

FAQs on EFAST2 Electronic Filing System



U.S. Department of Labor
Employee Benefits Security Administration
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General

Q1: Do I have to file the Form 5500 or Form 5500-SF electronically?

Yes. All pension and welfare plans and DFEs that are required to submit an annual return/report under Title I of ERISA (Form 5500 or Form 5500-SF) must do so electronically for all plan years. Beginning January 2010, an all-electronic system called EFAST2 began processing those electronic annual returns/reports. Prior year delinquent or amended Form 5500 annual return/reports must be filed electronically through EFAST2 as described in question 4 below.

A "one-participant" plan or certain foreign plans may voluntarily file the Form 5500-SF (see the Form 5500-SF Instructions) electronically with EFAST2 rather than filing a Form 5500-EZ on paper with the IRS. However, in accordance with section 301.6058-2 of the Treasury Regulations, the IRS requires "one-participant" plans and foreign plans that are required to file at least 250 returns of any type with the IRS to file Form 5500-SF electronically using EFAST2 in lieu of the Form 5500-EZ. For more information on filing the Form 5500-EZ, see the instructions for Form 5500-EZ, go to www.irs.gov, or call 1-877-829-5500.

Q2: How can I file my plan year 2014 or later Form 5500 or Form 5500-SF?

You have two options:

- You can electronically prepare and submit your Form 5500 or Form 5500-SF using EFAST2-approved third-party software. Click [here](#) to see a list of the available software.
- You can electronically prepare and submit your Form 5500 or Form 5500-SF using **IFILE**. IFILE is a free limited-function web application with a **User Guide**.

The **Form 5500 Selection Tool** will help you to determine which version of the Form 5500 and which schedules you should use.

The EFAST2 and IFILE Quick Start Guide provides a summary of steps needed to file your Form 5500 or Form 5500-SF.

Q3: [deleted]

Q4: How can I submit a delinquent or amended Form 5500 return/report for a Title I plan for years prior to 2014 or Form 5500-SF for plan years 2009-2013?

Delinquent and amended filings of Title I plans must be submitted electronically through EFAST2 and cannot be submitted on paper.

For plan years prior to 2014, delinquent or amended Form 5500 return/report should be submitted electronically through EFAST2 using the current year Form 5500 or Form 5500-SF, schedules, and instructions. However, you must indicate, in the appropriate space at the beginning of the Form 5500, the plan year for which the annual return/report is being filed.

Exceptions to this requirement are the schedules listed below, which must be filed with EFAST2 using the correct plan year schedules and instructions, as applicable:

- Schedule B, SB, or MB (Actuarial Information),
- Schedule E (ESOP Annual Information),
- Schedule P (Annual Return of Fiduciary of Employee Benefit Trust),
- Schedule R (Retirement Plan Information), and
- Schedule T (Qualified Pension Plan Coverage Information).

If you are filing a delinquent 2007 Form 5500 return/report for a defined benefit pension plan, you must include the 2007 Schedule B, Schedule R and all required attachments for these schedules. Attach them as pdf images to the current filing year Form 5500 (2017 forms should be used as current filing year forms as of 1/1/2018), tagging them as "other attachments".

You have the option of using either the current filing year or the correct-year (2007 in this example) Schedule C.

Since the Schedule E would not apply to a defined benefit plan and the Schedule P and Schedule T did not apply for 2007 plan year filings, all other required schedules and attachments should be completed using current filing year forms and instructions. The entire filing should then be filed electronically in accordance with EFAST2 electronic filing requirements.

To obtain correct-year schedules and related instructions, go to the Form 5500 Series page, print the schedules of the form year that correspond to the plan year for which you are filing and use the instructions for that year.

Do not attach any Schedule SSA to any filing with EFAST2. Rather, submit the most current year Form 8955- SSA to the IRS. See **IRS Retirement Plans Community - Form 5500** for additional information.

Do not send any penalty payments associated with a delinquent filing to EFAST2. Penalty payments to the IRS or made under the Department's **Delinquent Filer Voluntary Compliance Program (DFVCP)** must be submitted separately in accordance with the applicable requirement.

The **Form 5500 Version Selection Tool** will help you to determine which version of the Form 5500 and which schedules you should use.

Q4a: Can filers use the Form 5500-SF to file 2008 or prior delinquent or amended return/report?

No. You may not file the Form 5500-SF for any 2008 or prior plan year return/report. Filers wishing to file or amend their plan year 2008 or prior Form 5500 must use the current Form 5500 to submit that return/report in accordance with the directions in FAQ 4. Required schedules must be included in accordance with the procedures described in FAQ 4.

Filers wishing to file or amend their plan year 2008 or prior Form 5500-EZ must use the correct prior year paper version only and must file it with the IRS. In this situation, filing electronically using EFAST2 on a Form 5500 or Form 5500-SF is not allowed. Filers should contact the IRS at 1-877-829-5500 for further information.

Filing Preparation Software

Q5: What is IFILE?

IFILE is the Form 5500 and Form 5500-SF preparation and submission tool available on the DOL's website.

Q6: Do I have to use IFILE?

No. IFILE is offered as an alternative to EFAST2-approved third-party software.

Q7: What third-party software is approved?

Click [here](#) to see the list of EFAST2-approved third-party software. As noted in that listing, some software is only approved for certain years, forms, schedules, or attachments. Make sure the software you are using is approved for your needs.

Q8: What are the benefits of using EFAST2-approved third-party software instead of IFILE?

IFILE cannot be used to transmit batches of filings; it can only be used to transmit single filings. Many third-party preparers benefit from transmitting batches of filings. Some EFAST2-approved third-party software may support transmission of batches of filings.

IFILE does not help you prepare an annual return/report. Some EFAST2-approved third-party software may integrate with your systems to automatically populate some of the information required.

IFILE does not contain filing assistance or integrated instructions. Some EFAST2-approved third-party software may provide such value-added support.

