

Troubleshooter's Guide to Filing the ERISA Annual Report (Form 5500 and Form 5500-SF)

U.S. Department of Labor

Employee Benefits Security Administration

This publication has been developed by the U.S. Department of Labor, Employee Benefits Security Administration (EBSA). It provides only general guidance. Not all rules or requirements are reflected. See the instructions to the Form 5500 and applicable regulations for detailed information. The contents of this document are not a legal interpretation of the Employee Retirement Income Security Act.

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INTRODUCTION

The U. S. Department of Labor's (DOL) Employee Benefits Security Administration (EBSA), in conjunction with the Internal Revenue Service (IRS) and the Pension Benefit Guaranty Corporation (PBGC), publishes the Form 5500 Annual Return/Report of Employee Benefit Plan (Form 5500) and the Short Form Annual Return/Report of Small Employee Benefit Plan (Form 5500-SF).

The Form 5500 and the Form 5500-SF are used by employee benefit plan administrators to satisfy their annual reporting obligations under the Employee Retirement Income Security Act of 1974 (ERISA) and the Internal Revenue Code (Code). The annual report contains information on the general characteristics, financial condition, and operations of the plan. The information in the annual report is carefully reviewed by the DOL, IRS, and PBGC for compliance with applicable reporting requirements and used for enforcement, compliance assistance, research and other purposes.

This guide is intended to help filers comply with the Form 5500 and Form 5500-SF annual reporting requirements and avoid common reporting errors. Not all rules or requirements are reflected and the guide is not a legal interpretation of ERISA. Filers should carefully read the instructions to the Form 5500 and the Form 5500-SF and applicable regulations for complete information on annual reporting and filing requirements.

EFAST2 Processing System

Electronic Filing. Effective January 1, 2010, you must electronically file all Forms 5500 and Forms 5500-SF with the **ERISA Filing**

Acceptance System 2 (EFAST2). EFAST2 replaces the current EFAST paper-based filing system, and relies on electronic filing technologies to simplify and expedite the filing, receipt, and processing of the Form 5500 and Form 5500-SF. You may electronically file your Form 5500 or Form 5500-SF by using EFAST2's Web-based filing system (IFILE), or by using electronic filing software from an EFAST2-approved private sector vendor.

Changes to the Form 5500

There were several important changes in 2009 to the annual report forms:

- Establishment of the Form 5500-SF as a new simplified report for certain small plans with secure assets that have a readily determinable value.
- Removal of the IRS-only schedules (Schedule E and SSA) because of the move to a wholly electronic filing system.¹
- Revision of the Schedule C filed by large plans to improve the information plan officials receive and report on service provider fees and expenses.
- Electronic filing of the Schedule SB and Schedule MB to reflect the changes in reporting and funding requirements for single and multiemployer defined benefit pension plans under the Pension Protection Act of 2006 (PPA).

¹ The Form 8955-SSA has replaced the Schedule SSA and must be filed directly with the IRS. The Schedule E (Form 5500) was removed and is not being replaced. Visit <http://www.irs.gov> for more information.

These schedules were filed as paper attachments to the 2008 Form 5500.

- Modification of the Schedule R to add questions required by the PPA to gather information on pension plan funding and compliance with minimum funding requirements. This information was filed as a separate attachment for the 2008 Form 5500.
- Modification of the Schedule R to collect data PBGC needs to better monitor the plans it insures. This information was filed as a separate attachment for the 2008 Form 5500.
- Miscellaneous technical changes to the schedules and instructions to improve and clarify reporting.

A summary of these and other important changes also appears at the beginning of the 2009 and 2010 Form 5500 instructions under the heading “Changes to Note.”

New Annual Reporting Requirements for Code Section 403(b) Plans

DOL repealed, starting with the 2009 annual return/report, the special limited financial reporting rules that applied to Code section 403(b) plans. Thus, beginning with the 2009 plan year, administrators of 403(b) plans subject to Title I of ERISA, like administrators of 401(k) plans, must file financial and other compliance information about the plans annually with the government on a Form 5500 or Form 5500-SF. Large 403(b) plans (generally those with 100 or more participants) also must include a report of an independent qualified public accountant (IQPA) with their Form 5500.

EBSA has issued legal guidance and has several publications that are designed to explain the new annual reporting rules for Code section 403(b) plans. All of these materials are available on a newly created

EBSA Web site at <http://www.dol.gov/ebsa/403b.html>. For example, a Field Assistance Bulletin (FAB) 2010-01 was issued to answer many frequently asked questions from the 403(b) community on the new Form 5500 reporting requirements. The DOL also published a brochure entitled *Getting Ready for Changes in Filing Your Plan's Annual Return/Report Form 5500*.

How to Get Assistance

For more information about EFAST2 processing, see the **EFAST2 All-Electronic Filing System** FAQs and other guidance at www.efast.dol.gov. If you need help completing the Form 5500 or Form 5500-SF or have related questions, call the EFAST2 Help Line (toll-free) at **1-866-463-3278**. The EFAST2 Help Line is available Monday through Friday from 8 a.m. to 8 p.m., Eastern Time. Please see the Appendix for a list of other resources.

You can also access the EFAST2 Web site 24 hours a day, 7 days a week at www.efast.dol.gov to:

- File the Form 5500 or Form 5500-SF with any required schedules or attachments
- Check on the status of a filing you submitted
- View filings posted by EFAST2
- Register for electronic credentials to sign, create, or submit filings
- View forms and related instructions
- Get information regarding EFAST2 including approved software vendors
- See answers to frequently asked questions about the Form 5500, the Form 5500-SF, and EFAST2
- Access the main EBSA and DOL Web sites for news, regulations, and publications

You can access the IRS Web site 24 hours a day, 7 days a week at www.irs.gov to:

- View forms, instructions, and publications
- See answers to frequently asked tax questions
- Search publications online by topic or keyword
- Send comments to the IRS or request IRS help by e-mail
- Sign up to receive local and national tax news by e-mail

You can order related forms and IRS publications from the IRS Web site or by calling **1-800-TAX-FORM** (829-3676). You can order EBSA publications by calling **1-866-444-3272**.

FORM 5500 AND FORM 5500-SF

ERISA generally requires the administrator of an employee benefit plan to submit an annual report on either the Form 5500 or the Form 5500-SF, if eligible, with any required schedules, statements, and attachments. The Form 5500 and Form 5500-SF are required to be filed electronically with EBSA under EFAST2. Required schedules and attachments must be completed in accordance with the instructions and included in the electronic filing of the Form 5500 or Form 5500-SF.

Many employee benefit plans participate in certain investment and insurance arrangements that file a separate Form 5500 electronically with EFAST2 for the investment or insurance arrangement itself. These direct filing investment and insurance arrangements include master trust investment accounts (MTIAs), common/collective trusts (CCTs), pooled separate accounts (PSAs), 103-12 investment entities (103-12 IEs), and group insurance arrangements (GIAs). A separate Form 5500 must be filed for each MTIA in a master trust or the annual report of the plans that participate in the Master Trust will be treated as incomplete and subject to rejection. Although direct filing of a separate Form 5500 is optional for CCTs, PSAs, 103-12 IEs, and GIAs, plans that participate in CCTs, PSAs, 103-12 IEs, or GIAs may have to include more detailed information on the plan's own Form 5500 if there is no separate DFE filing for the arrangement.

Depending on the type and size of the plan or DFE, a report of an independent qualified public accountant (IQPA), and other schedules, supplemental documents, and materials may be required to be attached electronically to the Form 5500 or Form 5500-SF.

EBSA processes the Form 5500 and Form 5500-SF reports received under EFAST2, provides information from the reports to the IRS and PBGC for use in enforcement and other program activities. The information in the annual report is carefully reviewed by the DOL, IRS, and PBGC for compliance with applicable reporting requirements. Incomplete filings are subject to rejection and civil penalties may be assessed.

Most Forms 5500 and Forms 5500-SF filed electronically through EFAST2 will be available, free to the public, via the Internet on the EFAST2 Web site. Copies of the annual reports, including those not available on the EFAST2 Web site, are generally available through the DOL's public disclosure room.

The plan administrator is required to keep a copy of the Form 5500 and Form 5500-SF, including schedules and attachments, with all required manual signatures, as part of the plan's records. The plan administrator also must make a paper copy available on request to participants, beneficiaries, and the DOL as required by section 104 of ERISA and 29 C.F.R. § 2520.104b-1. In addition, pursuant to Section 504 of the Pension Protection Act of 2006 (PPA), if your plan is a defined benefit plan, and the plan sponsor has an intranet Web site (or Web site maintained by the plan administrator on behalf of the plan sponsor) that is used for the purpose of communicating with employees, you must post certain basic plan identifying information and actuarial information from the Form 5500 or Form 5500-SF on the company's intranet Web site.

Form 5500 Annual Return/Report

The Form 5500 Annual Return/Report consists of the main Form 5500, which includes basic identifying information and, depending upon the type of filer, one or more of nine schedules that focus on a particular subject matter or filing requirements. Plans required to file an annual report must file using the Form 5500 if they are not eligible to file the Form 5500-SF.

Pension and welfare benefit plans that covered 100 or more participants as of the beginning of the plan year should generally complete a Form 5500 following the requirements for a “large plan.”

Plans that covered fewer than 100 participants as of the beginning of the plan year generally are required to file a Form 5500 annual report following the requirements for a “small plan,” or may instead complete a simplified annual report called the Form 5500-SF if the plan meets certain eligibility requirements.

Form 5500-SF Annual Return/Report

The Form 5500-SF (Short Form 5500) is a simplified and abbreviated version of the Form 5500 for certain small plans described below. It includes basic identifying information, financial information, plan characteristics, general compliance information, pension funding compliance information, and information pertaining to plan terminations and transfers of plan assets. For most plans, no other schedules are required, except single-employer defined benefit pension plans using the Form 5500-SF must file the Schedule SB (Form 5500), Single-Employer Defined Benefit Plan Actuarial Information, and money purchase plans amortizing a funding waiver eligible to use the Form 5500-SF must also file the Schedule MB (Form 5500), Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information.

Plans eligible to file the Form 5500-SF generally include plans that meet the following conditions:

- must have fewer than 100 participants at the beginning of the plan year;
- must be exempt from the requirement that its books and records be audited by an independent qualified public accountant (IQPA);
- must have 100 percent of its assets invested in certain secure investments with a readily determinable fair value;
- must hold no employer securities; and
- must not be a multiemployer plan.

The detailed eligibility requirements for the Form 5500-SF are in the instructions to the Form 5500-SF under the heading “**Who May File.**”

Under the “80-120 Participant Rule,” if the number of covered participants as of the beginning of the plan year is not less than 80 and not more than 120, and an annual return/report was filed for the prior year, the plan may elect to continue to file in the same “large plan” or “small plan” category that it filed as for the prior year. Beginning with 2009 filings, small plans (including small 403(b) plans, if eligible) may file the Form 5500-SF instead of the Form 5500 under this rule.

Use the number of participants required to be entered in line 5 of the Form 5500 or Line 5a of the Form 5500-SF to determine whether a plan is a “small plan” or “large plan.” For more information, see the 2009 and 2010 Form 5500 instructions under the headings “**What to File,**” and “**Quick Reference Chart of Form 5500 Schedules and Attachments.**”

Note for Form 5500-EZ Filers. The EFAST2 system will not accept the IRS Form 5500-EZ, Annual Return of One-Participant (Owners and Their Spouses) Retirement Plan (Form 5500-EZ). The IRS,

however, will permit certain Form 5500-EZ filers to file the Form 5500-SF electronically through EFAST2 instead of filing the paper Form 5500-EZ with the IRS. See the instructions to the Form 5500-SF under “**Specific Instructions Only for ‘One-Participant Plans’**” for additional guidance. Not all Form 5500-EZ filers are eligible to use the Form 5500-SF, and filing requirements may differ from the filing requirements of other small plans. More information on the Form 5500-EZ can be found at the IRS Web site: www.irs.gov.

Schedules and Attachments

As noted above, depending on the type and size of the plan or DFE, various schedules, supplemental documents and other materials may be required to be attached electronically to the Form 5500 or Form 5500-SF.

All required schedules and attachments must identify the name of the plan or DFE, plan sponsor’s name, sponsor’s Employer Identification Number (EIN), plan number (PN), plan year beginning and ending dates, and in the case of attachments, the type of attachment, associated schedule and the associated line number of that schedule. If you are using IFILE, it will automatically populate the Plan Year Beginning Date, Plan Year Ending Date, Plan Name and Sponsor Name on Schedules C, D, G, H, I, and R. IFILE will automatically populate the Plan Name and Sponsor Name for Schedules A, MB, and SB. Third-party software may also automatically populate the schedules with some or all of this information. **Important: Remember when creating attachments that all information contained in all attachments must be legible.**

Schedule A (Insurance Information). The Schedule A must be filed by plans and certain DFEs when benefits under the plan are provided by an insurance company, insurance service, or other similar organization (including, for example, Blue Cross, Blue Shield or a health maintenance organization). This includes investment contracts with insurance companies, such as group annuity

contracts, guaranteed investment contracts and pooled separate accounts. The insurance company (or similar organization) is statutorily required to provide information it has that is necessary for you to complete the return/report. If you do not receive this information in a timely manner, you should contact the insurance company, insurance service, or other similar organization, and advise them that the plan administrator will identify the provider on the Part IV of Schedule A as failing to provide necessary information if the required information is not provided.

Schedule C (Service Provider Information). The Schedule C must be filed by large pension plans, large welfare plans, and certain DFEs when one or more service providers received, directly or indirectly, \$5,000 or more in compensation for services rendered during the year. Schedule C must also be filed to report the termination of the plan’s IQPA or enrolled actuary. The Schedule C and the instructions were substantially revised and expanded for 2009 filings. The Department also has published answers to frequently asked questions on its Web site to provide further guidance on typical Schedule C issues that filers face.

