

Publication EFAST-A
USER'S GUIDE FOR
ELECTRONIC/MAGNETIC MEDIA FILING
OF
FORMS 5500 AND 5500-EZ
Final Deliverable 830

Department of Labor

10 May 2007

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Lawrence Computing Center
Deputy Program Manager, EFAST
3833 Greenway Drive
Lawrence, KS 66046

or FAX to: (785) 838-2179

Attention: Deputy Program Manager, EFAST

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**USER'S GUIDE FOR ELECTRONIC/MAGNETIC MEDIA FILING OF
FORMS 5500 AND 5500-EZ**

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Revision History

| Date | Section | Description of Change |
|-----------|--------------------------|---|
| 9/1/2005 | throughout | Changed all references from plan year 2004 to plan year 2005. |
| 12/1/2005 | 5.1, 5.2 | Removed reference to Schedule T. |
| 3/21/2006 | Cover | Changed DRAFT to FINAL. |
| 8/7/2006 | throughout | Changed all references from plan year 2005 to plan year 2006. |
| 8/7/2006 | Cover | Changed FINAL to DRAFT. |
| 8/7/2006 | 5.1 5.2 SECTION 13 | Removed Schedule P from list of forms and schedules, and list of multiple occurrences of schedules. |
| 3/13/2007 | Cover | Changed DRAFT to FINAL. |
| 3/13/2007 | 8.1 | Added mail address and fax number for EFAST-1 applications. |
| 3/29/2007 | Throughout | Replaced NCS Pearson and NCSP with Pearson Government Solutions and PGS, respectively. |
| 4/25/2007 | SECTION 2 | For FIPS Pub 4-1, the Standard Category was changed to Year 2000 Compliance. |
| 4/25/2007 | 4.2 8.4.1 | Removed "Plan" from "Plan employer" for Form 5500-EZ reference. |
| 4/25/2007 | SECTION 6 | The line item reference for Form 5500-EZ was corrected to read "Line Item A (2)". |
| 4/25/2007 | SECTION 12 | Section reference for Amended filings was corrected to the appropriate section. |
| 4/25/2007 | 12.3 | The error code for more than 297 errors was corrected to read "0099" to coincide with Appendix B. |

Revision History

| Date | Section | Description of Change |
|-------------|-------------------------|---|
| 4/25/2007 | Appendix A (page 36) | The reference to EFAST-B for Figure 1 in the “Instructions for Submitting Filings on CD-ROM or Diskette” section now correctly identifies the Section in the EFAST-B. |
| 4/25/2007 | Appendix A (page 36) | The Labeling on All Media examples have been corrected to match the layout described. |

USER'S GUIDE FOR ELECTRONIC/MAGNETIC MEDIA FILING OF FORMS 5500 AND 5500-EZ

SECTION 1. INTRODUCTION

Employee benefit plan reports are required to be filed annually and are used by the U.S. Department of Labor (DOL), Department of Labor's Employee Benefits Security Administration (EBSA), Pension Benefit Guaranty Corporation (PBGC), and Social Security Administration (SSA) to carry out the provisions of the Employee Retirement Income Security Act of 1974, as amended, (ERISA) and other applicable statutes. This user's guide provides the information needed to participate in the ERISA Filing Acceptance System (EFAST) electronic/magnetic media filing program for Plan Year 2006. Filings may be submitted at any time, but they will not be processed until July 1st, 2007.

1.1 Purpose

The purpose of the EFAST electronic filing program is to increase electronic filing by providing a convenient means of submitting completely paperless Form 5500 series filings. Electronic filing software checks and verifies filings prior to transmission. This ensures that the filings are valid, in the proper format, and are less likely to contain mathematical errors than paper filings, thereby reducing employer exposure to possible civil penalties associated with deficient filings. In addition to reducing the filers' cost of paper and postage on typical paper submissions, electronic filing also produces more accurate filings, which reduces correspondence with the Government.

This guide specifies the requirements for participating in the electronic/magnetic media filing program for Employee Benefit Plan Filings (Forms 5500 and 5500-EZ).

Publication EFAST-B, *File Specifications, Validation Criteria and Record Layouts for Electronic/Magnetic Media Filing of Forms 5500 and 5500-EZ for Plan Year 2006*, provides the technical information needed by Transmitters and Software Developers who wish to participate in this program. SECTION 2 of this guide includes a list of related documentation.

1.2 Contractor's Role

The Pearson Government Solutions (PGS) Team is responsible for developing and maintaining the electronic filing and paper systems for the EFAST (ERISA Filing Acceptance System). This includes designing and developing the system and all associated documentation. Some of the required documentation includes this Electronic Filing User's Guide and the Electronic Filing File Specifications. The PGS Team will work with Department of Labor (DOL), Software Developers, Transmitters, and Signers to develop the best possible program and documentation.

SECTION 2. REFERENCED DOCUMENTS

| Title | Standard Category | Description |
|---|----------------------|--|
| Publication EFAST-B, <i>File Specifications, Validation Criteria and Record Layouts for Electronic/Magnetic Media Filing of Forms 5500 and 5500 EZ for Plan Year 2006</i> | | Explains different parts of a filing, gives general information about and explains what records are found in the .DOL file, explains what unstructured attachments are and details what types of files can be transmitted, lists the possible errors that occur during the initial validation checks on the filing, gives the format for the initial acknowledgement checks done on the filing, provides special instructions for entering EIN, name, and address fields, explains repeating pages, and provides record layouts for all the Forms and Schedules. |
| Publication EFAST-1, <i>Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers</i> | | Application form and instructions that all participants must complete to participate in the EFAST electronic/magnetic media program. |
| FIPS PUB 4-1 | Year 2000 Compliance | Representation for calendar date and ordinal date for information technology. |
| FIPS PUB 31 | Security | Guidelines for Automatic Data Processing Physical Security and Risk Management. |
| FIPS PUB 38 | ADP | Guidelines for Documentation of Computer Programs and Automated Data Systems (being reviewed for withdrawal). |
| FIPS PUB 41 | Security | Computer Security Guidelines for Implementing the Privacy Act of 1974. |
| FIPS PUB 46-2 | Security | Data Encryption Standard (DES). Includes software, firmware, hardware, and any combination thereof. |
| FIPS PUB 74 | Security | Guidelines for Implementing and Using the NBS Data Encryption Standard (DES). |
| FIPS PUB 87 | ADP | Guidelines for ADP Contingency Planning. |
| FIPS PUB 112 | Security | Password Usage. |
| FIPS PUB 140-1 | Security | Security Requirements for Cryptographic Modules. |
| FIPS PUB 171 | Security | Key Management Using ANSI X9.17. |

| Title | Standard Category | Description |
|----------------|--------------------------|----------------------------|
| FIPS PUB 180-1 | Security | NIST secure hash standard. |
| FIPS PUB 186 | Security | NIST DSS standard. |

SECTION 3. PARTICIPATING IN THE ELECTRONIC FILING PROGRAM

This user's guide contains the information needed to participate in the electronic filing program. The following sections include information about:

- Encryption and signature procedures
- Types of participants
- Composition of the filing
- Amended filings
- Limitations and exclusions from filing electronically
- Application procedures
- Overview of PATS for Software Developers
- Transmitting
- Signature procedures
- Encryption procedures
- Filing receipt and acceptance
- Record keeping
- Advertising caveats
- Administrative review
- Contact information
- Troubleshooting

This publication supersedes any procedures for electronic/magnetic media filing of Forms 5500 and 5500-EZ previously issued. The procedures contained in this publication are effective for filings submitted for Plan Year 2006 and subsequent years.

3.1 Personal Identification Numbers, Signer IDs and Encryption Keys

Each individual acting as a Signer receives a secure Personal Identification Number (PIN) and a Signer ID (a nine digit number), which are used in conjunction to "sign" the electronic filing. Electronic 5500 filings must be "signed" with a combination of a PIN and Signer ID.

Each Transmitter receives an Encryption Key, which are used to encrypt modem-to-modem filings. Filings submitted via one of these electronic methods must be encrypted prior to transmission to maintain a high level of security. Once received at the processing center, filings are decrypted and checked for a valid PIN and Signer ID before processing begins. The EFAST electronic filing system provides an electronic acknowledgement of receipt for all filings submitted. This acknowledgement provides assurance that the filing has been received.

The advantages to using a PIN and a Signer ID to “sign” the filing are:

- Security. Only the filer and authorized Government personnel have access to the secured PIN and Signer ID.
- Less paperwork. The Transmitter’s responsibility to send paper forms, schedules, and attachments to DOL is eliminated, thus making the filing completely electronic.

NOTE: The documents formerly attached to Form 8453-E are now required to be included as part of the electronic filing as Unstructured Attachments as prescribed in Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts*. Form 8453-E is no longer a valid form.