IFILE does not allow more than one individual to edit a filing without exporting, downloading, importing, etc. (see questions 20 and 30); whereas, some EFAST2-approved third-party software may provide such file sharing functionality. With file sharing as part of the software, different people can work on a single filing in a coordinated and streamlined manner.

Q9: [deleted]

Registering for EFAST2 Credentials

Q10: How do I register for EFAST2 credentials?

You can register for credentials through the EFAST2 website www.efast.dol.gov.

Q11: When I register for credentials through the EFAST2 website, what are the different user types and what type(s) of user should I select?

There are five user types under EFAST2. You can check as many as apply to you.

- **Filing Author:** Filing Authors can complete Form 5500/5500-SF and the accompanying schedules, submit the filing, and check filing status. Filing Authors cannot sign filings unless they also have the "Filing Signer" type. If you are using EFAST2-approved third-party software to author your filing rather than IFILE, you do not need to check this box.
- **Filing Signer:** Filing signers are Plan Administrators, Employers/Plan Sponsors, or Direct Filing Entities who electronically sign the Form 5500/5500-SF. This role should also be selected by plan service providers that have written authorization to file on behalf of the plan administrator under the EFAST2 e-signature option. No other filing-related functions may be performed by selecting this user type alone.
- **Schedule Author:** Schedule Authors can complete one or more of the schedules that accompany Form 5500/5500-SF. Schedules created by a Schedule Author are not associated with a filing. For a schedule created by a Schedule Author to be used in a filing, the schedule must be exported. This exported file will then be imported by the Filing Author to the correct filing. Schedule Authors cannot initiate, sign, or submit a filing. If the Filing Author is using EFAST2-approved third-party software to author your filing rather than IFILE, then you do not need to check this box.
- **Transmitter:** Transmitters can transmit Form 5500/5500-SF filings to the EFAST2 system for processing on behalf of others. Transmitters are responsible for the security of all filing information prior to and during its transmission. A Transmitter can be a company, trade, business, or individual.
- **Third-Party Software Developer:** Third-Party Software Developers make Form 5500 filing preparation or transmission software for use in the EFAST2 system. They submit test cases using their software to the Participant Acceptance Testing System (PATS) Team. The PATS Certification Team will then review their submissions and provide feedback or approve and certify the software. A Third-Party Software Developer can be a company, trade, business, or individual.

Q12: If I am completing a Form 5500 or Form 5500-SF using an EFAST2-approved third-party software program, will I need to register for EFAST2 electronic credentials?

You do not need to register for EFAST2 electronic credentials just to complete the annual return/report using third-party software. If you will be submitting the filing to EFAST2, however, you may need to register for credentials as a "Transmitter" user type. If you will be signing the filing, you will need to register for credentials as the "Filing Signer" user type.

Q13: [deleted]

Q14: How do I serve as a third-party software provider under EFAST2?

You will need to get Third-Party Software Developer credentials (see question 11).

The certification for filing preparation software checks that the XML files designed to populate the annual return/report and schedules are correctly assembled and formatted. You must certify filing preparation software on an annual basis for each new form year.

Third-party software developer specifications are provided to prospective developers that request such specifications. If you have not received these and are interested in being an EFAST2-approved third-party software developer, please call 1-866-GO-EFAST.

Q15: [deleted]**Q16: How can I update my contact information after I've registered?**

After successfully logging into the EFAST2 website, click on the "Profile" link in the navigation bar and you will be able to change any of your contact information, including email address. If your contact information changes or is no longer applicable to your role, please update the information in your profile as soon as possible.

Q16a:What should I do if I filled out the registration with EFAST2 but did not receive an email to complete the registration process?

Once you apply for registration, EFAST2 sends an email to your registered email address within 5 minutes. If you did not receive the email in your inbox, it may have been blocked as spam or junk mail. Check your "spam" or "junk" email folders to see if you have received the email. If you've checked your "spam" or "junk" email folders and the email has not been received, call 1-866-463-3278 (1-866-GO EFAST).

Some e-mail providers require that you add an e-mail address to your address book before you can receive any e mail from that address. To ensure that our messages can be delivered to your inbox, enter our originating e-mail address, efast2@efastsys.dol.gov and our reply to e-mail address, efast2@efast.dol.gov into your address book

Q16b: How do I retrieve a forgotten User ID, password, or PIN?

User ID	<p>From the EFAST2 Website (efast.dol.gov) select "Login" on the Welcome screen. Then select "Forgot User ID" and enter the email address that you provided during registration. You will need to provide the answer to your challenge question to view your User ID.</p> <p>If you have not fully completed the registration process, you will see an option to "Complete Registration" after answering your challenge question.</p>
Password	<p>From the EFAST2 Website select "Login" on the Welcome screen, then select "Forgot Password" on the Login page. To use the "Forgot Password" option, you must enter a valid User ID or registered email address. You will also be prompted to enter the answer to your challenge question. If done successfully, you will be allowed to create a new password.</p>
PIN	<p>After successfully logging in to the EFAST2 Website, you may view your EFAST2 PIN and other registration information by selecting "User Profile." The User Profile page will display your credentials and provide options to "Change Profile," "Change Password," and "Change PIN."</p>

Q16c: [deleted]

Q16d: [deleted]

Q16e: How do I unlock my account?

To reset your locked password, from the EFAST2 Website select "Login" on the Welcome screen, then select "Forgot Password." You will be prompted to enter either your User ID or your email address.

Once you enter either your User ID or email address, you will then be prompted to answer your challenge question.

You will have three attempts to provide your challenge answer correctly before your user account is temporarily revoked for up to 20 minutes. After the allotted time, you may attempt to answer the challenge question again. If you do not wish to wait the allotted time until you can try answering the challenge question again or you have forgotten the answer to your challenge question, you can call the EFAST2 Help Desk at 1-866-GO-EFAST (1- 866-463-3278) for assistance in permanently revoking your account and registering for a new account. If you repeatedly reach the limit of invalid challenge responses, your account will be permanently revoked. If that occurs, you will need to call the EFAST2 Help Desk or register again.

