FAQs on EFAST2 Electronic Filing System



U.S. Department of Labor Employee Benefits Security Administration January 3, 2024

- General
- Filing Preparation Software
- Registering for EFAST2 Credentials
- Completing a Form
- Attachments
- Signing a Return/Report

Do you have questions or problems that aren't addressed here?

Call the EFAST2 Help Line: 1-866-GO-EFAST (1-866-463-3278).

- Submitting an Annual Return/Report and Checking its Status
- Online Disclosure
- Troubleshooting Problems with EFAST2
- Official Government Correspondence

General

Q1: Can I file the Form 5500, Form 5500-SF, Form 5500-EZ, Form PR, or Form 5558 on paper?

For the Form 5500, the Form 5500-SF, and the Form PR:

You must electronically file the Form 5500, the Form 5500-SF, and the Form PR (Pooled Plan Provider Registration).

For the Form 5500-EZ:

If you are a one-participant plan or a foreign plan, beginning January 1, 2021, you must file the Form 5500-EZ electronically through EFAST2. You may file paper Form 5500-EZ with the IRS only if you are not subject to the IRS electronic filing requirement under 26 CFR 301.6058-2 (See <u>T.D. 9972</u>, final Regulations issued under Code sections 6058 and 6059). All filers are encouraged to file Form 5500-EZ electronically. It is safe, easy to complete, and you have an immediate record that the return was filed. You can no longer use the Form 5500-SF in lieu of Form 5500-EZ. See the Form 5500-EZ Instructions and the IRS's Form 5500 Corner for more information.

For the Form 5558:

Form 5558 can only be used to apply for a one-time extension of time to file Form 5500, Form 5500-SF, Form 5500-EZ, and Form 8955-SSA. The Form 5558 should be filed in accordance with the Form 5558 instructions. See <u>Form 5558 reminders</u> for additional information.

There are special instructions for Defined Contribution Group (DCG) reporting arrangements requesting extensions. See FAQ 66.

Q2: How can I prepare/submit my electronic filing through EFAST2?

For the Form 5500 Series:

You may use EFAST2-approved third-party software or IFILE to prepare/submit your filing.

See Question 8 for the differences between EFAST2-approved third-party software and IFILE. The <u>EFAST2 and IFILE Quick Start Guide</u> provides an overview of how to prepare/submit your Form 5500 Series filing.

For the Form PR:

You must use IFILE. The <u>How to Register as a Pooled Plan Provider</u> guide provides an overview of how to prepare and submit your Form PR.

Q3: [deleted]

Q4: How can I submit a delinquent or amended filing?

For the Form 5500 Series:

The <u>Form 5500 Series Version Selection Tool</u> will help you determine which version of the Form 5500, 5500-SF, or 5500-EZ you should use. Refer to the <u>form-specific instructions</u> for more information on filing requirements.

An amended filing should be submitted as a complete replacement of the previously submitted filing. You will need to resubmit the entire form, with all required schedules and attachments, through EFAST2. You cannot submit just the parts of the filing that are being amended.

For the Form PR:

The Form PR is a pooled plan provider registration form and is not filed with the Form 5500 Series return/report. It is not year-specific. If you are a pooled plan provider required to submit a Form PR, you must complete a supplemental Form PR to provide information about specified reportable events. You must file, amend, or supplement your Form PR through IFILE. Refer to the <u>Form PR Instructions</u> for more information on filing requirements.

An amended or supplemental filing should be submitted as a complete replacement of the previously submitted filing. You cannot submit just the parts of the filing that are being amended. In Part IV of the Form PR, identify the information that is being amended.

Q4a: How do I submit a Form 5500 or 5500-SF for a plan year 2020 or earlier?

EFAST2 supports three active form years: the current form year (2023) and the two prior form years (2022 and 2021).

You must submit delinquent and/or amended Form 5500s and 5500-SFs electronically through EFAST2. You cannot submit them on paper.

Use the current year (2023) forms, schedules, and instructions. You can use the correct plan year schedules and instructions found on the <u>Form 5500 Series page</u> for the following schedules:

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

After completing the schedules, attach them to your submission as PDFs and tag them in your electronic filing as "Other Attachments."

For all delinquent or amended filings, you must indicate the plan year for which you are filing in the appropriate space at the beginning of the form and/or schedules.

Do not attach a Schedule SSA to any filing submitted to EFAST2. Rather, submit the most current year Form 8955-SSA to the IRS. See IRS Form 8955-SSA Resources for additional information.

