FAQs on EFAST2 Electronic Filing System



U.S. Department of Labor Employee Benefits Security Administration January 11, 2021

- General
- Filing Preparation Software
- Registering for EFAST2 Credentials
- Completing a Form
- Attachments
- Signing a Return/Report
- 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, or Form PR on paper?

Generally, no. You must electronically file the Form 5500 and 5500-SF. You also must electronically file the Form PR (Pooled Plan Provider Registration).

If you are a one-participant plan or foreign plan, beginning January 1, 2021 you *must* file the Form 5500-EZ; you can no longer use the Form 5500-SF. If you are not subject to the IRS e-filing requirements, then you may file a Form 5500-EZ on paper with the IRS. Otherwise, file the Form 5500-EZ electronically through EFAST2. See the Form 5500-EZ Instructions and IRS's Form 5500 Corner for more information.

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

You have two options for preparing/submitting a Form 5500, 5500-SF, or 5500-EZ

- EFAST2-approved third-party software
- IFILE

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

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

Call the EFAST2 Help Line: 1-866-GO-EFAST (1-866-463-3278). You must use IFILE to prepare/submit a Form PR. The **How to Register as a Pooled Plan Provider** provides an overview of how to prepare and submit your Form PR.

Q3: [deleted]

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

The **Form 5500 Series Version Selection Tool** will help you determine which version of the Form 5500, 5500-SF, or 5500-EZ you should use. Refer to the **form-specific instructions** 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.

The Form PR is not year-specific and is not an annual return/report, but you must complete a supplemental Form PR to provide information about specified reportable events. File, amend, or supplement your Form PR through IFILE. Refer to the **Form PR instructions** 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 2018 or earlier?

Beginning in 1/1/2021, EFAST2 will support two active form years: i.e., for 2021, the current form year (2020) and the just-prior form year (2019); in 2022, the 2021 and 2020 form year, and so on.

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 (2020) forms, schedules, and instructions. You can use the correct plan year schedules and instructions found on the **Form 5500 Series page** for the following schedules:

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

After printing and 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 in the appropriate space at the beginning of the form and/or schedules the plan year for which you are filing.

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 **Delinquent Filer Voluntary Compliance Program** (**DFVCP**) 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?

Beginning January 1, 2021, an amended "one-participant" plan or foreign plan required to file the 5500-EZ/5500-SF electronically must file based on the chart below.

Amended Return	Filed in Calendar Year 2021	Filed in or after Calendar Year 2022
To amend a one-participant or foreign plan originally filed electronically through EFAST2 using Form 5500- SF	If it was a 2019 form, use the 2019 Form 5500-SF through EFAST2. Otherwise, use the 2020 Form 5500- EZ through EFAST2. Use the 2019 Form 5500-SF through EFAST2*	Use the just-prior-year Form 5500-EZ for amending originals filed for the just- prior year. Use the current-year form for amending originals filed for the current or all other years.
To amend a one-participant or foreign plan originally filed electronically through EFAST2 using Form 5500- EZ	Use the 2020 Form 5500-EZ through EFAST2 **	Use the just-prior-year Form 5500-EZ for amending originals filed for the just- prior year. Use the current-year form for amending originals filed for the current or all other years.
To amend a one-participant or foreign plan originally filed on paper 5500-EZFile on paper 5500-EZFile on paper 5500-EZ		File on paper 5500-EZ with the IRS on the form year that corresponds to the original filing

* Beginning in 1/1/2021, EFAST2 will support two active form years: the current form year (2020) and the just-prior form year (2019). The 2019 Form 5500-SF is the last form year to include the one-participant plan and foreign plan checkboxes.

**Beginning 1/1/2021, one-participant and foreign plans will file original filings through EFAST2 using the Form 5500-EZ

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 North Rulon White Blvd. Ogden, UT 84404-0020

Generally, you must use the form year corresponding to the delinquent year. The Form 5500-EZ that applied for each plan year after 1989 may be found at http://apps.irs.gov/app/picklist/list/priorFormPublication.html?value=5500-EZ&criteria=formNumber

The current year (2020) Form 5500-EZ must be used if either (i) the filer would otherwise be required to file a Form 5500 return for the delinquent plan year, or (ii) 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 Form 5500-EZ instructions and **Rev. Proc. 2015-32** for more information about the IRS later Filer Penalty Relief Program filing.

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

Amended filings are to correct inadvertent or good faith errors and/or omissions on a previously filed Form PR, for example, 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, submit a supplemental filing to report changes in the pooled plan provider's status. See "How to Register as a Pooled Plan Provider" and the Form PR instructions.

For an amended or supplemental filing prior to February 1, 2021, you would need to create a new Form PR and type all information into the form. After February 1, 2021 the EFAST2 system will make it easier for you to amend or supplement a previously-filed Form PR by auto-filling the information you previously submitted.