Completing an Annual Return/Report (Form 5500 or Form 5500-SF)

Q17: I am filing a Form 5500-SF for a plan covered by Title I of ERISA and the plan invested in a direct filing entity. I don't see a way to complete a Schedule D for a Form 5500-SF. Do I have to attach a Schedule D?

The only schedules required to be filed with the Form 5500-SF for a plan that is covered by Title I are the Schedule SB (actuarial information) for defined benefit pension plans or Schedule MB (actuarial information) for money purchase plans that are amortizing funding waivers. No other schedule should be submitted with the Form 5500-SF.

If you are filing the Form 5500, you must submit all required schedules and attachments, including the Schedule D, if applicable.

Q18: How do I file my Form 8955-SSA information with the Government?

Form 8955-SSA, Annual Registration Statement Identifying Separated Participants with Deferred Vested Benefits must instead be filed directly with the Internal Revenue Service. For information on how to submit an annual registration statement for deferred vested participants, see Instructions for the Form 5500-SSA and **IRS Retirement Plans Community - Form 5500 Corner**.

Form 8955-SSA should be filed with the IRS to satisfy the reporting requirements of Code section 6057(a). See **Announcement 2011-21**. Do not attach a completed Form 8955-SSA or prior year Schedule SSA to your Form 5500 filing.

Q19: How can I see what my annual return/report will look like before it is filed?

Using your filing preparation software, you can view your annual return/report as it would appear populated in a form facsimile. In IFILE, you can click the "View PDF" button to see your annual return/report in a facsimile format. If you are using EFAST2-approved third-party software, check your user manual for instructions on how to view your annual return/report in a facsimile format.

Q20: Can I show my annual return/report to other people for review before I submit it to the Government?

You can export a draft Form 5500 or Form 5500-SF as an XML file that other individuals can import into their EFAST2-approved third-party software or into IFILE to review. If they wish to make changes to the draft annual return/report, they can do so, but they need to export the revised annual return/report into an XML file and send that back to you for the changes to be included in the transmission to EFAST2.

Q21: Is there a way I can validate my filing for errors before I submit it?

Yes. You can (and should) "validate" your filing before submitting it. The automatic validation will perform an initial check for errors, such as if mandatory compliance questions were left unanswered. This is a check of errors in your filing before you submit it to the Government. If the errors/warnings are not corrected before submission, the Government will be alerted to the errors associated with your filing when it is submitted. Please run the pre-validation check and correct any errors/warnings to the best of your ability before you submit your filing. After a filing is submitted to EFAST2, the Government may perform additional checks of the annual return/report, and your filing may be rejected based on these additional checks.

Q22: Can a draft Form 5500 be "submitted" for viewing online and reviewing?

Please do not submit a draft annual return/report to EFAST2. When you "submit" an annual return/report, you are sending it to the Government. Do not submit a draft annual return/report to EFAST2 simply because you or your client wish to see what the filing will look like after it is filed. If you wish to view a completed annual return/report in IFILE, see the **IFILE User's Guide**. Also, see questions 20 and 21 for additional information on reviewing and checking your file before submission.

Q23: If the answer to a question seeking an amount is none or zero, should I fill the numeric fields with zero or leave it blank?

If the numeric answer to the question is zero, or if the question provides that you cannot leave it blank, then enter "0". Only leave a numeric field blank where the instructions specifically permit you to do so.

If you leave an item blank that should be zero and then validate your annual return/report for errors, you will be notified that the item must be completed. Conversely, if you enter zero in an item that should have been blank and then validate your annual return/report for errors, you may receive different error messages. Consult the **Form 5500 or 5500-SF instructions** for guidance specific to each question on the forms.

Q23a: How do I enter special characters such as asterisk into the Plan Name, Sponsor Name, Administrator Name and/or DFE Name fields?

Only certain special characters are allowed to be entered under EFAST2.

For example, the Plan Name and the Plan Transfer Name fields allow only unaccented letters, numbers, hashes (#), hyphens, slashes, commas, periods, parentheses, ampersands, apostrophes, percent, asterisks, at symbols (@), and single spaces. Leading spaces, trailing spaces, adjacent spaces and other characters are currently invalid for these fields.

Additionally, the Sponsor/DFE Name (including the Sponsor's DBA Name, Sponsor's Care/Of Name and Last Reported Sponsor Name), the Administrator Name (including the

Administrator's Care/Of Name), the Insurance Carrier Name, and Contributing Employer Name fields contain similar restrictions on valid characters. The only allowable characters for these fields are letters, numbers, commas, periods, hyphens, slashes, ampersands, apostrophes, percents, asterisks, parenthesis, at symbols (@), or single spaces. All other characters are currently invalid for these fields.

Q23b: [deleted]

Attachments

Q24: How do I attach the report of the independent qualified public accountant (IQPA report)?

The IQPA report needs to be documented on letterhead, signed, and then saved as a single Portable Document Format (PDF) file. That PDF file then needs to be attached to the Form 5500 annual return/report. When you submit the Form 5500 annual return/report, the attachments will be transmitted to EFAST2 along with the rest of the information in the annual return/report.

Q24a: I only received one file from my IQPA containing both the signed Accountant's Opinion and the supporting Financial Statements. Do I need to separate this file into the AO Attachment and the Financial Statements Attachment?

The EFAST2 system checks that certain attachments required by the Form 5500 Instructions are included in a filing. Attachments must be included using the proper "tag" for the attachment. Ideally each required attachment should be its own file and attached to your electronic filing with the proper "tag." If you do not include a required attachment or use an incorrect "tag," you may get an error or warning message from the EFAST2 system that you did not include a required attachment. Section 5.10 of the **IFILE User's Guide** provides a map of attachments with the "tag" used by EFAST2.

If your IQPA report contains both the signed Accountant's Opinion and the supporting audit report and financial statements, you do not need to separate the document. You may upload the entire IQPA report into the "AO" Attachment "tag" as a single PDF file.