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

If you need to file a 2008 or earlier plan filing, you cannot file the 5500-SF even if you are a small plan.

Q4b: How do I submit a filing for an amended "one-participant" or foreign plan?

For this situation	Do this
To amend a one-participant or foreign plan originally filed electronically through EFAST2 using Form 5500-SF	Use the prior-years Form 5500-EZ for amending returns originally filed for the prior years. Use the current-year form for amending returns filed for the current year or returns that were filed more than 3 years ago. Do not use Form 5500-SF for an amended return.
To amend a one-participant or foreign plan originally filed electronically through EFAST2 using Form 5500-EZ	Use the prior-years Form 5500-EZ for amending returns originally filed for the prior years. Use the current-year form for amending returns filed for the current year or returns that were filed more than 3 years ago.
To amend a one-participant or foreign plan originally filed on paper 5500-EZ	File on paper 5500-EZ with the IRS on the form year that corresponds to the original filing.

An amended return for a "one-participant" plan or foreign plan must be filed based on the chart below.

Q4c: How do I submit a filing for a late or delinquent "one-participant" or foreign plan?

You must submit a complete Form 5500-EZ return to the IRS on paper, including all required schedules and attachments, for each plan year for which the return was delinquent. A delinquent return cannot be filed through EFAST2. All delinquent Form 5500-EZ returns must be mailed to:

Internal Revenue Service 1973 Rulon White Blvd. Ogden, UT 84404-0020

Generally, you must use the form year corresponding to the delinquent year. The Form 5500-EZ for each plan year after 1989 may be found on the <u>IRS website</u>.

The current year (2022) Form 5500-EZ must be used if:

- the filer would otherwise be required to file a Form 5500 return for the delinquent plan year, or
- the return is delinquent for a year prior to 1990.

Any such current-year Form 5500-EZ return must be filled out with the beginning and ending dates for the plan year for which the return was delinquent.

See the <u>Form 5500-EZ instructions</u> and <u>Rev. Proc. 2015-32</u> for information about the IRS' Penalty Relief Program for late filings.

Q4d: How do I submit an amended or supplemental Form PR?

Amended filings are to correct inadvertent or good faith errors and/or omissions, typographical errors, and other matters that do not constitute supplemental reportable events.

Supplemental filings are required to report certain events that occurred after the previous filing, as provided on the Form PR and its instructions. For example, you must submit a supplemental filing to report changes in the pooled plan provider's status. See <u>How to Register as a Pooled Plan Provider</u> and the <u>Form PR instructions</u>.

Filing Preparation Software

Q5: What is IFILE?

<u>IFILE</u> is the Government's preparation and submission tool for the Form 5500, Form 5500-SF, Form 5500-EZ, and Form PR.

Q6: Do I have to use IFILE?

For the Form 5500 Series:

To electronically submit the Form 5500, 5500-SF, or 5500EZ, you may use <u>EFAST2-approved third-party</u> <u>software</u> or you may use IFILE.

For the Form PR:

You must use IFILE. There is no EFAST2-approved third-party software to submit the Form PR.

Q7: Which third-party software is approved?

The <u>EFAST2 website</u> lists <u>EFAST2-approved third-party software</u>. Some listed software is only approved for certain years, forms, schedules, or attachments. Make sure the software you are using meets your needs.

Q8: What are the differences between EFAST2-approved third-party software and IFILE?

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

IFILE	EFAST2-approved third-party software
Does not contain filing assistance or integrated instructions	May provide filing assistance or integrated instructions
Only one individual can edit a filing without exporting, downloading, importing, etc.	May provide file-sharing functionality, enabling different people to work on a single filing
Can only transmit single filings	May support transmitting batches of filings
Is free to use	May charge for service

Q9: [deleted]

Registering for EFAST2 Credentials

Q10: How do I register for EFAST2 credentials?

You can register for credentials on the <u>EFAST2 website</u>. Click **Sign In with Login.gov** and follow the steps to **Sign In** or **Create an Account** at <u>Login.gov</u>.

When you return to the <u>EFAST2 website</u>, you can complete your EFAST2 profile and receive your EFAST2 User ID and PIN.

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

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

I want to:	Choose User Type	Definition
Create, import, or amend a filing in IFILE	Filing Author	Filing authors initiate filings in IFILE, fill in the information, and are responsible for submitting it. This user type has no signature authority.
Sign a Form	Filing Signer	 Filing signers are: Plan administrators, employers/plan sponsors, or Direct Filing Entities who electronically sign the Form 5500/5500-SF/5500-EZ. Plan service providers that have written authorization to file on behalf of the plan administrator under the EFAST2 e-signature option. Pooled plan providers who electronically sign the Form PR. There must be a Filing Signer to submit the filing. To perform other filing-related functions, you must also select other user roles. For example, the same person can be a Filing Author and a Filing Signer.

