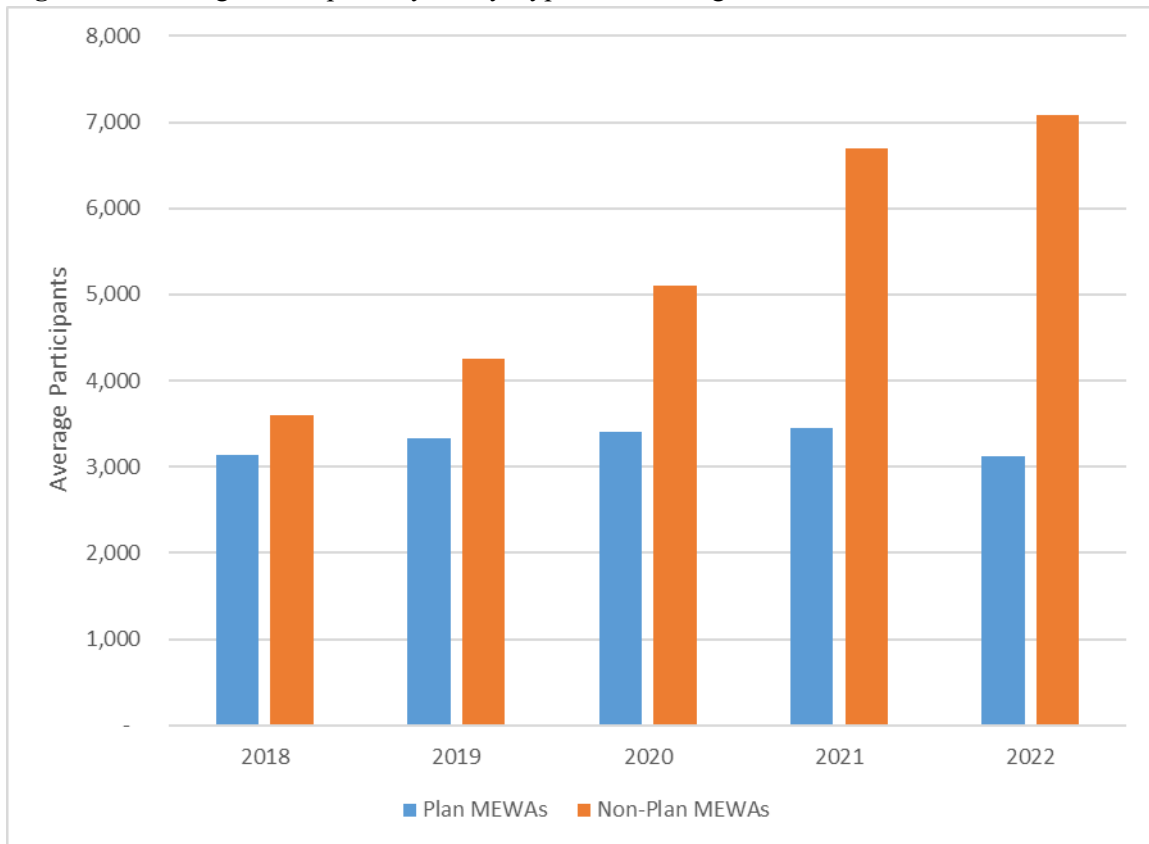
Figure 12: Total Participants by Entity Type, Total Filings for Statistical Years 2018-2022



Although Plan MEWAs reported the most participants, Figure 13 below shows that Plan MEWAs, on average, tended to be the smallest entities. Non-Plan MEWAs had at least twice as many participants as the average Plan MEWA in Statistical Year 2022.

While the size of the average Non-Plan MEWA increased by at least 18 percent in each year since 2018, 2022 saw a slowdown in growth, with a nearly 6 percent increase in average participants compared to the prior year.

Figure 13: Average Participants by Entity Type, Total Filings for Statistical Years 2018-2022

