



BENEFIT NEWS BRIEFS

DOL Posts New EFAST2 FAQ on Disclosing PIN Numbers

In [Benefit News Briefs 2009-53](#), we reported on 45 *Frequently Asked Questions (FAQS)* about EFAST2 and presented detailed background on the process.

DOL Posts New FAQ on EFAST2

The Department of Labor (DOL) recently added a new *FAQ 33*, renumbering the old *FAQs 33 – 45* as *FAQs 34 – 46*. The new *FAQ* addresses the use of PIN numbers for signing the Form 5500. According to the *FAQ*, plan administrators are NOT to share their PIN with their Form 5500 preparers:

Q33: I am a Plan Administrator that needs to electronically sign a Form 5500. Can I tell my preparer what my PIN is so they can sign and submit it for me?

As the Plan Administrator, the Form 5500 or 5500-SF that will be sent to EFAST2 must be examined by you before it is submitted. Your signature attests that has been done and that, to the best of your knowledge and belief, it is true, correct, and complete. Since the EFAST2 PIN is the plan administrator/sponsor/DFE's electronic signature for purposes of the Form 5500 and Form 5500-SF, PINs must be protected and not shared. We appreciate the fact that some filers may find it easier to comply with the electronic signature requirement if PIN sharing were permitted. However, we believe plan administrators and other filers will be able to comply with their annual reporting obligations within the EFAST2 system PIN requirements even if some filers will need to adjust their practices to address individual challenges.

A copy of the 46 *FAQs* with a specially prepared table of contents is available by "[clicking here.](#)" The *FAQs* are posted on the DOL website at: <http://www.dol.gov/ebsa/faqs/faq-EFAST2.html>.

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