The advantages to using an Encryption Key to encrypt the filings are:

- Security. Only the filer and authorized Government personnel have access to the secured Encryption Keys.
- Integrity. Maintains the integrity of the data sent to DOL.
- Comfort. Provides a level of comfort to filers who may otherwise be concerned that the data could be compromised or altered if sent on paper.

3.2 Filing Media

This program accepts filings submitted electronically (modem-to-modem, magnetic tape, CD-ROM, and diskette). Filings are submitted to the Lawrence Computing Center (LCC). APPENDIX A provides the specifications for modem-to-modem and magnetic media filing.

Refer to Appendix A of this document and to Publication EFAST-B, *File Specifications, Validation Criteria and Record Layouts for Electronic/Magnetic Media Filing of Forms 5500 and 5500 EZ for Plan Year 2006* for information on file naming conventions, file formats, record specifications, validation criteria, and other information related to the physical format and record layouts of electronic filing data files.

SECTION 4. TYPES OF PARTICIPANTS

The following categories include the major participants in the electronic/magnetic media filing program: **Preparer, Signer, Transmitter, and Software Developer**. These categories are not mutually exclusive. For example, the **Signer** may also be the **Software Developer** and **Transmitter**. (The acceptance materials each type of participant receives upon acceptance are described under Acceptance Materials, in SECTION 8.)

4.1 Preparer

The Preparer (sometimes referred to as tax preparer) is a party that completes the forms, schedules, and attachments associated with the filing on behalf of the Signer or Plan Sponsor/employer.

Preparers can electronically sign filings only if they apply to be a **Signer** (see Section 4.2).

Preparers can submit electronic filings only if they apply to be a **Transmitter** (see Section 4.3).

If preparers do not wish to sign electronic filings as a Signer or do not wish to submit electronic filings as a Transmitter, they do not need to apply to participate in the EFAST program.

4.2 Signer

A Signer in the EFAST electronic filing program is defined as an individual who would normally either: 1) Sign the bottom of Form 5500, page 1 as a “plan administrator” or as an “employer/plan sponsor/DFE” or 2) Sign the bottom of Form 5500-EZ as a “employer” or “plan administrator”. Only individuals may apply as Signers.

Anyone who would sign paper filings in the above listed spaces is required to complete Form EFAST-1, *Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers*, in order to sign electronic 5500 series filings.

The Signer should use this user’s guide as reference material for EFAST electronic filing.

4.3 Transmitter

The Transmitter is an entity that transmits filings signed by the Signer directly to the DOL using software created by an approved Software Developer. Each prospective Transmitter is required to complete Form EFAST-1, *Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers*, to apply to participate in the program.

A transmitter transfers 5500 series filings via modem-to-modem or via magnetic media (magnetic tape, diskette, or CD-ROM) directly to the DOL.

The entity that applies as a Transmitter must have an Employer Identification Number (EIN). Each transmitter must have a unique EIN.

4.4 Software Developer

The Software Developer is an entity that develops software for the purposes of one or more of the following:

- Preparing filings
- Formatting filings according to DOL electronic/magnetic media filing specifications
- Transmitting filings directly to the DOL

The software may be developed to be sold to the public or to be used by the developer. The filings that the Transmitter transmits to the DOL must conform to formatting standards listed in Publication EFAST-B.

The Software Developer must complete Form EFAST-1, *Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers*, to apply to participate in the program. Once the Software Developer's application is accepted by DOL, the Software Developer begins Participant Acceptance Testing (PATS). Refer to SECTION 9, which explains the PATS process in more detail.

The entity that applies as a Software Developer must have an Employer Identification Number (EIN).

The Software Developer should use the following document(s) as reference materials for EFAST electronic filing:

- Publication EFAST-A, *User's Guide For Electronic/Magnetic Media Filing of Forms 5500 and 5500-EZ*
- Publication EFAST-B, *File Specifications, Validation Criteria and Record Layouts for Electronic/Magnetic Media Filing of Forms 5500 and 5500 EZ for Plan Year 2006*

SECTION 5. COMPOSITION OF THE FILING

Employee Benefit Plan electronic/magnetic media filings that are transmitted electronically or on magnetic media to the DOL consist of the following:

- Form 5500 or Form 5500-EZ filing data
- Schedules
- Unstructured Attachments

The filing **must** contain the same information as a comparable filing submitted entirely on paper.

5.1 Forms and Schedules

The following forms and schedules are the only forms and schedules acceptable for electronic/magnetic media filing. The Maximum Number Per Filing refers to the amount allowable by the EFAST electronic filing system. Different software packages may allow lesser amounts.

| Form or Schedule | Maximum Number Per Filing |
|---|------------------------------|
| Form 5500 – Annual Return/Report of Employee Benefit Plan | 1 |
| Form 5500-EZ – Annual Return of One-Participant (Owners and Their Spouses) Retirement Plan | 1 |
| Schedule A (Form 5500) – Insurance Information | 999 |
| Schedule B (Form 5500) – Actuarial Information | 1 |
| Schedule C (Form 5500) – Service Provider | 1 |
| Schedule D (Form 5500) – DFE/Participating Plan Information | 1 |
| Schedule E (Form 5500) – ESOP Annual Information | 1 |
| Schedule F (Form 5500) – Fringe Benefit Plan Annual Information Return | 0 |
| Schedule G (Form 5500) – Financial Transaction Schedules | 1 |
| Schedule H (Form 5500) – Financial Information | 1 |

| Form or Schedule | Maximum Number Per Filing |
|---|----------------------------------|
| Schedule I (Form 5500) – Financial Information – Small Plan | 1 |
| Schedule R (Form 5500) – Retirement Plan Information | 1 |
| Schedule SSA (Form 5500) – Annual Registration Statement Identifying Separated Participants With Deferred Vested Benefits | 1 |
| Unstructured Filing Attachments – Such as AR/AO Reports and other information that would traditionally be submitted as paper attachments | 999 |

5.2 Multiple Occurrences of Schedules

A filer may submit multiple occurrences of the following schedules. Some software programs may allow lesser amounts.

| Schedule | Maximum Number of Occurrences |
|-----------------|--------------------------------------|
| Schedule A | 999 |

5.3 Multiple Partial Schedules

A filer may submit unlimited repeated instances of partial pages of certain schedules if the schedule cannot hold enough information. For example, if a filer wishes to enter more participants than page 2 of Schedule SSA can accommodate, that filer can submit multiple occurrences of Schedule SSA page 2.

The following pages can have up to 9,999 occurrences. Some software programs may allow lesser amounts.

| Schedule | Pages That Repeat |
|-----------------|--------------------------|
| Schedule A | Page 2 |
| Schedule C | Pages 2 and 3 |
| Schedule D | Pages 2 and 3 |
| Schedule G | Pages 2, 3, and 4 |
| Schedule SSA | Page 2 |

The multiple partial schedules should be added to the filing using the filer software and must be submitted with the entire filing.

5.4 Filing Extension Forms Such as Form 5558, 4868, 7004, 2688, and 2758

All extension forms must be filed as unstructured attachments using the instructions in EFAST-B Part I Sections 5.7.5 and 6.

If filing for an extension using any of the above forms, the following text should be written in the unstructured attachment: “A paper copy of Form 5558, Application for Extension of Time to File Certain Employee Plan Returns*, has been filed with the IRS for this plan.” This statement is made under penalty of perjury: The form referred to in this statement MUST have been filed with the IRS.

(* - Substitute the Form number and Form name of the Extension that was filed. If Form 2688 or Form 2758 are filed, the extension date must also be included in this text.)

5.5 Attachments

Paper attachments are not acceptable as attachments to an electronic filing. All attachments must be received with the filing as Unstructured Attachments. The following attachment types are allowable by the EFAST electronic filing system. Some software programs may not allow for all listed format types.

| Format | Minimum Version |
|---|------------------------|
| ASCII character (text) format | -- |
| Microsoft Word document format | 6.0 |
| Corel WordPerfect document format | 6.0 |
| Adobe Portable Document Format (PDF) | 3.0 |
| Hypertext-Markup Language (HTML) format | -- |
| Microsoft Excel format | 5.0 |
| Lotus 1-2-3 format | 3.0 |

The software program should provide the method of attaching the files. The requirements for including Unstructured Attachments as part of the electronic filing are prescribed in Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts*.

SECTION 6. AMENDED FILINGS

Amended Forms 5500 and 5500-EZ are acceptable on electronic/magnetic media; however, the following restrictions apply:

- The amended filing **must be identified as amended** (Part I, Line Item B (2) of Form 5500 or Part I, Line Item A (2) of Form 5500-EZ must be checked. See Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts*).
- Amended filings must be complete replacements of the original filings.