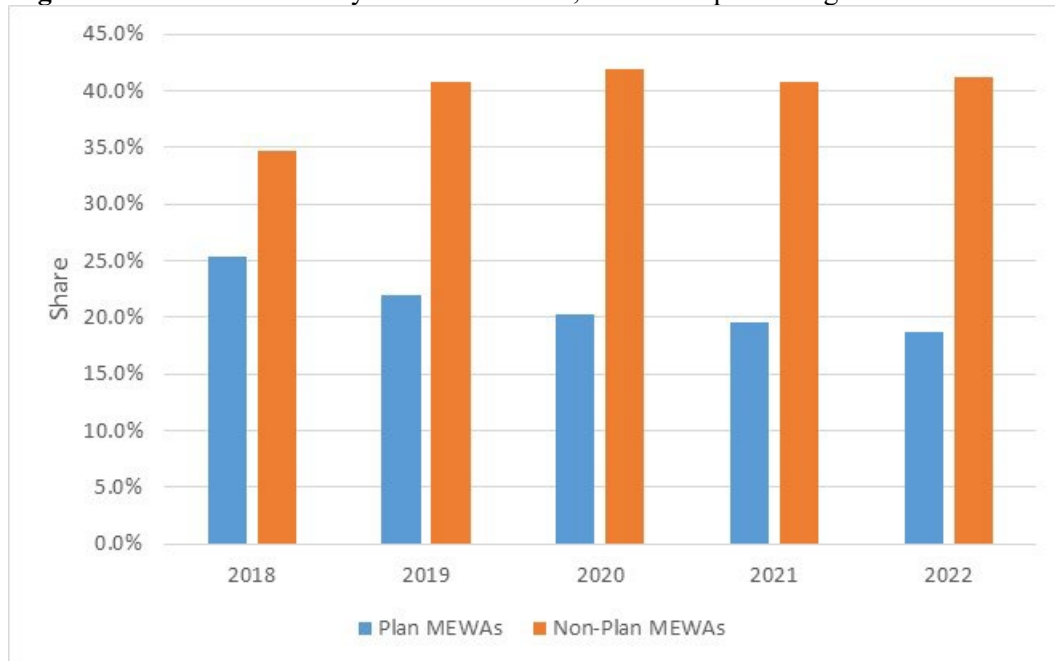


FUNDING STATUS

Figure 14 below displays the share of MEWAs that reported not being fully insured, based on their Form M-1 Annual Report filings. Over the 5-year period, Non-Plan MEWAs were more likely than Plan MEWAs to report not being fully insured.

The share of Plan MEWAs that reported not being fully insured trended down, decreasing from 25 percent in Statistical Year 2018 to nearly 19 percent in Statistical Year 2022. On the other hand, the share of Non-Plan MEWAs that reported not being fully insured increased from nearly 35 percent in 2018 to 41 percent in 2022.

Figure 14: Share of Not Fully Insured MEWAs, Annual Report Filings for Years 2018-2022



CONCLUSION

This bulletin reports Statistical Year 2022 Form M-1 filing information for the following categories:

- all filers;
- those indicating Began Operating;
- those indicating MEWA Registrations, ECE Originations, ECE Special Filings, or material changes; and
- annual reports.

The bulletin includes statistics on the number of unique entities, reasons for filing, participants covered, states where operating, funding, and service providers, as well as additional information on a subset of entities that could also be matched to their Form 5500 filing. It is intended to provide a snapshot of the 2022 filing population, as reported by its administrators.

For Statistical Year 2022, 805 unique entities submitted Form M-1 filings, a 6 percent increase from Statistical Year 2021. Most were fully insured Plan MEWAs, though those entities tended to be smaller than Non-Plan MEWAs. These entities operated in all 50 states, the District of Columbia, certain U.S. territories, and several non-U.S. locations, and they covered approximately 2.8 million participants.⁴⁶

For the first time, the bulletin also presents trends on unique entities by plan type, plan participants for total filings, and the share of MEWAs that reported not being fully insured from Statistical Year 2018 to Statistical Year 2022. Since 2018, the number of unique entities increased nearly 14 percent and the total number of participants in MEWAs and ECEs increased nearly 21 percent. During the 5-year period, average participants for Non-Plan MEWAs increased, while average Plan MEWA participants remained flat. Non-Plan MEWAs were more likely than Plan MEWAs to report not being fully insured.

⁴⁶ The participant count comes from looking at the largest number of participants reported on all entities' Statistical Year 2022 filings. For additional details, see [Appendix A](#), "Participants" section.

APPENDIX A: DATA PREPARATION DETAILS

This appendix provides details on the data preparation steps used to create the various descriptive statistics.

2022 FORM M-1 FILING POPULATION:

- The research dataset for this bulletin consists of Form M-1 filings for MEWAs or ECEs that filed a Form M-1 during the relevant period and were in operation during the 2022 Statistical Year, operating from January 1 to December 31, 2022, or operating during a fiscal year with at least 6 continuous months in 2022.
- The Department constructed the research dataset by starting with 2022 Form M-1 Annual Report filings that indicated the submission was for a calendar year MEWA or ECE.
- The 2022 Bulletin includes fiscal year filings if the annual report filings indicated the MEWA or ECE operated during a fiscal year with at least 6 continuous months in 2022. If the MEWA or ECE's fiscal year operated for exactly 6 months spanning 2 different years, the Department categorized the filings as being in the 2022 Statistical Year if the fiscal year end date occurred in 2022.⁴⁷
- In order to capture all the filings for special events that occurred in 2022, the Department separately added 2021 Form M-1 registration, origination, or special filings submitted between January 1 and December 31, 2022.

ENTITY IDENTIFICATION:

An entity may file multiple Form M-1s for a single operating year for a number of reasons, including amending a previous filing from that operating year, expanding coverage to additional states, and increasing participants by 50 percent or more. This bulletin attempts to determine the number of entities that submitted those filings in a given statistical year. This task is somewhat complex, because an entity might have data entry inconsistencies across its additional filings. Examples of possible inconsistencies include transposed numbers in EINs, omitted PNs, and typographical errors in MEWA or ECE names.

The process of counting entities for the purpose of this bulletin necessitated that the Department develop a process for reviewing all filings in the population and determine whether each filing could be matched to other filings as either the same entity or an additional filing by an entity. Focusing on four key identifying variables (EIN, PN, entity name, and entity address), the Department looked for matching and non-matching variables to identify entities and categorize additional filings of entities.

The Department took a phased approach, detailed in the table below, with each phase looking for matching and non-matching combinations to help identify possible additional filings by entities. During each phase, the Department manually reviewed possible additional filings and categorized them as either a unique entity or additional filings of an already identified entity.

