



# Modernizing ERISA Health Plan Disclosure Rules for the Digital Age

## Issue:

Every year, outdated federal rules requiring paper mailings to ERISA health plan participants generate more than [20 billion sheets](#) of unnecessary paper — that’s 130 sheets per person, per year, most of it unwanted.

Policies governing health plan communications were written before most Americans had internet access. Today, these policies force employers and health plans to print and mail paper notices that most participants would prefer to receive electronically — wasting money, resources, and time. Modernizing these rules to allow default electronic delivery (e-delivery), while preserving the right to receive paper, is an obvious, achievable, and overdue reform.

**Needed Reforms:** In 2020, the DOL issued a safe harbor rule permitting default e-delivery for ERISA retirement plan disclosures, but did not extend it to health plans. **The fix is straightforward: rulemaking that allows default e-delivery for health plans, consistent with the 2020 framework.**

## Why It Makes Sense:

*It cuts waste and saves money.*

A [2025 analysis](#) estimates the reform would generate **\$19.5 billion in cost-savings** between 2025 and 2034, an average of **\$1.9 billion per year**, accruing primarily to employers and plan administrators who currently spend approximately **\$2.8 billion annually** on printing, postage, and mailing.



**\$19.5 Billion in Cost Savings**

*Consumers prefer and benefit from e-delivery.*

In a [nationally representative survey](#), nearly **8 in 10 employees** enrolled in ERISA-covered health plans would prefer to switch to default e-delivery to receive information about their health insurance benefits, with the option to continue receiving paper at any time. With [near-universal internet access among ERISA participants](#), e-delivery improves access, supports health literacy, and ensures participants can reliably find their plan information.



Nearly **8 in 10 Employees**

*The environmental and resource savings are enormous.*

Based on more than **20 billion sheets printed annually** and using Environmental Paper Network’s [Paper Calculator™](#) life cycle tool, **this policy change could save:**<sup>1</sup>

- 366,000 tons of wood
- 1,350,000,000 pounds of CO<sub>2</sub> emissions
- 2,500,000 million BTUs of energy
- 2,160,000,000 gallons of water
- 113,000,000 pounds of solid waste



**20 Billion Sheets Printed Annually**

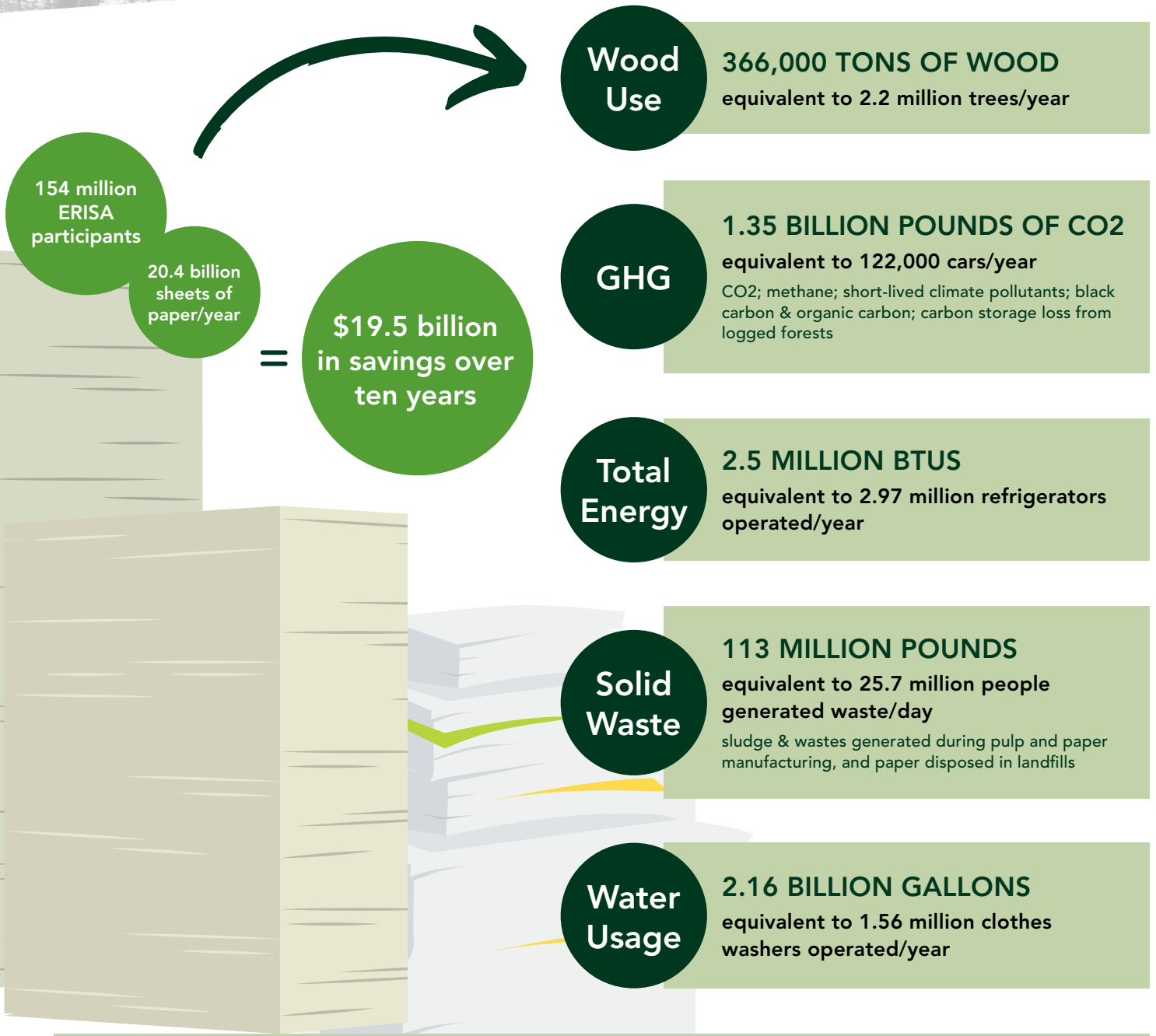
**Enabling default e-delivery for ERISA health plans is a commonsense, overdue reform that modernizes a decades-old mandate, saves billions, and better serves the 154 million Americans using these plans.**



About the [Environmental Paper Network](#): The Environmental Paper Network (EPN) is a global network of more than 350 civil society organizations working together to transform the way paper is produced and consumed. Through collaboration, shared tools, and coordinated strategies, EPN advances more sustainable systems of production and use for our shared future.

<sup>1</sup> Environmental impact estimates were made using the Environmental Paper Network Paper Calculator Version 4.1™. For more information visit [www.papercalculator.org](http://www.papercalculator.org). Calculated from 20,412,533,333 sheets of uncoated freesheet (copy paper) containing an estimated 10% recycled content. Does not include the impacts from digital alternatives – only paper reduction.

# Estimated Environmental Impacts of Paper Healthcare Disclosures



Current paper disclosures generate harmful chemicals and compounds that impact the health of America's air and water:

## Air & Water Pollution

VOLATILE ORGANIC COMPOUNDS (VOCs) = **14,200 POUNDS** → 59.5 million miles driven in a car/year

HAZARDOUS AIR POLLUTANTS (HAPS) = **161 THOUSAND POUNDS** → equivalent to over 32 thousand passenger cars/year

PARTICULATE MATTER (PM) = **31.9 MILLION PM2.5 EQUIV/M3** → equivalent to 1.21 million cars/year

SULFUR DIOXIDE (SO2) = **831 THOUSAND POUNDS** → 270,000 eighteen-wheelers/year