

# 2024 Instructions for Schedule DCG

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## 2024 Instructions for Schedule DCG (Form 5500) *Individual Plan Information*

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## Purpose of Schedule [Return to top](#)

This schedule is used for a common plan administrator as defined in 29 CFR 2520.104-51(c)(2)(iii) to report information regarding each individual plan participating in a Defined Contribution Group Reporting Arrangement (DCG or DCG reporting arrangement), as permitted by SECURE Act section 202.

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Schedule DCG must be attached to a Form 5500 filed for a DFE that has checked the box in Part I, line A and specified the report is for a DCG reporting arrangement (i.e., when "D" is entered as the DFE code on Part I, line A of the Form 5500). Each plan participating in a DCG must individually complete a Schedule DCG to be attached to the Form 5500. Remember to check the Schedule DCG box on the Form 5500 (Part II, line 10(a)(4)) and indicate the number of Schedules DCG that are attached to the Form 5500.

For more information, see the instructions for DCG filing under [Direct Filing Entity \(DFE\) Filing Requirements](#).

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## Part I - DCG Information [Return to top](#)

**Lines A, B, C and D.** [top](#) The information must be the same as reported on lines 1a, 1b, 2a, and 2b of Part II of the DCG's Form 5500 to which this schedule is attached. For lines A and C, the DCG's name may be different from the DCG sponsor's name (e.g., in the case of the DCG sponsor that offers more than one DCG reporting arrangement).

## Part II – Individual Plan Identification Information [Return to top](#)

**Line E Box for a Single-Employer Plan.** [top](#) Check this box to confirm that Schedule DCG is filed for a defined contribution pension plan that is a single-employer plan. A single-employer plan for this reporting purpose is an employee benefit plan maintained by one employer or one employee organization (determined on a controlled group basis) in which the funds attributable to each employer are available to pay benefits only for that employer's employees. A plan that does not meet this definition is ineligible to participate in a DCG and should not complete this Schedule. The plan instead must file a separate Form 5500 or Form 5500-SF (if eligible) in accordance with form instructions.

**Line E Box for a Collectively-Bargained, Single-Employer Plan.** [top](#) Check this box if the contributions to the plan and/or the benefits paid by the plan are subject to the collective bargaining process. The contributions and/or benefits do not have to be identical for all employees under the plan.

**Line F Box for the First Schedule.** [top](#) Check this box only if an annual return/report has not been previously filed for this plan. If a plan participates in a DCG reporting arrangement, it is treated as satisfying its annual return/report requirement under Code section 6058(a) and ERISA Section 104.

**Line F Box for an Amended Schedule.** [top](#) Check this box if an annual return/report for the DCG has already been filed for the 2024 plan year, including a Schedule DCG for this plan, and you are now amending this Schedule DCG to correct

errors and/or omissions on the previously filed return/report.

**Note.** An amended annual return/report filing must be submitted as a complete replacement of the previously submitted filing. If a Schedule DCG needs to be amended, the common plan administrator must resubmit the entire annual return/report filing for the DCG, with all required schedules and attachments, including Schedule DCG for all the plans in the DCG, through EFAST2. You cannot submit just the Schedule DCG that is being amended. The line F box for "Amended Schedule" must be checked only for those Schedules DCG that have been changed from the original submission. See EFAST2 FAQs available on the EFAST website at [www.efast.dol.gov](http://www.efast.dol.gov)

**Line F Box for the Final Schedule.** **top** Check this box if this is the last annual return/report required for this plan.

**Note.** Check this box if all assets under the plan have been distributed to the participants and beneficiaries or legally transferred to the control of another plan. Do not check this box if you are reporting participants and/or assets at the end of the plan year or if you merely withdraw from a DCG reporting arrangement and still have a filing requirement for this plan.

## Part III – Basic Individual Plan Information [Return to top](#)

**Line 1a.** **top** Enter the formal name of the plan participating in the DCG or enough information to identify the plan. Abbreviate if necessary. If an annual return/report or a schedule has previously been filed on behalf of the plan, regardless of the type of form or schedule that was filed, use the same name or abbreviation that was used on the prior filings. Once you use an abbreviation, continue to use it for that plan on all future annual return/report or schedule filings with the IRS, DOL, and PBGC. Do not use the same name or abbreviation for any other plan, even if the first plan is terminated. If the plan has changed its name from the prior year filing(s), complete line 3 to indicate that the plan was previously identified by a different name.

**Line 1b.** **top** Enter the three-digit plan or entity number (PN) assigned to the plan participating in the DCG. This three-digit number, in conjunction with the EIN entered on line 2b, is used by the IRS, DOL, and PBGC as a unique 12-digit number to identify the plan.