Schedule D (DFE/Participating Plan Information). The Schedule D must be filed by plans and DFEs to identify and provide summary financial information on MTIAs, CCTs, PSAs, and 103-12 IEs in which the plan or DFE participated or invested during the year. The Schedule D also must be filed by DFEs to identify plans that participated or invested in the DFE during the DFE year.

Schedule G (Financial Transaction Schedules). The Schedule G must be filed by large pension plans, large welfare plans, and certain DFEs to report loans, leases and fixed income obligations in default or classified as uncollectible and nonexempt prohibited transactions.

Schedule H (Financial Information). The Schedule H must be filed by large pension plans, large welfare plans and DFEs to report

financial information. The Schedule H includes an asset and liability statement, an income and expense statement, information on any required report and opinion of an IQPA, and compliance information on other financial transactions and activities of the plan.

Schedule I (Financial Information - Small Plan). The Schedule I must be filed by small pension plans and small welfare plans to report financial information, unless the plan is exempt from filing an annual report or is eligible and files a Form 5500-SF. The Schedule I is a simplified version of the Schedule H that includes an asset and liability statement, an income and expense statement, and compliance information on other financial transactions and activities of the plan.

Schedule MB (Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information). The Schedule MB must be filed by multiemployer defined benefit pension plans and by certain money purchase pension plans that currently amortize a waiver of the minimum funding requirements as specified in the instructions for the Schedule MB.

Schedule R (Retirement Plan Information). The Schedule R must be filed by large and small pension plans, including defined contribution pension plans. Whether certain parts of Schedule R must be completed depend on whether the plan is subject to the minimum funding requirements of Code section 412 or ERISA section 302 and the type of plan.

Schedule SB (Single-Employer Defined Benefit Plan Actuarial Information). The Schedule SB must be filed by single-employer defined benefit pension plans, including multiple-employer defined benefit pension plans that are treated as single employer plans for annual reporting purposes.

The report of an independent qualified public accountant (IQPA). ERISA imposes a general requirement that employee benefit plans

be audited each year by an IQPA unless they are covered by an exemption or meet the conditions for an audit waiver. The report of an IQPA generally must be filed with the Form 5500 by large pension plans, GIAs, 103-12 IEs, and by some large welfare plans. Small welfare plans that file the Schedule I are exempt from the annual audit requirement. In the case of small pension plans, there are additional requirements for the plan to be eligible for the audit waiver. If the small pension plan does not meet the conditions for the waiver, an IQPA's audit report must be filed with the plan's Form 5500. The DOL's regulation at 29 CFR 2520.104-46 and the instructions to the Schedule I (Form 5500) have detailed information on the small pension plan audit waiver conditions.

Schedule of Assets Held for Investment Purposes at End of Plan Year and Schedule of Investment Assets Both Acquired and Disposed of Within the Plan Year. One or both of these schedules of assets held for investment purposes must be filed by large pension plans, large welfare plans, and DFEs that are required to check "Yes" to Schedule H, line 4i.

Schedule of Reportable Transactions. The schedule of reportable (5 percent) transactions must be filed by large pension plans, large welfare plans, and DFEs that are required to check "Yes" to Schedule H, line 4j.

Schedule of Delinquent Participant Contributions. The schedule of delinquent participant contributions must be filed by large pension and welfare plans that checked "Yes" on Schedule H, line 4a, and by small pension and welfare plans that checked "Yes" on Schedule I, line 4a and "No" on Schedule I, line 4k.

Application for Extension of Time To File Certain Employee Plan Returns. When filing under an extension of time, you are no longer required to attach a copy of IRS Form 5558, Application for Extension of Time To File Certain Employee Plan Returns, or attach an explanation

of an approved special extension of time. Rather, filers check the appropriate extension of time box in line D on the Form 5500 or in line C on the Form 5500-SF, and if applicable, enter a description of the approved special extension. Plans relying on a Form 5558 extension must file the Form 5558 with the IRS on or before the normal due date for the Form 5500 or Form 5500-SF, and keep a copy of the Form 5558 with the plan's records.

Other supplemental attachments. Various supplemental attachments and materials must be filed as attachments when required by the instructions to the Form 5500 and the schedules listed above.

Important: Remember when creating electronic attachments that all information contained in all attachments must be legible.

EFAST2 PROCESSING OF THE FORM 5500-SF AND FORM 5500

Effective January 1, 2010, all Form 5500 and Form 5500-SF filings, including all required schedules, statements, and attachments, must be filed electronically with EFAST2. This includes amended returns/reports and filings corrected in response to correspondence from the IRS and/or the DOL. The electronic filing requirement also applies to filings for Plan Years 2008 and early years – they are required to file electronically under EFAST2 if filed on or after January 1, 2010.²

Electronic Filing Options

You may file using software from an EFAST2-approved vendor or you may file online, using EFAST2's Web-based filing system (IFILE) found at www.efast.dol.gov. In either case, you will need to register for an EFAST2 account if you are preparing the electronic filing, signing, or submitting a completed Form 5500/5500-SF to EFAST2.

The EFAST Web site at www.efast.dol.gov has been updated to provide filers with a variety of tools and guidance, including the 2009 and 2010 Form 5500 and Form 5500-SF, associated schedules and instructions, frequently asked questions, user guides, and a tutorial. A helpful **video on electronic filing** is also available. Assistance with the EFAST2 system and the Form 5500 and 5500-SF is also available toll-free through the EFAST2 Help Line at 1-866-GO-EFAST (463-3278), Monday through Friday from 8 a.m. to 8 p.m., Eastern Time.

² Although no longer in effect, a limited exception from the electronic filing requirement allowed plans to file for their 2008 plan years electronically under the original EFAST system up until June 30, 2010 and on paper through October 15, 2010.

The tools on the EFAST2 site include several specifically focused on filers and service providers that manage the Form 5500 filing process for employee benefit plans.

- The Guide for Filers and Service Providers provides basic information on EFAST2 for filers and their service providers, including how to become an EFAST2 user and how to use the EFAST2 system once you have filing credentials.
- The EFAST2 Tutorial is a comprehensive online tutorial showing users how to register for an EFAST2 account and credentials. It also walks the user through the EFAST2 workflow process for creating and submitting a filing with IFILE, including how to create and work with supporting schedules.
- The EFAST2 IFILE User Guide provides detailed information and instructions for filers using IFILE. The IFILE feature allows filers to use the EFAST2 Web site to complete the required forms and schedules online in multiple sessions, print a copy for their records, and file it electronically at no cost.
- The EFAST2 Filing Search Guide outlines the process for searching, viewing, and saving filings that are stored electronically under a new EFAST2 “Data Dissemination Service” (DDS) application. The DDS application can be used by both the general public and those who have registered for EFAST2 electronic credentials (though registered users can also access certain filings that are not available to the general public).

Electronic Signature Options

All Form 5500 and Form 5500-SF filings with EFAST2 must be electronically signed. EFAST2 gives you two electronic signature options: (1) the plan administrator can get EFAST signature credentials by registering for an EFAST2 account and electronically sign the Form 5500/Form 5500-SF him or herself; (2) the plan administrator can elect to have a service provider who manages the filing process for the plan get his or her own EFAST2 signing credentials and submit the electronic Form 5500 or Form 5500-SF for the plan.

If you choose the service provider option, the service provider submitting the electronically signed Form 5500 or Form 5500-SF must have specific written authorization from the plan administrator, the plan administrator must manually sign a paper copy of the electronically completed Form 5500 or Form 5500-SF, and a PDF copy of the first two pages of the manually signed Form 5500 or Form 5500-SF must be included as an attachment to the electronic Form 5500 or Form 5500-SF submitted to EFAST2. The plan administrator should also understand that the PDF with his or her manual signature will be posted on the Internet with the remainder of the plan's filing.

IMPORTANT: The plan administrator is required to keep a copy of the Form 5500 and Form 5500-SF, including schedules and attachments, with all required manual signatures as part of the plan's records. The plan administrator also must make a paper copy available on request to participants, beneficiaries, and the DOL as required by section 104 of ERISA and 29 C.F.R. § 2520.103-1. In addition, if your plan is a defined benefit plan and you maintain a company intranet, you must post certain information from the Form 5500 on the company's intranet Web site. Filers may use electronic media for record maintenance and retention, so long as they meet the applicable requirements. See, for example, 29 C.F.R. § 2520.107-1.

For more information on the electronic signature option, see EFAST2 All-Electronic Filing System FAQs at www.dol.gov/ebsa/faqs/faq-EFAST2.html. To obtain an electronic signature, go to www.efast.dol.gov and register in EFAST2 as a signer. You will be provided with a UserID and a PIN. Both the UserID and PIN are needed to electronically sign the Form 5500 or Form 5500-SF.

Identifying Filing Errors

When the Form 5500 is submitted to EFAST2, the data entries will be initially screened. Your entries must satisfy this preliminary screening in order to be received and processed by the EFAST2 system. For example, your entries must be in the proper format in order for the EFAST2 system to receive and process your filing (if a question requires you to enter a dollar amount, you cannot enter a word). If your filing is not submitted by the filing due date in a format that can be received by EFAST2, you may be deemed a non-filer for annual reporting enforcement and penalty purposes.

To reduce the possibility of correspondence and penalties from the DOL, IRS, and/or PBGC, you should check your return/report for filing errors before electronically signing and submitting it to EFAST2 by using the "Validate" function or some type of third-party software error check system. When using IFILE check for errors before electronically signing the form because you will be required to electronically sign again each time after you correct any errors. Third-party software may have this same system.

Once your filing is successfully received, the EFAST2 system notifies the submitter via email that the submission was received and the return/report is ready to be processed. The EFAST2 system will then separately validate the file and generate a filing status report available to the submitter within approximately 20 minutes. You will need to check back with either IFILE or your software vendor to access the filing status report and get a list of any specific errors or warnings that EFAST2 may have identified on your return/report.

The “Acknowledgement Error” messages on the status report will contain the following information:

- General information explaining the error; and,
- Specific information that relates to the edit test failures noted in the filing. This will indicate the reporting deficiency.

You will have to make an amended filing to correct errors or address warnings on your filing status report. Make sure to use the “validate” function to check for and correct errors prior to submitting the filing to reduce the need for amended filings.

If your filing did not contain errors covered by the EFAST2 validation process, the filing status report will report a status of “Filing Received.” Even then, your return/report may be subject to further detailed review by DOL, IRS, and/or PBGC, and your filing may be deemed incomplete, incorrect or otherwise deficient based upon this further detailed review.

EFAST2 Edit Testing

The Form 5500, Form 5500-SF, and their schedules will be subjected to EFAST2 computerized edit tests that concentrate on nine major test functions:

- **Mandatory answer/invalid data.** These tests determine if a filer has failed to answer a required question, has failed to check an appropriate box, or has entered information that is not valid.
- **Math consistency.** These tests are applied to financial statements to ensure the totals and subtotals equal the calculated amounts making up each subtotal and total. A filing fails these tests when the sum of the individual items does not equal the totals or subtotals shown on the form.

- **Missing schedules.** These tests verify that, when a filer answers “Yes” to one or more of the questions on the Form 5500, Form 5500-SF, or their schedules that require the attachment of other schedules or when information on the financial statements indicate that schedules are required to be attached, the schedules are actually attached.
- **Financial activity.** These tests determine if the filer answered the appropriate narrative questions when financial activity took place.
- **Missing amount.** These tests determine if the filer failed to indicate dollar amounts in the space provided after answering “Yes” to questions or marking box(es).
- **Nonexempt.** These tests determine if the filer failed to answer required questions on Schedule H or I.
- **Missing specify/explain information.** These tests determine whether a narrative explanation has been provided with the filing when “specify” or “explain” are indicated on the Form 5500, Form 5500-SF, and schedules.
- **Large plan/DFE financial/transaction information.** These tests determine if the plan/DFE provided the required supplemental schedules.
- **Final report.** This test checks reports identified as a final filing for consistency with answers to certain other questions.

For more information about EFAST2 processing, see the **EFAST2 All-Electronic Filing System FAQs** and other guidance at www.efast.dol.gov.

POTENTIAL FILING ERRORS AND HOW TO AVOID THEM

To help minimize the number of filings that are rejected or that otherwise need to be corrected/amended, the DOL, PBGC, and IRS compiled the following practical, common sense tips for some of the most frequently occurring Form 5500 filing problems.

Follow EFAST2 Electronic Filing Guidance

Whether electronically filing through the EFAST2 Web site's IFILE option or transmitting your Form 5500 via third-party software, failing to follow EFAST2 electronic filing guidance can give rise to many possible errors.

In addition to the other tools described above available on the EFAST2 Web site, the DOL put together a list of the most common EFAST2-related errors to help filers avoid these problems. You can see the list at www.efast.dol.gov/fip/pubs/Most_Common_EFAST2_Errors.pdf. The list includes a description of the filing errors, the error message that will be received when a particular error occurs, and methods for correcting or avoiding the error.

The following tips should also help service providers and plan administrators using EFAST2:

1. A signer only needs to register once even if signing for multiple plans because the EFAST2 signer registration is for an individual, not a plan.
2. When registering for an EFAST2 account, select the role for “filing signer” or “filing author” if in doubt.
3. Account information on the person registering can be changed by clicking on the “User Profile” screen.
4. Filings submitted under the EFAST2 program will be posted on DOL's Web site for general public viewing. Therefore, **do not** submit the new Form 8955-SSA or a Schedule SSA with your filing or any other materials that include social security numbers. Some EFAST2 accounts already have been revoked because they contained this information. The Form 8955-SSA (which replaced the Schedule SSA (Form 5500)) must be filed with the IRS. Do not include social security numbers on the Form 5500, Form 5500-SF, or any schedule or attachment. Because of privacy concerns, the inclusion of a social security number may result in the rejection of the filing. More information about transmitting SSA information to the government can be found at the IRS Web site: <http://www.irs.gov>.
5. Use the EFAST2 “Validate” feature before submitting your filing. If you correct any identified errors, you can avoid having to file an amended return/report to correct the mistake. If a filing is submitted without validation and there are errors, an amended filing must be submitted. There have been many instances where filings had to be amended that could have been avoided if the filing was “validated” first.