Filing Preparation Software

Q5: What is IFILE?

IFILE 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?

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

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

Q7: What third-party software is approved?

The EFAST2 website (**www.efast.dol.gov**) lists **EFAST2-approved third-party software**. Note that 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.	
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 through the EFAST2 website: www.efast.dol.gov.

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 are filing signers. Plan service providers that have written authorization to file on behalf of the plan administrator under the EFAST2 e-signature option also are filing signers. 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 select other user roles, in addition to filing signer. For example, the same person can be a Filing Author and a Filing Signer. 	
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 5500/5500-SF/5500-EZ 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 or company/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 5500/5500-SF/5500-EZ filings to EFAST2 for processing. However, such software must be validated and approved by DOL to ensure that files are correctly assembled and formatted. If you are interested in being an EFAST2- approved third-party software developer, **register** on the EFAST2 website as a "Third- Party Software Developer", review the **EFAST2 Software Developer Guide**, or call 1-866-GO- EFAST 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 email address. If your contact information changes or is no longer applicable to your role, please update the information in your profile as soon as possible.

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

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

To reduce the likelihood of an EFAST2 message being marked as "spam" or "junk," add our email addresses to your address book: noreply@efastsys.dol.gov and support@efast.dol.gov.

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

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

Q16c: [deleted]

Q16d: [deleted]

Q16e: How do I unlock my account?

- To unlock your account, select "Login", and then select "Forgot Password." You will be prompted to enter your User ID or your email address.
- Once you enter either your User ID or email address, you will then be prompted to answer your challenge question.

If you cannot provide the correct answer within three attempts, your account will be temporarily revoked for up to 30 minutes. After that time, you may attempt to answer the challenge question again. If you do not wish to wait before trying again, or if you have forgotten the answer to your challenge question, call 1-866-GO-EFAST (1-866-463-3278) for assistance in permanently revoking your account and registering for a new account. If you repeatedly reach the limit of invalid challenge responses, your account will be permanently revoked, and you will need to register again or call 1- 866-GO-EFAST (1-866-463-3278).

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 **Instructions for Form 8955-SSA** and **IRS Form 8955-SSA Resources**. 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 facsimile 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 an initial 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 additional 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 FAQ 19.

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 provides that you cannot leave it blank, then enter the number "0". Only leave a numeric field blank where the instructions specifically permit you to do so.

If you leave blank an item that should be zero 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 report of the independent qualified public accountant (IQPA report)?

The IQPA report needs to be documented on letterhead, signed, and then saved as a single 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.

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 **IFILE User's Guide** 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. (Note: 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, and upload that document where you would otherwise upload the Schedules 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 and 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 must still 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 Internal Revenue Service with the plan's records. See **About Form 5558** 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 for presidentially-declared disasters or for combat zone service in support of the U.S. military. (See the **Form 5500 Instructions** 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 FAQ 33a) 	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, although it is easier and better to create a PDF from another application's data file (see FAQ 28). 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 FAQ 27a).

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/plan sponsor to view and sign the filing. Check with your software vendor or user's manual.
- **B.** You can use IFILE to share the filing with the plan administrator/plan 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.

Note that if you export or edit a signed annual return/report, the electronic signatures are automatically erased. If you export or edit the annual return/report 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 **vou** expect to submit the filing for the plan administrator/plan sponsor:

- First, export the annual return/report from your EFAST2-approved third-party software to an XML file.
- Then import the XML file into IFILE.
- Specify the plan administrator/plan sponsor as the signer by entering their email address as the filing's signer. If the plan administrator/plan sponsor has not yet registered in EFAST2 as a Filing Signer, you will receive an alert at this time.
- The plan administrator/plan sponsor will log in to IFILE using his or her individual EFAST2 electronic credentials. The plan administrator/plan sponsor will be able to view and sign (but not edit) the filing.
- Once the filing is signed, you can submit it. The plan administrator/plan sponsor, however, retains legal responsibility for the submission's timeliness, accuracy, and completeness.

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

- First, export the annual return/report from your EFAST2-approved third-party software to an XML file.
- Send the XML file to the plan administrator/plan sponsor. The plan administrator/plan sponsor will need to have already registered in EFAST2 as a Filing Author and as a Filing Signer. The plan administrator/plan sponsor can log in to IFILE and import the XML file into IFILE. The plan administrator/plan sponsor can then review and edit the annual return/report in IFILE.
- Then the plan administrator/plan sponsor will identify themself as the signer and sign the filing.
- Once the plan administrator/plan sponsor signs the filing, they can submit it.

C. As a final alternative, the plan administrator may authorize you to submit electronically the Form 5500/5500-SF/5500-EZ for the plan as described in FAQ 33a.

