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PBGC seeks more information on asset transfers in premium filings

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Jan. 6, 2021

PBGC's 2021 premium filing package will request additional information on certain asset transfers. Proposed [premium filing instructions](#) and [My PAA screens](#) include a new question requiring plan sponsors to report whether an asset transfer between existing plans taking place on the first day of the plan year is *de minimis*. For the transferee plan in a *de minimis* merger, filers will have to report whether the receiving plan has less assets than the transferor plan immediately before the transfer. PBGC needs this information to verify the participant count date.

The proposed instructions also reflect changes made by the Setting Every Community Up for Retirement Enhancement (SECURE) Act in late 2019. The SECURE Act changed the calculation of PBGC premiums for cooperative and small-employer charity (CSEC) plans, effective for plan years beginning after Dec. 31, 2018. However, the 2020 PBGC comprehensive premium filing instructions did not reflect those changes. Instead, PBGC released a technical update ([TU 20-1](#)) to help plan sponsors prepare their 2019 and 2020 premium filings. The proposed 2021 instructions also include a space to indicate the plan is a CSEC plan and a new appendix with the special CSEC rules.

PBGC recently announced an overhaul to the [My PAA website](#) is coming March 1. In light of significant changes to the look and feel of that site, as well as several user enhancements, the premium filing package will no longer contain instructions for online filing. PBGC anticipates posting a training webinar for the new My PAA in early February.

Related resources

Non-Mercer resources

- [Proposed PBGC premium information request](#) (Federal Register, Dec. 22, 2020)
- [Proposed My PAA data entry screens](#) (PBGC, Dec. 22, 2020)

- [Proposed 2021 comprehensive premium filing instructions](#) (PBGC, Dec. 22, 2020)
- [Technical Update 20-1](#) (PBGC, Jan. 23, 2020)

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- [PBGC 2020 premium package doesn't reflect CSEC changes](#) (Jan. 13, 2020)

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