6. After the Form 5500 or Form 5500-SF is submitted to EFAST2, make sure the filing status report on the EFAST2 Web site says “Filing Received.” If not, correct the identified errors and submit an amended return.
7. When filing an amended Form 5500 or Form 5500-SF with EFAST2, submit a completed, dated and electronically signed Form 5500 or Form 5500-SF (check Box B(2) in Part I to indicate it is an amended return/report), and refile all schedules and attachments, including those that are not being amended.
8. The Form 5500 or Form 5500-SF will be considered timely filed on the due date if 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 the event the return/reports are timely submitted but not successfully received by EFAST2, the filer should print the “unsuccessful submission” notice from the EFAST2 Web site and attach it to the resubmitted report as an “other attachment.” Depending on the reason for the unsuccessful submission, the administrator may still be subject to civil penalties if the resubmission is made after the deadline.

The Form 5500 or Form 5500-SF must be properly signed and dated.

Remember, even though you must file electronically with EFAST2, the plan must keep in its records an original copy of the Form 5500 filing with all required signatures. Make sure that you have the proper signatures and dates on the Form 5500, Form 5500-SF, and any attached schedules that require a signature (Schedules MB and SB).

The Form 5500 must have the proper EIN and Plan Number (PN).

1. It is critical that the Employer Identification Number (EIN) used to identify the “plan sponsor” be correct and the same year to year when completing line 2b of the Form 5500 or Form 5500-SF. Switching EINs without reporting the change on line 4 of the Form 5500 or Form 5500-SF will disrupt proper processing of your filing. Also, the same EIN must go on Line D of all the attached schedules.
2. A multiple-employer plan or plan of a controlled group of corporations should select one of the participating employers to list as the plan sponsor and use that employer’s EIN on line 2b. If the plan sponsor is a group of individuals (e.g., a board of trustees of a collectively bargained plan) get a single EIN for the group. In the case of a Form 5500 filed for a Direct Filing Entity (DFE), use the EIN assigned to the CCT, PSA, MTIA, 103-12 IE, or GIA.
3. The three-digit plan number (PN), in conjunction with the EIN, is used as a unique 12-digit number to identify the plan or DFE. Although EINs are obtained from the IRS, the plan sponsor/ employer or plan administrator assigns the PN. Also, once a three-digit plan number and your EIN is used for one plan or DFE it cannot be used for any other of your plans or DFEs, even after the plan or DFE terminates.
4. Plan administrators, plan sponsor/employers and DFE sponsors should assign PNs as follows. Plans providing pension benefits (such as profit-sharing or money purchase plans) should be assigned plan numbers starting with 001 and consecutive numbers should be assigned to other pension plans (e.g., 001, 002, 003, etc.). The sponsor of an MTIA, CCT, PSA or 103-12 IE

filing as a DFE should also start with number 001 and consecutive numbers should be assigned to other DFEs of the sponsor. Welfare plans and group insurance arrangements (GIAs) filing as DFEs should be assigned plan numbers starting with 501 and consecutive numbers should be assigned to other welfare plans and GIAs (e.g., 501, 502, 503, etc.). Do not use 888 or 999 as a PN.

5. Consult the Form 5500 instructions for line 1b and 2b in Section 5, “Line-by-Line Instructions”, for additional information on EINs and PNs. The instructions for Line 2b include information on how to obtain EINs from the IRS.

File all the required schedules and attachments with your Form 5500.

1. Make sure you are filing all the required schedules and attachments with your Form 5500 (including the report of the independent qualified public accountant, if applicable). Required schedules and attachments must be completed according to the instructions and included with the electronic filing. The Form 5500 instructions, under the heading “What to File,” break down filing requirements based on type of filer (large plan, small plan, pension plan, welfare plan, or DFE), and include a *Quick Reference Chart* that lists each of the Form 5500 schedules and identifies who has to file them.
2. Submit all schedules for which a box is checked on Form 5500, Part II, line 10. If you check a box indicating that a schedule is attached, the schedule must be submitted with your Form 5500. Do not submit unnecessary or blank schedules.
3. If you are filing Schedule A, take special care to enter the total number of these schedules you are filing in the space provided on Line 10.

4. The EFAST2 FAQs explain how filers should submit electronic attachments (including instructions on handling attachments required to be submitted as separate files that are included in the plan’s actuarial report or auditor’s report). The FAQs also address the use of digital IDs (instead of password-protected PDFs).
5. Remember when creating electronic attachments that all information contained in all attachments must be legible.

Do not submit an incomplete Form 5500.

The forms you file, among other things, will be subjected to an initial scan to determine that forms have been properly filed electronically and then may be subjected to a review that includes the checking of specific data elements as well as checking for omissions, such as missing signature, missing financial data, missing IQPA’s report, and missing fiscal year beginning and ending dates.

The Form 5500 filing may not be for a period greater than 12 months.

1. Be certain the time period entered in Part I of the Form 5500 or the Form 5500-SF is not greater than twelve months. If the plan year is a calendar year (January 1 through December 31) the spaces provided for dates in Part I may be left blank. If the plan or DFE is not reporting on a calendar year basis, but instead using a fiscal year, then input the twelve-month (or shorter) fiscal year period in the spaces provided. Example: fiscal year beginning 07/01/2009 and ending 06/30/2010.
2. Make certain that there is no gap between the ending date of your previous year’s Form 5500 and the beginning date of the current year’s form. Take special care if filing a Form 5500 for a short plan year (a plan or DFE year of less than twelve months), for instance, if the plan or DFE changes from a calendar year

to a non-calendar fiscal year. In that case, the beginning date entered on the “short plan year” Form 5500 should be one day after the ending date of the previous year’s Form 5500 and the ending date should be one day before the beginning date entered on the next year’s Form 5500. In addition, Line B(4) should be checked on the short plan year Form 5500. Please refer to the Form 5500 filing instructions, under the heading “Change in Plan Year” in Section 3, Electronic Filing Requirement, for additional information.

3. The plan year beginning and ending date on all attached Schedules must match the plan year beginning and ending dates on Part I of the Form 5500.

Do not file a Form 5500 or Form 5500-SF as a “final return/report” if the plan has assets, liabilities or participants at the end of the plan year.

1. Even if you consider a plan to have been terminated, a Form 5500 and all necessary schedules are required to be filed until all assets have been distributed to the participants, legally transferred to the control of another plan, or in the case of a welfare plan reverted to the employer; and all liabilities for which benefits may be paid under a welfare benefit plan have been satisfied. Except as noted below for certain defined benefit pension plans, a plan should not check the “final return/report” box on Line B(3) of the Form 5500 or Form 5500-SF and report having participants at year-end or report having assets and liabilities at the end of the year on the Schedule H or I.
2. If a trustee is appointed for a terminated defined benefit plan subject to ERISA section 4042, the last year for which a return/report must be filed is the year in which the trustee is appointed. For the final reporting year, check the “final return/report” box on

line B(3) of the Form 5500, report the number of participants as of the end of the year on line 6 on the Form 5500, enter Code 1H on line 8a of the Form 5500, and report the value of the assets and liabilities at the end of the year on the Schedule H or I, as applicable.

3. A welfare plan that does not expect to file a Form 5500 for the next plan year because the plan has become eligible for the Form 5500 filing exemption for small unfunded, insured or combination unfunded and insured welfare plans should not check Line B(3) on the Form 5500 but should enter Code 4R on line 8b.

Use a proper business code when completing Line 2d of the Form 5500.

1. On Form 5500, Line 2d, and Form 5500-SF, Line 2d, be certain to enter a valid business code that best describes the nature of the plan sponsor’s business.
2. The only business codes that are valid for use in answering Line 2d are listed in the Form 5500 and Form 5500-SF instructions section marked “Codes for Principal Business Activity”. If more than one employer and/or employee organization is involved, the business code for the main business activity of the employers and/or employee organizations should be entered.
3. Business codes may change from year to year. Therefore, the business code used for your last year’s filing may not be a valid business code for the current year filing (e.g., if filing a 2010 Form 5500, the business code you select should be one of the business codes from the 2010 instructions).

Use the correct Plan Characteristics Codes on the Form 5500.

1. On Form 5500, Line 8 and Form 5500-SF, Line 9, you must indicate if the plan is providing pension benefits, welfare benefits, or both pension and welfare benefits.
2. You must enter all applicable Plan Characteristics Codes in the spaces provided. These codes describe the type of pension and/or welfare benefits provided and other features of the plan. A list and description of the Plan Characteristics Codes is in the Instructions for the Form 5500 and the Form 5500-SF.
3. An individual account pension plan like a money purchase plan or profit sharing plan (including a 401(k) arrangement) should enter the appropriate “Defined Contribution Pension Features” and “Other Pension Benefit Features” codes that are listed in the Form 5500 instructions. Individual account plans would not normally enter codes for “Defined Benefit Pension Features,” such as 1A, 1B, or 1C.

Properly identify the Funding and Benefit Arrangements on Line 9 of the Form 5500 and Form 5500-SF.

1. Indicate all the proper Funding and Benefit Arrangements on Form 5500 and Form 5500-SF, Lines 9a and 9b. The “Funding Arrangement” is the method used for the receipt, holding, investment, and transmittal of plan assets prior to the time the plan actually provides benefits. The “Benefit Arrangement” is the method by which the plan provides benefits to participants.
2. The responses on Lines 9a and 9b are cross-referenced for Form 5500 filers against information on Schedules H, I, and/or A, as appropriate. Be careful to attach the appropriate

financial or insurance schedule (H, I, A) that corresponds to the Benefit and Funding Arrangements you indicate. For instance, if “Trust” is indicated as an Arrangement, then a Schedule H or I (as appropriate) should be submitted with the Form 5500. Likewise if you indicate “insurance” as a Funding and/or Benefit Arrangement, a Schedule A should be filed with Form 5500 for any insurance contract with a contract or policy year that ended with or within the plan year.

3. Please refer to the Form 5500 and Form 5500-SF filing instructions “Line-by-Line Instructions,” for a description of the Funding and Benefit Arrangements.

File the appropriate Financial Information Schedule with your Form 5500.

1. Make sure you file the proper Financial Information Schedule with your Form 5500. The Schedule H is for “large plan” filers (generally plans with 100 or more participants at the beginning of the plan year) and all DFEs. The Schedule I is for “small plan” filers (generally plans with fewer than 100 participants at the beginning of the plan year) that are not eligible to file the Form 5500-SF.
2. If you filed as a “small plan” last year and the number of plan participants is fewer than 121 at the beginning of this plan year, you may continue to file this year Schedule I, or if eligible the Form 5500-SF, as a “small plan” under the “80-120 Participant Rule.” Please consult Section 4 of the Instructions for Form 5500 under the “What to File” heading for more information on the “80-120 Participant Rule.” This rule allows plans with between 80 and 120 participants at the beginning of the plan year to file the Form 5500 in the same category (“large plan” or “small plan”) as the prior year filing.

3. Certain IRA pension plans, fully insured pension plans, and large welfare plans that are insured, unfunded, or combination insured/unfunded do not have to file Schedule H or I. Please consult Section 4, under the heading “Limited Pension Plan Reporting” and “Welfare Benefit Plan Filing Requirements” in the Instructions for Form 5500, for additional information and eligibility requirements.
4. If you are filing Schedule H or I, make certain that all required information provided is accurate and complete. Make sure the spaces on the asset/liability and income/expense statements (lines 1 and 2) on the Schedule H and I that require a total from the lines above are completed accurately. To enter zero or none for monetary amounts, you may enter a “0” or leave the line blank, unless the instructions require that a “0” be entered.

Schedule H:

- If Schedule H is filed, Part III of the schedule, regarding the IQPA's report and opinion, must be completed. The report of the IQPA identified on Line 3 must be attached to the Form 5500 unless Line 3d(1) or 3d(2) (3b(1) or 3b(2) on 2002 or prior year forms) is correctly checked.
- Plans filing Schedule H must answer all items in Part IV, Lines 4a through 4n and Line 5a, except as provided in the instructions. Check either “yes” or “no” as appropriate, and, where applicable, enter the dollar amounts or other information that is required. Except in the case of Line 4n, which may be left blank if Line 4m is answered “No,” not responding to an item may cause the filing to be rejected.
- MTIAs, 103-12 IEs, PSAs, and GIAs do not need to complete certain line items on the Schedule H. Please consult the Schedule H and its instructions for additional information.

Schedule I:

- When filing Schedule I, be certain that the amounts entered on Part I, lines 3a through 3g (Specific Assets of the Plan) are the year-end values for the assets. The purchase price for an asset that was purchased during the plan year is not necessarily the year-end value. Also, if the plan sold an asset reportable on lines 3a through 3g during the plan year, a “0” should be entered on the appropriate line in the amount column if there were no other asset values to report on that line.
- The amounts entered on Schedule I, Line 3f, “Loans (other than to participants),” should be the value of the loans that are an asset of the plan. Loans are assets to be reported on line 3f if the plan loaned the amounts (other than participant loans) or purchased loans originated by a third party. Do not include amounts the plan borrowed; amounts the plan owes should be reported as a liability on Schedule I, line 1b.
- Plans completing Schedule I must answer all items in Part II, Lines 4a through 4n and Line 5, except as provided in the instructions. Check either “yes” or “no” as appropriate, and, where applicable, enter the dollar amounts or other information that is required. Except in the case of Line 4n, which may be left blank if Line 4m is answered “No,” not responding to an item may cause the filing to be rejected.

Completely Answer Multiple Part Questions

For all multiple part questions, you must answer all parts as directed. The EFAST2 computerized edit program is designed to identify any multiple part questions that have not been completely answered.

COMPLIANCE/PENALTY SANCTIONS

There are various penalties (summarized in the Form 5500 and Form 5500-SF instructions) that may be assessed or imposed for failing to comply with the annual reporting requirements. The Department of Labor has authority to assess civil penalties of up to \$1,100 per day (or a higher amount if adjusted pursuant to the Federal Civil Penalties Inflation Adjustment Act of 1990, as amended) per annual report against plan administrators who fail or refuse to comply with all annual reporting requirements. These Department of Labor civil penalty sanctions apply with respect to annual reports required to be filed for plan years beginning on or after January 1, 1988.

