



February 4, 2026

The Honorable Glenn Grothman  
U.S. House of Representatives  
1211 Longworth HOB  
Washington, DC 20515

The Honorable Donald Norcross  
U.S. House of Representatives  
2427 Rayburn HOB  
Washington, DC 20515

Dear Representatives Grothman and Norcross,

On behalf of the CHRO Association, we commend you for introducing and supporting the ***Form 5500 Filing Simplification Act***. This legislation demonstrates a clear recognition that outdated administrative requirements impose unnecessary burdens on employers while providing limited additional value to plan participants or regulators.

The CHRO Association is a public policy advocacy organization that represents the most senior human resources officers (CHROs) in nearly 400 of the largest corporations doing business in the United States and globally. Collectively, these companies employ more than 10 million employees in the United States, nearly nine percent of the private sector workforce, and 20 million employees worldwide. All Association members offer retirement benefits to their employees and are committed to maintaining robust retirement programs while ensuring administrative efficiency and transparency.

Form 5500 plays a vital role in ensuring transparency and accountability for retirement and welfare benefit plans under ERISA, and we fully support its purpose. However, the current statutory filing deadline often does not align with the practical realities of plan administration. As a result, many plan sponsors are compelled to file a separate extension request using Form 5558 simply to comply on time—creating a redundant, two-step process that consumes time and resources without improving oversight or participant protection.

The ***Form 5500 Filing Simplification Act*** offers a thoughtful, commonsense solution. By establishing a single, uniform filing deadline of 9.5 months following the end of the plan year, the legislation eliminates unnecessary complexity while preserving the integrity of the reporting framework. Directing the Departments of Labor and Treasury to update regulations accordingly, and allowing for electronic filing, appropriately modernizes the process and reflects how employers and service providers operate today.

This reform is particularly meaningful for small and mid-sized employers, which often lack dedicated compliance teams and are disproportionately affected by duplicative administrative requirements. Reducing these burdens helps ensure that all employers can

focus their resources on offering and maintaining strong retirement benefits—rather than navigating avoidable paperwork.

We are pleased to join leading benefits and retirement organizations in supporting this effort and applaud your leadership in advancing practical policy solutions that strengthen the employer-sponsored benefits system. The *Form 5500 Filing Simplification Act* is a smart, targeted reform that improves efficiency without compromising transparency, and it deserves swift consideration. We encourage lawmakers to co-sponsor this bill and support its passage. If the Association can be helpful, please do not hesitate to contact me at [Cbirbal@chro.org](mailto:Cbirbal@chro.org).

Thank you for your leadership and continued commitment to policies that support employers in their compliance efforts.

Sincerely,

A handwritten signature in cursive script that reads "Chatrane Birbal".

Chatrane Birbal  
Senior Vice President, Public Policy & Government Relations  
CHRO Association

CC: U.S. House of Representatives