Do **NOT** transmit an amended filing if you have not received an acknowledgement of the original filing.

Filings transmitted to correct a “Not Acceptable” condition (that is, an Acceptance Code of “R” was shown on the acknowledgement for that filing) **MUST NOT** be marked as amended filings **unless** the correction is being made to a filing that was filed as amended and then was not acceptable for error conditions.

SECTION 7. LIMITATIONS AND EXCLUSIONS

The following types of Employee Benefit filings are **excluded** from electronic filing:

- Filings sent using software not approved by the DOL for electronic/magnetic media filing. See SECTION 10 for a list of approved software. A Developer's software becomes approved upon successfully completing the testing process.
- Filings with accounting periods of more than 365 or 366 days. (366 day accounting periods are only acceptable for leap-year filings.)
- Filings partially filed electronically and partially on paper.
- Filings for which sections of the form are filed at different times rather than filed at the same time.
- Filings submitted on unsupported media. (APPENDIX A – ELECTRONIC/MAGNETIC MEDIA SPECIFICATIONS provides information about supported media.)
- Filings including unsupported attachment types. (See Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts* for more information.)
- Unsigned filings; i.e., filings submitted without including the PIN and Signer ID as an electronic signature. (Section 8.4.1 provides information on signing the filings.)
- Filings that are not encrypted and are submitted via modem-to-modem or transmission. (Section 8.5.1 provides information on encryption.)

SECTION 8. APPLICATION PROCEDURES

The first step toward electronic/magnetic media filing of Forms 5500 and 5500-EZ is completing Form EFAST-1, *Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers*. A complete application and line-by-line instructions for completing the application can be obtained at the EFAST Web site at www.efast.dol.gov under Forms & Publications.

Applications should be submitted by Signers, Transmitters, and Software Developers. To assure the quality of the program and the consistency of the data, all participants must agree to follow the requirements and specifications in this publication and all related publications. Section 2 of this User's Guide provides a list of related documentation.

In subsequent processing years, previously approved applicants will **not** be required to submit a new application to participate in the electronic filing program. Transmitters and Software Developers, however, may submit revised applications at any time if any information changes. Signers are **not** allowed to submit an application marked as Revised. If a Signer has a change in information, a new application must be completed or should call the Consolidated Help Desk.

8.1 Submitting the Application

Submit all completed Forms EFAST-1 to the address listed on the form. DOL will accept applications by mail or fax. Applicants must indicate on the application the type(s) of participant(s) they plan to be.

Mail your EFAST-1 application to:

EBSA
P.O. Box 7047
Lawrence, KS 66044-7047

You may also send it by private delivery service to: EBSA, Attn: EFAST-1, 3833 Greenway Drive, Lawrence, KS 66046-1290.

Or fax your EFAST-1 application to 785-838-2185.

This fax number is for EFAST-1 applications only.

Applications will be accepted at any time. All applications are processed and appropriate materials mailed to the approved applicant within one week of receiving the completed Form EFAST-1. Applications from Canadian Provinces will be accepted.

Software Developers should be aware that successfully completing the testing process is required prior to the EFAST system accepting electronic filings for processing through any software programs. See Section 9 for more information about testing and certification procedures.

8.2 Acceptance Criteria

In order for the application to be accepted, each type of participant (Signer, Transmitter, and Software Developer) must complete Form EFAST-1 according to its instructions. If an application is incomplete,

it will be returned as unprocessable.

8.3 Acceptance Materials

Once the application is accepted, the participants receive the following items: (Each item is described further in the following section.)

Signer

- PIN
- Signer ID
- Publication EFAST-A, *User's Guide for Electronic/Magnetic Media Filing of Forms 5500 and 5500-EZ*

Transmitter

- Encryption Key
- EFIN and Password
- Publication EFAST-A, *User's Guide for Electronic/Magnetic Media Filing of Forms 5500 and 5500-EZ*
- Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts*

Software Developer

- Test PIN
- Test Encryption Key
- EFIN and Password
- Software Developer ID Code
- Publication EFAST-A, *User's Guide for Electronic/Magnetic Media Filing of Forms 5500 and 5500-EZ*
- Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts*
- Publication EFAST-C, *EFAST Participant Acceptance Testing Procedures*. This testing packet contains materials for Participant Acceptance Testing, which is discussed further in Section 9.

8.4 Signer Acceptance Materials

The following sections provide detail about the information sent to Signers upon the acceptance of

EFAST-1.

8.4.1 Personal Identification Number and Signer ID

Each Signer is assigned two identifying numbers by the EFAST Electronic filing system: A Personal Identification Number (PIN) and a Signer ID.

A Personal Identification number is a unique sixteen (16) character identifier. The Signer ID is a unique nine (9) digit identifier. Used together, these numbers act as the Signer's "signature" on the electronic filing. The parties whose PIN and Signer ID is used for electronic/magnetic media filing become the parties responsible for the filing.

Beginning with filings received on and after July 1, 2000, the DOL requires a PIN and Signer ID to be included with each filing as an alternative to using a paper Form 8453-E as a signature document for electronic and magnetic media filings.

Form 5500 filings may be submitted with the "signatures" of two different individual Signers, one as "plan administrator" and the other as the "employer/plan sponsor/DFE". Each Signer must still submit both parts of that "signature" (the Signer ID and PIN).

Form 5500-EZ filings may be submitted with only one "signature", that of the "employer" or "plan administrator".

Sample PIN: F9A2 608D 6D55 C3B1

Sample Signer ID: 48-4856298

The LCC will assign and generate a Personal Identification Number (PIN) and Signer ID upon approval of Form EFAST-1, *Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers*. The PIN and Signer ID will be distributed in separate letters with written documentation containing suggested guidelines and standards for handling, using, and protecting them. The letters containing the PIN and Signer ID should be stored in a secure location to which only authorized people have access. The Signer ID does not expire until it is inactive for two consecutive years. After two consecutive years of inactivity, the Signer ID is deactivated. **The Signer must then complete and submit a new application to receive a new PIN and Signer ID.** Signers are advised to read the instruction text thoroughly before completing an application.

The Signer ID and PIN should be entered in the data-entry software used to create the electronic file. The PIN is displayed on the acceptance letter with two (2) spaces every four (4) digits to improve readability, however, the spaces are not valid characters of the PIN. The spaces must be removed from the PIN before placing it in the .DOL. When a filing is received by DOL, the PIN and Signer ID are cross-checked against the DOL databases to verify that it is valid. Once the PIN and Signer ID are validated, processing can begin.

8.4.2 Deactivating PINS and Signer IDs

In the event that a PIN and/or Signer ID is lost, or stolen, or compromised in any way, the Signer may call the EFAST Consolidated Contact Center to request immediate deactivation of the PIN and Signer ID. The EFAST Consolidated Contact Center's telephone number is 866-463-3278 (866-GO EFAST). Callers will be required to provide either their Signer ID or the PIN and the reason for deactivating the PIN and Signer ID. **The Signer must then complete and submit a new application to receive a new PIN and Signer ID.** Signers are advised to read the instruction text thoroughly before completing an application.

8.5 Transmitter Acceptance Materials

The following sections provide detail about the information sent to Transmitters upon the acceptance of EFAST-1.

8.5.1 Encryption Key

An Encryption Key is a string of characters that gives the sender and receiver of an electronic file the ability to securely transfer a modem filing. This Encryption Key will be associated with the Transmitter's EIN.

Beginning with filings received after July 1, 2000, the DOL requires that all filings submitted by modem be encrypted to protect the privacy of the filings. (Magnetic media filings should **not** be encrypted.) DOL will use private key cryptographic methods, which require the sender and receiver to know and use the same private key.

Sample Encryption Key: AB31 7AB9 4C34 808C 1CEA 2583 586E A8D9 2A76 8F08 D0DC
861C

The LCC will generate and assign an Encryption Key upon the acceptance of Form EFAST-1, *Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers*. The Encryption Key will be distributed in a separate letter and will include written documentation containing suggested guidelines and standards for handling, using, and protecting it. The letter containing the Encryption Key should be stored in a secure location to which only authorized people have access. Encryption Keys are valid until they are inactive for two consecutive years. After two consecutive years of inactivity, the Encryption Keys are deactivated. The transmitter may request to be reactivated by calling the EFAST Consolidated Contact Center at 866-463-3278. The caller will be required to provide the EFIN and Password of the Transmitter. A new Key will then be issued to the Transmitter.