⁴⁷ The criteria used to classify July 1, 2021, through June 30, 2022, fiscal year filers as needing to file a 2022 Form M-1 comes from the publicly available Department of Labor document titled "10 Tips For Filing Form M-1 For Association Health Plans And Other MEWAs That Provide Medical." <https://www.dol.gov/sites/dolgov/files/ebsa/employers-and-advisers/plan-administration-and-compliance/reporting-and-filing/forms/m1-filing-tips.pdf>.

If a review of the four identifying variables did not produce a clear category for the potentially related filings, the Department reviewed additional information from the filings to ascertain whether the filings were entities not yet identified or possible additional filings of an already identified entity.

After the Department categorized all filings with any matching data in the four identifying variables as entities or additional filings, it designated all remaining filings from the population as entities.

This report assumes that a filing that matches no other filing across the four identifying variables is an entity with only one filing.

Table 1A: Phased Approach for Counting Entities

Entity Identifying Variables			
1	EIN	3	Entity Name
2	PN	4	Entity Address

Phase	Match	Description
Phase 1	1, 2, 3, and 4	Baseline for removal of unique MEWA duplicates.
Phase 2	1, 3, and 4; not 2	Identifies EIN, Name, and Address matches with no PN or incorrect PN entries.
Phase 3	1, 2, and 3; not 4	Identifies EIN, PN, and Name matches with likely incorrect or missing Address entries or unique Address with duplicate EIN, PN, and Names.
Phase 4	1, 2, and 4; not 3	Identifies EIN, PN, and Address matches with likely incorrect Name entries, or unique Name entries with duplicate EIN, PN, and/or Address.
Phase 5	2, 3, and 4; not 1	Identifies PN, Name, and Address matches with likely incorrect or missing EIN entries, or unique EIN entries with duplicate EIN, PN, and/or Address.
Phase 6	1 and 2; not 3 or 4	Identifies EIN and PN matches with likely incorrect Name or Address entries, or unique Name and Address entries with duplicate EIN and PNs.
Phase 7	1; not 2, 3, or 4	Identifies EIN matches with unique, incorrect, or missing PN, Name, and/or Address.
Phase 8	3; not 1, 2, or 4	Identifies Name matches with unique, missing, or incorrect EIN, PN, and/or Address.
Phase 9	1, 2, and 3; not 4	Identifies EIN, PN, and Name matches with likely incorrect or missing Address entries or unique Address with duplicate EIN, PN, and Names.

Phase	Match	Description
Phase 10	Not 1, 2, 3, or 4	Identifies all filings with no matches in EIN, PN, Name, or Address.
Phase 11	N/A	Review of all filings flagged as possible entities and possible additional filings for further manual review.

FUNDING STATUS:

On the Form M-1, Part II, Question 17, MEWAs and ECEs are asked to report on each state in which they provide medical coverage and the respective funding status (fully insured or not) of the medical coverage in that state. Because of the possibility of a single entity offering fully insured coverage in some states and not fully insured coverage in others, this bulletin includes four categories of funding status at the entity level:

- (1) fully insured - all states,
- (2) fully insured - some states,
- (3) not fully insured, and
- (4) undetermined.

To derive the funding status at the entity level, the Department aggregated all filings for an entity by each state coverage line-item question (Question 17g, “If no to 17e, is the entity fully insured?”). Through this process, a single entity could have specific states appear more than once due to multiple filings on which the entity filled out Question 17.

In the aggregate list, if an entity reported for all states a funding status of fully insured, the Department classified the entity as “Fully Insured - All States.” If an entity reported being fully insured in some states and not in others, then the Department classified the entity as “Fully Insured - Some States.” If MEWAs and ECEs did not indicate the entity was fully insured in any state, then the Department classified the entity as “Not Fully Insured.” If Question 17g was left blank on all of the line items associated with the specific entity, then the Department classified the entity as “Undetermined.”

SERVICE PROVIDERS:

An entity might report multiple service providers on the same filing or on multiple filings submitted in a given year.

After manually reviewing the data at the service provider level, the Department concluded that filers were reporting identifying information for their service providers too inconsistently to accurately classify a service provider as unique in this bulletin. Across multiple filings, the same service provider could have various names, EINs, and/or non-obvious spelling errors.

Instead, the Department decided to include service provider data by entity counts, where entities are broken down further by entity type and funding status.

Therefore, the bulletin includes information on whether a MEWA or ECE ever reported having one of four different types of service providers (TPA, actuary, marketing agent, or stop-loss) on any of its 2022 Statistical Year filings. For example, TPAs are reported by 361 entities, 220 of which are “Fully Insured - All States” and identified as Plan MEWAs.

STATE COVERAGE:

In Part II, Question 17, entities report all states in which they provide benefits for medical coverage. For this purpose, entities list the state(s) where the employers (of the employees receiving coverage) are domiciled. Entities also indicate if a state was not included on previous M-1 filings by checking the “New State?” box. Additional information, as applicable, is submitted for the types of coverage provided for each state listed.

Table 2A: Part II, Question 17

17a	17b	17c	17d	17e	17f	17g	17h	17i	17j
Enter State where the MEWA or ECE is operating.	Is coverage provided?	State registration number.	Name of state agent or entity for service of process.	Is the entity a licensed health insurer in this State?	If yes to 17e, enter NAIC number.	If no to 17e, is the entity fully insured?	If yes to 17g, enter name and NAIC number of insurer.	Does the entity purchase stop loss coverage?	If yes to 17i, enter the name and NAIC number of insurer.