Also, if your return/report requires the submission of the Schedule(s) of Assets or a Schedule of Reportable Transactions, you must upload these documents separately into the appropriate attachment "tag." If you must file both schedules but do not have separate files, you may wish to either:

- Upload the same combined file into each of the required attachment type tags. You need to be careful doing this though because if your completed Form 5500 is very large (contains upwards of 100 pages of attachments in total), you will likely have difficulty transmitting the filing to EFAST2 due to the total size of the file.
- Create a separate document with a brief statement that the required Schedule(s) of Assets and/or Schedule of Reportable Transactions is included in the Accountant's audit report attachment, and upload that document where you would otherwise upload the Schedule(s) of Assets and/or Schedule of Reportable Transactions, using the appropriate tag(s) for those attachment(s).

Q24b: I only received one file from my actuary. Do I need to separate this file into the various attachments needed for the Schedule MB or SB?

If your return/report requires the submission of the following attachments, you must upload these documents separately into the appropriate attachment "tag," otherwise EFAST2 may generate an error message which you will see when you check the accuracy or status of the filing.

- Schedule of Funding Standard Account Bases
- Summary of Plan Provisions
- Statement of Actuarial Assumptions/Methods
- Balances Subject to Binding Agreement with PBGC
- Alternative 17-Year Funding Schedule for Airlines
- Information on Use of Substitute Mortality Tables
- Change in Actuarial Assumptions
- Schedule of Active Participant Data
- Change in Method
- Schedule of Amortization Bases
- Additional Information for Plans in At-Risk Status
- Illustration Supporting Actuarial Certification of Status
- Actuarial Certification of Status
- Summary of Funding Improvement Plan
- Summary of Rehabilitation Plan
- Reorganization Status Explanation (2014 Plan Year and prior)
- Reorganization Status Worksheet (2014 Plan Year and prior)
- Justification for Change in Actuarial Assumptions
- Schedule MB/SB in PDF format
- Schedule MB and Schedule SB Statement by Enrolled Actuary

If you do not have software capable of splitting the file apart or cannot get separate files from your actuary, you may create separate documents with a brief statement that the required attachment is included in the Actuary Statement file, and upload the document where you would otherwise upload the required attachment using the correct tag for that attachment.

Q25: Will the EFAST2 system still receive my filing if I do not attach the IQPA report with my Form 5500 annual return/report when it is required?

The EFAST2 system will receive your filing, but submitting the annual return/report without the required IQPA report is an incomplete filing, and the incomplete filing may be subject to further review, correspondence, rejection, and assessment of civil penalties. Also, if you do not submit the required IQPA report, you must still correctly answer the IQPA questions on Schedule H, line 3. Not attaching the IQPA report would result in lines 3a, 3b, and 3d left blank because the IQPA report is not attached. You must also leave line 3d blank because the reason the IQPA reports is not attached (i.e., was not completed on time) is not a reason listed in any of the available check boxes. You should still complete line 3c if you can identify the plan's IQPA. Please note that failing to include the required IQPA report and leaving parts of the Schedule H,

line 3 blank will result in the system status indicating that there is an error with your filing because, as noted above, submitting your annual return/report without a required IQPA report is an incomplete filing, and may be subject to further review, correspondence, rejection, and assessment of civil penalties. Thus, if you find it necessary to file a Form 5500 without the required IQPA report, you must correct that error as soon as possible.

Q26: If I am filing for an extension of time based on a request for an extension submitted on Form 5558 with the Internal Revenue Service, do I need to attach a copy of the Form 5558 to my Form 5500 or Form 5500-SF?

No. You do not need to attach a copy of the Form 5558 that was filed with the Internal Revenue Service to the annual return/report in EFAST2. You must, however, keep a copy of the Form 5558 that was filed with the Internal Revenue Service with the plan's records. See **Form 5558, Application for Extension of Time To File Certain Employee Plan Returns** for the most recent version of the Form 5558 and additional information.

Q26a: For what purpose can I check the "Special extension" box on the Form 5500?

Only use the "Special Extension" box for extensions announced by the IRS, DOL, and PBGC such as presidentially-declared disasters or for service in, or in support of, the Armed Forces of the United States in a combat zone. (See the **Form 5500 instructions** for "Other Extensions of Time" and Part I, Line D.)

Q27: What file format do I need to use for attachments to my filing to make sure they get transmitted to and received by EFAST2?

The IQPA report, image of the signed Schedule MB, image of the signed Schedule SB, and image of the signed Form 5500/5500-SF for those using the e-signature option (see question 33a) must be submitted in Portable Document Format (PDF). All other attachments can be submitted in either PDF or plain text format (TXT).

Q27a: Can I encrypt or password-protect the PDF files?

No. A PDF that has been encrypted or password protected to restrict editing, printing, or viewing cannot be included as an attachment in your filing. If you attempt to include such an attachment in your filing, EFAST2 will remove that PDF from your filing and you may receive an error indicating an attachment is missing.

If you are concerned about the authenticity or security of a PDF file, you can sign or certify the PDF with a digital ID. A PDF that has been signed/certified with a digital ID can be included as an attachment in your filing and successfully transmitted to EFAST2.

Q28: How do I turn an attachment into a PDF file?

Using software that will create a PDF file from another software application's data file often provides the best quality PDF and small file size. There are many software options for creating

PDFs by "saving as" a PDF file or "printing" to a PDF file rather than a printer. When you are creating a PDF file using such software, you often must have the application that created the original file installed on your computer.

You can also create a PDF file by using other free and paid software programs that you may already be using on your computer, regardless of your operating system. In order to avoid being erroneously identified as failing to file a required attachment, attachments must be right-side-up in the resulting PDF file. Filers who include attachments with sideways or upside-down pages may be targeted for missing attachments because the DOL compliance tools will not recognize that the required information was attached.

Q29: Can I turn a paper document into a PDF file?

