

July 22, 2014

Memorandum for: ICF International

From: EBSA

Subject: 408(b)2 Focus Group Sample Selection

EBSA is providing to ICF three data sets to be used in selecting plans for the focus groups. The data sets are based on the OPR 2011 Form 5500 Private Pension Plan Research File which contains information from the Form 5500, Short Form (SF), and schedules H and I. The full research file is available on the EBSA website.¹ A few additional variables were added to the research file.

The data sets contain 51 variables. The first data set contains plans with less than one hundred participants and has 270,114 plan observations. The second data set contains plans with between 100 and 999 participants and has 51,807 plan observations. The third data set contains plans with between 1,000 or more participants and has 8,217 plan observations.

EBSA is also providing the 2011 Pension User Guide that describes the research file. This document contains a codebook of the variables in the research file. This is also on the EBSA website. Also being furnished is a condensed codebook containing only the variables in the Final Data set with the additional variables added.

The dataset contains only plans meeting the following criteria:

- Keeps only plans where there are positive administrative provider payments (SF5500 lines 8F+8G>0 or on F5500 Schedule H Part II (i) line 5 >0 ; Schedule I Part I (2) lines h+i>0
- Excludes pension benefit codes “3F”, “3C”, “3E”, “2N” and “3B”.
- Excludes plans with less than \$1,000 in assets per participant.

ICF is to draw from the data sets plans to contact in order to obtain subjects for the Focus Groups. ICF is to use the following criteria when constructing the focus groups:

- Geography- Focus groups will occur in cities where ICF has offices. DOL anticipates using zip code information on the Form 5500 to locate plans in the area.
 - ICF will pick the cities based on the locations of their offices. They will have groups geographically dispersed throughout the continental United States. ICF will provide a list of cities for final DOL approval before sample selection begins.
 - The zip code variable for plans filing the short form is sf_spons_us_zip and for plans filing the Form 5500 it is spons_dfe_mail_us_zip.

¹ <http://www.dol.gov/ebsa/publications/form5500dataresearch.html#planbulletins>

- Finding the responsible plan fiduciary- While the plans sponsor and the plan administrator could be different people, in all plans in the data set they report the same phone number. ICF should ensure that the individual invited to do the focus group is a “responsible plan fiduciary,.” a plan fiduciary with authority to cause the plan to enter into a service arrangement.
- For the small plans EBSA wants each focus group to contain plans with varying sizes based on the number of plan participants. EBSA would like about 1/3 of each focus group to come from each of the following categories: 1-24, 25-74, and 75-100 participants.
- For the small plans EBSA would like to include in each focus group a mix of plans filing the Form 5500 versus the Short Form. It is believed this could be a proxy for bundled versus unbundled services to the plan. Filing type is also correlated with plan size. About 17 percent of plans filed the Form 5500 while about 83 percent of plans filed the Short Form. The variable fsource with value “f” for Form 5500, and “s” for short form is used to differentiate the two.

Plans by the Number of Participants and Filing Type

	Form 5500	Short Form	Total
1-25	27,627	139,446	167,073
26-75	13,917	72,769	86,686
76-100	4,029	12,326	16,355
Total	45,573	224,541	270,114

- For plans from the 100-999 participants group EBSA wants the focus group to contain plans with varying sizes based on the number of plan participants. EBSA would like about 1/3 of each focus group to come from each of the following categories: 100-399, 400-699, and 700-999 participants.
- For plans from the 1,000+ participants group EBSA wants the focus group to contain plans with varying size, but is not providing a quota. EBSA does want some from the smaller end of the size range.

ICF can access each plan’s filing of the 2011 Form 5500 on the EBSA public website.² The values of variables opr_ein and opr_pn allow a unique identification.

² <https://www.efast.dol.gov/portal/app/disseminate?execution=e1s1>