Because an entity may file multiple Form M-1s in a single plan year for different filing purposes, causing additional filings to be submitted for the same entity, the Department reviewed additional filings of entities for any discrepancies in Part II, Question 17’s state information. An entity can remove or add states throughout a plan year, which could result in additional filings to amend this information.

This bulletin includes all entities that list a state on any filings submitted for the plan year to report all states that an entity operates in during any part of the plan year. However, the Department counted an entity once per state regardless of multiple filings to ensure that number of entities operating in each state is not overstated.

Table 3A: State Coverage by Entity Type, Total Filings for Statistical Year 2022

State	Plan MEWA	Non-Plan MEWA	ECE	MEWA Headquarters	New State
AK	30	2	0	4	5
AL	87	8	2	23	11
AR	55	4	1	2	10
AZ	101	7	1	6	16
CA	143	11	1	67	17
CD	1	0	0	1	0
CO	102	7	1	10	11
CT	64	7	1	5	10
DC	55	4	1	9	7
DE	43	3	0	5	5

State	Plan MEWA	Non-Plan MEWA	ECE	MEWA Headquarters	New State
FL	138	9	1	31	24
GA	120	9	1	21	20
GU	0	1	0	0	0
HI	40	5	1	23	10
IA	57	4	1	7	10
ID	57	2	0	5	12
IL	104	7	1	25	16
IN	107	7	1	27	12
KS	73	5	1	13	14
KY	97	7	0	32	9
LA	68	6	1	0	6
MA	73	5	1	5	11
MD	73	6	2	11	9
ME	42	3	1	5	3
MI	76	8	1	14	16
MN	84	5	1	14	12
MO	85	7	1	12	8
MS	61	4	0	3	8
MT	51	2	1	7	12
NC	98	10	1	7	12
ND	37	2	1	9	4
NE	67	4	0	11	10
NH	48	3	0	3	9
NJ	85	8	1	9	14
NM	48	6	1	1	9
NV	95	6	1	26	15
NY	115	17	1	36	26
OH	104	16	1	18	17
OK	64	6	1	4	13
OR	106	5	1	46	18
PA	98	8	1	18	14
PR	8	1	0	3	0
RI	37	3	1	2	8
SC	101	8	1	18	15
SD	31	2	0	2	3
TN	108	4	1	29	12
TX	149	9	2	62	27
UT	70	5	1	15	15
VA	93	8	2	14	18
VI	1	1	1	0	1
VT	25	1	0	3	1
WA	124	8	0	58	14
WI	80	8	1	16	14
WV	44	4	0	3	5
WY	49	2	1	5	6

PARTICIPANTS:

This bulletin seeks to report all participants covered by Form M-1 entities for the 2022 Statistical Year. When an entity submitted additional filings, the Department counted the largest number of participants reported on all entities' 2022 Statistical Year filings. The Department considered discrepancies in the number of participants reported between an entity's filings and reviewed them to determine how different the results were using various methods.

To assess whether the largest number was the correct number to report for this bulletin, the Department looked at the last filings versus largest participant count filings and examined entities that had extension filings and/or amended reports for discrepancies.

Ultimately, the Department decided to report the largest number of participants for all entities to be as inclusive as possible in reporting participants covered. This method resulted in 2,778,135 participants being reported by entities during Statistical Year 2022.

To calculate the participant count reported in Section IV: Annual Reports, the Department used the same method of choosing the largest reported number of participants, but it only looked across annual reports filed by entities.

FORM 5500 MATCHES:

For this bulletin, the Department performed the 2022 Form M-1 and Form 5500 filing matches using the following steps:

- The Department used Line 11c of the Form 5500 (which is used to report the receipt confirmation code the plan received when it filed the Form M-1) to match the Form M-1's confirmation number variable. The Form 5500 requires filers who report that they are subject to Form M-1 filing requirements to enter the Receipt Confirmation Code for the Form M-1 annual report for the parallel Form 5500 annual report. If the plan was not required to file the 2022 Form M-1 annual report during the Form 5500 reporting year, the filer is told to enter the Receipt Confirmation Code for the most recent Form M-1 that was required to be filed.
- The Department restricted the dataset of Form 5500 filings to those with plan years ending between 2021 and 2022.
- If the filer entered the same Receipt Confirmation Code on multiple Form 5500s, the Department matched the same plan year dates as the Form 5500 and the Form M-1.

This method identified 581 entities that filed both a Form M-1 and Form 5500 for Statistical Year 2022. This is the fourth year the Department matched and analyzed the two form filings for this bulletin series.

FORM M-1 LAYOUT FOR REGISTRATION, ORIGINATION, SPECIAL FILING SECTION:

The Form M-1 layout itself prescribes the way statistics regarding registrations, originations, and special filings are classified and presented in this bulletin.

Figure 4A below depicts the five underlying events that could be indicated when filing a MEWA registration. Those same five events are split across the origination and special filing categories for ECEs.