Transmitters will enter the Encryption Key in the software used to create the electronic file. The Encryption Key is displayed on the acceptance letter with two (2) spaces every four (4) digits to improve readability, however, the spaces are not valid characters of the Encryption Key. The spaces must be removed from the Encryption Key before placing it in the .DOL. The software encrypts the filing before sending it to DOL. The DOL determines the validity of the Encryption Key and EFIN. Once the Key is validated, the DOL system decrypts the encrypted filing data.

8.5.2 Replacement Key

In the event that the Key is lost, or stolen, or compromised in any way, the Transmitter may request immediate revocation of the Key by calling the EFAST Consolidated Contact Center at 866-463-3278 (866-GO EFAST). The caller will be required to provide the EFIN and Password of the Transmitter, and the reason for revoking the Key. A new Key will then be issued to the Transmitter.

Encryption Keys expire after two years of inactivity. The transmitter may request to be reactivated by calling the EFAST Consolidated Contact Center at 866-463-3278. The caller will be required to provide the EFIN and Password of the Transmitter. A new Key will then be issued to the Transmitter.

8.5.3 Electronic Filer Identification Number (EFIN)

The Electronic Filer Identification Number (EFIN) is a unique six digit number assigned to all Transmitters and Software Developers. The EFIN identifies the Transmitter or Software Developer and is used to log in to the communications system. This EFIN will be associated with the Transmitter's EIN.

Sample EFIN: 170001

The LCC will generate and assign an EFIN and distribute the EFIN and Password together in a letter to Software Developers and Transmitters upon acceptance of the Form EFAST-1, *Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers*. EFINs do not expire.

8.5.4 Password

The Password is a string of twelve (12) alphanumeric characters assigned to all parties who will transmit filings directly to the DOL. The Password also serves as an identifier when the Transmitter or Software Developer submits filings and receives acknowledgements.

Sample PASSWORD: UR466Y3F1M77

The LCC will generate and assign a Password and distribute the EFIN and Password together in a letter to Software Developers and Transmitters upon acceptance of the Form EFAST-1, *Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers*. The letter containing the Password should be stored in a secure location to which only authorized people have access. Passwords do not expire.

8.6 Software Developer Acceptance Materials

The following sections provide detail about the information sent to Software Developers upon the acceptance of EFAST-1.

8.6.1 Test PIN

The LCC generates and assigns a **Test PIN** to Software Developers to be used when submitting Test filings for PATS. An overview of testing and certification procedures is discussed further in SECTION 9. Detailed instructions for testing are provided to Software Developers upon having their application accepted.

8.6.2 Test Encryption Keys

The LCC will also generate and assign a **Test Key** to Software Developers to be used when submitting Test filings for PATS. An overview of testing and certification procedures is discussed further in Section 9. Detailed instructions for testing are provided to Software Developers upon acceptance of their application.

8.6.3 EFIN

The Electronic Filer Identification Number (EFIN) is a unique six digit number assigned to all Transmitters and Software Developers. The EFIN identifies the Transmitter or Software Developer and is used to log in to the communications system.

Sample EFIN: 170001

The LCC will generate and assign an EFIN and distribute the EFIN and Password together in a letter to Software Developers and Transmitters upon acceptance of the Form EFAST-1, *Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers*. EFINs do not expire.

8.6.4 Password

The Password is a string of twelve (12) alphanumeric characters assigned to all parties who will transmit filings directly to the DOL. The Password also serves as an identifier when the Transmitter or Software Developer submits filings and receives acknowledgements.

Sample PASSWORD: UR466Y3F1M77

The LCC will generate and assign a Password and distribute the EFIN and Password together in a letter to Software Developers and Transmitters upon acceptance of the Form EFAST-1, *Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers*. The letter containing the Password should be stored in a secure location to which only authorized people have access. Passwords do not expire.

8.6.5 Software Developer ID Code

The Software Developer ID is a unique, three digit alphanumeric identifier for Software Developers. It is used to determine whether Software Developers have successfully passed the testing process.

Sample SOFTWARE DEVELOPER ID CODE: 3WD

The LCC will generate and assign a Software Developer ID Code and distribute it in a letter to Software Developers and Transmitters upon acceptance of the Form EFAST-1, *Application for EFAST Electronic Signature and Codes for EFAST Transmitters and Software Developers*. The letter containing the Code should be stored in a secure location to which only authorized people have access. Software Developer ID Codes do not expire.

SECTION 9. PARTICIPANT ACCEPTANCE TESTING FOR SOFTWARE DEVELOPERS

Participant Acceptance Testing (PATS) is mandatory for all **Software Developers**. Participants who do not develop software do not have to test; although, to send filings electronically they must use the software of an approved Software Developer. The purpose of testing is to ensure that DOL can receive and process the electronic/magnetic media filings. Software Developers must test every year prior to the beginning of production processing in July. Annual PATS testing is necessary because the forms, schedules, and types of test validations performed on the data change annually. A Software Developer becomes “approved” by successfully passing the testing process.

Upon acceptance of the Software Developer’s application to participate in the electronic/magnetic media filing program, the LCC will assign a unique Electronic Filer Identification Number (EFIN) and Password to each Transmitter and Software Developer. (A Transmitter who is also a Software Developer receives only one EFIN.) The LCC will also assign and deliver a Software Developer ID Code, Test PIN and Encryption Key to Software Developers whose applications are accepted. The Test PIN and Key will be used to test the signature and encryption on the Test filings the Software Developer submits. Testing should begin prior to the due date or extended due date of the filing(s) to allow ample time to resolve any transmission or data problems.

Software Developers must ensure that their software packages and communication systems provide the same software capabilities and, if applicable, identical data communication capabilities to all users. Test files must be submitted using the same medium that will be used to submit the Live filings. (For example, if the Software Developer’s client software will be used to create and submit filings on diskette, CD-ROM, and modem-to-modem, the Software Developer must send Test filings on at least one of these types of media.) Communication systems and software packages must pass acceptance tests only once each year. Live filings must not be submitted through software until the Software Developer has been notified of acceptance by the DOL. Software that has been successfully tested is considered “approved” and may be used by anyone who has applied to participate in the program.

A packet of testing materials will be sent to Software Developers whose applications are accepted. The “PATS packet” will include all instructions necessary for Software Developer testing and test scenarios. The Software Developer will enter the data from these test scenarios in their software programs, thereby creating the Test filings. If applicants have any questions about testing procedures, they should call the EFAST Consolidated Contact Center by calling 866-463-3278 (866-GO EFAST).

Once a Software Developer has met testing criteria and becomes accepted, additional Test filings can be sent to the system to further test different filing methods or formats. Test filings returned as unprocessable during this period do not affect a Software Developer’s status as Approved.

9.1 Acceptance Criteria

In order to become “approved” Software Developers must demonstrate that the filings created with the software they developed:

- are transmitted in the correct format and meet the DOL electronic filing specifications as defined in Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts*.
- contain no validation or math errors.
- contain the Software Developer ID Code.
- include a valid Test PIN.
- are encrypted correctly, when submitted via modem, using the Test Key provided.
- are **not** encrypted when sent on magnetic media.
- are created from scenarios provided in the PATS packet.

The electronic filing system personnel review each Test transmission and create acceptable or non-acceptable acknowledgements. Acknowledgements for non-acceptable filings are created in both electronic and paper letter formats. If the Test filings contain errors, the acknowledgement contains information about what errors were encountered on each filing. The developer must then correct the errors and retransmit the Test files.

9.2 Certification

Once a Software Developer passes testing procedures, that software is certified and considered “approved”. A unique identification number, “Software Developer ID Code,” will be assigned to each software company who applies and is approved. The Software Developer ID Code will be placed in the file created by the filing software and will be used by DOL to determine whether a Transmitter is using approved software. Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts*, identifies where the Software Developer shall place the Software Developer ID Code in the file.

When the LCC has determined that the Test transmissions are acceptable, DOL will send the applicant a letter of acceptance to participate in the program in addition to creating an electronic acknowledgement. Acceptance is valid only for the year specified in the electronic acknowledgement or acknowledgement letter. EFAST personnel will notify participants when they may begin transmitting Live data.

9.3 Timing and Approval

Software Developers must pass PATS each year. The EFAST system accepts PATS filers based on FORM YEAR. Each developer must pass PATS testing for each form year in order to submit live filings for that form year. For instance, a Software Developer must pass the 2006 PATS procedure in order to submit 2006 form year filings (even though that developer may have passed PATS for a previous year).

