

From: [Britni Dresen](#)
To: [*TS M&P TFP PRA Comments](#)
Subject: [EXT] OMB Control No. 1545-2187
Date: Wednesday, October 15, 2025 10:00:58 AM

To whom it may concern,

As the form 8955-SSA appears to be a requirement under ERISA, I would like to ask that two updates to the process be made.

First would be to establish a unique code to identify participants who have terminated employment but are receiving distributions through an installment agreement (Example: an ESOP Payment that is made over 5 plan years). Additionally, capturing the number of years remaining on the installment schedule would provide greater clarity and accuracy in reporting.

There is considerable confusion across the industry regarding the appropriate timing for transitioning a participant from an "A" code to a "D" code in cases involving installment payments that are not annuity-based. This is particularly relevant when participants are required to make an annual election to continue their installment payments.

Implementing a distinct code for these situations would help standardize reporting and reduce misinterpretation.

Secondly, before the Social Security Administration (SSA) issues notices to participants, it would be beneficial for plan sponsors to have the opportunity to verify whether the accounts in question are still active. Plan sponsors and third-party administrators (TPAs) often spend significant time researching and responding to inquiries from participants who received full distributions years ago.

Much of this confusion arises from the lack of a requirement to update the "D code" status. Although the SSA letter states that participants *may* be entitled to additional benefits, many interpret it as confirmation that they *are* entitled to more. Some participants even express concern that it could impact their Social Security payments. Allowing plan sponsors to review the list of participants in advance of the notices being sent would help prevent unnecessary confusion and ensure that only relevant communications are issued.

Please let me know if you have any questions or need clarification on the requests above.

Thank you,



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