Start at 001 for the first plan providing pension benefits. Consecutively number other plans providing pension benefits as 002, 003, etc. Once you use a plan number, continue to use it for that plan on all future filings with the IRS, DOL, and PBGC. Do not use it for any other plan, even if the first plan or DFE is terminated.

**Line 1c.** **top** Enter the date the plan first became effective.

**Line 2a.** **top** Enter the name of the plan sponsor. If the plan covers only the employees of one employer, enter the employer's name. Enter the current street address, the name of the city, and the two-character abbreviation of the U.S. state or possession and zip code. Enter a foreign postal code and country name, if applicable. Leave U.S. state and zip code blank if entering a foreign routing code and country name.

A post office box number may be entered if the Post Office does not deliver mail to the sponsor's street address.

**Note.** Use the IRS Form 8822-B, Change of Address or Responsible Party - Business, to notify the IRS if the address provided here is a change in your business mailing address or your business location.

**Line 2b.** **top** Enter the nine-digit EIN assigned to the plan sponsor/employer. Do not use a SSN in lieu of an EIN. Because

of privacy concerns, the inclusion of a SSN or any portion thereof on this line may result in the rejection of the filing.

A plan sponsor/employer without an EIN must apply for one as soon as possible. To apply for an EIN from the IRS:

- Mail or fax Form SS-4, "Application for EIN," obtained at [www.irs.gov/orderforms](http://www.irs.gov/orderforms). See [www.IRS.gov/Businesses](http://www.IRS.gov/Businesses) and click on "Employer ID Numbers" for additional information. The EIN is issued immediately once the application information is validated. (The online application process is not yet available for corporations with addresses in foreign countries or Puerto Rico.)

**Line 2c. top** Enter the plan sponsor's/employer's telephone number, including the area code.

**Line 2d. top** Enter the six-digit business code from the list of business codes on pages 94, 95, and 96 that best describes the primary nature of the plan sponsor's/employer's business. Do not enter code 525100 (Insurance & Employee Benefit Funds) or 813930 (Labor Unions and Similar Labor Organizations) unless the predominant industry in which the active participants are employed is the industry of insurance and employee benefit funds, or the industry of labor unions and similar labor organizations.

**Lines 3a-d. top** If the plan sponsor's/employer's name and/or EIN have changed or the plan name has changed since the last return/report or schedule was filed for this plan, enter the plan sponsor's name and EIN, the plan name, and the plan number as it appeared on the last return/report or schedule filed.

**Caution!** *The failure to indicate on line 3 that a plan sponsor was previously identified by a different name or a different EIN or that the plan name has been changed could result in correspondence from the DOL and/or the IRS.*

**Line 4a. top** Enter the name and address of the common plan administrator as shown on the DCG's Form 5500, Part II, line 3a.

**Line 4b. top** Enter the common plan administrator's nine-digit EIN as shown on the DCG's Form 5500, Part II, line 3b.

**Line 4c. top** Enter the telephone number for the common plan administrator as shown on the DCG's Form 5500, Part II, line 3c. Use numbers only, including the area code, and do not include any special characters. See Form 5500, Part II, lines 3a-3c for additional information.

**Line 5a. top** Enter the total number of participants at the beginning of the plan year.

**Line 5b. top** Enter the total number of participants at the end of the plan year.

**Line 5c(1). top** Enter the total number of active participants at the beginning of the plan year.

**Line 5c(2). top** Enter the total number of active participants at the end of the plan year.

"Participant" for purpose of lines 5a–5c(2) means any individual who is included in one of the categories below.

1. Active participants (for example, any individuals who are currently in employment covered by the plan and who are earning or retaining credited service under the plan) including:
  - Any individuals who are eligible to elect to have the employer make payments under a section 401(k) qualified cash or deferred arrangement, and
  - Any nonvested individuals who are earning or retaining credited service under the plan.  
This category does not include (a) nonvested former employees who have incurred the break in service period specified in the plan or (b) former employees who have received a "cash-out" distribution or deemed

distribution of their entire nonforfeitable accrued benefit.

2. Retired or separated participants receiving benefits (for example, individuals who are retired or separated from employment covered by the plan and who are receiving benefits under the plan). This category does not include any individual to whom an insurance company has made an irrevocable commitment to pay all the benefits to which the individual is entitled under the plan.
3. Other retired or separated participants entitled to future benefits (for example, any individuals who are retired or separated from employment covered by the plan and who are entitled to begin receiving benefits under the plan in the future). This category does not include any individual to whom an insurance company has made an irrevocable commitment to pay all the benefits to which the individual is entitled under the plan.
4. Deceased individuals who had one or more beneficiaries who are receiving or are entitled to receive benefits under the plan. This category does not include any individual to whom an insurance company has made an irrevocable commitment to pay all the benefits to which the beneficiaries of that individual are entitled under the plan.