Figure 4A: Layout of Registration, Origination, and Special Filing Question from the Form M-1:

☐ **MEWA Registration**

Enter MEWA registration date:

Reasons for filing Registration:

- ☐ 50% Increase in Covered Employees
- ☐ Began Operating
- ☐ Began Operating in an Additional State
- ☐ Material Change
- ☐ Merger

☐ **ECE Origination**

Enter ECE origination date:

Reasons for filing Origination:

- ☐ 50% Increase in Covered Employees
- ☐ Began Operating
- ☐ Merger

☐ **ECE Special Filing**

Enter ECE special filing date:

Reasons for filing Special Filing:

- ☐ Began Operating in an Additional State
- ☐ Material Change

As shown in the figure above, an entity may check “Began Operating” in both the MEWA registration and ECE origination sections of the form, regardless of the entity type. This bulletin only reports if an entity indicated it began operating at least once on a filing and does not report the total number of occurrences for each filing.

APPENDIX B: COMPARISONS BETWEEN STATISTICAL YEARS 2021 and 2022

Note: Numbering of appendix tables corresponds to the table numbers of the main report, but not every table of the main report is reflected in Appendix B.

Table 2B: Form M-1 Filings by Entity Type, Total Filings for Statistical Years 2021, 2022

Entity Type	2021		2022		2021-2022
	Filing Count	Share	Filing Count	Share	Percent Change
Plan MEWA	854	91.6%	875	91.8%	2.5%
Non-Plan MEWA	65	7.0%	69	7.2%	6.2%
ECE	13	1.4%	9	0.9%	-30.8%
Total	932	100.0%	953	100.0%	2.3%

Note: Percentages will not total 100% due to rounding.

Table 3B: Form M-1 Filings by Filing Purpose, Total Filings for Statistical Years 2021, 2022

Filing Purpose	2021		2022		2021-2022
	Filing Count	Share	Filing Count	Share	Percent Change
Annual Report	815	87.4%	858	90.0%	5.3%
MEWA Registration	101	10.8%	96	10.1%	-5.0%
ECE Origination	8	0.9%	0	0.0%	-100.0%
ECE Special Filing	9	1.0%	1	0.1%	-88.9%

Note: Percentages will not total 100% due to rounding.

Table 4B: Unique Entities by Number of Filings, Total Filings for Statistical Years 2021, 2022

Filings	2021		2022	
	Entities	Share	Entities	Share
1	613	80.8%	679	84.3%
2	125	16.5%	107	13.3%
3	15	2.0%	16	2.0%
4	6	0.8%	3	0.4%
Total	743	100.0%	805	100.0%

Note: Percentages will not total 100% due to rounding.

Table 5B: Unique Entities by Entity Type, Total Filings for Statistical Year 2021, 2022

Entity Type	2021		2022		2021-2022
	Entity Count	Share	Entity Count	Share	Percent Change
Plan MEWA	701	92.4%	745	92.5%	6.3%
Non-Plan MEWA	50	6.6%	51	6.3%	2.0%
ECE	8	1.1%	9	1.1%	12.5%
Total	759	100.0%	805	100.0%	6.1%

Note: Percentages will not total 100% due to rounding.

Table 6B: Top Headquartered States by Entity Type, Total Filings for Statistical Years 2021, 2022

2021					2022				
State	Plan MEWA	Non-Plan MEWA	ECE	Total	State	Plan MEWA	Non-Plan MEWA	ECE	Total
California	53	6	6	65	California	54	7	6	67
Washington	62	0	0	62	Texas	56	3	0	59
Texas	51	4	0	55	Washington	58	0	0	58
Oregon	42	0	0	42	Oregon	46	0	0	46
New York	24	11	0	35	New York	24	11	1	36
Tennessee	28	1	0	29	Kentucky	31	1	0	32
Kentucky	27	1	0	28	Florida	30	1	0	31
Florida	26	1	0	27	Tennessee	29	0	0	29
Illinois	26	0	0	26	Indiana	26	1	0	27
Indiana	25	1	0	26	Nevada	26	0	0	26

Table 7B: Top States of Entities Indicating “New State” by Entity Type, Total Filings for Statistical Years 2021, 2022

2021					2022				
State	Plan MEWA	Non-Plan MEWA	ECE	Total	State	Plan MEWA	Non-Plan MEWA	ECE	Total
Florida	21	2	0	24	Texas	27	0	0	27
Texas	17	2	2	21	New York	23	3	2	26
Indiana	17	1	0	18	Florida	24	0	0	24
South Carolina	16	2	0	18	Georgia	20	0	0	20
Illinois	14	2	0	16	Oregon	17	1	0	18
Virginia	14	1	1	16	Virginia	18	0	0	18
Arizona	13	2	0	15	California	17	0	0	17
California	13	2	0	15	Ohio	15	2	0	17
Georgia	12	3	0	15	Arizona	16	0	0	16
Kentucky	13	2	0	15	Illinois	16	0	0	16
Michigan	13	2	0	15	Michigan	16	0	0	16
Missouri	13	2	0	15	Nevada	15	0	0	15
Washington	14	1	0	15	South Carolina	15	0	0	15
N/A	N/A	N/A	N/A	N/A	Utah	15	0	0	15

Table 8B: Total Participants by Entity Type and Size, Total Filings for Statistical Years 2021, 2022

2021							
Entity Type	Entity Counts	Participant Counts	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	701	2,414,652	87.5%	3,445	652	0	336,194
Non-Plan MEWA	50	335,059	12.1%	6,701	1,673	0	47,287
ECE	8	10,582	0.4%	1,323	334	30	6,039
Total	759	2,760,293	100.00%	3,637	687	0	336,194

Note: Percentages will not total 100% due to rounding.

