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Requests for Information Regarding Electronic Disclosure by Employee Benefit Plans

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Requests for Information Regarding Electronic Disclosure by Employee Benefit Plans

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General Comment

Businesses are being overburdened with excessive disclosure notices and requirements. Confusion is rampant as to what can be included in the SPD and/or Plan document and what must be disclosed separately as a Notice of Material Modification.

What is MOST needed is:

1. Fewer disclosure and notice requirements, permit more information to be disclosed ONE TIME in the Notice of Material Modification and/or in an updated SPD or Plan document. I have lost count over the various mandated notices, one or more of which is included in almost every one of the new Health Care Reform rules and we still await even more rules on the 60 day advance notice requirements and the 4-page standardized summary, which are totally unrealistic and unreasonable on their face.
2. DOL needs to permit an easy, quick and effective way of keeping employees informed of their benefits rights. For starters, follow the example of the FEBE web site where all the plan information, annual notices of benefits changes are kept. Written copies are NOT mailed out to retirees. Retirees and Active employees alike are expected to go on line for their answers.
3. For those people who REQUIRE OR NEED written documents, let them request it and opt out of electronic notification.
4. Electronic notification rules via email are excessively cumbersome as they require read receipts. This is inordinately difficult and costly to do for any employer with more than 20 or so employees.

SIMPLIFY, SIMPLIFY, SIMPLIFY. EMPLOYERS/BUSINESSES NEED A BREAK. Businesses are being over regulated to death and the compliance costs are now EXCESSIVE.