

## Supporting Statement Part A for Paperwork Reduction Act Submission

**AGENCY:** Pension Benefit Guaranty Corporation

**TITLE:** Survey of Nonparticipating Single Premium Group Annuity Rates

**STATUS:** Request for regular review and extension of currently approved collection (OMB control number 1212-0030; expires March 31, 2015)

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1. Need for collection. PBGC's regulations prescribe actuarial valuation methods and assumptions (including interest rate assumptions) to be used in determining the actuarial present value of benefits under single-employer plans that terminate (29 CFR Part 4044) and under multiemployer plans that undergo a mass withdrawal of contributing employers (29 CFR Part 4281). Each month PBGC publishes the interest rates to be used under those regulations for plans terminating or undergoing mass withdrawal during the next month.

The interest rates are intended to reflect current conditions in the annuity markets. To determine the interest rates to be used, pricing data is obtained from insurance companies that provide single premium annuities through a quarterly "Survey of Nonparticipating Single Premium Group Annuity Rates." (The survey is supplemented periodically with questions to determine the mortality and loading assumptions on which the annuity rates are based. The response time for these supplemental questions is considered *de minimis* compared to the response time for the basic interest rate questions.) The American Council of Life Insurers (ACLI) distributes the survey forms to insurance companies and the forms are returned to ACLI. ACLI then forwards the survey forms to PBGC.

2. Use of information. PBGC uses the survey information in determining the interest rate assumptions that it prescribes under its regulations on the valuation of benefits under pension plans that are terminating or that have undergone a mass withdrawal of contributing employers (29 CFR Parts 4044 and 4281). PBGC also uses the information in determining the interest rates it uses to value benefits payable to participants and beneficiaries in PBGC-trusteed plans for purposes of PBGC's financial statements. If the surveys were not conducted, PBGC would have to set these valuation rates without appropriate data on current conditions in the annuity market.

3. Information technology. No consideration has been given to the use of improved information technology to reduce burden. The number of respondents surveyed is too low to warrant the use of high technology.

4. Duplicate or similar information. The information gathered by the ACLI also goes to the Internal Revenue Service. One copy of the form goes to PBGC, and a second copy, with certain additional information, goes to the IRS. The procedure is the result of conferences between respondents and representatives of PBGC and the IRS; it reflects respondents' preference to submit data separately to the two agencies.

5. Reducing the burden on small entities. Inapplicable.

6. Consequence of reduced collection. If the survey was conducted less frequently, PBGC's rates could not be as responsive as they now are to changes in conditions in the annuity market and thus would not as closely reflect current conditions in that market.

7. Consistency with guidelines. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR § 1320.5(d)(2).

8. Outside input. The ACLI distributes the survey forms to insurance companies most, or all, of which are members of the ACLI. Participation in the quarterly surveys is voluntary. The ACLI, in consultation with PBGC, prepared the survey forms and instructions; they reflect input from PBGC, the ACLI, and insurance company respondents.

PBGC published a 60-day notice on December 23, 2014 (at 79 FR 77053); PBGC received no comments. PBGC published a 30-day notice on March 9, 2015 (at 80 FR 12526).

9. Payment to respondents. PBGC provides no payments or gifts to the ACLI or respondents in connection with this collection of information.

10. Confidentiality. Respondents are assured of the anonymity of their responses, and the survey instructions state that the information provided will be used only for the purpose of setting actuarial assumptions for valuing pension plan benefits. In addition, ACLI conducts the survey in such a manner that neither the ACLI nor PBGC knows which insurance companies have provided which responses. PBGC regards the information gathered through the survey as confidential under 5 U.S.C. section 552(b)(4) and 29 CFR § 4901.21(b)(2), and believes that public disclosure of the information would make it difficult or impossible for PBGC to continue collecting the information and would thus impair the effectiveness of its program for setting actuarial assumptions for valuing pension plans.

11. Personal questions. The collection of information does not call for submission of information of a sensitive or private nature.

12. Hour burden on the public. Based on experience, PBGC expects that over the next three years, the ACLI will send the survey to about 22 insurance companies each quarter and that about six insurance companies will complete and return the survey each quarter. PBGC

estimates that it will take ½ hour for each of the respondents to respond to each quarterly survey, or 12 hours per year (6 surveys x .50 hour x 4 quarters).

Accordingly, PBGC estimates that the annual hourly burden of this collection of information will be 12 hours, with substantially all of the work being performed by interns or actuarial students. The dollar equivalent of this hour burden may be estimated using the following data from the Bureau of Labor Statistics:

- Actuaries (occupational code 15-2011) at the 10<sup>th</sup> percentile are paid an hourly wage of approximately \$28.00 (10<sup>th</sup> percentile is assumed to be that for interns or actuarial students).<sup>1</sup>
- Wage rates are about 70 percent of total labor costs (with the remaining 30 percent attributable to benefits costs).<sup>2</sup> Thus total labor costs would approximately equal the hourly wage rate divided by 70 percent (0.7).

For an hourly wage rate of \$28.00, the total labor cost would thus be \$40.00 per hour, and the dollar equivalent of 12 hours would be \$480.00.

13. Cost burden on the public. PBGC assumes that virtually all of the work on the survey will be completed by in-house staff of the insurance companies with none of it contracted out.

14. Cost to the government. ACLI prepares the forms and distributes them to respondents. PBGC incurs some expense in analyzing the survey responses, but it cannot be

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1 <http://www.bls.gov/oes/current/oes152011.htm>

2 <http://www.bls.gov/news.release/ecec.nr0.htm> (see first paragraph).

accounted for separately from the cost of determining PBGC interest rates which would have to be done whether the survey were conducted or not.

15. Explanation of burden changes. The change in the dollar equivalent hourly burden on the public reflects revised estimates of the total labor costs for the staff who will complete the surveys for the insurance company respondents.

16. Publication plans. PBGC does not intend to publish the results of this collection of information.

17. Display of expiration date. PBGC is not seeking approval to not display the expiration date for OMB approval of this information collection.

18. Exceptions to certification statement. There are no exceptions to the certification statement.