2022							
Entity Type	Entity Counts	Participant Counts	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	875	2,327,995	83.8%	3,125	624	0	331,023
Non-Plan MEWA	69	361,552	13.0%	7,089	1,716	0	52,714
ECE	9	88,588	3.2%	9,843	516	30	68,495
Total	953	2,778,135	100.0%	3,451	669	0	331,023

2021-2022 Percent Change						
Entity Type	Entity Counts	Participant Counts	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	24.8%	-3.6%	-9.3%	-4.3%	N/A	-1.5%
Non-Plan MEWA	38.0%	7.9%	5.8%	2.6%	N/A	11.5%
ECE	12.5%	737.2%	644.1%	54.7%	-100.0%	1034.2%
Total	25.6%	0.6%	-5.1%	-2.6%	N/A	-1.5%

Table 9B: Form M-1 Filings by Entity Type, “Began Operating” Filings for Statistical Years 2021, 2022

Entity Type	2021		2022		2021-2022
	Filing Count	Share	Filing Count	Share	Percent Change
Plan MEWA	50	87.7%	50	98.0%	0.0%
Non-Plan MEWA	2	3.5%	1	2.0%	-50.0%
ECE	5	8.8%	0	0.0%	-100.0%
Total	57	100.0%	51	100.0%	-10.5%

Table 10B: Unique Entities by Number of Filings, “Began Operating” Filings for Statistical Years 2021, 2022

2021			2022		
Filings	Entities	Share	Filings	Entities	Share
1	44	89.8%	1	43	91.5%
2	2	4.1%	2	4	8.5%
8	3	6.1%	3	N/A	N/A
Total	49	100.0%	Total	47	100.0%

Table 11B: Unique Entities by Entity Type, “Began Operating” Filings for Statistical Years 2021, 2022

Entity Type	2021		2022		2021-2022
	Entity Count	Share	Entity Count	Share	Percent Change
Plan MEWA	42	98.4%	46	97.9%	9.5%
Non-Plan MEWA	2	1.6%	1	2.1%	-50.0%
ECE	5	0.0%	0	0.0%	-100.0%
Total	49	100.0%	47	100.0%	-4.1%

Table 12B: Top Headquartered States by Entity Type, “Began Operating” Filings for Statistical Years 2021, 2022

2021					2022				
State	Plan MEWA	Non-Plan MEWA	ECE	Total	State	Plan MEWA	Non-Plan MEWA	ECE	Total
California	1	1	5	7	Hawaii	8	0	8	8
Nevada	6	0	0	6	Florida	5	0	0	5
Illinois	4	0	0	4	Utah	4	0	0	4
Texas	4	0	0	4	Colorado	3	0	0	3
Washington	4	0	0	4	Minnesota	3	0	0	3
Alabama	3	0	0	3	N/A	N/A	N/A	N/A	N/A
Kentucky	3	0	0	3	N/A	N/A	N/A	N/A	N/A

Table 14B: Form M-1 Filings by Entity Type, MEWA Registrations, ECE Originations and Special Filings for Statistical Year 2022

Entity Type	2021		2022		2021-2022
	Filing Count	Share	Filing Count	Share	Percent Change
Plan MEWA	57	90.5%	39	81.3%	-31.6%
Non-Plan MEWA	6	9.5%	9	18.8%	50.0%
ECE	0	0.0%	0	0.0%	N/A
Total	53	100.0%	48	100.0%	-23.8%

Note: Percentages will not total 100% due to rounding.

Table 15B: Types of Filings by Underlying Events, MEWA Registrations, ECE Originations, and ECE Special Filings for Statistical Years 2021, 2022

Type of Filing	2021				2022			
	Material Change	Began Operating in Additional State	50% Increase in Covered Employees	Merger	Material Change	Began Operating in Additional State	50% Increase in Covered Employees	Merger
Plan MEWA	13	14	5	0	17	16	5	1
Non-Plan MEWA	6	0	0	0	8	0	1	0
ECE	0	0	0	0	0	0	0	0
Total	19	14	5	0	25	16	6	1

Table 16B: Unique Entities by Number of Filings, MEWA Registrations, ECE Originations, and Special Filings for Statistical Year 2021, 2022

Filings	2021		2022	
	Entities	Share	Entities	Share
1	38	79.2%	25	73.5%
2	7	14.6%	6	17.7%
3	2	4.2%	1	2.9%
4	0	0.0%	2	5.9%
5	1	2.1%	0	0.0%
Total	48	100.0%	34	100.0%

Note: Percentages will not total 100% due to rounding.

Table 17B: Unique Entities by Entity Type, MEWA Registrations, ECE Originations, and Special Filings for Statistical Years 2021, 2022

Entity Type	2021		2022		2021-2022
	Filing Count	Share	Filing Count	Share	Percent Change
Plan MEWA	42	87.5%	26	76.5%	-38.1%
Non-Plan MEWA	6	12.5%	8	23.5%	33.3%
ECE	0	0.0%	0	0.0%	N/A
Total	48	100.0%	34	100.0%	-29.2%

Table 18B: Form M-1 Filings by Entity Type, Annual Report Filings for Statistical Years 2021, 2022

Entity Type	2021		2022		2021-2022
	Filing Count	Share	Filing Count	Share	Percent Change
Plan MEWA	750	92.0%	790	92.1%	5.3%
Non-Plan MEWA	57	7.2%	59	6.9%	3.5%
ECE	8	0.8%	9	1.0%	12.5%
Total	815	100.0%	858	100.0%	5.3%