I want to:	Choose User Type	Definition	
Create a schedule but not a Form 5500/5500- SF in IFILE	Schedule Author	Schedule Authors complete only one of the Schedules in a Form 5500 Series filing. Unlike a Filing Author, a Schedule Author (without other user types) cannot initiate, sign, or submit a filing. This is rare.	
Submit a filing on behalf of an individual or company	Transmitter	An individual, company, or organization authorized by the plan sponsor or plan administrator to submit electronic returns for the plan. This is rare.	
Develop and certify third-party software	Third-Party Software Developer	Third-Party Software Developers are companies, trades, businesses, or other persons applying for authorization to be an EFAST2 Software Developer. This is rare.	

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

If you will be signing the filing, you will need to register for credentials as a "Filing Signer."

Q13: [deleted]

Q14: May I develop my own software to prepare and transmit Form 5500/5500-SF/5500-EZ filings?

Private-sector companies may develop software to prepare and transmit Form 5500 Series filings to EFAST2 for processing. However, DOL must validate and approve such software to ensure that files are correctly assembled and formatted.

If you are interested in being an EFAST2-approved third-party software developer, <u>register on the</u> <u>EFAST2 website as a "Third-Party Software Developer"</u>, review the <u>EFAST2 Software Developer Guide</u>, or call **1-866-GO-EFAST (1-866-463-3278)** with questions.

Q15: [deleted]

Q16: How can I update my contact information after I've registered?

Log in to the EFAST2 website and click on the "Profile" link in the navigation bar to change any of your contact information, including your email address.

If your contact information changes or is no longer applicable to your role, please update the information in your profile as soon as possible.

Q16a: [deleted]

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

Beginning Jan 1, 2024, User IDs and passwords are no longer used to sign in to EFAST2. Instead, use Login.gov to sign in.

You may view your EFAST2 User ID, PIN and/or profile information after successfully signing in to the EFAST2 website using Login.gov by going to *Your Account* menu and clicking *Sign In & PIN Help*.

Q16c: [deleted]

Q16d: [deleted]

Q16e: [deleted]

Completing a Form

Q17: [deleted]

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

You must file Form 8955-SSA, Annual Registration Statement Identifying Separated Participants with Deferred Vested Benefits, with the IRS. For more information, see <u>Instructions for Form 8955-SSA</u> and <u>IRS Form 8955-SSA Resources</u>. Never include a completed Form 8955-SSA or prior year Schedule SSA with your Form 5500 filing.

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

We recommend previewing your annual return/report to help you make sure the information entered is accurate and complete.

In IFILE, click the "View PDF" button to see a copy of your annual return/report.

If you are using EFAST2-approved third-party software for your Form 5500 Series return/report, check your user manual for instructions.

Q20: Can I use EFAST2 to export and import my Form 5500, Form 5500-SF or Form 5500-EZ?

You can export a draft Form 5500, Form 5500-SF, or Form 5500-EZ as an XML file that other individuals can import and review in their EFAST2-approved third-party software or IFILE. If the filing undergoes changes during that review, import the updated XML version of the filing before submitting.

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

Yes. You can (and should) validate your filing before submitting it. The automatic validation will perform a check for errors, such as if mandatory compliance questions were left unanswered.

If you don't correct identified issues before you submit, the Government will be alerted to the errors associated with your filing when it is submitted. Filing errors found during any review after submission may result in the Government rejecting your filing.

Q22: Can I submit a draft filing for review?

No. Do not submit a draft filing to EFAST2. The Government will treat any electronically submitted filing as final. If you wish to view a completed filing before submitting, follow the directions in Q19.

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

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

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

Q23a: [deleted]

Q23b: [deleted]

Attachments

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

The IQPA report needs to be indicate the city and state where the report was issued, be dated, signed manually, and then saved as a single PDF file. You must attach that PDF to the Form 5500 annual return/report under the "Accountant's Opinion" tag to transmit it through EFAST2 with the rest of the information in the annual return/report.

If you file for a Defined Contribution Group (DCG) and have a participating plan within the DCG that requires an IQPA report, attach that PDF to the Schedule DCG under the "Accountant's Opinion" tag.