Once a developer passes PATS for a form year, that developer can submit filings for that form year for two years:

| Form Year | PATS cases released in: | Plan Year | If approved, filings can be submitted which contain the Software Developer's ID number for that Form Year until: |
|------------------|--------------------------------|------------------------------|---|
| 1999 | 2000 | 01/01/1999-12/31/1999 | June 30 th , 2002 |
| 2000 | 2001 | 01/01/2000-12/31/2000 | June 30 th , 2003 |
| 2001 | 2002 | 01/01/2001-12/31/2001 | June 30 th , 2004 |
| 2002 | 2003 | 01/01/2002-12/31/2002 | June 30 th , 2005 |
| 2003 | 2004 | 01/01/2003-12/31/2003 | June 30 th , 2006 |
| 2004 | 2005 | 01/01/2004-12/31/2004 | June 30 th , 2007 |
| 2005 | 2006 | 01/01/2005-12/31/2005 | June 30 th , 2008 |
| 2006 | 2007 | 01/01/2006-12/31/2006 | June 30 th , 2009 |

After the date listed in the right-hand column, filings that have the form year listed will be rejected (error code 0028).

A Software Developer can also PATS test previous years. As long as filings are still acceptable for a form year, a developer can test for that form year.

Each year, as soon as Software Developers receive the “new” forms, they can participate in PATS testing (this time is different each year). As soon as they pass the PATS procedure for that year, they can submit live filings.

SECTION 10. APPROVED SOFTWARE

To participate in EFAST electronic filing, the filing must be prepared using “approved” software. That is, the Software Developer who created the program used to transmit electronic filings must have passed testing procedures. The software will allow for entry of the form/schedule data, creating unstructured attachments, “signing” the filing by entering the PIN and Signer ID assigned by DOL, and encrypting the filing using the Encryption Key supplied by DOL. The specific instructions for using the software will be included in the instruction manual provided with the software by the Software Developer.

For more information about the PIN/Signer ID and Encryption Key, refer to Section 8.4.1 and Section 8.5.1.

A current list of approved software companies and their software can be viewed at: www.efast.dol.gov

SECTION 11. TRANSMITTING FILINGS TO THE LCC

The following transmission procedures will be used for electronic filing 5500 series forms and schedules.

11.1 Modem-to-Modem

1. The filing is prepared using software that converts the data to the acceptable file format as prescribed in Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts*.
2. When the filing is selected (in the software) for electronic filing, the communication software performs the following:
 - converts the file to acceptable format (as necessary)
 - encrypts the filing
 - connects to DOL and transfers file

The number needed to dial to transmit filings via modem-to-modem transmission is (888) 273-9539.

11.2 Magnetic Media

1. The filing is prepared using software that converts the data to the acceptable file format as prescribed in Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts*.
2. When the filing is selected (in the software) for electronic filing, the filing software performs the following (which may or may not be in this order depending on the software used):
 - converts the file to acceptable format (as necessary)
 - saves the filing to the selected external media
3. The filer mails the external media containing the filing(s) to DOL following the labeling and procedures prescribed in Appendix A.

11.2.1 Shipping Procedures

The method of delivery for a package is optional. Envelopes, packages or cartons containing magnetic tape(s) and any package sent via courier service should be sent to:

Regular Mail:

Lawrence Computing Center
P.O. Box 7041
Lawrence, KS 66044-7041

Overnight Delivery:

Lawrence Computing Center - EFAST

Attn: Production Control

3833 Greenway Drive

Lawrence, KS 66046

SECTION 12. FILING TRANSMISSION AND ACCEPTANCE

DOL reserves the right to revoke the electronic/magnetic media filing privilege of any participant who does not maintain an acceptable level of quality or who deviates from the procedures and specifications set forth in this publication and in the current version of Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts*. Participants must maintain a high degree of integrity and accuracy in order to take part in the program. The electronic/magnetic media data must meet all the validity and consistency tests required as specified in this publication and in Publication EFAST-B.

If a participant decides to submit a filing on paper, which was previously deemed non-acceptable by the LCC, he or she must attach a letter of explanation to the paper filing. A copy of the relevant part of the non-acceptance letter (or a print out of the .ACK file, both described under “Acknowledging Filings”) sent by the DOL should be attached to the letter. The copy of the acknowledgement is necessary in order to bypass delinquency penalty assessment.

Electronic/magnetic media filings will not be considered legally filed and complete until the electronic/magnetic media records are received and acknowledged as being **acceptable** by the DOL. After DOL deems an electronic/magnetic media filing acceptable, it cannot be recalled or intercepted in process. If the Transmitter wants to change any information on a filing that has been acknowledged as acceptable for further processing, an amended filing must be submitted (see SECTION 6).

If an acceptable filing contains a Schedule B and the Schedule B data transmitted was incorrect, an amended filing must be submitted. The actuary should contact the Transmitter to ensure that an amended filing is submitted.

Transmitters are responsible for the security of all data prior to transmission. They must also encrypt the filing data transmitted via modem to ensure that the data cannot be compromised. (See Section 8.5.1 for information about securing the data.)

Signers must ensure that the source material is correct prior to giving plan information to the **Transmitter**.

Software Developers must correct software errors that cause electronic/magnetic media data found to be non-acceptable. All software corrections must be distributed as quickly as possible to all participants who use that software.

12.1 Security of Data

As stated above, the security of the data is the **Transmitter's** responsibility until the filing is transmitted. Several other security features protect the sensitive benefit plan data once the filing leaves the **Transmitter's** hands: use of a PIN and Signer ID as signature, data encryption, use of EFIN and Password to log in, and security firewalls on the DOL servers.

- The use of a PIN and Signer ID as the signature provides a secure method of “signing” the filing. The PIN and Signer ID are encrypted with the filing prior to transmission.
- Data Encryption secures the filing data because the sender and receiver both have to know what the Encryption Key is in order to encrypt and decrypt the data. This is discussed in greater detail in Section 8.5.1.
- The EFIN and Password are required to access the EFAST communications system. Transmitters only have access to their own acknowledgement files.
- Security firewalls ensure that the communication infrastructure is secure and cannot be infringed upon.

12.2 Acceptance of Filings for Processing

The processing of Live filings occurs in two parts: An initial and a final processing. As Live filings are received on the EFAST electronic filing system, preliminary checks are done on the filing. Acknowledgements are created for modem-to-modem or magnetic media filings both deemed non-acceptable and acceptable. Initially acceptable filings are then subjected to further checking. Filings found to be non-acceptable are not passed on for final processing and should be corrected and resubmitted. Note: Modem-to-Modem filings will receive a time stamp (in Central time) upon receipt at LCC.

In order to be deemed acceptable by the DOL, a Live filing must be 1) readable and 2) in the proper format. SECTION 7 identifies the cases in which a filing may not be submitted electronically. When a Transmitter submits a filing that falls within these exclusions, the filing will be deemed non-acceptable. The acknowledgement error codes that may occur during initial processing and their respective explanations are provided in APPENDIX B. Errors on Forms 5500 and 5500-EZ that are found during the electronic/magnetic media process are grouped into several categories: General, General Transmission, and by Form or Schedule.

12.3 Acknowledging Filings

DOL acknowledges each Live electronic transmission or magnetic media submission within 10 days. All modem-to-modem and magnetic media non-acceptable and initially acceptable electronic filings receive an electronic acknowledgement via a computer file. A paper letter acknowledgement is also mailed to the Transmitter for non-acceptable filings. Both acknowledgement formats indicate the errors associated with the specific non-acceptable filing or batch. The acknowledgement file specifies which filings DOL deems non-acceptable or initially acceptable.

Acknowledgement files will be provided to filers using a communications system that receives the electronic filings and creates electronic acknowledgements. Upon acceptance to participate in the electronic/magnetic media filing program, Transmitters are issued an EFIN and assigned a Password. The Transmitter's user directory is only accessible by the Transmitter. The Transmitter is responsible for logging on to the communications system periodically to check for acknowledgements. Approved software programs will allow for a Transmitter to enter this information. The program is also responsible to receive the acknowledgement files and place them in a readable format.

The initial checks performed are specified in Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts*. Filings that pass the initial checks receive an initial acceptance and are sent on to the main system for final processing. Filings deemed non-acceptable are not processed further and need to be corrected and resubmitted.

As acknowledgements are received, the Transmitter should immediately match each acknowledgement to the original electronic/magnetic media transmission. It is recommended that the Transmitter keep a database that stores the EFIN and other information unique to the filing. The filing software may include a database that automatically matches the filings to acknowledgements received. If the filing software does not provide a means of matching filings to acknowledgements, the Transmitter may wish to maintain a separate system of matching key information in filings with the acknowledgements. See Publication EFAST-B, *File Specifications, Validation Criteria, and Record Layouts* for acknowledgement file layout details. Any filing batch, which is not listed with the acknowledgements, bypassed the system because of file format problems, the filings contained in it are **not** considered **filed**. The Transmitter must retransmit these filings.