Voluntary Compliance

If the filing status report on the EFAST2 Web site regarding a filing indicates that some of the required information was omitted, or the information furnished was not consistent with the instructions or with other information reported on the form, the filer can submit an amended filing that corrects the identified errors or omissions. When filing an amended Form 5500 or Form 5500-SF with EFAST2, submit a completed, dated and electronically signed Form 5500 or Form 5500-SF (check Box B(2) in Part I to indicate it is an amended return/report), and refile all schedules and attachments, including those that are not being amended.

If you receive correspondence from the government regarding errors or omissions in your filing, respond promptly.

Also, in an effort to encourage pension and welfare plan administrators to file overdue annual reports, EBSA maintains

a Delinquent Filer Voluntary Compliance Program (DFVCP) that provides delinquent plan administrators with the opportunity to pay reduced civil penalties for voluntarily complying with the annual reporting requirements. For further information concerning the DFVC Program, you may check the EFAST2 site at www.efast.dol.gov or call 1-866-GO-EFAST.

EBSA has provided an online calculator, available at www.dol.gov/ebsa/calculator/dfvcmain.html, to compute the penalties due under the DFVC program. To submit payments under the DFVC Program electronically go to www.dol.gov/ebsa and follow the directions provided.

Civil Penalty Sanctions

If voluntary compliance is not achieved, the Secretary of Labor may assess a civil penalty of up to \$1,100 a day (or a higher amount if adjusted pursuant to the Federal Civil Penalties Inflation Adjustment Act of 1990, as amended) from the date of a plan administrator's failure or refusal to file the annual report required to be filed with the Secretary under ERISA section 101(b). For purposes of this paragraph, an annual report that has been rejected under ERISA section 104(a)(4) for failure to provide "material information" shall not be treated as having been filed with the Secretary of Labor.

Under the Department of Labor's implementing regulations, the penalty is computed from the original due date of the return/report on which the administrator failed or refused to file the required information and continues until a satisfactory annual report is filed.

The regulation defines “a failure or refusal to file” as a failure or refusal to file, in whole or in part, the information required by ERISA and the DOL’s regulations at the time and in the manner prescribed for annual report filings. The regulation also allows the DOL, at its discretion, to waive all or part of a penalty if an administrator files a timely statement showing reasonable cause for failure to file a complete report when due. The period during which a statement of reasonable cause is being considered by the DOL will not be taken into account for purposes of computing the penalty.

WHAT TO FILE -- THE 2009 and 2010 FORM 5500 AND FORM 5500-SF

The **Quick Reference Chart** and **Checklists** in this section were prepared to help filers understand the structure of the 2009 and 2010 Form 5500 and Form 5500-SF annual reports, and give them tools to use in making sure they include the proper schedules with their annual report filing. Not all rules or requirements are reflected, and not all individual line items are discussed individually. These tools are not a legal interpretation of ERISA. Filers should carefully read the instructions to the Form 5500 and the Form 5500-SF and applicable regulations for complete information on annual reporting and filing requirements.

Quick Reference Chart of Form 5500, Schedules, and Attachments (Not Applicable for Form 5500-SF Filers)¹

	Large Pension Plan	Small Pension Plan²	Large Welfare Plan	Small Welfare Plan²	DFE
Form 5500	Must complete.	Must complete.	Must complete. ³	Must complete. ³	Must complete.
Schedule A (Insurance Information)	Must complete if plan has insurance contracts.	Must complete if plan has insurance contracts. ⁴	Must complete if plan has insurance contracts.	Must complete if plan has insurance contracts. ⁴	Must complete if MTIA, 103-12 IE, or GIA has insurance contracts.
Schedule C (Service Provider Information)	Must complete Part I if service provider was paid \$5,000 or more, Part II if a service provider failed to provide information necessary for the completion of Part I, and Part III if an	Not required.	Must complete Part I if service provider was paid \$5,000 or more, Part II if a service provider failed to provide information necessary for the completion of Part I, and Part III if an	Not required.	MTIAs, GIAs, and 103-12 IEs must complete Part I if service provider paid \$5,000 or more, and Part II if a service provider failed to provide information necessary for the completion of Part I.

Quick Reference Chart of Form 5500, Schedules, and Attachments (Not Applicable for Form 5500-SF Filers) cont.

	Large Pension Plan	Small Pension Plan ²	Large Welfare Plan	Small Welfare Plan ²	DFE
	accountant or actuary was terminated.		accountant or actuary was terminated.		GIAs and 103-12 IEs must complete Part III if accountant was terminated.
Schedule D (DFE/Participating Plan Information)	Must complete Part I if plan participated in a CCT, PSA, MTIA, or 103-12 IE.	Must complete Part I if plan participated in a CCT, PSA, MTIA, or 103-12 IE. ⁴	Must complete Part I if plan participated in a CCT, PSA, MTIA, or 103-12 IE.	Must complete Part I if plan participated in CCT, PSA, MTIA, or 103-12 IE. ⁴	All DFEs must complete Part II, and DFEs that invest in a CCT, PSA, or 103-12 IE must also complete Part I.
Schedule G (Financial Schedules)	Must complete if Schedule H, lines 4b, 4c, or 4d are “Yes.”	Not required.	Must complete if Schedule H, lines 4b, 4c, or 4d are “Yes.” ³	Not required.	Must complete if Schedule H, lines 4b, 4c, or 4d for a GIA, MTIA, or 103-12 IE are “Yes.”
Schedule H (Financial Information)	Must complete. ⁵	Not required.	Must complete. ^{3, 5}	Not required.	All DFEs must complete Parts I, II, and III. MTIAs, 103-12 IEs, and GIAs must also complete Part IV. ⁵
Schedule I (Financial Information)	Not required.	Must complete. ⁴	Not required.	Must complete. ⁴	Not required.
Schedule MB (Actuarial Information)	Must complete if multiemployer defined benefit plan or money	Must complete if multiemployer defined benefit plan or money	Not required.	Not required.	Not required.

Quick Reference Chart of Form 5500, Schedules, and Attachments (Not Applicable for Form 5500-SF Filers) cont.

	Large Pension Plan	Small Pension Plan ²	Large Welfare Plan	Small Welfare Plan ²	DFE
	purchase plan subject to minimum funding standards. ⁶	purchase plan subject to minimum funding standards. ⁶			
Schedule R (Pension Plan Information)	Must complete. ⁷	Must complete. ^{4, 7}	Not required.	Not required.	Not required.
Schedule SB (Actuarial Information)	Must complete if single-employer or multiple-employer defined benefit plan and subject to minimum funding standards.	Must complete if single-employer or multiple-employer defined benefit plan and subject to minimum funding standards.	Not required.	Not required.	Not required.
Accountant's Report	Must attach.	Not required unless Schedule I, line 4k, is checked "No."	Must attach. ³	Not required.	Must attach for a GIA or 103-12 IE.

¹ This chart provides only general guidance. Not all rules and requirements are reflected. Refer to specific Form 5500 instructions for complete information on filing requirements (e.g., *Who Must File* and *What To File*). For example, a pension plan is exempt from filing any schedules if the plan uses Code section 408 individual retirement accounts as the sole funding vehicle for providing benefits. See *Limited Pension Plan Reporting*.

² Pension plans and welfare plans with fewer than 100 participants at the beginning of the plan year that are not exempt from filing an annual return/report may be eligible to file the Form 5500-SF, a simplified report. In addition to the limitation on the number of participants, a Form 5500-SF may only be filed for a plan that is exempt from the requirement that the plan's books and records be audited by an independent qualified public accountant (but not by reason of enhanced bonding), has 100 percent of its assets invested in certain secure investments with a readily determinable fair market value, holds no employer securities, and is not a multiemployer plan. See *Who Must File*.

³ Unfunded, fully insured, or combination unfunded/fully insured welfare plans covering fewer than 100 participants at the beginning of the plan year that meet the requirements of 29 CFR 2520.104-20 are exempt from filing an annual report. See *Who Must File*. Such a plan with 100 or more participants must file an annual report, but is exempt under 29 CFR 2520.104-44 from the accountant's report requirement and completing Schedule H, but MUST complete Schedule G, Part III, to report any nonexempt transactions. See *What To File*.

⁴ Do not complete if filing the Form 5500-SF instead of the Form 5500.

⁵ Schedules of assets and reportable (5%) transactions also must be filed with the Form 5500 if Schedule H, line 4i or 4j is "Yes."

⁶ Money purchase defined contribution plans that are amortizing a funding waiver are required to complete lines 3, 9, and 10 of the Schedule MB in accordance with the instructions. Also see instructions for line 5 of Schedule R and line 12a of Form 5500-SF.

⁷ A pension plan is exempt from filing Schedule R if all of the following conditions are met:

- The plan is not a defined benefit plan or otherwise subject to the minimum funding standards of Code section 412 or ERISA section 302.
- No plan benefits that would be reportable on line 1 of Part I of this Schedule R were distributed during the plan year. See the instructions for Schedule R, Part I, line 1, below.
- No benefits, as described in the instructions for Schedule R, Part I, line 2, below, were paid during the plan year other than by the plan sponsor or plan administrator. (This condition is not met if benefits were paid by the trust or any other payor(s) which are reportable on IRS Form 1099-R, Distributions From Pensions, Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance Contracts, etc., using an EIN other than that of the plan sponsor or plan administrator reported on line 2b or 3b of Form 5500.)
- Unless the plan is a profit sharing, ESOP or stock bonus plan, no plan benefits of living or deceased participants were distributed during the plan year in the form of a single-sum distribution. See the instructions for Schedule R, Part I, line 3, below.
- The plan is not an ESOP.
- The plan is not a multiemployer defined benefit plan.

Small Pension Plan Checklist – Small pension plans must file either the Form 5500 and its schedules and attachments or, if eligible, the Form 5500-SF and any applicable schedule. Complete the lines on the Form 5500-SF or Form 5500 and applicable schedules and provide any statements and attachments in accordance with the instructions.

Form 5500-SF: An annual return/report for a small employee pension benefit plan that is eligible and chooses to file a Form 5500-SF consists of:

- Form 5500-SF (be certain to enter all applicable plan characteristics codes on line 9); and
- Schedule MB or SB, if applicable, to report actuarial information.

Form 5500: An annual return/report for a small employee pension benefit plan filing a Form 5500 consists of:

- Form 5500 (be certain to enter all applicable plan characteristics codes on line 8);
- Schedule A, if applicable, as many as needed to report insurance contract information, including annuity and investment contracts;
- Schedule SB or MB, if applicable, to report actuarial information (and any required attachments thereto);
- Schedule D, Part I, if applicable, to list all CCTs, PSAs, MTIAs, and 103-12 IEs in which the plan participated or invested during the year;
- Schedule I, to report small plan financial information;
- Schedule R, if applicable, to report retirement plan information;
- IQPA report if the plan does not meet the conditions for the small plan audit waiver. (See instructions for Schedule I, line 4k); and
- Schedule of Delinquent Participant Contributions, if applicable (see Schedule I instructions).

Certain pension plans using individual retirement accounts or annuities described in Code section 408 as the sole funding vehicle for providing benefits need only complete Form 5500, Part I and Part II, lines 1 through 4 and 8 (enter pension feature code 2N). Fully insured pension plans described in the instructions for *Limited Pension Plan Reporting* are exempt from attaching Schedule H and an accountant's opinion, and from the requirement to engage an IQPA. See the instructions for *Limited Pension Plan Reporting*. **Caution:** Code section 403(b) plans are no longer eligible for special limited financial reporting and must file the full Form 5500 or, if eligible, the Form 5500-SF.

Small Welfare Plan Checklist – Small welfare plans not exempt from filing must file either the Form 5500 and its schedules and attachments or, if eligible, the Form 5500-SF. Complete the lines on these forms and schedules and provide any statements and attachments in accordance with the instructions. A welfare benefit plan that covered fewer than 100 participants as of the beginning of the plan year and that is unfunded, fully insured, or a combination of unfunded and insured is exempt from filing the Form 5500 and Form 5500-SF. See the instructions to the forms and the DOL regulation at 29 C.F.R. § 2520.104-20.

Form 5500-SF: An annual report for a small employee welfare benefit plan filing a Form 5500-SF consists of the Form 5500 SF (enter all applicable plan characteristic codes on line 9).

Form 5500: An annual report for a small employee welfare benefit plan filing a Form 5500 consists of:

- Form 5500 (enter all applicable plan characteristics codes on line 8);
- Schedule A, if applicable, as many as needed to report insurance contract information;
- Schedule D, Part I, if applicable, to list all CCTs, PSAs, MTIAs, and 103-12 IEs in which the plan participated or invested during the year;
- Schedule I, to report small plan financial information; and
- Schedule of Delinquent Participant Contributions, if applicable (see Schedule I instructions for line 4a).

Large Pension Plan Checklist - Complete the lines on the Form 5500 and schedules and provide any statements and attachments in accordance with the instructions. An annual return/report for a large employee pension benefit plan consists of:

- Form 5500 (be certain to enter all applicable plan characteristics codes on line 8);
- Schedule A, if applicable, as many as needed to report insurance contract information, including annuity and investment contracts;
- Schedule C, if applicable, to report information on service providers and, if applicable, any terminated accountants or enrolled actuaries;
- Schedule D, Part I, if applicable, to list all CCTs, PSAs, MTIAs, and 103-12 IEs in which the plan participated or invested during the year;
- Schedule G, if applicable, to report loans, leases and fixed income obligations in default or uncollectible, and prohibited transactions;
- Schedule H, to report large plan financial information;
- Schedule MB or SB, if applicable, to report actuarial information (and any required attachments thereto);
- Schedule R, if applicable, to report retirement plan information;
- Schedule of Delinquent Participant Contributions, if applicable (see Schedule H instructions);
- Schedules of Assets Held for Investment Purposes and Reportable Transactions (see Schedule H instructions for lines 4); and
- Report of IQPA identified on Schedule H, line 3c, unless Schedule H, line 3d(2) is correctly checked.