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

No. If your IQPA report contains both the signed Accountant's Opinion and the supporting audit report and financial statements, you do not need to separate the document. It is better to attach each required document as a unique file with the proper tag, but you may upload the entire IQPA report into the "AO" attachment "tag" as a single PDF.

Note: If you omit a required attachment or use an incorrect tag, EFAST2 may alert you that you did not include a required attachment. Section 5.10 of the <u>IFILE User's Guide</u> provides a map of attachments with the tags used by EFAST2.

Also, if you must submit the Schedule(s) of Assets or a Schedule of Reportable Transactions, you must upload these documents using the appropriate attachment tags. If you must file both schedules but do not have separate files, you may either:

- Upload the combined file into each of the required attachment type tags. If your completed Form 5500 has 100 or more pages of attachments, you will likely have difficulty transmitting the filing to EFAST2. See Q29 for options for minimizing file size.
- Create a separate document with a brief statement that the required Schedule(s) of Assets and/or Schedule of Reportable Transactions is included in the IQPA report attachment. Upload that

document where you would otherwise upload the Schedule(s) of Assets and/or Schedule of Reportable Transactions, using the appropriate tags for those attachments.

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

If your return/report requires the submission of the following attachments to one of the actuarial schedules, you must upload them separately with the appropriate attachment tag, or EFAST2 may generate an error message:

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

If your software does not split the file apart, and your actuary cannot provide separate files, you may create separate documents with a brief statement that the required attachment is included in the Actuary Statement file. Upload each of those documents where you would otherwise upload the required attachments, using the correct tag for that attachment.

Q25: Will EFAST2 receive my filing if I do not attach the IQPA report to my Form 5500 annual return/report?

EFAST2 will receive your filing, but the filing is incomplete without the required IQPA report. An incomplete filing may be subject to further review, correspondence, rejection, and civil penalties.

Please note Schedule H, Line 3 specifically asks for information regarding the plan's IQPA report. If you do not submit the required IQPA report, you still must correctly answer these questions.

If you have to file Form 5500 without the required IQPA report, correct that error as soon as possible.

Q26: If I filed IRS Form 5558 to ask for an extension and am now filing my Form 5500, 5500-SF, or 5500-EZ on extension, do I need to attach a copy of the Form 5558 when I submit my Form 5500, 5500-SF, or 5500-EZ?

No. You do not need to attach a copy of the Form 5558 in EFAST2. However, you must keep a copy of the Form 5558 you filed with the IRS with the plan's records. See <u>About Form 5558</u> for the most recent version of the Form 5558 and additional information.

Q26a: When should I check the "Special Extension" box on the Form 5500 or Form 5500-SF?

Only use the "Special Extension" box for extensions announced by the IRS, DOL, and PBGC, such as presidentially declared disasters or combat zone service in support of the U.S. military. (See the Form <u>5500 Instructions</u> for "Other Extensions of Time," Part I, Line D.)

Q27: What file format should I use for attachments to my filing?

Use the following formats to submit attachments to the Form 5500/5500-SF/5500-EZ:

PDF only	PDF or TXT (plain text format)
 IQPA report Image of the signed Schedule MB Image of the signed Schedule SB Image of the signed Form 5500/5500- SF/5500-EZ if you're using the e-signature option (see Q33a) 	All other attachments

Filers of Form 5500-EZ are not required to file schedules or attachments related to Form 5500 except for an image of the signed Form 5500-EZ, if you're using the e-signature alternative.

No attachments are required for the Form PR.

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

No. EFAST2 will not process a filing that includes an encrypted or password-protected PDF.

If you are concerned about the authenticity or security of a PDF file, you can sign or certify the PDF with a digital ID.

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

The best way to create a small, high-quality PDF is to use software that will allow you to "save as" or "print to" a PDF file. Generally, you must have the application that created the original file on your computer to do so.

To avoid an error message, make sure the image in the resulting PDF is right side up. The system does not recognize sideways or upside-down pages.

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

Yes, though it is easier and better to create a PDF from another application's data file (see Q28). Scanners generally come with software that includes an option to save a scanned document as a PDF.

Look for menu items such as "output type" or "settings" to select PDF as the output file type. Consult your scanner's user manual for specific instructions.

Remember that EFAST2 has a size limit for submissions. Some options for reducing file size include:

- Scanning at 300x300 resolution.
- Using true gray, grayscale, or black and white color depth.
- Using "optimize" or "compress" functions if your software allows. Note: Optimizing a PDF may remove any digital IDs if you have added one (see Q27a).