The following information is displayed in the acknowledgement for each error:

- Non-acceptance code defining the specific error encountered. (See APPENDIX B for a list of the error codes and their meanings.)
- Type of form/schedule on which the error exists.
- Which form the error occurred on. (Multiples of the same schedule may exist.)
- Page of the form where the error occurred. (Multiples of the same page may exist.)
- Field number in which the error occurs.

The acknowledgement can list up to 297 error codes for each filing. If there are more than 297 error codes, the filing will be considered unprocessable and will be assigned error code 0099.

The Transmitter will receive both a paper and electronic acknowledgement of non-acceptance or an electronic acknowledgement of initial acceptance for each modem-to-modem and magnetic media transmission that is filed. The process for receiving acknowledgements may vary depending on the software application used to connect to the LCC.

If any of the following conditions occurs, the Transmitter should notify the EFAST Consolidated Contact Center:

- The Transmitter does not receive the acknowledgement within 10 days after the transmission date.
- The Transmitter receives an acknowledgement for filings that were not transmitted on the designated transmission.
- The Transmitter receives the acknowledgement but it does not include all the filings transmitted.

12.4 Acknowledgement Codes

It is the responsibility of the Software Developer to create a program that downloads acknowledgement files and displays them in a readable format for the Transmitter.

Acceptable

If a modem-to-modem or magnetic media filing has been deemed acceptable for further processing, an electronic acknowledgement is created. Although the filing is acceptable for processing, it is not implied that the filing will pass subsequent edit and entity checks or post to the master database without delays.

Non-Acceptable

If a modem-to-modem or magnetic media filing is not acceptable for processing due to an error involving the filing format or the filing data it must be corrected and retransmitted to the DOL within 30 days.

The Transmitter is responsible for retransmitting data within the time frames specified. The DOL WILL NOT notify the Transmitter when the time frame has expired. Penalties may be assessed for late or incomplete filings.

Modem-to-modem or magnetic media filings shown on the acknowledgement as non-acceptable are not considered filed. The Transmitter must make the necessary corrections and retransmit the filings.

12.5 Document Locator Number (DLN)

The DLN (Document Locator Number) is a unique fourteen digit number that the LCC assigns to each filing it processes. Both Live and Test filings receive DLNs, regardless of whether the filings are acceptable or not acceptable for processing.

The DLN of each non-acceptable filing is included in the acknowledgements the EFAST electronic filing system issues. Transmitters may need this number in order for the LCC to provide quick and accurate user support.

The DLN is provided in both electronic and paper acknowledgement formats.

12.6 Batch ID

The Batch ID is a unique ten digit number that the LCC assigns to each batch it processes. Both Live and Test batches receive Batch IDs regardless of whether the batch is acceptable or not acceptable for processing purposes.

The Batch ID of each non-acceptable batch is included in the acknowledgements the LCC issues. Transmitters may need this number in order for the LCC to provide quick and accurate user support.

The Batch ID is provided in both electronic and paper acknowledgement formats.

12.7 Monitoring

The DOL monitors each participant's submissions to ensure that quality is kept at an acceptable level. Participants, including Signers, Transmitters, and Software Developers must conform to the requirements described in this user's guide.

If a participant does not maintain an acceptable level of quality, the electronic/magnetic media filing authorization may be revoked.

The following conditions can lead to suspension:

- Deterioration in the format of submissions
- Non-acceptable cumulative error rate
- Violation of advertising standards, listed in SECTION 14 of this document.
- Unethical practices in filing preparation
- Misrepresentation on the participant's application (Form EFAST-1)
- Other facts or criteria that would adversely reflect on the electronic/magnetic media program

DOL will counsel suspended participants about the requirements for re-acceptance into the program.

SECTION 13. ELECTRONIC FILER RECORD-KEEPING RESPONSIBILITIES

Use of the PIN and Signer ID as an electronic “signature” certifies that all required signatures are on file in the plan’s records including all of the following items that are applicable: a signed original Form 5500 or 5500 EZ (Plan Administrator, Plan Sponsor, Plan Sponsor/employer and Signer), AR/AO (certified public accountant), Schedule B (actuary), and Schedule SSA (Signer).

13.1 Document Retention

Each applicant must retain a copy of the signed and completed Form EFAST-1. Once the application is accepted, the participant receives letters containing the items discussed under Acceptance Materials in SECTION 8. The participant is responsible for storing these letters in a secure location. Written documentation containing suggested guidelines and standards for handling and protecting the Signer ID, PIN and Key will be distributed with the PIN, Signer ID, and Key. It is the participant’s responsibility to follow these guidelines.

The Transmitter must retain the following documentation:

- a copy of the filing
- any acknowledgements received from the DOL

The same retention periods specified in the Internal Revenue Code and Section 1.07 of ERISA that apply to paper also apply to electronic filings.

The copies of the filings must be reproducible on replicas of DOL official forms or in a format designed by the participant in which each data item refers to the corresponding line entry on the official forms. The copy may be retained on computer media. The computer media copy must be composed to avoid violating disclosure rules; anyone who receives a copy must be given **ONLY** the information he or she is entitled to receive.

Upon request, the Transmitter must give DOL access to all materials that the Transmitter is required to retain to comply with these procedures.

13.2 Schedule B Signatures

By including the PIN and Signer ID with the filing, the Signer guarantees that the actuary signed a paper copy of the Schedule B. The Signer must retain the copy of the Schedule B signed by the actuary for the normal retention periods for filing information as specified in the Internal Revenue Code and Section 1.07 of ERISA.

SECTION 14. ADVERTISING CAVEATS

DOL endorsement must not be implied in any advertising of software developed for this program. Acceptance to participate as a Software Developer in the program **DOES NOT MEAN** that the Department of Labor endorses the computer software or quality of services provided. Therefore, if a participant has passed the PATS process, any public communication in which that participant's electronic/magnetic media filing capability is referenced, whether through publication or broadcast, can only clearly indicate that DOL has "deemed the participant acceptable" for electronic/magnetic media filing. This communication **MUST NOT** imply a Department of Labor endorsement

Software Developers must not advertise that their software is "deemed acceptable" until they have successfully completed the PATS process each year.

SECTION 15. CONTACT INFORMATION AND PROGRAM UPDATES

Questions, suggestions, or comments regarding this publication should be addressed to:

Lawrence Computing Center
Attn: Deputy Program Manager, EFAST
3833 Greenway Drive
Lawrence, KS 66046

FAX: (785) 838-2179

This is not a toll free phone number.

Questions about the electronic filing program should be addressed to the EFAST Consolidated Contact Center. The EFAST Consolidated Contact Center can be reached by calling 866-463-3278 (866-GO EFAST).

SECTION 16. TROUBLESHOOTING

16.1 General Support

The EFAST Consolidated Contact Center will respond to filer inquiries and assist Transmitters and Software Developers with a wide variety of issues, including:

- Following the application procedures for participation in the electronic/magnetic media filing program.
- Assisting applicants with questions about certification and testing for electronic participation.
- Using the software supplied by DOL including:
 - Determining the correct modem settings
 - Properly completing all “set-up” information.
 - Becoming acclimated to the software.
 - Setting up the software on network systems.
 - Filing certain forms.
 - Accessing certain reports from the software.
 - Deleting a client file.
 - E-mailing a file to the EFAST Consolidated Contact Center.

16.2 Reissue Encryption Keys and Deactivate PINs

Please refer to Section 8.5.2 for procedures on having your encryption key reissued. Please refer to Section 8.4.2 for procedures on having your PIN and Signer ID deactivated.

16.3 Telephone Support

The EFAST Consolidated Contact Center will answer calls during the hours of 7:00 a.m. to 7:00 p.m. CST.

EFAST CONSOLIDATED CONTACT CENTER TELEPHONE:

866-463-3278 (866-GO EFAST)

This telephone number does not have voice mail or other messaging service. The EFAST Consolidated Contact Center staff will not make outgoing telephone calls to filers to resolve filing problems.

16.4 Email Support

The EFAST Consolidated Contact Center staff will also provide support via e-mail during the hours of 7:00 a.m. to 7:00 p.m. CST. Inquiries may be emailed to the EFAST Consolidated Contact Center at the following address:

electronicfiling.help@pearson.com

16.5 Other Support

For other questions not related to electronic filing, including questions regarding to Form 5500-Series instructions, please refer to the EFAST website:

www.efast.dol.gov

APPENDIX A

ELECTRONIC/MAGNETIC MEDIA SPECIFICATIONS

Refer to Publication EFAST-B, *File Specifications, Validation Criteria and Record Layouts for Electronic/Magnetic Media Filing of Forms 5500 and 5500 EZ for Plan Year 2006* for information on file naming conventions, file formats, record specifications, validation criteria, and other information related to the physical format and record layouts of electronic filing data files.