Large Welfare Plan Checklist - Complete the lines on the Form 5500 and schedules and provide any statements and attachments in accordance with the instructions. An annual report for a large employee welfare benefit plan consists of:

- Form 5500 (enter all applicable plan characteristics codes on line 8);
- Schedule A, if applicable, as many as needed to report insurance contract information;
- Schedule C, if applicable, to report information on service providers and any terminated accountants or actuaries;
- Schedule D, Part I, if applicable, to list all CCTs, PSAs, MTIAs and 103-12 IEs in which the plan participated or invested during the year;

- Schedule G, if applicable, to report loans, leases and fixed income obligations in default or uncollectible, and prohibited transactions;
- Schedule H, to report large plan financial information, unless exempt;
- Schedule of Delinquent Participant Contributions, if applicable (see Schedule H instructions for line 4a);
- Schedules of Assets Held for Investment Purposes and Reportable Transactions (see Schedule H instructions for lines 4i and j); and
- Report of the IQPA identified on Schedule H, line 3c, unless Schedule H, line 3d(2) is correctly checked.

Note: A large unfunded, fully insured or combination unfunded/insured welfare plan that meets the conditions of 29 CFR 2520.104-44 is not required to file the Schedule H, schedules of assets held for investment purposes and reportable transactions, and the IQPA report. Welfare plans not required to file a Schedule H, generally, also do not need to file a Schedule C. A Schedule G still must be attached to this Form 5500 to report any nonexempt transactions.

Direct Filing Entities Checklists – A Form 5500 filed for a Master Trust Investment Account (MTIA), Common/Collective Trust (CCT), Pooled Separate Account (PSA), 103-12 Investment Entity (103-12 IE) or Group Insurance Arrangement (GIA) is considered part of the annual report of participating or investing pension and welfare plans. If the Form 5500 filed by the DFE is incomplete or inaccurate, the participating or investing plans’ annual reporting requirements may not be met and the administrator of these plans may be subject to penalties for noncompliance. The reporting requirements for a DFE are based upon the type of DFE as follows:

MTIA - Complete the lines on the Form 5500 and schedules and provide any statements and attachments in accordance with the instructions. An annual report for an MTIA consists of:

- Form 5500, enter the letter “M” in Part 1, line A; skip lines C, D, 1c, 2d and 5 through 9;
- Schedule A, if applicable, as many as needed to report insurance contract information;
- Schedule C, if applicable, to report service provider information. Part III is not required for MTIAs;
- Schedule D, Part II, to list all plans that participated in the MTIA and, if applicable, Part I, to list all CCTs, PSAs, and 103-12 IEs in which this MTIA invested during the year;
- Schedule G, if applicable, to report loans leases and fixed income obligations in default or uncollectible, and prohibited transactions;
- Schedule H, to report financial information, except lines 1b(1), 1b(2), 1c(8), 1g, 1h, 1i, 2a, 2b(1)(E), 2e, 2f, 2g, 4a, 4e, 4f, 4g, 4h, 4k, 4l, 4m, 4n, and 5. A report of an IQPA is not required for a MTIA (check Schedule H, line 3d(1)); and
- Schedules of assets held for investment purposes and reportable transactions (see Schedule H instructions for line 4).

CCT or PSA - Complete the lines on the Form 5500 and schedules and provide any statements and attachments in accordance with the instructions. An annual report for a CCT or PSA consists of:

- Form 5500, enter the applicable letter “C” or “P” in Part 1, line A; skip lines C, D, 1c, 2d and 5 through 9;
- Schedule D, Part II, to list all plans that invested in the CCT or PSA and, if applicable, Part I, to list all CCTs, PSAs and 103-12 IEs in which this CCT or PSA invested during the year; and
- Schedule H to report financial information, except do not complete lines 1b(1), 1b(2), 1c(8), 1d, 1e, 1g, 1h, 1i, 2a, 2b(1)(E), 2e, 2f, and 2g. Also do not complete Part IV. A report of an IQPA is not required for a CCT or PSA (check Schedule H, line 3d(1)).

103-12 IE - Complete the lines on the Form 5500 and schedules and provide any statements and attachments in accordance with the instructions. An annual report for a 103-12 IE consists of:

- Form 5500, enter the letter “E” in Part I, line A; skip lines C, D, 1c, 2d and 5 through 9;
- Schedule A, if applicable, as many as needed to report insurance contract information;
- Schedule C, if applicable, to report service provider information and any terminated accountants;
- Schedule D, to list all plans that participated in the 103-12 IE and, if applicable, to list all CCTs, PSAs and 103-12 IEs in which this 103-12 IE invested during the 103-12 IE year;
- Schedule G, if applicable, to report loans leases and fixed income obligations in default or uncollectible, and prohibited transactions;
- Schedule H to report financial information, except do not complete lines 1b(1), 1b(2), 1c(8), 1d, 1e, 1g, 1h, 1i, 2a, 2b(1)(E), 2e, 2f, 2g, 4a, 4e, 4f, 4g, 4h, 4j, 4k, 4l, 4m, 4n, and 5;
- Schedules of assets held for investment purposes (see Schedule H instructions for line 4i); and
- Report of the IQPA identified on Schedule H, line 3c.

GIA - Complete the lines on the Form 5500 and schedules and provide any statements and attachments in accordance with the instructions. An annual report for a GIA consists of:

- Form 5500, enter the letter “G” in Part 1, line A and skip lines C and 2d;
- Schedule A, as many as needed, to report insurance contract information;
- Schedule C, if applicable, to report service provider information and any terminated accountants;
- Schedule D, to list all plans that participated in the GIA and, if applicable, to list all CCTs, PSAs and 103-12 IEs in which this GIA invested during the GIA year;

- Schedule G, if applicable, to report loans leases and fixed income obligations in default or uncollectible, and prohibited transactions;
- Schedule H, except lines 4a, 4e, 4f, 4g, 4h, 4k, 4m 4n, and 5, to report financial information;
- Schedules of assets held for investment purposes and reportable transactions (see Schedule H instructions); and
- The report of the IQPA identified on Schedule H, line 3c.

LINE BY LINE GUIDE FOR COMPLETING FORM 5500-SF

(Short Form Annual Return/Report of Small Employee Benefit Plan)³

Line Item	Who Must Complete	How to Complete
Top of Form - Plan year information	Eligible small pension and welfare plans may file the Form 5500-SF instead of the Form 5500 and its schedules and attachments	Enter the plan year being reported if not a calendar year (e.g., March 31, 2009, to March 30, 2010).
A	All	Check only one box to indicate the type of filer.
B (the first return/report)	All	Check this box if a Form 5500 or Form 5500-SF has not been previously filed for this plan. For purposes of completing this box, the Form 5500 EZ is not considered an annual return/report.
B (an amended return/report)	All	Check box if this Form 5500-SF amends a Form 5500 or Form 5500-SF previously filed for this year, and follow the Form 5500-SF instructions.
B (the final return/report)	All	Check box if this is the final Form 5500-SF required to be filed for the plan or arrangement. A plan or arrangement with participants, assets and/or liabilities at the end of the plan year should not check this box. A plan or arrangement that will be filing a Form 5500 for the next plan year should not check this box.
B (a short plan year return/report—less than 12 months)	All	Check box if this Form 5500-SF is for a period of less than 12 months. Show the dates in the space provided. The beginning and ending dates of the plan year must be entered at the top of the form in Part I, above line A.
C	All	Check appropriate box if you filed for an extension of time using Form 5558, are filing using the automatic extension of time to

³ Certain “one-participant plans” may choose to file the Form 5500-SF instead of the Form 5500-EZ. See *Who May File Form 5500-SF* and *Specific Instructions for Only “One-Participant Plans”* in the Form 5500-SF instructions. **Note:** Filing requirements for “one-participant plan” filers that are not subject to Title I of ERISA differ from the filing requirements of small pension and welfare plans and are beyond the scope of this guide. For more information, see the instructions for the Form 5500-SF, the instructions for the Form 5500-EZ or contact the Internal Revenue Service.

LINE BY LINE GUIDE FOR COMPLETING FORM 5500-SF

(Short Form Annual Return/Report of Small Employee Benefit Plan), CONT.

Line Item	Who Must Complete	How to Complete
		file the Form 5500-SF until the due date of the Federal income tax return of the employer, are filing under the DFVC program, or are filing using a special extension of time to file that has been announced by the IRS, DOL, or PBGC. If you checked that you are using a special extension of time, enter a description of the extension of time in the space provided.
1a	All	Enter formal name of plan or enough information to identify the plan. You may abbreviate. Make sure any abbreviations are consistent.
1b	All	Enter the three digit plan or entity number (PN) that the employer or plan administrator assigned to the plan. This number, in conjunction with the employer identification number (EIN) entered on line 2b, is a unique 12-digit number used to identify the plan.
1c	All	Enter the date the plan first became effective.
2a	All	Enter the plan sponsor's name and address. If the plan covers only the employees of one employer, enter the employer's name. For a multiple-employer plan, if an association or similar entity is not the sponsor, enter the name of a participating employer. A plan of a controlled group of corporations should enter the name of one of the sponsoring members. The same name must be used in all subsequent filings.
2b	All	Enter the nine digit employer identification number (EIN) assigned to the plan sponsor/employer.
2c	All	Enter the sponsor's telephone number.

LINE BY LINE GUIDE FOR COMPLETING FORM 5500-SF

(Short Form Annual Return/Report of Small Employee Benefit Plan), CONT.

Line Item	Who Must Complete	How to Complete
2d	All	Enter the six digit business code that best describes the nature of the plan sponsor's business (the main business activity) from the list of business codes in the Form 5500-SF instructions.
3a-3c	All	Enter the name, address, EIN, and telephone number of the plan administrator. If the administrator is the sponsor identified in item 2, the word "same" should be entered on line 3a and lines 3b and 3c should be blank.
4	All	If the name and/or EIN of the plan sponsor has changed since the last return/report filed for this plan, enter the name, EIN, and PN from the last return/report.
5a	All	Enter correct number. If Line 5a exceeds 120 participants, you may not file the Form 5500-SF and must file a Form 5500 for the plan.
5b	All	Enter correct number.
5c	Defined contribution pension benefit plans	Enter correct number.
6a	All	Check "Yes" if the plan's assets were invested in eligible assets. See the Form 5500-SF instructions for the definition of "eligible plan assets." If "No" is checked, you may not file the Form 5500-SF and must file a Form 5500 for the plan.
6b	All	Check "Yes" if the plan is exempt from the report of an IQPA under 29 CFR 2520.104-46. If "No" is checked, you may not file the Form 5500-SF and must file a Form 5500 for the plan.

LINE BY LINE GUIDE FOR COMPLETING FORM 5500-SF

(Short Form Annual Return/Report of Small Employee Benefit Plan), CONT.

Line Item	Who Must Complete	How to Complete
7a	All	Enter beginning and end of year total assets. (If zero, enter "0".)
7b	All	Enter beginning and end of year total liabilities. (If zero, enter "0".)
7c	All	Subtract line 7b from line 7a and enter result. (If zero, enter "0".)
8a	All	Enter contributions received or receivable, depending on accounting method being used. Negative entries may result in correspondence.
8b	All	Enter the amount.
8c	All	Enter total of all cash contributions and other plan income during the year (the amounts on lines 8a(1), 8a(2), 8a(3), and 8(b)).
8d	All	Enter plan benefits paid, including direct rollovers. Do not include amounts entered on line 8e. Negative entries may result in correspondence.
8e	All	Enter the amount (If none, enter "0".)
8f	Plans that paid administrative service providers	Enter the amount (If none, enter "0".)
8g	All	Enter the amount (If none, enter "0".)
8h	All	Add lines 8d, 8e, 8f, and 8g.

LINE BY LINE GUIDE FOR COMPLETING FORM 5500-SF

(Short Form Annual Return/Report of Small Employee Benefit Plan), CONT.

Line Item	Who Must Complete	How to Complete
8i	All	Subtract line 8h from line 8c.
8j	All	Enter the net value of all assets transferred to and from the plan during the year.
9a	Plans with pension benefits	Enter applicable plan characteristic codes.
9b	Plans with welfare benefits	Enter applicable plan characteristic codes.
10a-10g	All	Check "Yes" or "No" and, if "Yes," enter amount.
10h	All	Check "Yes" or "No."
10i	Plans that checked "Yes" in line 10h	Check "Yes" or "No."
PART VI	Only plans subject to minimum funding requirements of Code section 412 or ERISA section 302. (Profit-sharing plans, insurance contract plans described in section 412(e)(3), and certain plans to which no employer contributions are made do not complete.)	Enter information as applicable.
11	Defined benefit pension plans	Check "Yes" or "No." If "Yes," defined benefit pension plans attach completed Schedule SB (Form 5500). Note: An electronic copy of the signed Schedule SB must be filed as part of a plan's electronic filing under the EFAST2 system.

LINE BY LINE GUIDE FOR COMPLETING FORM 5500-SF

(Short Form Annual Return/Report of Small Employee Benefit Plan), CONT.

Line Item	Who Must Complete	How to Complete
12	All pension plans	Check “Yes” or “No.” If “No,” skip lines 12a-12e.
12a	Money purchase defined contribution pension benefit plan (including a target benefit plan) that received a waiver of minimum funding standard and waiver is being amortized	Enter information. Complete lines 3, 9, and 10 of Schedule MB and skip to line 13. See instructions for Schedule MB (Form 5500). Note: An electronic copy of the signed Schedule MB must be filed as an attachment to the plan’s electronic filing under the EFAST2 system.
12b	Defined contribution pension benefit plans that did not complete line 12a	Enter the amount.
12c	Defined contribution pension plans that did not complete line 12a	Enter the amount.
12d	Defined contribution pension plans that did not complete line 12a	Subtract line 12c from line 12b and enter the result. Report negative amounts with a “-” before the number. File IRS Form 5330 with IRS if the amount in line 12b is greater than the amount in line 12c, except, as provided in line 12e. See the Form 5500-SF instructions.
12e	Defined contribution pension plans that did not complete line 12a	Check “Yes” or “No.” If “Yes,” and contributions made no later than 8 1/2 months after the end of the plan year, no Form 5330 necessary.
13a	All	Check “Yes” or “No.” If “Yes,” enter the amount of plan assets that reverted to the employer this year.
13b-c	All	Check “Yes” or “No.” If “Yes,” and assets were transferred to another plan(s), identify the plan(s) by entering the plan(s) name(s), EIN(s) and PN(s).