Scanners generally come with software that includes an option to save a scanned document as a PDF. Look for menu items such as "output type" or "settings" to select PDF as the output file type. Consult your scanner's user manual for specific instructions.

When creating a PDF file by scanning a paper document, you need to be careful that the resulting file size is not too large. There is a limitation on the size of submissions sent to EFAST2. Scanning your document at 300x300 resolution and using True Gray, Grayscale, or Black and White color depth can help to minimize the resulting file size of the PDF.

You may also be able to minimize the size of a PDF file if you are using PDF software with functions such as "optimize" or "compress". Note that optimizing a PDF may remove any digital IDs on the PDF described in question 27a.

If you are scanning multiple pages and your scanner does not have a document feeder, you will need to scan each page and then combine them into one PDF file for each attachment type. Check that your pages appear in the order you want them prior to saving and submitting them.

You are encouraged to use software that will create a PDF from another application's data file, as this often produces a better quality PDF file and small file size, as described in the previous question.

In order to avoid being erroneously identified as failing to file a required attachment, attachments must be right side-up in the resulting PDF file. Filers who include attachments with sideways or upside-down pages may be targeted for missing attachments because the DOL compliance tools will not recognize that the required information was attached.

Signing a Return/Report

Q30: If I am using EFAST2-approved third-party software to prepare a filing for a client, how do I provide the plan sponsor/administrator signature (PIN) in the submission?

There are a few alternatives:

- A.** Your EFAST2-approved third-party software may have a file sharing function that allows a plan administrator/plan sponsor to view and apply their signature to the filing. Check with your software vendor or user's manual to see if the software vendor offers this function.
- B.** You can use IFILE as a medium to share the filing with the plan administrator/plan sponsor. How you do that depends on whether you want to submit the filing or whether the plan administrator/plan sponsor wants to submit the filing. It also depends on whether the plan administrator/plan sponsor wants the ability to make changes to the annual return/report before submission.
- C.** If you expect to submit the filing for the plan administrator/plan sponsor, you will need to export the annual return/report from your EFAST2-approved third party software to an XML file. You can then import the XML file into IFILE. After the file is imported into IFILE, you will need to specify the plan administrator/plan sponsor as the signer by entering the plan administrator/plan sponsor's email address. If the plan administrator/plan sponsor had not yet registered in EFAST2 as a Filing Signer, you will be alerted at this time. The plan administrator/plan sponsor will have to login to IFILE using his or her individual EFAST2 electronic credentials. The plan administrator/plan sponsor will not be able to edit the filing but would be able to view and sign the filing. Once the filing is signed, you can then submit it. The plan administrator/plan sponsor, however, retains legal responsibility for the timeliness of the submission, as well as for its accuracy and completeness.
- D.** If the plan administrator/plan sponsor wants to submit the filing, you will need to export the annual return/report from your EFAST2-approved third-party software to an XML file that you will send to the plan administrator/plan sponsor. The plan administrator/plan sponsor will need to have already registered in EFAST2 as a Filing Author and as a Filing Signer. The plan administrator/plan sponsor can log in to IFILE and import the XML file into IFILE.
- E.** The plan administrator/plan sponsor can then review and edit the annual return/report in IFILE. Then the plan administrator/plan sponsor will identify himself when registering as the Filing Signer. Once the plan administrator/plan sponsor signs the filing, he or she can then submit it.

If an annual return/report is signed and then exported or edited, the electronic signatures are automatically erased. If you export or edit the annual return/report after it is signed, the plan sponsor or plan administrator will need to sign it electronically again before the annual return/report is submitted to EFAST2. This applies whether you are using IFILE or EFAST2-approved third-party software. See also, question 33a.

Q31: Do you need a separate registration for the “Employer/Plan Sponsor” and for the "Plan Administrator" (two separate signature lines) if the employer/plan sponsor and the plan administrator are the same person?

No, you only need to register one time for both purposes. The credentials that you get can be used for multiple years and on multiple filings. If the same person serves as both the plan sponsor and plan administrator, that person only needs to sign as the plan administrator on the "Plan Administrator" line.

Q32: Can I register to get Filing Signer credentials for my clients?

No. The EFAST2 process for obtaining Filing Signer credentials is designed so that the person signing electronically must be the person registering for the credentials. Further, Filing Signer credentials are attributed to a single person and must not be shared.

Q33: I am a plan administrator that needs to electronically sign a Form 5500. Can I tell the service provider that manages the plan's Form 5500 filing process what my PIN is so the service provider can sign and submit it for me?

No. As the plan administrator, you must examine the Form 5500 or 5500-SF that will be sent to EFAST2 before it is submitted. Your electronic signature attests that has been done and that, to the best of your knowledge and belief, it is true, correct, and complete. Since the EFAST2 PIN is the plan administrator/plan sponsor electronic signature for purposes of the Form 5500 and Form 5500-SF, PINs must be protected and not shared. However, as described below in response to question 33a, if a service provider manages the Form 5500 filing process for your plan, the service provider may get his or her own Signer credentials and electronically sign the filing attesting that he or she is authorized to submit the return/report and has attached a PDF copy of the plan's Form 5500/Form 5500-SF that has been manually signed and dated by the plan administrator under penalty of perjury.

**Q33a: I am a service provider that assists clients in managing the filing process.
Can I electronically sign the annual return/report for my client?**

Plan administrators may authorize plan service providers that manage the plan's annual filing process to electronically submit the Form 5500/Form 5500-SF for the plan.

Under this additional e-signature option, service providers that manage the filing process for plans or DFEs can get their own EFAST2 signing credentials and submit the electronic Form 5500 or 5500-SF for the plan or DFE. As described more fully below, the service provider must have specific written authorization from the plan administrator, employer/plan sponsor, or DFE to submit the plan's or DFE's electronic filing. In addition, the plan administrator, employer/plan sponsor, or person authorized to sign on behalf of the DFE,

including the “jurat”, must manually sign a paper copy of the completed Form 5500 or 5500-SF, as applicable, and the service provider must include a PDF copy of the manually signed Form 5500 (without schedules or attachments) or 5500-SF as an attachment to the electronic Form 5500 or Form 5500-SF submitted to EFAST2. The service provider also must inform the plan administrator, employer/plan sponsor, or DFE that, by electing to use this option, the image of the plan administrator's, employer/plan sponsor's, or DFE signee's manual signature will be included with the rest of the annual return/report posted by the Labor Department on the Internet for public disclosure.