MODEM-TO-MODEM

To transmit filings:

- Set up a Dial-up networking connection to the MCI service on Windows 95/98, or set up a RAS session via Windows NT. You must have Version 1.3 or greater of Dial-up Networking installed on your Windows 95/98 operating system. Phone number: 888 273-9539.
- Use the EFIN for the user name and the password for the password.
- Establish an FTP Network connection to the EFAST server. IP address: 192.168.20.70. Use the EFIN for the user name and the password for the password. Your FTP program must be set in **binary** transfer mode.
- The system automatically transfers you to your user directory. At this time, the filing batches may be uploaded via FTP.

Filings submitted via modem must be encrypted. The freely available encryption .DLL file will automatically encrypt all necessary portions of the .DOL file as well as all the Unstructured Attachment files for modem-to-modem filings. For more information about encryption and the encryption .DLL, see Appendix C of Publication EFAST-B, *File Specifications, Validation Criteria and Record Layouts for Electronic/Magnetic Media Filing of Forms 5500 and 5500-EZ for Plan Year 2006*.

MAGNETIC MEDIA

Only complete filings and their attachments can be submitted on magnetic media (i.e., filings cannot span tapes or diskettes).

All Magnetic Media must be formatted using ASCII text. Filings submitted on magnetic media must not be encrypted.

ACCEPTABLE TYPES OF MEDIA

Diskette

High density (1.44 MB) diskettes in standard MS-DOS format.

CD-ROM

5-1/4 inch CD-ROM disks written using the ISO-9660, hierarchical file system (HFS), or Hybrid HFS - ISO 9660 file system standard.

Magnetic Tape

The block size for all magnetic tapes must be under 60,000 bytes. The acceptable tape formats are as follows:

- **9-track magnetic tape:**

| | |
|------------------------|--|
| MEDIA: | REEL TAPE - 1/2 INCH - 9 TRACK |
| DENSITY: | 1600 BPI – 6250 BPI |
| CHARACTER SET: | ASCII |
| RECORD LENGTH: | (choose a convenient size – i.e. 8,192) |
| BLOCK SIZE: | (block size = record size - i.e. 8,192 where block size < 60,000) |
| INTERNAL LABEL: | Internal Labels are required. Standard Label Preferred VOL1, HDR1, HDR2, EOF OR EOY Tapemarks Separating labels from data |
| EXTERNAL LABEL: | All magnetic tape must have external labels. See the LABELING ON ALL MEDIA Section of this document for labeling instructions. |

All tapes that arrive without labels consisting of the fields listed above will not be processed. The following specifications also apply to the 9-track tape:

- Type of tape** - 0.5” (12.7mm) wide Mylar base, computer grade magnetic tape on reels of up to 2400 feet (731.52m) within the following specifications:

1. Tape thickness - 1.5 mils.

2. Reel diameter - 10.5 inch (26.67 cm), 8.5 inch (21.59cm), or 7 inch (17.78cm).

Parity - odd.

Inter record gap - .3 inch for 6250 BPI. / .6 inch for 1600 BPI.

- **3480 and 3490 cartridge:**

| | |
|------------------------|---|
| MEDIA: | 3480 Cartridge - 18 Track / 3490 Cartridge – 36 Track |
| DENSITY: | 38,000 BPI |
| CHARACTER SET: | ASCII |
| RECORD LENGTH: | (choose a convenient size – i.e. 8,192) |
| BLOCK SIZE: | (block size = record size - i.e. 8,192 where block size < 60,000) |
| INTERNAL LABEL: | Internal Labels are required. Standard label preferred VOL1, HDR1, HDR2, EOF or EOVS tapemarks Separating labels from data |
| EXTERNAL LABEL: | All magnetic tape must have external labels. See the LABELING ON ALL MEDIA Section of this document for labeling instructions. |

All tapes that arrive without labels consisting of the fields listed above will not be processed.

- **8 mm DAT** -ANSI/EIA/ ISO/IEC standard, 8 mm wide magnetic tape cartridge;
- **4 mm DAT** - Standard 90M or 60M, 4 mm wide magnetic tape cartridge.

Magnetic Tape File Characteristics

For all magnetic tapes, use fixed block – 8,192 or 16,384 or 32,768 bytes. The block size for all magnetic tapes must be under 60,000 bytes.

Magnetic Tape Sequence

For magnetic tapes, the tape header should precede the normal sequence for DOL files (see Publication EFAST-B for more information). An example magnetic tape's layout follows:

- (1) TAPE HEADER
- (2) [filing1].DOL
- (3) [filing1_attach1].001
- (4) [filing1_attach2].002
- (5) [filing2].DOL
- (6) [filing2_attach1].001
- (7) [filing2_attach2].002
- (8) *etc...*

Creating Magnetic Tapes

All magnetic tapes that are to be submitted to the EFAST system should be ASCII Format and labeled with a fixed block size of 8192 or 16384 or 32768. Refer to the file sequence in the above section of this document.

In order to transfer the .DOL to the tape, you must first choose a block size for the tape. Then, write the binary .DOL file to the tape. Fill each fixed block on the tape completely with data from the .DOL file before beginning to write to the next block. If the size of your .DOL file is not a multiple of the fixed block size you have chosen (and, in most cases, it will not be), the size of the last block on the tape should match the size of the remaining data.

Example:

You have a .DOL file that is 16,385 bytes, and you choose to put that file on a tape which has a fixed block size of 8192.

The first block on the magnetic tape would contain the first 8192 bytes from the .DOL file.

The second block on the magnetic tape would contain the second 8192 bytes from the .DOL file.

The third block on the magnetic tape would contain the final single byte from the .DOL file.

That is,

| | |
|----------------|---------------------|
| Block 1 = | 8192 bytes |
| Block 2 = | 8192 bytes |
| Block 3 = | 1 byte |
| Total = | 16,385 bytes |

All users of tape media, whether they use the STK Redwood, STK 9840, IBM 3590, IBM 3490E, DAT, Exabyte, DLT, or any other type of media, **must use magnetic labels**. The format of these labels is defined by ANSI Standard X 3.27, and major computer suppliers such as IBM provide relevant

documentation. One such manual published by IBM is:

Using Magnetic Tape Labels and File Structure
SC26-4565 (1991)

Reading tapes after creation for verification.

Labeled Tapes

Finding the maximum block size of a tape:

The maximum block size can be found by issuing a 'Scan Tape' command. In the case of a labeled tape, the block size can be found in the HDR2 label. For example, HDR2F0819200132... shows a file of fixed length records with a maximum block size of 8192.

Finding the record length of a tape:

If the tape is labeled, again the information can be found in the HDR2 label. For example, HDR2F0819200132... shows a file of fixed length records with a record length of 132.

Unlabeled Tapes

If the tape is unlabeled, and without knowledge of how the tape was written, the only way to find out the size of the records is by inspecting the tape and counting the bytes. This is why it is important to use labels.

INSTRUCTIONS FOR SUBMITTING FILINGS ON MAGNETIC TAPES

All magnetic tape submissions should be formatted according to ANSI Standard **X3.27-1987 (rev 1998)**.

See the beginning of this Appendix for magnetic media sequence.

The filename of each .DOL file must be unique. See Section 5.1 of Publication EFAST-B, *File Specifications, Validation Criteria and Record Layouts for Electronic/Magnetic Media Filing of Forms 5500 and 5500 EZ for Plan Year 2006*. The filename of the unstructured attachment files must correspond to the guidelines in Section 6.1 of Publication EFAST-B, *File Specifications, Validation Criteria and Record Layouts for Electronic/Magnetic Media Filing of Forms 5500 and 5500 EZ for Plan Year 2006*.

INSTRUCTIONS FOR SUBMITTING FILINGS ON CD-ROM OR DISKETTE

All files transmitted on CD-ROM or Diskette must be in the root directory of the media.

Files on CD-ROM or diskette must be submitted in the following order: First .DOL file and all the unstructured attachments attached to that .DOL file, next .DOL file and all the unstructured attachments attached to that .DOL file, etc. Figure 1, Section 4 of Publication EFAST-B, *File Specifications, Validation Criteria and Record Layouts for Electronic/Magnetic Media Filing of Forms 5500 and 5500 EZ for Plan Year 2006*.

The filename of each .DOL file must be unique. See Section 5.1 of Publication EFAST-B, *File Specifications, Validation Criteria and Record Layouts for Electronic/Magnetic Media Filing of Forms 5500 and 5500 EZ for Plan Year 2006*. The filename of the unstructured attachment files must correspond to the guidelines in Section 6.1 of Publication EFAST-B, *File Specifications, Validation Criteria and Record Layouts for Electronic/Magnetic Media Filing of Forms 5500 and 5500 EZ for Plan Year 2006*.