Things to remember when creating PDF attachments:

- Make sure all of the pages of each attachment type are submitted as one PDF file.
- Check that your pages appear in the right order before saving and submitting them.

Your attachment must be right side up, or DOL may not recognize that the required information was attached.

Signing a Return/Report

Q30: If I, as a third-party preparer, am using EFAST2-approved third-party software to prepare a Form 5500 Series return/report for a client, how do I provide the plan sponsor/administrator signature in the submission?

There are a few options:

- A. EFAST2-approved third-party software may have a file-sharing function that allows a plan administrator/sponsor to view and sign the filing. Check with your software vendor or user's manual.
- B. Use IFILE to share the filing with the plan administrator/sponsor. Talk to the plan administrator/sponsor to confirm whether they want the ability to edit the annual return/report before submission. Also, make sure you know whether you or the plan administrator/sponsor will submit the filing. This might affect how you share the filing and what filing credentials the plan administrator will need.

If you export or edit a signed annual return/report, the electronic signatures are automatically erased. If you export or edit it after it is signed, the plan sponsor/administrator will need to sign it electronically again before you or they submit it to EFAST2. This applies whether you are using IFILE or EFAST2-approved third-party software.

If **you, the third-party preparer**, expect to submit the filing for the plan administrator/sponsor, follow these steps:

- Export the annual return/report from your EFAST2-approved third-party software to an XML file.
- Import the XML file into IFILE.
- Specify the plan administrator/sponsor as the signer by entering their email address as the filing's signer. If they have not yet registered in EFAST2 as a Filing Signer, you will receive an alert.
- Have the plan administrator/sponsor log in to IFILE using his or her individual EFAST2 electronic credentials. The plan administrator/sponsor will be able to view and sign (but not edit) the filing.

• Once the filing is signed, you can submit it. However, the plan administrator/sponsor retains legal responsibility for the submission's timeliness, accuracy, and completeness.

If the plan administrator/sponsor wants to submit the filing:

- Export the annual return/report from your EFAST2-approved third-party software to an XML file.
- Send the XML file to the plan administrator/sponsor, who should have already registered in EFAST2 as a Filing Author and as a Filing Signer. They can log in to IFILE, where they can then import the XML file and review and edit the annual return/report.
- The plan administrator/sponsor should identify themself as the signer and sign the filing.
- Once the plan administrator/sponsor signs the filing, they can submit it.
- C. The plan administrator may authorize you to electronically submit the Form 5500 Series for the plan as described in Q33a.

Q31: Do you need a separate registration for the "Employer/Plan Sponsor" and for the "Plan Administrator" (two separate signature lines) on the Form 5500 Series return- report if the employer/plan sponsor and the plan administrator are the same person?

No, you only need to register one time for both purposes. You can use the credentials that you get for multiple years and on multiple filings. If you are serving as both the plan sponsor and plan administrator, you only need to sign on the "Plan Administrator" line.

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

No. The person signing electronically must be the person registering for the credentials. The system attributes Filing Signer credentials to a single person. Do not share filing credential information.

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

No. Do not share your PIN.

As the plan administrator, you must examine the Form 5500, Form 5500-SF, or Form 5500-EZ before it is submitted through EFAST2. Your signature – whether electronic or manual, depending on the filing alternative you and your service provider choose – attests that you have examined the filing, and that, to the best of your knowledge and belief, it is true, correct, and complete.

However, as described in Q33a, if a service provider manages the filing process for your plan, they may get their own signer credentials and electronically sign the filing, attesting that they are authorized to submit the return/report and have attached a PDF copy of the plan's Form 5500/5500-SF/5500-EZ that the plan administrator has manually signed and dated.

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

Yes, if the plan administrator has authorized you to electronically submit the Form 5500/5500-SF/5500-EZ for the plan.

Under the e-signature option, service providers that manage the filing process for plans or Direct Filing Entities (DFEs) can get their own EFAST2 signing credentials and submit the electronic Form 5500 for a plan or DFE, or the Form 5500, Form 5500-SF or Form 5500-EZ for a plan. The service provider must have specific written authorization from the plan administrator, employer/plan sponsor, or DFE to submit the filing.

In addition, the plan administrator, employer/plan sponsor, or person authorized to sign on the DFE's behalf, including the "*jurat*," must manually sign a paper copy of the applicable completed form. The service provider must attach a PDF copy of the manually signed form (without schedules or attachments) to the electronic filing submitted to EFAST2.