LINE BY LINE GUIDE FOR COMPLETING FORM 5500-SF

(Short Form Annual Return/Report of Small Employee Benefit Plan), CONT.

Line Item	Who Must Complete	How to Complete
Signature Block	All	<p>The Form 5500-SF filed under Title I of ERISA must be signed electronically by the plan administrator or, if the plan administrator is an entity, a person authorized to sign on behalf of the plan administrator or by a service provider who has received written authorization from the plan administrator to submit the plan's electronic filing. If a service provider signs and submits the Form 5500-SF, the plan administrator must sign a paper copy of the electronically completed Form 5500-SF, and the service provider must include a PDF copy of the first two pages of the manually signed Form 5500-SF as an attachment to the electronic Form 5500-SF submitted to EFAST2. For more information on the electronic signature option, see EFAST2 All-Electronic Filing System FAQs at www.dol.gov/ebsa/faqs/faq-EFAST2.html. The Code permits either the plan sponsor/employer or the administrator to sign the filing. However, any Form 5500-SF that is not electronically signed by the plan administrator or authorized service provider will be subject to rejection and civil penalties under Title I of ERISA. To obtain an electronic signature, go to www.efast.dol.gov and register in EFAST2 as a signer. You will be provided with a UserID and PIN. Both the UserID and PIN are needed to sign the Form 5500-SF. A signed copy of the Form 5500-SF must be retained by the plan administrator.</p>

LINE BY LINE GUIDE FOR COMPLETING FORM 5500

(Annual Return/Report of Employee Benefit Plan)

Line Item	Who Must Complete	How to Complete
Top of Form - Plan year information	All large and small pension plans, large and small welfare plans and DFEs that are not eligible to file a Form 5500-SF and are not exempt from filing	Enter the plan or DFE year being reported if not a calendar year (e.g., January 31, 2009, to January 30, 2010.)
A	All	Check only one box to indicate the type of filer. If “a DFE” is checked, enter the appropriate DFE code - M, C, P, E, or G.
B <i>(the first return/report)</i>	All	Check this box if a Form 5500 or Form 5500-SF has not been previously filed for this plan or DFE. Note: Even if you previously filed a Form 5500-EZ for this plan, check this box if this is the first time you have filed a Form 5500 for this plan.
B <i>(an amended return/report)</i>	All	Check box if this Form 5500 amends a Form 5500 or Form 5500-SF previously filed for this year, and follow the Form 5500 instructions.
B <i>(the final return/report)</i>	All	Check box if this is the final Form 5500 required to be filed for the plan or arrangement. A plan or arrangement with participants, assets and/or liabilities at the end of the plan year should not check this box.
B <i>(a short plan year return/report—less than 12 months)</i>	All	Check box if this Form 5500 is for a period of less than 12 months. The beginning and ending dates of the plan or DFE year must be entered at the top of the form in Part I, above line A.
C	All plans	Check box when contributions and/or benefits are subject to the collective bargaining process. The contributions and/or benefits do not have to be identical for all employees under the plan.
D	All plans and GIAs	Check box if you filed for an extension of time to file Form 5500 with the IRS, are filing using the automatic extension of time to file until due date of Federal income tax return of the employer, are filing under a special extension of time to file, or are filing under the DFVC Program. Maintain a copy of the Form 5558 <i>Application</i>

LINE BY LINE GUIDE FOR COMPLETING FORM 5500

(Annual Return/Report of Employee Benefit Plan), CONT.

Line Item	Who Must Complete	How to Complete
		<i>for Extension of Time To File Certain Employee Plan Returns</i> or the employer's extension of time to file the income tax return with the filer's records. If you use a special extension, enter a description of the extension of time in the space provided.
1a	All	Enter the formal name of the plan or DFE or enough information to identify the plan or DFE. Abbreviate if necessary. Make sure any abbreviations are consistent.
1b	All	Plans and DFEs are identified by a unique 12 digit number - the nine digit Employer Identification Number (EIN) that is entered on line 2b, followed by the three digit plan number (PN) entered on line 1b. The PN entered on line 1b reflects the type of plan or DFE being reported. Assign 001 to a plan with pension benefits or a DFE (other than a GIA). If more than one Form 5500 is filed with the same EIN on line 2b for plans with pension benefits or DFEs (other than a GIA), consecutively assign higher numbers to additional plans/DFEs - 002 for the second plan or DFE, 003 for the third, etc. Assign 501 to a plan with no pension benefits or a GIA (line A "a DFE" is checked and G is entered). If more than one Form 5500 is filed with the same EIN on line 2b for plans with no pension benefits or for GIAs, consecutively assign higher numbers to the additional plans or GIAs - 502 for the second plan or GIA, 503 for the third, etc. Do not use 888 or 999 as a PN. Note: Filers that previously used a PN of 333 or higher consecutive number may continue to use this number.
1c	All plans	Enter the date the plan first became effective.
2a	All	Enter the name of the plan sponsor or, in the case of a Form 5500 filed for a DFE, the name and address of the insurance company, financial institution or other sponsor of the DFE (e.g., in the case of a GIA, the trust or other entity that holds the insurance contract or, in the case of an MTIA, one of the sponsoring employers). If the plan covers only the employees of one employer, enter the employer's name.

LINE BY LINE GUIDE FOR COMPLETING FORM 5500

(Annual Return/Report of Employee Benefit Plan), CONT.

Line Item	Who Must Complete	How to Complete
2b	All	Enter the nine-digit employer identification number (EIN) assigned to the plan sponsor/employer. For a DFE, enter the EIN assigned to the CCT, PSA, MTIA, 103-12 IE or GIA. This number, in conjunction with the PN entered on line 1b, provides a unique 12 digit number to identify this plan or DFE. See 1b above.
2c	All	Enter the sponsor's telephone number.
2d	All plans	Enter the six-digit business code that best describes the nature of the plan sponsor's business (the main business activity) from the list of business codes in the Form 5500 instructions.
Signature Block	All	The Form 5500 filed under Title I of ERISA must be signed electronically by the plan administrator or, if the plan administrator is an entity, a person authorized to sign on behalf of the plan administrator or by a service provider who has received written authorization from the plan administrator to submit the plan's electronic filing. If a service provider signs and submits the Form 5500-SF, the plan administrator must sign a paper copy of the electronically completed Form 5500-SF, and the service provider must include a PDF copy of the first two pages of the manually signed Form 5500-SF as an attachment to the electronic Form 5500-SF submitted to EFAST2. For more information on the electronic signature option, see EFAST2 All-Electronic Filing System FAQs at www.dol.gov/ebsa/faqs/faq-EFAST2.html . The Code permits either the plan sponsor/employer or the administrator to sign the filing. However, any Form 5500 that is not electronically signed by the plan administrator or authorized service provider will be subject to rejection and civil penalties under Title I of ERISA. For DFE filings, a person authorized to sign on behalf of the DFE must sign for the DFE. To obtain an electronic signature, go to www.efast.dol.gov and register in EFAST2 as a signer. You will be provided with a UserID and PIN. Both the UserID and PIN are needed to sign the Form 5500. A signed copy of the Form 5500 must be retained by the plan administrator.

LINE BY LINE GUIDE FOR COMPLETING FORM 5500

(Annual Return/Report of Employee Benefit Plan), CONT.

Line Item	Who Must Complete	How to Complete
3a-3c	All	Enter the name, address, EIN, and telephone number of the plan administrator. If the administrator is the sponsor identified in line 2, or Part I, box A (a DFE) is checked because the Form 5500 is submitted as the report of a DFE, the word "Same" should be entered on line 3a and lines 3b and 3c should be blank.
4	All	If name and/or EIN of the plan sponsor or DFE have changed since the last return/report filed for this plan, enter the name, EIN and PN from the last return/report.
5	All pension plans (unless an IRA plan eligible for limited pension plan reporting), welfare plans and GIAs	Enter the correct number.
6a - 6f	Pension plans, (unless an IRA plan eligible for limited pension plan reporting), welfare plans and GIAs	Enter the correct number. (Welfare plans complete only lines 6a, 6b, 6c and 6d.)
6g	Defined contribution pension plans	Enter the correct number.
6h	Pension plans except multiemployer plans or multiple-employer plans that are collectively bargained	Enter the correct number.
7	Multiemployer plans	Enter correct number.
8a	Plans providing pension benefits	Enter all applicable plan characteristics codes.
8b	Plans providing welfare benefits and GIAs	Enter all applicable plan characteristics codes.
9a	Pension plans, welfare plans, and GIAs	Check all applicable boxes. If 9a(1) or (2) is checked and an insurance contract year ends within the plan year, attach the appropriate number of Schedules A. Code section 403(b) plans that

LINE BY LINE GUIDE FOR COMPLETING FORM 5500

(Annual Return/Report of Employee Benefit Plan), CONT.

Line Item	Who Must Complete	How to Complete
		are funded with and pay benefits through Code section 403(b)(7) “custodial accounts” should check “trust.”
9b	Pension plans, welfare plans, and GIAs	Check all applicable boxes. If 9b(1) or (2) is checked and an insurance contract year ends within the plan year, attach the appropriate number of Schedules A. Code section 403(b) plans that are funded with and pay benefits through Code section 403(b)(7) “custodial accounts” should check “trust.”
10a - 10b	Pension plans, welfare plans, and DFEs	Check all applicable boxes and, if applicable, enter the number of schedules attached.
10a(1)	Defined benefit and other pension plans subject to the minimum funding standards of ERISA section 302 or Code section 412 and all other pension plans that distributed benefits during the year, except IRA plans entitled to limited pension plan reporting	Check box, if applicable, and attach Schedule R.
10a(2)	Multiemployer defined benefit pension plans subject to minimum funding standards and certain money purchase defined contribution plans	Check box, if applicable, and attach Schedule MB. Note: An electronic copy of the signed Schedule MB must be filed as an attachment to the plan’s electronic filing under the EFAST2 system.
10a(3)	Single employer defined benefit pension plans subject to minimum funding standards	Check box, if applicable, and attach Schedule SB. Note: An electronic copy of the signed Schedule SB must be filed as an attachment to the plan’s electronic filing under the EFAST2 system.
10b(1)	Large pension plans (unless entitled to limited pension plan reporting), large welfare plans (unless exempt) and DFEs	Check box, if applicable, and attach Schedule H.

LINE BY LINE GUIDE FOR COMPLETING FORM 5500

(Annual Return/Report of Employee Benefit Plan), CONT.

Line Item	Who Must Complete	How to Complete
10b(2)	Small pension plans (unless entitled to limited pension plan reporting) and small welfare plans	Check box, if applicable, and attach Schedule I.
10b(3)	All (except CCTs and PSAs) with insurance contracts	Check box, if applicable, and enter number of Schedules A attached.
10b(4)	Large pension plans, large welfare plans, MTIAs, GIAs, and 103-12 IEs	Check box, if applicable, and attach Schedule C. Part I is required if any service provider was paid \$5,000 or more. Part II is required if any service provider failed or refused to provide information necessary to complete Part I. Part III is required if an accountant or actuary was terminated. (Part III not required for MTIAs.)
10b(5)	All pension and welfare plans participating in MTIAs, CCTs, PSAs, and 103-12 IEs, and all DFEs	Check box, if applicable, and attach Schedule D. Part I is required for plans and DFEs to report information on interests in MTIAs, CCTs, PSAs and 103-12 IEs. Part II is required for DFEs to report information on participating plans.
10b(6)	Large pension plans, large welfare plans, MTIAs, GIAs, and 103-12 IEs	Check box, if applicable, and attach Schedule G if Schedule H, lines 4b, 4c or 4d are "Yes." Also check box and attach Schedule G if an unfunded, fully insured or unfunded/insured welfare plan exempt from completing Schedule H had any nonexempt transactions.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE A

(Insurance Information)

Line Item	Who Must Complete	How to Complete
Top Of Form	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	This information must be the same as entered on the Form 5500 to which the Schedule A is attached. See Form 5500 Part I and Part II, lines 1a, 1b, 2a and 2b.
1(a)	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Report the name of the insurance carrier.
1(b)	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Report the EIN of the insurance company named on line 1(a).
1(c)	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Enter the code number assigned by the National Association of Insurance Commissioners (NAIC) to the insurance company named on line 1(a). Enter zeros ("0") in the spaces provided if none has been assigned.
1(d)	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Report the contract or identification number.
1(e)	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Report the number of persons.
1(f) – 1(g)	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Report the beginning and ending dates of the policy or contract year. Leave 1(f) blank if separate contracts covering individual employees are grouped. Schedule A information can be provided for the policy or contract year ending with or within the plan year unless the insurance company maintains records on the basis of the plan year.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE A

(Insurance Information), CONT.