LABELING ON ALL MEDIA

A transmitter must place a label on both the packaging of the media and on each piece of media itself. These labels should be identical (with the exception of the EIN and EFIN which should not appear on the package label as noted below). They should both have the following information on separate lines of the label:

- Media Type - This indicates the kind of media being submitted; the choices are: Diskette, CD-ROM, 9-Track Magnetic Tape, 3480/3490 Cartridge, 8mm DAT, or 4mm DAT.
- ASCII character set indication - If you are submitting 9-Track or 3480/3490 magnetic tapes, you must indicate that the tape is in the ASCII character set. All other media does not require this indication.
- Record length indication - If you are submitting 9-Track or 3480/3490 magnetic tapes, you must indicate the tape's record length. All other media does not require this indication.
- Block size indication - If you are submitting 9-Track or 3480/3490 magnetic tapes, you must indicate the tape's block size. All other media does not require this indication.
- Media ID - This line must always read: "EFAST Processing System".
- Transmitter's Name - The name of the company submitting magnetic media.
- Transmitter's Contact Name - The contact name at the company submitting magnetic media.
- Transmitter's EIN - EIN of the company submitting magnetic media. (Do not include on package label.)
- Transmitter's EFIN - EFIN of the company submitting magnetic media. (Do not include on package label.)
- Date Created - The date that the data or information was created and stored on media. Format: MM-DD-YYYY
- Sensitivity Indicators - Media containing sensitive information should be labeled "For Official Use Only, Sensitive Benefit Plan Data".
- Plan Year - This line indicates what plan year filings the tape holds.
- Destination Agency Name- This line should always read: "To: Department of Labor".
- Date created - If you are submitting 9-Track or 3480/3490 magnetic tapes, you must indicate the date the tape was created. All other media does not require this indication.
- Total number of batches - If you are submitting 9-Track or 3480/3490 magnetic tapes, you must indicate the total number of batches contained on the tape. All other media does not require this indication.
- Total number of filings - If you are submitting 9-Track or 3480/3490 magnetic tapes, you must indicate the total number of filings contained on the tape. All other media does not require this indication.

The following is an example label for filings sent in on a diskette:

Diskette

EFAST Processing System

From: Hart Smith, Inc.

Contact: John Smith

EIN: 01-4585684

EFIN: 175682

Created: 07-06-2006

FOR OFFICIAL USE ONLY, SENSITIVE BENEFIT PLAN DATA

2006 Plan Year Data

To: Department of Labor

The following is an example label for filings sent in on a 3480 magnetic tape:

3480

Code set: ASCII

Record length: 8,192

Block size: 8,192

EFAST Processing System

From: Hart Smith, Inc.

Contact: John Smith

EIN: 01-4585684

EFIN: 175682

Created: 07-06-2006

FOR OFFICIAL USE ONLY, SENSITIVE BENEFIT PLAN DATA

2006 Plan Year Data

To: Department of Labor

Created: 07-06-2006

Total # of batches: 22

Total # of filings: 503

APPENDIX B

Live Filing Errors

The following errors may occur during the Live filing initial processing.

| <u>Error Code</u> | <u>Explanation</u> |
|--------------------------|---|
| #0003 | Non-Standard Form or Schedule. You have submitted a Form or Schedule which cannot be processed in our Annual Report processing environment. Forms and Schedules that do not conform to our standard processing environment are not acceptable for processing. For future filings, please submit the correct version or format. |
| #0008 | Decryption Failure. The filing could not be properly decrypted. Check to see that a valid encryption key was used, properly entered, and that it has not expired. Also check to make sure that the correct transmitter's EFIN and correct indicator was used (Live, Test). Please make corrections and resubmit this filing. |
| #0010 | Improper Format. The file or batch received contained an improperly formatted field(s). Possibilities for this error include: Field number indicators, byte count, or field formatted improperly. Please contact the software vendor. |
| #0011 | PIN/Signer ID Authentication Failure. This filing contains an invalid Personal Identification Number (PIN) or a Signer ID in the summary record of the filing. Check to see that the PIN and Signer ID that were used were properly entered. Also check to make sure that the correct indicator is used (Live, Test). Please make corrections and resubmit this filing. |
| #0012 | Filing Batch Contains Virus. Attachments within the filing batch were infected with at least one computer virus. Please check the filing and attachments and resubmit the filing batch. |
| #0013 | Invalid Code. This filing contains an invalid Software Developer ID Code in the header of the filing. Please contact the software vendor. |
| #0017 | Invalid Field. The file received contains an invalid field. Please contact the software vendor. |
| #0024 | Invalid EFIN. An invalid EFIN was used to transmit the filing batch. Possibilities for this error include: transmission EFIN did not match EFIN in TRANS or RECAP record; non-software developer type submitted a test batch; non-transmitter type submitted a live batch. Please make corrections and resubmit this filing. |
| #0025 | Indeterminable Batch Type. The transmitted batch is not labeled as either a Live or Test batch. Please make corrections and retransmit the batch or contact the software vendor. |

**Error
Code**

Explanation

- #0026 Filing Count Conflict. The number of filings listed in the RECAP record and the actual number of filings in the filing batch are not consistent. Please contact the software vendor.
- #0028 Invalid Form Year. The Form Year listed in the header record is invalid. Please contact the software vendor.
- #0099 Errors Exceed Maximum. There are more than 297 errors in this filing. Only the first 297 errors can be reported. Please make necessary changes and retransmit the filing.

APPENDIX C

GLOSSARY

| TERM | MEANING |
|----------------|--|
| ANSI | American National Standards Institute |
| AR/AO | Accountant's Report/Accountant's Opinion |
| BPS | Bits per Second |
| DES | Data Encryption Standard or Security Data Encryption Standard |
| DLN | Filings are assigned an internal tracking number at DOL called a Document Locator Number (DLN). The DLN may be included in correspondence received from the DOL. |
| DOL | Department of Labor |
| EBSA | Employee Benefits Security Administration |
| EF | Electronic Filing |
| EFAST | ERISA Filing Acceptance System |
| EFIN | Electronic Filer Identification Number – a unique six (6) character number assigned to each Transmitter, which acts as an identifier for the Transmitter. |
| Encryption Key | A unique string of characters that give the sender and receiver of an electronic file the ability to transfer filings securely. |
| ERISA | Employee Retirement Income Security Act of 1974 |
| FIPS | Federal Information Processing Standards |
| HTML | Hypertext Markup Language |
| IRS | Internal Revenue Service |
| IVR | Interactive Voice Response |
| LAN | Local Area Network |
| LCC | Lawrence Computing Center – where the EFAST filings are processed. |

| TERM | MEANING |
|-----------------------|---|
| MB | MegaByte |
| NCSC | U.S. National Computer Security Center |
| NIST | U.S. National Institute for Standards and Testing |
| Password | A string of twelve (12) alphanumeric characters assigned to Transmitters for identification purposes when sending their filings or receiving acknowledgements electronically via modem. |
| PATS | Participant Acceptance Testing System |
| PBGC | Pension Benefit Guaranty Corporation |
| PGS | Pearson Government Solutions |
| PIN | Unique Personal Identification Number, which, together with the Signer ID, acts as the Signer's signature on the filing. |
| POA | Power of Attorney |
| SEC | Securities and Exchange Commission |
| SEI | Software Engineering Institute |
| Signature Alternative | The PIN and Signer ID are used as an alternative to the paper signature formerly required when filing electronically. |
| Signer | An individual who takes responsibility for and signs a 5500 series filing. Each individual, who wishes to act as a Signer and submit filings electronically, needs to complete the application to participate in the program. |
| Signer ID | A unique identifier for a Signer. It is included in the filing and may be used to deactivate a PIN. |
| Software Developer | An individual or business that creates, programs, or otherwise modifies computer software to create electronic 5500 series files. All software must pass Participant Acceptance Testing System (PATS) and be accepted. Refer to SECTION 9 for more information about testing. |

| TERM | MEANING |
|----------------------------|--|
| Software Developer ID Code | A separate unique identification number assigned to each software company whose software is tested and accepted by DOL. Once Software Developers pass testing procedures, their software is considered “accepted.” The Software Developer ID Code will be placed in the file created by the filing software and will be used by DOL to determine whether a Transmitter is using accepted software. |
| SSA | Social Security Administration |
| TIA | Taxpayer Information Authorization |
| TDEA | Triple Data Encryption Algorithm |
| TDES | Triple Data Encryption Standard |
| TIN | Taxpayer Identification Number |
| Transmitter | An individual or business that sends 5500 series filings via modem-to-modem, magnetic tape, floppy diskette, or CD-ROM directly to the Department of Labor using accepted software. |
| USPS | United States Postal Service |