The service provider also must inform the plan administrator, employer/plan sponsor or DFE that, by electing to use this option, the image of the plan administrator's, employer/plan sponsor's, or DFE signee's manual signature will be included with the rest of the Form 5500 or 5500-SF annual return/report that DOL is required to post online for public disclosure.

The IFILE application includes a statement for service providers that use this electronic signature option. The statement says that, by signing the electronic filing, the service provider is attesting that:

- the plan administrator/sponsor/DFE has authorized the service provider in writing to electronically submit the return/report;
- the service provider will keep a copy of the written authorization in their records;
- in addition to any other required schedules or attachments, the electronic filing includes a true and correct PDF copy of the completed Form 5500 (without schedules or attachments), Form 5500-SF, or Form 5500-EZ return/report bearing the manual signature of the plan administrator, employer/plan sponsor, or DFE, under penalty of perjury;
- the service provider advised the plan administrator, employer/plan sponsor, or DFE that, by selecting this electronic signature option, the image of the plan administrator's, employer/plan sponsor's, or DFE's manual signature will be included with the rest of the return/report that the DOL posts online for public disclosure; and
- the service provider will communicate to the plan administrator, plan sponsor/employer, or DFE signees any inquiries and information received from EFAST2, DOL, IRS, or PBGC regarding the return/report.

When attaching the PDF of the manually signed Form 5500, 5500-SF, or 5500-EZ you must "tag" the PDF as an "EsignatureAlternative" attachment type. That PDF must contain the scanned pages of the Form 5500, 5500-SF, or Form 5500-EZ. Do not include a PDF copy of the schedules or attachments in this PDF file, because that may result in the return/report being too large to submit (see Q44). With the exception of the signature line(s), the form that was manually signed, scanned, and attached to the filing must match the information electronically submitted in XML format.

If you are using EFAST2-approved software to complete and file the Form 5500, Form 5500-SF, or Form 5500-EZ, contact your software vendors to confirm whether this e-signature option is available.

This e-signature option does not allow a service provider to affix the plan administrator's, employer's/plan sponsor's, or DFE's PIN to the electronic filing, because EFAST2 prohibits individuals from sharing their PINs. If the plan administrator, employer/plan sponsor, or DFE is electronically signing the filing, they must personally affix their own electronic signer credentials.

Under the e-signature option, the name of the service provider who affixed their own electronic signer credentials will not appear as the "plan administrator," "plan sponsor," or "DFE" in the signature area on the image of the form that DOL posts online for public disclosure. The name will also not be disclosed as the electronic signer in publicly posted <u>Form 5500 datasets</u> or the public <u>EFAST2 Filing Search</u> <u>application</u>.

Before the service provider electronically submits the Form 5500, Form 5500-SF, or Form 5500-EZ by affixing their electronic signer credentials, the service provider must attach a PDF image of the form that is manually signed by the plan administrator, employer/plan sponsor, or DFE.

The name of the person who manually signed the Form 5500, Form 5500-EZ also must be entered in the electronically filed form in the appropriate signature field. The service provider's name may appear elsewhere in the public filing, for example, identified as a service provider on a Schedule C attached to the Form 5500 or as a paid preparer.

The software may prompt the person signing to provide their name, or it may auto-populate their name. Under the e-signature option, the service provider must enter their name as the person signing the filing.

Q33b: What happens if I submit my Form 5500 Series filing without a valid electronic signature?

All Form 5500/5500-SF/5500-EZ filings must have a valid electronic signature. Any submission that is not signed with a valid signature could be rejected and incur civil penalties. If you submitted your filing without a valid electronic signature as required, you must sign and submit an acceptable amended filing.

When amending your return, first ensure that the plan administrator (or service provider if using the esignature option) has a valid EFAST2-issued User ID and PIN. If not, you or your service provider may need to obtain new or modified EFAST2 credentials.

Follow the <u>Form 5500/5500-SF/5500-EZ instructions</u> and electronically amend your filing (see Qs 39-41). If you are using the e-signature option, you must attach the PDF image of the manually signed Form 5500 (without schedules or attachments), Form 5500-SF, or Form 5500-EZ to the amended filing.

Note: You must keep a manually signed copy of the filing as part of the plan's records, whether the records are maintained on paper or electronically in accordance with the DOL's regulations.

Q33c: Can I sign my filing using my company's name rather than my own name?

No. The signature on the Form 5500, Form 5500-SF, Form 5500-EZ, or Form PR must reflect an individual's name and not a company name. You cannot share your signer credentials with someone else.

Q34: Do actuaries or accountants need to register for EFAST2 electronic Filing Signer credentials?