Line Item	Who Must Complete	How to Complete
2 – Totals	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Enter totals of all commissions and fees paid to all persons listed on line 3.
3 – Elements (a) - (e)	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Enter in each element (a) the name and address of one agent, broker or other person to whom commissions or fees were paid. Report the required information in elements (b) through (e) with respect to the person named in each element (a). Complete as many entries as necessary to report all required information, listing all persons in descending order by the amount of commissions and fees paid.
4	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Report the current value of plan's interest under this contract in the general account at year end. Line 4 may be left blank if: (1) the Schedule A is filed for a defined benefit pension plan and the contract was entered into before March 20, 1992; or (2) the Schedule A is filed for a defined contribution pension plan and the contract is a fully benefit-responsive contract, i.e., it provides a liquidity guarantee by a financially responsible third party of principal and previously accrued interest for liquidations, transfers, loans, or hardship withdrawals initiated by plan participants exercising their rights to withdraw, borrow or transfer funds under the terms of a defined contribution plan that do not include substantial restrictions to participants' access to plan funds.
5	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Report the current value of the plan's interest at year end in separate accounts under the contract.
6 – 10	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Report the requested information, as applicable.
11 and 12	All pension and welfare plans, MTIAs, GIAs, and 103-12 IEs with insurance contracts	Report whether the insurance company failed to provide any information necessary to complete this Schedule. If "Yes" is checked, specify the information not provided in line 12.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE C

(Service Provider Information)

Line Item	Who Must Complete	How to Complete
Top of Form	Large pension plans, large welfare plans, and all MTIAs, GIAs, and 103-12 IEs required to check Form 5500 line 10b(4)	This information must be the same as provided on the Form 5500 to which the Schedule C is attached. See Form 5500 Part I and Part II, lines 1a, 1b, 2a and 2b.
1a-1b	Large pension plans, large welfare plans, and all MTIAs, GIAs, and 103-12 IEs, if a service provider was paid, directly or indirectly, \$5,000 or more	You may use the alternative reporting option in line 1 for a service provider who received only eligible indirect compensation about which the plan received the required disclosures. If “Yes” is checked, provide name and EIN or address of the person who provided the disclosures on eligible indirect compensation in line 1b. For persons who received only eligible indirect compensation and for whom all the required disclosures were provided to the plan administrator, you only need to complete line 1. For a service provider who received \$5,000 or more in eligible indirect compensation and other reportable indirect compensation, the service provider must be separately listed on line 2 and “key” service provider (providers who are fiduciaries, or who provide contract administrator, consulting, custodial, investment advisory, investment management, broker, or recordkeeping services) information must be reported on line 3. See Schedule C instructions for definition of “eligible indirect compensation” and required disclosures.
2	Large pension plans, large welfare plans, and all MTIAs, GIAs, and 103-12 IEs if a service provider was paid, directly or indirectly, \$5,000 or more	Except for those persons for whom “Yes” was checked in line 1a, list, in descending order by compensation, each person who received, directly or indirectly, \$5,000 or more in total compensation. Enter correct information in elements (a) through (h) using as many entries as needed. Note: If “key” service providers (service providers who are fiduciaries, or who provide contract administrator, consulting, custodial, investment advisory, investment management, broker, or recordkeeping services) report their compensation by a formula, the amount of indirect compensation is presumed to meet the \$5,000 reporting threshold. Also, if any such provider reports a formula for its indirect compensation (that is

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE C

(Service Provider Information), CONT.

Line Item	Who Must Complete	How to Complete
		not eligible indirect compensation), information about that indirect compensation is reportable on line 3. For more information, see Q 26 in FAQs About The 2009 Form 5500 Schedule C on the EBSA Web site at http://www.dol.gov/ebsa/faqs/faq_scheduleC.html .
2g	Large pension plans, large welfare plans, and all MTIAs, GIAs, and 103-12 IEs if a service provider was paid, directly or indirectly, \$5,000 or more	If you answered “Yes” on line 2(f), enter the amount. If none, enter “0”. Note: You may use a formula for completing this element, even where it may be possible for the service provider to calculate a monetary amount or estimate.
2h	Large pension plans, large welfare plans, and all MTIAs, GIAs, and 103-12 IEs if a service provider was paid, directly or indirectly, \$5,000 or more	Complete with respect to indirect compensation. If “Yes,” attach a statement describing the formula(s) that is labeled “Schedule C, Line 2(h) formula description.” Note: If a service provider receives both eligible indirect compensation (for which the disclosures have been made) and either direct compensation or indirect compensation that is not eligible, only complete this line with respect to the indirect compensation, excluding eligible indirect compensation.
3	Large pension plans, large welfare plans, and all MTIAs, GIAs, and 103-12 IEs that reported a service provider on line 2 who is a fiduciary to the plan or provides contract administrator, consulting, custodial, investment advisory, investment management, broker, or recordkeeping services to the plan and who received \$1,000 or more in indirect compensation or was given a formula used to determine the indirect compensation instead of an amount or estimated amount of the indirect compensation	Enter correct information for elements (a) through (e). Complete as many entries as necessary. Note: Only report indirect compensation that is not eligible indirect compensation. For example, if a service provider receives both eligible indirect compensation (including satisfaction of the disclosure requirements) and other indirect compensation, line 3 reporting only applies with respect to the portion of the service provider’s compensation that does not constitute eligible indirect compensation.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE C

(Service Provider Information), CONT.

Line Item	Who Must Complete	How to Complete
3(c)	Large pension plans, large welfare plans, and all MTIAs, GIAs, and 103-12 IEs that reported a service provider on line 2 who is a fiduciary to the plan or provides contract administrator, consulting, custodial, investment advisory, investment management, broker, or recordkeeping services to the plan and who received \$1,000 or more in indirect compensation or was given a formula used to determine the indirect compensation instead of an amount or estimated amount of the indirect compensation	Enter amount of indirect compensation. Enter a "0" if that is the only indirect compensation reportable in this element. Note: You may use a formula for completing this element, even where it may be possible for the service provider to calculate a monetary amount or estimate.
3(e)	Large pension plans, large welfare plans, and all MTIAs, GIAs, and 103-12 IEs that reported a service provider on line 2 who is a fiduciary to the plan or provides contract administrator, consulting, custodial, investment advisory, investment management, broker, or recordkeeping services to the plan and who received \$1,000 or more in indirect compensation or was given a formula used to determine the indirect compensation instead of an amount or estimated amount of the indirect compensation	If a formula(s) was used for amounts reported on line 3 in element (c), provide a description of the formula(s).
4	Large pension plans, large welfare plans, and all MTIAs, GIAs, and 103-12 IEs if a service provider was paid, directly or indirectly, \$5,000 or more	Enter correct information for elements (a) through (c) for each plan fiduciary or service provider who failed or refused to provide any of the information necessary to complete Part I. See FAQs for certain transitional relief for this line item.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE C

(Service Provider Information), CONT.

Line Item	Who Must Complete	How to Complete
Part III	Large pension plans, large welfare plans, and all GIAs and 103-12 IEs if an accountant or actuary was terminated	Complete elements (a) through (e) for each terminated person and provide an explanation of the reasons for the termination. Include a description of any material disputes or matters of disagreement concerning the termination, even if resolved prior to the termination. The plan administrator must also provide the terminated accountant or enrolled actuary with a copy of the explanation for termination provided in Part III of this schedule along with a completed copy of the Notice to Terminated Accountant or Enrolled Actuary found in the Schedule C Instructions. Note: An EIN must be provided for each service provider and terminated person listed. The filer should take steps to obtain missing service provider EINs in sufficient time to ensure that they are available by the time the form is required to be filed. Do not use a social security number in lieu of an EIN. The reporting of a social security number on the Form 5500 or any of its schedules may result in the rejection of the filing.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE D

(DFE/Participating Plan Information)

Line Item	Who Must Complete	How to Complete
Top of Form	All DFEs and plans participating in MTIAs, CCTs, PSAs, and 103-12 IEs, i.e., filers required to check Form 5500 line 10b(5)	This information must be the same as provided on the Form 5500 to which the Schedule D is attached. See Form 5500 Part I and Part II, lines 1a, 1b, 2a and 2b.
Part I	All pension plans, welfare plans and DFEs that participated at any time during the plan or DFE year in an MTIA, CCT, PSA, or 103-12 IE	Complete a separate item (elements (a) through (e)) for each MTIA, CCT, PSA, or 103-12 IE in which the plan or DFE participated. The EIN/PN/Entity code (elements (c) and (d)) provides a unique 13 character identification number for each entity named in element (a). If a DFE is listed, elements (a) through (d) must report the applicable information entered on the DFE's Form 5500, lines 1a, 1b, 2a, 2b, and A. If a CCT or PSA is listed for which a DFE Form 5500 was not filed, enter "000" as the PN after entering the EIN of the CCT or PSA in element (c).
Part II	All DFEs	List all plans that invested or participated in the DFE during the DFE year. Complete a separate item (elements (a) through (c)) for each plan. GIAs need not complete element (a) or enter the PN in element (c).

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE G

(Financial Transaction Schedules)

Line Item	Who Must Complete	How to Complete
Top of Form	Large pension plans, large welfare plans and all MTIAs, GIAs, and 103-12 IEs (Schedule G filers should also check the box for line 10b(6) of the Form 5500)	This information must be the same as provided on the Form 5500 to which the Schedule G is attached. See Form 5500 Part I and Part II, lines 1a, 1b, 2a, and 2b.
Part I	Large pension plans, large welfare plans and all MTIAs, GIAs, and 103-12 IEs with loans or fixed income obligations in default or classified as uncollectible. See Schedule G instructions that provide special rules for participant loans.	Complete a separate item (elements (a) through (i)) for each loan or fixed income obligation in default or determined to be uncollectible as of the end of the plan year (fiscal year for a GIA, MTIA, or 103-12 IE). Provide, on a separate attachment, an explanation of what steps have been taken or will be taken to collect overdue amounts for each loan listed. Also see Schedule H, line 4b.
Part II	Large pension plans, large welfare plans and all MTIAs, GIAs, and 103-12 IEs with leases in default or classified as uncollectible	Complete a separate item (elements (a) through (j)) for each lease in default or classified as uncollectible. Provide on a separate attachment an explanation of what steps have been taken or will be taken to collect overdue amounts for each lease listed. Also see Schedule H, line 4c.
Part III	Large pension plans, large welfare plans and all MTIAs, GIAs, and 103-12 IEs with nonexempt party-in-interest transactions	Complete a separate item (elements (a) through (j)) for each nonexempt party-in-interest transaction unless the nonexempt transaction is: (1) statutorily exempt under Part IV of ERISA; (2) administratively exempt under ERISA section 408(a); (3) exempt under Code sections 4975 (c) or (d); (4) the holding of participant contributions for a welfare plan that meets the conditions of ERISA Technical Release 92-01; (5) a transaction of a 103-12 IE with parties other than the plan, or (6) a delinquent participant contribution or a delinquent participant loan repayment reported on Schedule H, line 4a.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE H

(Financial Information)

Line Item	Who Must Complete	How to Complete
Top of Form	Pension benefit plans and welfare benefit plans, filing as “large plans,” and all DFEs. Exceptions: Insured, unfunded, or combination unfunded/insured welfare plans as described in 29 CFR 2520.104-44(b)(1) and the <i>Large Welfare Plan</i> instructions, and certain pension plans and arrangements described in 29 CFR 2520.104-44(b)(2) and the <i>Limited Pension Plan Reporting</i> instructions	This information must be the same as provided on the Form 5500 to which the Schedule H is attached. See Form 5500 Part I and Part II, lines 1a, 1b, 2a, and 2b. Do not attach both a Schedule H and a Schedule I to the same Form 5500.
Parts I and II	Large pension, large welfare plans, and DFEs required to complete Schedule H	Enter all required information in the asset and liability statement (Part I) and income and expenses statement (Part II) accurately. Refer to the instructions for line item definitions. Certain line items are described below.
1b(1)-1b(3)	Large pension plans and large welfare plans with receivables (less allowance for doubtful accounts) and all DFEs	Enter the amount as of the beginning and end of year. MTIAs, CCTs, PSAs, and 103-12 IEs complete only 1b(3).
1f	Large pension plans and large welfare plans, with assets at any time during the plan year and all DFEs	Add all amounts in the subparts in lines 1a, 1b(1), 1b(2), 1b(3), 1c(1), 1c(2), 1c(3)(A), 1c(3)(B), 1c(4)(A), 1c(4)(B), 1c(5), 1c(6), 1c(7), 1c(8), 1c(9), 1c(10), 1c(11), 1c(12), 1c(13), 1c(14), 1c(15), 1d(1), 1d(2) and 1e and enter the total, beginning and end of year. Enter “0” if there were no assets.
1k	Large pension plans, large welfare plans, and all DFEs	Add items 1g through 1j and enter the total, beginning and end of year. Enter “0” if there were no liabilities.
1l	Large pension plans, large welfare plans, and all DFEs	Subtract line 1k from 1f and enter the result, beginning and end of year. Enter “0” if there were no net assets. Entry in column (b) must equal the sum of the entry in column (a) plus lines 2k, 2l(1), and 2l(2).

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE H

(Financial Information), CONT.

Line Item	Who Must Complete	How to Complete
2a(3) column (b)	Large pension plans, large welfare plans, and GIAs with contributions	Add lines 2a(1)(A) through (C) and 2a(2) in column (a) and enter the total in line 2a(3) column (b). (MTIAs, CCTs, PSAs, and 103-12 IEs do not report contributions - see line item 2l.)
2b(1)(G) column (b)	Large pension plans, large welfare plans, and DFEs with interest earnings on investments	Add lines 2b(1)(A) through 2b(1)(F) and enter the total in column (b).
2b(2)(D) column (b)	Large pension plans, large welfare plans, and DFEs with dividend earnings on investments	Add lines 2b(2)(A), 2b(2)(B), and 2b(2)(C) and enter the total in column (b).
2b(4)(C) column (b)	Large pension plans, large welfare plans, and DFEs with gain (loss) on the sale of assets for the year	Subtract column (a), line 2b(4)(B) from 2b(4)(A), and enter the result in column (b). Negative numbers should be preceded by a negative “-“ sign.
2d	Large pension plans, large welfare plans, and DFEs with income	Add column (b), lines 2a(3), 2b(1)(G), 2b(2)(D), 2b(3), 2b(4)(C), 2b(5) (C) through 2c and enter the total.
2e(4) column (b)	Large pension plans, large welfare plans with benefit payments or payments to provide benefits, and GIAs	Add column (a), lines 2e(1) through 2e(3) and enter the total in column (b). (DFEs - see 2l) Negative numbers should not be entered on this line.
2i(5) column (b)	Large pension plans, large welfare plans, and DFEs with administrative expenses	Add column (a), lines 2i(1) through 2i(4), and enter the total in column (b).
2j	Large pension plans, large welfare plans, and DFEs with expenses	Add column (b), lines 2e(4), 2f, 2g, 2h, and 2i(5), and enter the total.
2k	Large pension plans, large welfare plans, and DFEs with income and/or expenses	Subtract line 2j from 2d and enter the result. Negative numbers should be preceded by a negative “-“ sign.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE H

(Financial Information), CONT.