Table 19B: Unique Entities by Number of Filings, Annual Report Filings for Statistical Years 2021, 2022

Filings	2021		2022	
	Entities	Share	Entities	Share
1	675	91.0%	722	91.6%
2	61	8.2%	62	7.9%
3	6	0.8%	4	0.5%
Total	742	100.0%	788	100.0%

Table 20B: Unique Entities by Entity Type, Annual Report Filings for Statistical Year 2021, 2022

Entity Type	2021		2022		2021-2022
	Entity Count	Share	Entity Count	Share	Percent Change
Plan MEWA	685	92.3%	728	92.4%	6.3%
Non-Plan MEWA	49	6.6%	51	6.5%	4.1%
ECE	8	1.1%	9	1.1%	12.5%
Total	742	100.0%	788	100.0%	6.2%

Table 21B: Entities by Entity Type and Funding Status, Annual Report Filings for Statistical Year 2021, 2022

2021					
Entity Type	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Undetermined	Total
Plan MEWA	543 (79.3%)	8 (1.2%)	134 (19.6%)	0 (0.0%)	685(100.0%)
Non-Plan MEWA	29 (59.2%)	0 (0.0%)	20 (40.8%)	0 (0.0%)	49 (100.0%)
ECE	8 (100.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	8 (100.0%)
Total	580	8	154	1	742

Note: Percentages will not total 100% due to rounding.

2022					
Entity Type	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Undetermined	Total
Plan MEWA	585 (80.4%)	7 (1.0%)	136 (18.7%)	0 (0.0%)	728(100.0%)
Non-Plan MEWA	30 (58.8%)	0 (0.0%)	21 (41.2%)	0 (0.0%)	51 (100.0%)
ECE	7 (77.8%)	0 (0.0%)	2 (22.2%)	0 (0.0%)	9 (100.0%)
Total	622	7	159	0	788

Note: Percentages will not total 100% due to rounding.

2021-2022 Percent Change					
Entity Type	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Undetermined	Total
Plan MEWA	7.7%	-12.5%	1.5%	N/A	6.3%
Non-Plan MEWA	3.4%	N/A	5.0%	N/A	4.1%
ECE	-12.5%	N/A	N/A	N/A	12.5%
Total	7.2%	-12.5%	3.3%	N/A	6.2%

Table 22B: Entities Reporting Various Service Providers by Funding Type, Annual Report Filings for Statistical Years 2021, 2022

2021				
Third-Party Administrators	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	211	5	107	323
Non-Plan MEWA	9	0	19	28
ECE	6	0	0	6
Total	226	5	126	357

2022				
Third-Party Administrators	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	220	2	104	326
Non-Plan MEWA	9	0	20	29
ECE	4	0	2	6
Total	233	2	126	361

2021-2022 Percent Change				
Third-Party Administrators	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	4.3%	-60.0%	-2.8%	0.9%
Non-Plan MEWA	0.0%	N/A	-5.3%	3.6%
ECE	-33.3%	N/A	N/A	0.0%
Total	3.1%	-60.0%	0.0%	1.1%

2021				
Marketing Agent	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	311	2	71	384
Non-Plan MEWA	14	0	17	31
ECE	7	0	0	7
Total	332	2	88	422

Table 22B Continued: Entities Reporting Various Service Providers by Funding Type, Annual Report Filings for Statistical Years 2021, 2022

2022				
Marketing Agent	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	336	4	66	406
Non-Plan MEWA	14	0	17	31
ECE	4	0	2	6
Total	354	4	85	443

2021-2022 Percent Change				
Marketing Agent	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	8.0%	100.0%	-7.0%	5.7%
Non-Plan MEWA	0.0%	N/A	0.0%	0.0%
ECE	-42.9%	N/A	N/A	-14.3%
Total	6.6%	100.0%	-3.4%	5.0%

2021				
Actuary	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	55	4	95	154
Non-Plan MEWA	3	0	16	19
ECE	0	0	0	0
Total	58	4	111	173

2022				
Actuary	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	61	2	93	156
Non-Plan MEWA	3	0	18	21
ECE	10	0	0	1
Total	65	2	111	178

Table 22B Continued: Entities Reporting Various Service Providers by Funding Type, Annual Report Filings for Statistical Years 2021, 2022

2021-2022 Percent Change				
Actuary	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	10.9%	-50.0%	-2.1%	1.3%
Non-Plan MEWA	0.0%	N/A	12.5%	10.5%
ECE	N/A	N/A	N/A	N/A
Total	12.1%	-50.0%	0.0%	2.9%

2021				
Stop-Loss Insurance	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	32	1	113	146
Non-Plan MEWA	3	0	18	21
ECE	0	0	0	0
Total	35	1	131	167

2022				
Stop-Loss Insurance	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	34	1	112	147
Non-Plan MEWA	3	0	19	22
ECE	0	0	0	0
Total	37	1	131	169

2021-2022 Percent Change				
Stop-Loss Insurance	Fully Insured – All States	Fully Insured – Some States	Not Fully Insured	Total
Plan MEWA	6.3%	0.0%	-0.9%	0.7%
Non-Plan MEWA	0.0%	N/A	5.6%	4.8%
ECE	N/A	N/A	N/A	N/A
Total	5.7%	0.0%	0.0%	1.2%