No. The actuary and accountant electronic signature images are not EFAST2-issued electronic signature credentials and do not require registration for Filing Signer credentials.

The filer or actuary must enter all required information into the electronic Schedule MB or Schedule SB as explained in the <u>Form 5500 instructions</u>. In addition to including the completed electronic Schedule MB or SB, the filer must also attach a PDF of the Schedule with the actuary's signature. The actuary must sign the completed Schedule MB or SB on page 1 either:

- with a signature, or
- by typing the actuary's name in the signature line followed by the actuary's handwritten initials.

A stamped or machine-produced actuary signature is not acceptable.

The accountant must complete and sign their audit report on company letterhead. The filer must attach an electronic image of the signed Accountant's Opinion in the annual return/report.

Submitting a Filing and Checking its Status

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

Yes. A third-party preparer can submit an annual return/report if the plan sponsor/administrator first signs it electronically or the preparer is using the signature alternative described in Q33a. However, the plan sponsor/administrator retains legal responsibility for submission's timeliness, accuracy, and completeness. (See Q30 regarding signing an annual return/report.)

Q35a: When exactly is my filing due?

To determine the date your filing is due, see the instructions.

You must submit your return/report to EFAST2 by midnight of the due date, based on the plan administrator's time zone, as indicated by the administrator's address specified on Line 3a of Form 5500, 5500-SF, or 5500-EZ.

If you attempt to submit a return/report on time and EFAST2 does not successfully receive it before the deadline, you should print the unsuccessful submission notice and include it with the resubmitted return/report, tagged as an "Other Attachment." You may still incur a late penalty, depending on why the original submission was unsuccessful.

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

Not necessarily. You need to check the filing status to ensure EFAST2 received your filing.

Q37: How do I check to see if EFAST2 received my filing?

There are four ways of verifying receipt of your filing:

- 1. If you used EFAST2-approved software, you can check the filing status through that software.
- 2. The transmitter and/or filing signer can check the status by logging into the <u>EFAST2 website</u>, regardless of what software (IFILE or EFAST2-approved) was used.
- Any person (not just the transmitter or signer) can see if a Form 5500 Series filing has been received by calling the EFAST2 Help Line at 1-866-GO-EFAST (1-866-463-3278). This method will not detail any errors specific to the filing.
- You may also use the <u>EFAST2 Filing Search website</u> to find Form 5500, 5500-SF, and PR filings processed by EFAST2.

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

Below is a chart summarizing the submission and filing statuses. The Filing Status can tell you about errors applicable to the transmitted filing.

Filing Status	What does it Mean?	Is the Return/Report Considered a Filing?	What do I need to do?
Unprocessable Submission	EFAST2 could not read or process any of the returns/reports in the submission.	No	Correct and resubmit the submission.
Processing	EFAST2 is trying to read and process each of the annual returns/reports in the submission. Annual returns/reports should not remain in this status for more than 20 minutes.	No – The annual return/report has not yet been processed.	Wait 20 minutes and check the filing status again.
Filing Unprocessable	EFAST2 could not read or process this annual return/report.	No	Correct and resubmit the annual return/report.
Processing Stopped	EFAST2 could not fully check the filing for errors because the filer omitted crucial information	Yes – However, it is incomplete.	Correct and resubmit the entire form as an amended filing.
Filing Error	EFAST2 discovered errors.	Yes – However, it contains errors.	Correct and resubmit the entire form as an amended filing.
Filing Received	EFAST2 either found no errors or only identified possible errors in the information provided by the filer.	Yes	If you need to correct anything, do so and resubmit the entire form as an amended filing.

Q39: How do I submit an amended filing in EFAST2?

For plan years 2019, 2020, and 2021 Form 5500 Series annual returns/reports, and the Form PR, make any necessary amendments to the original version you submitted, check the box for "amended return/report" in Part I, and resubmit the entire filing, including all required schedules and attachments.

For plan years 2018 and earlier returns/reports, see Q4. For confirmation of which form to file, use the Form Version Selection Tool.

Q40: I am amending my filing. Can I just submit the portion of the return/report that I am amending?

No. You will need to resubmit the entire form through EFAST2, with all required schedules and attachments. You cannot submit just the parts of the filing that are being amended.

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

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

Q41: [deleted]

Online Disclosure

Q42: Can the general public view my filings online?

The EFAST2 website publicly shows successfully submitted Form 5500, 5500-SF, and PR filings (forms, schedules, and attachments), with the following exceptions:

- filings/attachments containing sensitive information (e.g., Social Security number, financial information, etc.),
- filings for plan years before 2009, and
- one-participant and foreign plans.