Line Item	Who Must Complete	How to Complete
2l	Large pension plans, large welfare plans, and DFEs with transfers of assets	Enter transfers to and from plans and DFEs here. A DFE Schedule H for an MTIA, CCT, PSA, and 103-12 IE must include all asset transfers to/from participating plans, including amounts transferred to plans for benefit payments and amounts transferred from plans resulting from contributions to the participating plans.
Part III	Large pension plans, large welfare plans, and DFEs required to complete Schedule H	Enter all required information.
3	All plans and DFEs required to complete Schedule H	Skip to line 3d if the opinion of an IQPA is not attached.
3a	Large pension and large welfare plans, except for those plans entitled to check 3d(2); GIAs and 103-12 IEs	Check the appropriate box and attach any required information. NOTE: An electronic copy of the IQPA report, signed by the IQPA, must be filed in PDF format as part of the plan/DFE electronic filing under the EFAST2 system if the plan/DFE is subject to the IQPA audit requirement.
3b	Large pension and large welfare plans, except for those plans entitled to check 3d(2); GIAs and 103-12 IEs	Check if applicable.
3d	Large pension plans and large welfare plans deferring the attachment of the accountant's opinion because the plan year was a short plan year of seven months or fewer; and CCTs, PSAs and MTIAs	Check the appropriate box.
Part IV	Large pension plans, large welfare plans, GIAs, MTIAs, 103-12 IEs	Enter all required information. DFEs do not answer all questions in Part IV.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE H

(Financial Information), CONT.

Line Item	Who Must Complete	How to Complete
4a	Large pension plans and large welfare plans	Check “Yes” or “No.” If “Yes,” enter amount. See the Schedule H instructions and for additional information see Frequently Asked Questions About Reporting Delinquent Participant Contributions on the Form 5500 at http://www.dol.gov/ebsa/faqs/faq_compliance_5500.html .
4b	Large pension plans, large welfare plans, MTIAs, 103-12 IEs, and GIAs	Check “Yes” or “No.” If “Yes,” enter amount and attach Schedule G. See the Schedule H instructions.
4c	Large pension plans, large welfare plans, MTIAs, 103-12 IEs, and GIAs	Check “Yes” or “No.” If “Yes,” enter amount and attach Schedule G. See the Schedule H instructions.
4d	Large pension plans, large welfare plans, MTIAs, 103-12 IEs, and GIAs	Check “Yes” or “No.” If “Yes,” enter amount and attach Schedule G. See the Schedule H instructions.
4e, 4f, 4g and 4h	Large pension plans and large welfare plans	Check “Yes” or “No.” If “Yes,” enter amount. See the Schedule H instructions.
4i	Large pension plans and large welfare plans and all MTIAs, 103-12 IEs, and GIAs	Check “Yes” or “No.” If “Yes,” attach a schedule of assets held for investment purposes at end of year, a schedule of assets held for investment purposes that were both acquired and disposed of within the plan year, or both, as applicable. See the Schedule H instructions.
4j	Large pension plans, large welfare plans, MTIAs, and GIAs	Check “Yes” or “No.” If “Yes,” attach a schedule of reportable transactions. See the Schedule H instructions.
4k	Large pension plans and large welfare plans	Check “Yes” or “No.”
4l	Large pension plans, large welfare plans, and GIAs	Check “Yes” or “No.”

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE H

(Financial Information), CONT.

Line Item	Who Must Complete	How to Complete
4m	Large pension plans that are 401(k) or other individual account plans	Check “Yes” or “No.”
4n	Large pension plans that are 401(k) or other individual account plans that answered “Yes” in line 4m	Check “Yes” if the plan either provided required notice or an exception to providing the notice applied under 29 CFR 2520.101-3.
5a	Large pension plans and large welfare plans	Check “Yes” if a resolution to terminate the plan was adopted during this or any prior plan year, unless the termination was revoked and no assets reverted to the employer. If “Yes” is checked, enter the amount of plan assets that reverted to the employer during the plan year in connection with the implementation of such termination. Enter “0” if no reversion occurred during the current plan year.
5b(1), 5b(2) and 5b(3)	Large pension plans and large welfare plans	Complete, as applicable.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE I

(Financial Information - Small Plan)

Line Item	Who Must Complete	How to Complete
Top of Form	All pension benefit plans and welfare benefit plans filing the Form 5500 as “small plans,” except for certain pension plans and arrangements described in 29 CFR 2520.104-44(b)(2) and <i>Limited Pension Plan Reporting</i>	This information must be the same as provided on the Form 5500 to which the Schedule I is attached. See Form 5500 Part I and Part II, lines 1a, 1b, 2a, and 2b. Do not attach both a Schedule I and a Schedule H to the same Form 5500.
Part I	All plans required to complete Schedule I	Enter all required plan assets and liabilities information (line 1), income, expenses and transfers for this plan year information (line 2), and specific assets information (line 3) accurately. Refer to the instructions for line item definitions. Certain line items are described below.
1a	All	Enter beginning and end of year total assets. (If zero, enter “0”.) Note: Correspondence may occur if the “end of year” assets from the prior year’s report do not match the “beginning-of-year” assets reported on this year’s report.
1b	All	Enter beginning and end of year total liabilities. (If zero, enter “0”.)
1c	All	Subtract line 1b from line 1a and enter result. (If zero, enter “0”.)
2a	All	Enter contributions received or receivable. Negative entries may result in correspondence.
2d	All	Add 2a(1), 2a(2), 2a(3), 2b, and 2c and enter amount.
2e	All	Enter plan benefits paid, including direct rollovers; payments to insurance companies or similar organizations for provision of plan benefits; and payments made to other organizations or individuals providing benefits, such as providers of legal services, day care services, or training and apprenticeship services. Do not include amounts entered on lines 2f and 2g. Negative entries may result in correspondence. If none, enter “0”.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE I

(Financial Information - Small Plan), CONT.

Line Item	Who Must Complete	How to Complete
2f	All	Enter the amount; if none, enter "0".
2g	All	Enter the amount; if none, enter "0".
2h	All	Enter the amount; if none, enter "0".
2j	All	Add 2e, 2f, 2g, 2h, and 2i and enter total expenses in line 2j, column (b).
2k	All	Subtract line 2j from 2d and enter the plan net income (loss). Enter a negative "-" sign before a negative number.
2l	All	Enter the net value of all assets transferred to and from the plan during the plan year.
3a - 3g	All	Check "Yes" or "No;" if "Yes," enter amount.
Part II	All	Enter all required information.
4a - 4i	All	Check "Yes" or "No;" if "Yes," enter amount. For additional information on reporting delinquent contributions in Line 4a, see Frequently Asked Questions About Reporting Delinquent Participant Contributions on the Form 5500 at http://www.dol.gov/ebsa/faqs/faq_compliance_5500.html .
4j	All	Check "Yes" or "No."
4k	All	Check "Yes" or "No;" if "No," attach required information.
4l	All	Check "Yes" or "No;" if "Yes," enter amount.
4m	Small pension plans that are individual account plans	Check "Yes" or "No;" if "Yes," complete line 4n.

LINE BY LINE GUIDE FOR COMPLETING SCHEDULE I

(Financial Information - Small Plan), CONT.

Line Item	Who Must Complete	How to Complete
4n	Small pension plans that are individual account plans that answered "Yes" on line 4m	Check "Yes" if the plan either provided required notice or an exception to providing the notice applied under 29 CFR 2520.101-3.
5a	All	Check "Yes" or "No;" if "Yes," enter amount.
5b(1), 5b(2) and 5b(3)	All	Complete, as applicable.

GUIDE FOR OTHER FORM 5500 SCHEDULES

The following schedules are generally filed to comply with the Internal Revenue Code or Title IV of ERISA. Contact the IRS and PBGC for additional information

Schedule	Who Must Complete	How to Complete
<p>SCHEDULE MB <i>(Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information)</i></p>	<p>Multiemployer defined benefit pension plans subject to minimum funding standards. Certain money purchase defined contribution plans (including target benefit plans) are required to complete Schedule MB, lines 3, 9, and 10</p>	<p>The plan year information and lines A through D must be the same as provided in Part II of the Form 5500 or Form 5500-SF to which Schedule MB is attached. Be certain to label properly any attachments. See the instructions for Schedule MB.</p> <p>An electronic copy of the Schedule MB that has been signed by the enrolled actuary must be filed as part of a plan's electronic filing under the EFAST2 system. See instructions for Schedule MB or contact IRS for additional information.</p> <p>Enrolled actuary's signature is not required on a Schedule MB filed for a money purchase defined contribution plan.</p>
<p>SCHEDULE SB <i>(Single-Employer Defined Benefit Plan Actuarial Information)</i></p>	<p>Single-employer defined benefit pension plans (including multiple-employer plans) subject to the minimum funding standards</p>	<p>The plan year information and lines A through E must be the same as provided in line A of Part I and in Part II of the Form 5500 or Form 5500-SF to which Schedule SB is attached. Be certain to label properly any attachments. See the instructions for Schedule SB.</p> <p>An electronic copy of the Schedule SB that has been signed by the enrolled actuary must be filed as part of a plan's electronic filing under the EFAST2 system. See instructions or contact the IRS for additional information.</p> <p>For information about Schedule SB requirements for "one participant plans" required to file a Form 5500-EZ, see the instructions for Form 5500-EZ or contact the IRS for more information.</p>
<p>SCHEDULE R <i>(Retirement Plan Information)</i></p>	<p>Large and small pension plans whether qualified or nonqualified. The parts of Schedule R that must be completed depend on whether the plan is subject to the minimum funding standards of Code section 412 and ERISA section 302 and the type of plan</p>	<p>The plan year information and lines A through D must be the same as provided in Part II of the Form 5500 to which Schedule R is attached. For additional information, see instructions for Schedule R or contact the IRS for additional information.</p>

RESOURCES

EFAST2 Web Site – <http://www.efast.dol.gov/>

Form 5500 E-filing Requirement Fact Sheet - <http://www.dol.gov/ebsa/newsroom/fsEFAST2.html>

FAQs on EFAST2 - <http://www.dol.gov/ebsa/faqs/faq-EFAST2.html>

FAQs on Electronic Filing for Small Businesses - <http://www.dol.gov/ebsa/faqs/faq-EFAST2-smallbusiness.html>

About EFAST2 - http://www.efast.dol.gov/about/about_efast2.html

EFAST2 Guide for Filers and Service Providers - http://www.efast.dol.gov/fip/pubs/EFAST2_Guide_Filers_Service_Providers.pdf

EFAST2 Tutorial - <http://www.efast.dol.gov/training/EFAST2%20Tutorial%20Menu.html>

2009 and 2010 Form 5500s - <http://www.dol.gov/ebsa/5500main.html>

FAQs about the 2009 Form 5500 Schedule C - http://www.dol.gov/ebsa/faqs/faq_scheduleC.html

Supplemental FAQs on the 2009 Form 5500 Schedule C - <http://www.dol.gov/ebsa/faqs/faq-sch-C-supplement.html>

Notice of Adoption of Forms Revisions - <http://www.dol.gov/ebsa/regs/fedreg/notices/20071116.pdf>

Reporting and Coverage for 403(b) Plans Dedicated Web Page - <http://www.dol.gov/ebsa/403b.html>

Annual Reporting and ERISA Coverage for 403(b) Plans - <http://www.dol.gov/ebsa/regs/fab2010-1.html>

Form 5500 Reporting by IRC Section 403(b) Plans Covered by Title I of ERISA - <http://www.dol.gov/ebsa/regs/fab2009-2.html>

ERISA Coverage of IRC Section 403(b) Tax-Sheltered Annuity Programs - <http://www.dol.gov/ebsa/regs/fab2007-2.html>

Delinquent Filer Voluntary Compliance Program Fact Sheet - http://www.dol.gov/ebsa/Newsroom/0302fact_sheet.html

Delinquent Filer Voluntary Compliance Program FAQs - http://www.dol.gov/ebsa/FAQs/faq_DFVC.html

Delinquent Filer Voluntary Compliance Program Calculator and Online Payment - <http://www.dol.gov/ebsa/calculator/dfvcpmain.html>

Final Rule – Annual Reporting and Disclosure - <http://www.dol.gov/ebsa/regs/fedreg/final/20071116.pdf>

Final Rule – Electronic Filing of Annual Reports - <http://www.dol.gov/ebsa/regs/fedreg/final/2006006331.htm>

Reporting and Disclosure Guide for Employee Benefit Plans - <http://www.dol.gov/ebsa/pdf/rdguide.pdf>

Selecting an Auditor for Your Employee Benefit Plan - <http://www.dol.gov/ebsa/publications/selectinganauditor.html>

Compliance Assistance for Reporting and Filing Web page - http://www.dol.gov/ebsa/compliance_assistance.html#section5

For More Information

To help filers with the new EFAST system and the changes to the Form 5500, EBSA has an online tutorial, a list of approved third party software vendors, guidance, FAQs, video, and other information available on the EFAST/EFAST2 Web site at www.efast.dol.gov. As always, the instructions are the best place to start if you have questions about the Form 5500. EBSA is also sponsoring and participating in webcasts, seminars and other outreach programs to help with the transition to the new system and the changes to the Form 5500.

In addition, you can call:

Employee Benefits Security Administration
1-866-463-3278

Internal Revenue Service
1-877-829-5500

Pension Benefit Guaranty Corporation (PBGC)
(if you have a defined benefit pension plan)
1-800-736-2444

