



TOPIC: Draft NCCMP Comments on Annual Reporting and Disclosure Proposed Rule and Proposed Revision of Annual Information Return/Reports

EXECUTIVE SUMMARY: THE DEPARTMENT OF LABOR HAS PROPOSED SIGNIFICANT CHANGES TO THE REQUIRED ANNUAL REPORT (FORM 5500) FOR THE FIRST TIME IN EIGHT YEARS. THE PROPOSED CHANGES INCLUDING GREATLY EXPANDING THE SCOPE OF INFORMATION REQUESTED AND WHO MUST FILE. THE NCCMP HAS PREPARED COMMENTS DISCUSSING THE IMPACT OF THESE PROPOSED CHANGES ON MULTIEMPLOYER PENSION AND HEALTH AND WELFARE PLANS. WE RESPECTFULLY REQUEST YOUR INPUT ON THE DRAFT COMMENTS.

The proposed changes would require all types of plans to report additional information, and would greatly expand both the plans that must file the Form 5500, as well as the scope and level of detail of information that must be reported. Among other areas of concern, our draft comments urge the Agencies to reconsider each aspect of the new requirements to balance the Agencies' need for the information with the costs that are imposed on plans, and retain only those requirements that are needed for compliance.

The NCCMP requests your input to ensure that our comments in response to these proposed changes are comprehensive and represent the viewpoints of the entire multiemployer community. We also encourage any plan with concerns they believe deserves special emphasis to file their own comments to address these concerns directly with the relevant agency.

PURPOSE: SOLICITATION OF INPUT FOR COMMENTS
CATEGORY: PENSION AND HEALTH & WELFARE REGULATION
ISSUER: EMPLOYEE BENEFIT SECURITY ADMINISTRATION
TARGET AUDIENCE: TRUSTEES OF AND PLAN ADVISORS TO MULTIEMPLOYER PENSION AND HEALTH & WELFARE PLANS
OFFICIAL COMMENT PERIOD ENDS: DECEMBER 5, 2016
NCCMP DEADLINE: NOVEMBER 30, 2016
FORWARD COMMENTS TO: Multi-elert@nccmp.org
REFERENCE: VOL. XVI, ISSUE 4
FOR ADDITIONAL BACKGROUND SEE: [29 CFR, PARTS 2520 and 2590, RIN 1210-AB63](#)
[NCCMP Draft Comments](#)

We strive to ensure that the information contained in this and every issue of Multi-Elert is correct to the extent information is available. Nevertheless, the NCCMP does not offer legal advice. Plan fiduciaries should rely on their own attorneys and other professional advisors for advice on the meaning and application of any Federal laws or regulations to their plans.

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If you have questions about the NCCMP, or about this or other issues of Multi-Elert, please contact the NCCMP, by phone at (202) 737-5315 or by e-mail at nccmp@nccmp.org.