A statement for service providers that use this electronic signature option is in the IFILE application. The statement provides that, by signing the electronic filing, the service provider is attesting: (1) that the service provider has been authorized in writing by the plan administrator/plan sponsor/DFE to electronically submit the return/report; (2) that a copy of the specific written authorization will be kept in the service provider's records; (3) that, in addition to any other required schedules or attachments, the electronic filing includes a true and correct PDF copy of the completed Form 5500 (without schedules or attachments) or Form 5500-SF return/report bearing the manual signature of the plan administrator, employer/plan sponsor, or DFE under penalty of perjury; (4) that the service provider advised the plan administrator, employer/plan sponsor, or DFE that by selecting this electronic signature option, the image of the plan administrator's, employer/plan sponsor's, or DFE's manual signature will be included with the rest of the return/report posted by the Department of Labor on the Internet for public disclosure; and (5) that the service provider will communicate to the plan administrator, plan sponsor/employer, or DFE signee's any inquiries and information received from EFAST2, DOL, IRS or PBGC regarding the return/report.

When attaching the PDF image of the manually signed Form 5500 (without schedules or attachments) or 5500-SF, the PDF file must be included as an “EsignatureAlternative” attachment type. That PDF file must contain the scanned pages of the Form 5500 or 5500-SF. Do not include a PDF copy of the schedules or attachments in this PDF file because that may result in the return/report being too large to submit electronically to EFAST2 (see question 44). With the exception of the signature line(s), the Form 5500 or 5500-SF that were manually signed, scanned, and attached to the filing must match the information electronically submitted in XML format.

Filers using EFAST2 approved software to complete and file the Form 5500 or Form 5500-SF should contact their software vendors for information regarding whether this e-signature option is available as part of their software.

This additional e-signature option does not allow a service provider to affix the plan administrator's, employer/plan sponsor's, or DFE's PIN to the electronic filing because, as described above, EFAST2 prohibits individuals from sharing his or her PIN with the person preparing and transmitting the Form 5500 or Form 5500-SF. If the plan administrator, employer/plan sponsor, or DFE is electronically signing the filing, the person authorized to sign as the plan administrator, employer/plan sponsor, or DFE must personally affix his or her own electronic signer credentials.

Under the e-signature option, the name of the service provider who affixed his or her own electronic signer credentials will not automatically appear as the "plan administrator", "plan sponsor", or "DFE" in the signature area on the image of the Form 5500 or Form 5500-SF posted by the Department of Labor on the Internet for public disclosure, and will not be disclosed as the electronic signer in publicly-posted **Form 5500 datasets** or the public **Form 5500/5500-SF Filing Search** application. As described above, prior to the service provider electronically submitting the Form 5500 or 5500-SF by affixing their electronic signer credentials, the service provider must attach to the electronically filed Form 5500 or Form 5500-SF a PDF image of the Form 5500 or 5500-SF, as applicable, itself manually signed by the plan administrator, employer/plan sponsor, or DFE. The name of the person who manually signed the Form 5500 or 5500-SF, as applicable, as the plan administrator, employer/plan sponsor, or DFE also must be entered in the electronically filed Form 5500 or Form 5500-SF in the signature field entitled "Enter the name of individual signing as plan administrator"; "Enter the name of the individual signing as employer/plan sponsor"; or "Enter the name of the individual signing as DFE". The name of the service provider may appear elsewhere in the public filing, e.g., identified as a service provider on a Schedule C attached to the Form 5500 or as a paid preparer.

Depending on what software is being used, the person signing may be prompted by their software to provide their name, or their name may be automatically populated by the software. Under the e-signature option, the name of the person signing the filing must be the service provider's name.

Q33b: What happens if I fail to sign my filing with a valid electronic signature?

All submitted Form 5500 and 5500-SF filings must have a valid electronic signature. Form 5500/Form 5500-SF filings for both retirement and welfare benefit plans must be electronically signed by the plan administrator. Any Form 5500 that is not electronically signed will be subject to rejection and civil penalties under Title I of ERISA.

If your filing was not signed with a valid electronic signature as required, you must electronically sign and submit an acceptable amended filing. When attempting to amend your return, first ensure that the plan administrator, or service provider if using the e-signature option, has a valid EFAST2-issued User ID and PIN. If not, you or your service provider may need to obtain new or modified EFAST2 credentials (see EFAST2 Credentials FAQ). Follow the **Form 5500/Form 5500-SF instructions** and electronically amend your filing (see questions 39-41). If using the e-signature option, the PDF image of the manually signed Form 5500 (without schedules or attachments) or Form 5500-SF must be attached to the amended filing.

Note: A manually signed copy of the Form 5500/Form 5500-SF (whether the records are maintained as paper records or electronically in accordance with the Department of Labor's regulations) must be kept as part of the plan's records.

Q33c: Can I sign the Form 5500/5500-SF using my company's name rather than my own name?

No. The signature on the Form 5500 and/or 5500-SF must reflect an individual's name and not a company name. The signer credentials associated with an individual must not be shared.

Q34: Do actuaries or accountants need to register for EFAST2 electronic filing signer credentials?

No. EFAST2 does not require EFAST2-issued electronic signature credentials for anything other than for filing and submitting the Form 5500 and Form 5500-SF.

However, the Schedule MB and Schedule SB, if required, must be completed, printed, and signed by the actuary. An electronic image of the signed Schedule MB or Schedule SB with the actuary's signature must be attached to the annual return/report. The plan's actuary is permitted to sign the Schedule MB/SB on page one using the actuary's signature or by inserting the actuary's typed name in the signature line followed by the actuary's handwritten initials.