EBSA also posts date information on its <u>Form 5500 Datasets</u> webpage. These are structured datasets of Form 5500 Series forms and schedules filed each year, including filings prior to 2009.

IRS procedure requires information filed on Form 5500-EZ to be made available. Form 5500-EZ information will not be published on the Internet regardless of whether it is filed electronically or on paper.

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

The EFAST2 website generally displays submitted forms and schedules within minutes after successful receipt. However, attachments in a filing may take up to 21 days before they are available to the public.

Troubleshooting Problems with EFAST2

Q44: What should I do if the file is too big?

EFAST2 should accept any submissions up to 100 MB (though a filer's internet service provider or network issues could prevent a filer from transmitting a smaller file).

Submissions may include up to 100 filings. If a batch submission is over 100 MB, the transmitter should break it up so that there are fewer filings in each batch.

A single filing should not exceed the 100 MB size limit, even if the filing has multiple attachments. If a filing is bigger than 16 MB, it is probably because the PDF attachments were scanned with too high a resolution or color depth. See Q28 and Q29 for ways to minimize file size when creating a PDF document.

In the rare event a filing is over 100 MB and you cannot reduce the attachments' file size, please call **1-866-GO-EFAST (1-866-463- 3278)** for help.

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

Yes. Please turn off pop-up blockers when using the EFAST2 website.

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

Here are some common solutions:

- Update your browser.
- Use a different browser.
- Ensure that JavaScript is enabled on your computer.
- Ensure that the EFAST2 website is included as one of your computer's trusted sites.

If you are still having trouble, call 1-866-GO-EFAST (1-866-463-3278).

Q46: [deleted]

Official Government Correspondence

Q47: After I validate and file my submission, how will I know if there's a problem with my filing?

If the Government identifies a problem with your filing, DOL, IRS, or PBGC may contact you using the mailing address, phone number, and/or email address of the plan administrator, plan sponsor, or person who transmitted the filing. To avoid delays and minimize possible penalties, please ensure your EFAST2 user profile includes your current, valid business contact information.

See Q21 for guidance on checking your filing for errors before submitting it.

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

DOL uses email to communicate with filers regarding Form 5500/5500-SF inquiries and rejections. Initial emails will come from <u>DRC@dol.gov</u>. DOL sends such emails, intended for plan administrators, to the email account associated with the plan administrator's electronic signature on the Form 5500/5500-SF. Please ensure your EFAST2 user profile has your current, valid business email address.

If you are a plan administrator and you used a service provider under the e-signature alternative, your service provider may receive emails about your plan.

If you filed using the alternative signature option set forth in the Form 5500 Series instructions and Q33, your service provider must communicate any inquiries and information the Government sends regarding the return/report to the plan administrator/employer.

DOL's electronic correspondence process allows you to open the PDF, fill in requested information, and email the completed PDF back to <u>DRC@dol.gov</u>.

DOL will never ask for your name, Social Security number, bank account, or credit card information in an email.

If you have questions about DOL's correspondence or suspect you received a suspicious email, email <u>DRC@dol.gov</u> or call **1-866-GO-EFAST (1-866-463-3278)**.

If you have trouble opening DOL's email or the attached PDF files, you may request fax or paper copies from <u>DRC@dol.gov</u>.

Q49: Can I change the email address DOL uses to contact me about my Form 5500/5500-SF?

Yes. DOL's emails, intended for plan administrators, are sent to the email account associated with the plan administrator's electronic signature on the Form 5500/5500-SF. Please ensure the plan administrator's EFAST2 user profile has a current, valid business email.

You can change the email address in your EFAST2 user profile by logging in to the <u>EFAST2 website</u> and selecting the User Profile link in the left-hand navigation bar. There may be a slight processing delay before DOL begins sending email to the new address.

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

No. DOL does not currently offer a method to opt out of receiving email regarding filed Form 5500/5500-SFs. If DOL does not obtain a response to the issued emails, DOL may try to contact you via phone or mail before assessing penalties or fees.

Q51: Why would DOL email me?

DOL uses email to send questions about your Form 5500/5500-SF filing and to share information on upcoming outreach events. For example, DOL may send emails to small business plan sponsors regarding free, local DOL-sponsored compliance-assistance seminars.

Q52: Will IRS send me email regarding my filings?

No. If you receive a suspicious email that claims to come from the IRS, email <u>phishing@irs.gov</u>. See <u>Suspicious emails and Identity Theft</u> for more information.

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

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