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 returnreport. 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 chosen by you and your service provider—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 response to FAQ 33a, if a service provider manages the filing process for your plan, the service provider may get his or her own signer credentials and electronically sign the filing, attesting that he or she is authorized to submit the return/report and has attached a PDF copy of the plan's Form 5500/5500-SF/5500-EZ that has been manually signed and dated by the plan administrator.

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 submit electronically 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 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 behalf of the DFE, including the "*jurat*," must manually sign a paper copy of the applicable completed form, and 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 annual return/report posted online by the Department of Labor for public disclosure.

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

- the plan administrator/plan sponsor/DFE has authorized the service provider inwriting to electronically submit the return/report;
- the service provider will keep a copy of the specific 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 posted by the DOL online for public disclosure; and
- the service provider will communicate to the plan administrator, plansponsor/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 (without schedules or attachments), 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 FAQ 44). With the exception of the signature line(s), the Form 5500, 5500-SF, or 5500-EZ 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, as described above, EFAST2 prohibits individuals from sharing their PINs. If the plan administrator, employer/plan sponsor, or DFE is electronically signing the filing, the person authorized to sign as the plan administrator, employer/plan sponsor, or DFE must personally affix his or her own electronic signer credentials.

Under the e-signature option, the name of the service provider who affixed his or her own electronic signer credentials will not automatically appear as the "plan administrator", "plan sponsor," or "DFE" in the signature area on the image of the Form 5500, or Form 5500-SF posted by the Department of Labor online for public disclosure, and will not be disclosed as the electronic signer in publicly-posted **Form 5500 datasets** or the public EFAST2 Filing **Search** application.

As described above, 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 to the electronically filed Form 5500, Form 5500-SF, Form 5500-EZ, a PDF image of the Form 5500, Form 5500-SF, or Form 5500-EZ 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 5500, Form 5500-SF, or Form 5500-EZ in the appropriate signature field. The name of the service provider 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 e-signature option) has a valid EFAST2-issued User ID and PIN. If not, you or your service provider may need to obtain new or modified EFAST2 credentials (see **EFAST2 Credentials FAQ**). Follow the **Form 5500/5500-SF/5500-EZ instructions** and electronically amend your filing (see FAQs 39-41). If 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 (whether the records are maintained as paper records or electronically in accordance with the DOL's regulations) as part of the plan's records.

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. And 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 **Form 5500 instructions**. 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 one 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 a plan sponsor/administrator first signs it electronically or the preparer is using the signature alternative described in FAQ 33a. The plan sponsor/administrator, however, retains legal responsibility for the timeliness of the submission, as well as for its accuracy and completeness. (See FAQ 30 regarding signing an annual return/report.)

Q35a: By when exactly is my filing due?

To determine which 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 Acknowledgement 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:

- **A.** If you used EFAST2-approved software to submit a Form 5500 series filing, you can check the status of the filing through that software.
- **B.** After logging into the EFAST2 website (**www.efast.dol.gov**), the transmitter and/or filing signer can check the status of their Form 5500 series or PR filings regardless of what software (IFILE or EFAST2-approved) was used to submit the filings.

- C. 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.
- **D.** You may also use the EFAST2 Filing **Search website** 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. By looking closer at the Filing Status, you can see specific error messages applicable to the transmitted 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 and 2020 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, with all required schedules and attachments, through EFAST2. You cannot submit just the parts of the filing that are being amended.

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

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

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,
- One-participant and foreign plans,
- Filings identified as amendments and linked to their parent filing, and
- Prior-year filings submitted on a current-year form.

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

Information filed on Form 5500-EZ is required to be made available per IRS procedure. Form 5500-EZ information will not be published on the Internet regardless if filed electronically or filed 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 ISP 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 up the batch so that there are fewer filings in each batch submission. 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 FAQs 28 and 29 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 file size of the attachments, 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 FAQ 21 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. DOL sends initial emails from DRC@dol.gov. 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 5500/5500-SF/5500-EZ instructions and FAQ 33, your service provider must communicate to the plan administrator/employer any inquiries and information the Government sends regarding the return/report.

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

DOL will never request you supply 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 DRC@dol.gov 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 DRC@dol.gov.

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 the current, valid business email.

You can change the email address in your EFAST2 user profile by **logging in to the EFAST2 website** and then 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 e-mail that claims to come from the IRS, you can relay that e- mail to the IRS mailbox, phishing@irs.gov. See **Suspicious e-mails and Identity Theft** for more information on suspicious IRS emails.

Q53: I received a notice from the IRS regarding my 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 **IRS Retirement Plans Form 5500 Corner** for information regarding the IRS notices and links to relevant FAQs. You may also call IRS Employee Plans Customer Account Services at 1-877-829-5500.