The information from the actuary's Schedule MB or Schedule SB must also be entered into the appropriate location of the electronic Form 5500 or Form 5500-SF (including the Schedule SB or Schedule MB) being submitted. When entering the information, whether using EFAST2-approved third-party software or EFAST2's web-based filing system, all the fields entered by the actuary must be completed (see instructions for fields that need to be completed).

The accountant must complete and sign their audit report on company letterhead. An electronic image of the signed accountant's opinion must be attached to the annual return/report.

The actuary and accountant electronic signature images are not EFAST2-issued electronic signature credentials and do not require registration for Filing Signer credentials.

Submitting an Annual Return/Report (Form 5500 or Form 5500-SF) and Checking its Status

Q35: Can a third-party preparer submit an annual return/report for the sponsor electronically under EFAST2?

Yes. A third-party preparer can submit an annual return/report that a plan sponsor/administrator has already signed electronically. The plan sponsor/administrator, however, retains legal responsibility for the timeliness of the submission, as well as for its accuracy and completeness. See question 30, above, regarding signing an annual return/report.

Q35a: Exactly what time is my filing due, and what time zone does that reflect?

Timely returns/reports must be received by EFAST2 by midnight in the plan administrator's time zone. The plan administrator's time zone is determined by the plan administrator's address specified on Line 3a of the Form 5500 or Form 5500-SF.

In an instance where the filer attempts to submit a return/report on time and it is not successfully received by EFAST2 prior to the deadline, the filer should print the unsuccessful submission notice. The unsuccessful submission notice should be included with the resubmitted return/report and tagged as an "OtherAttachment." Based upon the facts and circumstances surrounding the original unprocessable submission and the subsequent resubmission, penalties may still be assessed from the original due date of the subsequent resubmission is received by EFAST2 after the deadline.

Q36: I tried submitting a Form 5500 annual return/report and I received an Acknowledgement ID. Does this mean my annual return/report was received?

An Acknowledgement ID means EFAST2 received an electronic “envelope” but it does not necessarily mean EFAST2 received the "filing" (i.e., the Form 5500 or Form 5500-SF, including all required schedules and attachments) inside the envelope. You need to check the filing status to ensure EFAST2 received your filing.

Q37: How do I check to see if a filing was received by EFAST2?

The individual who transmitted the annual return/report to EFAST2 or the signer(s) of that return/report can check the filing status, using the software used to submit the annual return/report, approximately 20 minutes after submission.

The transmitter and filing signer also can check the status of the returns/reports they submitted or signed through the EFAST2 website regardless of what software (IFILE or EFAST2-approved) was used to submit the filings.

Any person (not just the transmitter or signer) can check the status of a filing by calling the EFAST2 Help Line at 1-866-GO-EFAST (1-866-463-3278) and using our automated voice system. The automated system will provide you with the status of the filing but will not describe any errors specific to the filing.

Q38: How does the filing status tell me if an annual return/report is considered "filed" in EFAST2?

Below is a chart summarizing the submission and filing statuses and what they mean. By looking closer at the Filing Status, you can see specific error messages applicable to the transmitted filing.

Status	What It Means	Return/Report Considered A Filing?
Unprocessable Submission	EFAST2 was not able to process the submission. There may be multiple returns/reports in a single submission, none of which EFAST2 could read or process. All returns/reports in this submission are considered not received by the Government.	No - This submission must be corrected and resubmitted.
Processing	EFAST2 is currently trying to read and process each of the annual return/reports in the submission. Annual returns/reports should not remain in this status for more than 20 minutes.	No - The annual return/report has not yet been processed. Please check the filing status at a later time to determine the annual return/report's processing outcome.
Filing Unprocessable	EFAST2 could not read this annual return/report. This annual return/report is not considered filed with the Government.	No - This annual return/report must be corrected and resubmitted.
Processing Stopped	EFAST2 could read this annual return/report but could not fully check the filing for errors because crucial information was not provided by the filer. This annual return/report must be corrected and resubmitted in its entirety as an amended filing.	Yes
Filing Error	EFAST2 discovered errors in the annual return/report information provided by the filer. This annual return/report must be corrected and resubmitted in its entirety as an amended filing.	Yes
Filing Received	EFAST2 either found no errors or only identified possible errors in the annual return/report information provided by the filer. If corrections are warranted, they should be made and the corrected filing resubmitted in its entirety as an amended filing.	Yes

Q39: How do I submit an amended annual return/report (Form 5500 or Form 5500-SF) for plan years 2014 and later in EFAST2?

For plan years 2014 and later, starting with the original version you submitted, make the necessary amendments, check the box for "amended return/report" in Part I, and resubmit the entire annual return/report, including all needed schedules and attachments. For plan years 2013 and earlier, see question 4.

Q40: I am amending my Form 5500 (or Form 5500-SF) filing. Can I just submit the portion of the return/report which I am amending?

No. You will need to resubmit the entire Form 5500 (or Form 5500-SF), with all required schedules and attachments, through EFAST2. You cannot submit just the parts of the filing that are being amended.

Q40a: What should I do if I submit my filing twice (a duplicate filing)?

If you have submitted multiple filings with identical plan information, EFAST2 may identify it as a duplicate filing. Do not attempt to delete it. In most cases, EFAST2 will detect a duplicate filing, and only disclose one of the submitted filings.

Q41: [deleted]

Online Disclosure

Q42: Can the general public view Form 5500 and Form 5500-SF filings online?