Table 24B: Top States for Entities by Entity Type, Annual Report Filings for Statistical Year 2021, 2022

2021					2022				
State	Plan MEWA	Non-Plan MEWA	ECE	Total	State	Plan MEWA	Non-Plan MEWA	ECE	Total
California	136	10	0	146	Texas	147	9	2	158
Texas	134	9	2	145	California	141	11	1	153
Florida	123	8	0	131	Florida	136	9	1	146
Washington	119	6	0	125	New York	113	17	1	131
Georgia	113	9	0	122	Washington	122	8	0	130
New York	102	17	0	119	Georgia	119	9	1	129
Ohio	106	7	0	113	Ohio	101	16	1	118
Illinois	97	14	0	111	Indiana	107	7	1	115
Pennsylvania	104	4	0	108	Oregon	104	5	1	110
Kentucky	101	6	0	107	Tennessee	105	4	1	110

Table 25B: Total Participants by Entity Type and Size, Annual Report Filings for Statistical Years 2021, 2022

2021							
Entity Type	Entity Counts	Participant Counts	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	685	2,394,232	87.8%	3,495	658	0	336,194
Non-Plan MEWA	49	322,074	11.8%	6,573	1,715	0	47,287
ECE	5	10,153	0.4%	1,269	150	8	6,039
Total	742	2,726,459	100.0%	3,674	695	0	336,194

2022							
Entity Type	Entity Counts	Participant Counts	% Total	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	728	2,303,416	84.1%	3,164	624	0	331,023
Non-Plan MEWA	51	346,042	12.6%	6,785	1,630	0	52,714
ECE	9	88,588	3.2%	9,843	516	8	68,495
Total	788	2,738,046	100.0%	3,475	670	0	331,023

Note: Percentages will not total 100% due to rounding.

Table 25B Continued: Total Participants by Entity Type and Size, Annual Report Filings for Statistical Years 2021, 2022

2021-2022 Percent Change						
Entity Type	Entity Counts	Participant Counts	Average Entity Size	Median Entity Size	Min	Max
Plan MEWA	6.3%	-3.8%	-9.5%	-5.2%	N/A	-1.5%
Non-Plan MEWA	4.1%	7.4%	3.2%	-5.0%	N/A	11.5%
ECE	12.5%	772.5%	675.6%	244.0%	0.0%	1034.2%
Total	6.2%	0.4%	-5.4%	-3.6%	N/A	-1.5%

Table 26B: Form M-1 Entities by Entity Type – Annual only Matched M-1 and Form 5500 Filings for Statistical Years 2021, 2022

Entity Type	2021		2022	
	Matched Entities	Unique Entities	Matched Entities	Unique Entities
Plan MEWA	508	678	546	728
Non-Plan MEWA	29	49	28	51
ECE	6	8	7	9
Total	543	735	581	788

Table 28B: Assets – Matched Unique Entity for Statistical Years 2021, 2022

2021						
Entity Type	Entity Count	Sum	Average Assets	Median Assets	Min	Max
Plan MEWA	255	\$2,222,043,296	\$8,713,895	\$1,843,852	\$-22,968	\$221,794,192
Non-Plan MEWA	22	\$408,772,512	\$18,580,569	\$1,964,497	\$0	\$214,233,976
ECE	6	\$6,340,515	\$1,056,753	\$192,481	\$26,897	\$5,339,232
Total	283	\$2,637,156,323	\$9,318,574	\$1,823,412	\$-22,968	\$221,794,192

2022						
Entity Type	Entity Count	Sum	Average Assets	Median Assets	Min	Max
Plan MEWA	245	\$ 1,910,388,936	\$ 7,797,506	\$ 1,744,399	\$0	\$ 127,739,724
Non-Plan MEWA	21	\$ 314,151,984	\$ 14,959,618	\$ 1,724,605	\$0	\$ 113,343,632
ECE	7	\$ 14,5865,810	\$ 20,837,972	\$ 200,640	\$28,992	\$ 140,176,598
Total	273	\$ 2,370,406,730	\$ 8,682,809	\$ 1,724,605	\$0	\$140,176,598

Table 28B Continued: Assets – Matched Unique Entity for Statistical Years 2021, 2022

2021-2022 Percent Change						
Entity Type	Entity Count	Sum	Average Assets	Median Assets	Min	Max
Plan MEWA	-3.9%	-14.0%	-10.5%	-5.4%	100.0%	-42.4%
Non-Plan MEWA	-4.5%	-23.1%	-19.5%	-12.2%	N/A	-47.1%
ECE	16.7%	2200.5%	1871.9%	4.2%	7.8%	2525.4%
Total	-3.5%	-10.1%	-6.8%	-5.4%	-100.0	-36.8%

Table 29B: Funding Status Concordance by Form, MEWAs and ECEs for Statistical Years 2021, 2022

2021			
Form 5500	Form M-1		
	Not Fully Insured	Fully Insured – Some States	Fully Insured – All States
Self-Insured	96	0	29
Mixed Insured	5	2	24
Fully Insured	11	2	354

2022			
Form 5500	Form M-1		
	Not Fully Insured	Fully Insured – Some States	Fully Insured – All States
Self-Insured	95	0	27
Mixed Insured	4	1	33
Fully Insured	13	2	380