Yes. Successfully submitted filings are stored electronically and may be retrieved and viewed through the EFAST2 website with the following exceptions:

- Filings containing sensitive information (e.g. Social Security Number, financial information, etc.).
- Filings for plan years prior to 2009.
- One-participant and foreign plans filed on a Form 5500-SF.
- Filings identified as amendments and linked to their parent filing.
- Prior year filings submitted on a current form year.
- The filings retrieved by the Filing Search application include all the components of the filing: Form, Schedules, and attachments. These components may be viewed jointly or individually

Additionally, filing data are posted on EBSA's [Form 5500 Datasets](#) webpage. These are structured datasets of Form 5500 series forms and schedules filed each year, including filings prior to 2009. However, attachments are not included.

Q43: How soon would EFAST2 filings become available to the public?

The EFAST2 website generally displays submitted filings within one day of receipt.

Troubleshooting Problems with EFAST2

Q44: What should I do if the file size is "huge"?

EFAST2 should accept any submissions up to 100 megabytes (100MB) in file size. It is possible that a filer would not be able to transmit a submission under the EFAST2 limit due to issues on their end of the network or due to their Internet Service Provider. Submissions may include a batch of up to 100 filings. If a batch submission is over 100MB, the transmitter should break up the batch so that there are fewer filings in each batch submission. Based on the amount of data required to be submitted, a single filing should not exceed the 100 MB size limit, even if the filing has multiple attachments. If a filing is bigger than 16MB, it is likely because the PDF attachments were scanned with too high of a resolution or color depth. Filers need to be aware of this when creating their attachments as PDFs. See questions 28 and 29 for ways to minimize file size when creating a PDF document. In the rare event a filing is over 100MB and you cannot reduce the file size of the attachments, please call the EFAST2 Help Line at 1-866-GO-EFAST (1-866-463-3278) and they will work with you to get the filing transmitted.

Q45: Could pop-up blockers stop the display of acknowledgement or any other messages that might be provided through the filing process?

Yes. Please consider turning off pop-up blockers in your web browser when using the EFAST2 website.

Q45a: Some portions of the EFAST2 website are not functioning or displaying correctly for me. What should I do?

You may wish to update your browser or try an alternative browser. Further, please ensure that JavaScript is enabled on your computer and the EFAST2 website is included as one of your computer's trusted sites. If you are still experiencing difficulties, contact the EFAST2 Help Line at 1-866-GO-EFAST (1-866-463-3278).

Q46: Who can we contact about Form 5500 filing or EFAST2 if we have questions or problems?

Please begin by calling the EFAST2 Help Line at 1-866-GO-EFAST (1-866-463-3278).

Official Government Correspondence

Q47: Following EFAST2 validation and successful filing submission, how will I know if the Government identified a problem with my filing?

You may be contacted by DOL, IRS, or PBGC if the Government identifies a problem with your filing. Depending on the nature of the inquiry or notification, the Government will use the mailing address, phone number, and/or email address of the plan administrator, plan sponsor, or person who transmitted the filing to contact the filer. To expedite problem resolution and minimize possible penalties, please ensure your EFAST2 user profile is kept current with your valid business contact information. To minimize the chance of receiving official Government correspondence, remember to check your filing for errors before submitting it. See question 21.

Q48: I received an email from DOL regarding my Form 5500/5500-SF with a PDF attached. Is it official and legitimate correspondence?

DOL is using email to communicate with filers regarding Form 5500/5500-SF inquiries and rejections. The initial emails are sent from the address **EBSA-DRC@dol.gov**. The emails, intended for plan administrators, are sent to the email account associated with the plan administrator's electronic signature on the Form 5500/5500-SF. Please ensure your EFAST2 user profile is current with your valid business email address. Plan administrators who use service providers under the e-signature alternative may find their service provider has received electronic correspondence regarding their plan. Where the filer has used the alternative signature option set forth in the Form 5500/5500-SF instructions and question 33, the service provider must communicate to the plan administrator/employer any inquiries and information received from DOL regarding the return/report. DOL's electronic correspondence process allows you to open the PDF, fill in requested information, and email the completed PDF back to

DRC@dol.gov. DOL's electronic correspondence will never request you supply your name, social security number, bank account, or credit card information. If you have questions or concerns regarding DOL's email, you may submit those in a reply to DOL's email message or call the phone number listed at the bottom of the message. If you have difficulty receiving DOL's email or opening the attached PDF files you may request fax or paper copies from **DRC@dol.gov** .

Q49: I received an email from DOL regarding my Form 5500/5500-SF but would prefer DOL send such correspondence to a different email account. Is there a way to change the email address to which DOL sends such correspondence?

The emails, intended for plan administrators, are sent to the email account associated with the plan administrator's electronic signature on the Form 5500/5500-SF. Please ensure the plan administrator's EFAST2 user profile is current with the valid business email address where such correspondence should be sent. You can change the email address in your EFAST2 user profile by **logging into the EFAST2 website** and then selecting the User Profile link in the left-hand navigation bar. Note that there may be a delay between when the email address in the EFAST2 user profile is changed and when DOL issues email to the new address.

Q50: Can I opt-out of receiving DOL's emails regarding my Form 5500 or Form 5500-SF?

DOL does not currently offer a method to opt-out of email regarding filed Form 5500/5500-SFs. If DOL does not obtain a response to the issued emails, DOL may attempt alternate methods of notification prior to assessing penalties or fees.

Q51: In addition to questions related to my Form 5500/5500-SF filing, would DOL email other correspondence?

DOL intends to use email as a method of communicating information on upcoming outreach events. For example, DOL may send emails to small business plan sponsors regarding local DOL-sponsored free compliance assistance seminars.

Q52: Will IRS send me email regarding my Form 5500/5500-SF?

No. If you receive a suspicious e-mail that claims to come from the IRS, you can relay that e-mail to the IRS mailbox, phishing@irs.gov. See Suspicious e-Mails and Identity Theft for more information on suspicious IRS emails.

Q53: I received a notice from the IRS regarding my 5500/5500-SF. How can I get help to better understand the notice or draft my response?

See "Notices from the IRS" section on the IRS Retirement Plans Community Form 5500 Corner for information regarding the IRS notices and links to relevant FAQs. You may also call IRS Employee Plans Customer Account Services at 1-877-829-5500.