**Line 5d(1).** [top](#) Enter the number of participants included on line 5a (total number of participants at the beginning of the plan year) who have account balances at the beginning of the plan year.

**Line 5d(2).** [top](#) Enter the number of participants included on line 5b (total number of participants at the end of the plan year) who have account balances at the end of the plan year. For example, for a section 401(k) plan the number entered on line 5d(2) should be the number of participants counted on line 5b who have made a contribution, or for whom a contribution has been made, to the plan for this plan year or any prior plan year.

**Line 5e.** [top](#) Include any individual who terminated employment during this plan year, whether or not the individual (a) incurred a break in service, (b) received an irrevocable commitment from an insurance company to pay all the benefits to which the individual is entitled under the plan, and/or (c) received a cash distribution or deemed cash distribution of their nonforfeitable accrued benefit.

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**Note.** The cash, modified cash, or accrual basis accounting methods may be used for recognition of transactions in Part IV, as long as you use one method consistently. If Form 5500 or Form 5500-SF was filed for the previous year, amounts reported on Schedule DCG lines 6a, 6b, and 6c for the beginning of the plan year must be the same as reported for the end of the plan year for the corresponding lines on the return/report for the preceding plan year. If Schedule DCG was filed in the previous year, the amount reported on lines 6a, 6b, and 6c for the beginning of the plan year must be the same as reported for the end of the plan year on the Schedule DCG filed for the previous year. Use whole dollars only.

**Current value** means fair market value where available. Otherwise, it means the fair value as determined in good faith under the terms of the plan by a trustee or a named fiduciary, assuming an orderly liquidation at the time of the determination. See ERISA section 3(26).

**Line 6a.** [top](#) Enter the total amount of plan assets at the beginning of the plan year in column (a). Do not include contributions designated for the 2024 plan year in column (a). Enter the total amount of plan assets at the end of the plan year in column (b).

**Line 6a(1).** [top](#) Enter the current value of all loans to participants, including residential mortgage loans that are subject to Code section 72(p). Include the sum of the value of the unpaid principal balances, plus accrued but unpaid interest, if

any, for participant loans made under an individual account plan with investment experience segregated for each account, which are made in accordance with 29 CFR 2550.408b-1 and secured solely by a portion of the participant's vested accrued benefit. When applicable, combine this amount with the current value of any other participant loans. Do not include in column (b) a participant loan that has been deemed distributed during the plan year under the provisions of Code section 72(p) and Treasury Regulations section 1.72(p)-1, if both of the following circumstances apply:

1. Under the plan, the participant loan is treated as a directed investment solely of the participant's individual account; and
2. As of the end of the plan year, the participant is not continuing repayment under the loan.

If both of these circumstances apply, report the loan as a deemed distribution on line 7h. However, if either of these circumstances does not apply, the current value of the participant loan (including interest accruing thereon after the deemed distribution) must be included in column (b) without regard to the occurrence of a deemed distribution.

**Note.** After a participant loan that has been deemed distributed is included in the amount reported on line 7h, it is no longer to be reported as an asset on line 6a unless, in a later year, the participant resumes repayment under the loan. However, such a loan (including interest accruing thereon after the deemed distribution) that has not been repaid is still considered outstanding for purposes of applying Code section 72(p)(2)(A) to determine the maximum amount of subsequent loans. Also, the deemed distribution is not treated as an actual distribution for other purposes, such as the qualification requirements of Code section 401, including, for example, the determination of top-heavy status under Code section 416 and the vesting requirements of Treasury Regulations section 1.411(a)-7(d)(5). See Q&As 12 and 19 of Treasury Regulations section 1.72(p)-1.

The entry on line 6a, column (b) (plan assets at end of year) must include the current value of any participant loan included as a deemed distribution in the amount reported for any earlier year if, during the plan year, the participant resumes repayment under the loan. In addition, the amount to be entered on line 7h must be reduced by the amount of the participant loan reported as a deemed distribution for the earlier year.

**Line 6b. top** Enter the total liabilities at the beginning and end of the plan year. Liabilities to be entered here do not include the value of future pension payments to participants. The amount to be entered in line 6b for accrual basis filers includes, among other things:

1. Benefit claims that have been processed and approved for payment by the plan but have not been paid;
2. Accounts payable obligations owed by the plan that were incurred in the normal operations of the plan but have not been paid; and
3. Other liabilities such as acquisition indebtedness and any other amount owed by the plan.

**Line 6c. top** Enter the net assets as of the beginning and end of the plan year. (Subtract line 6b from 6a). Line 6c, column (b), must equal the sum of line 6c, column (a), plus lines 7l(net income (loss)) and 7m (transfers to (from) the plan).

**Lines 7a(1) and (2). top** Enter the total cash contributions received and/or receivable by the plan from employers and participants during the plan year. Plans using the accrual basis of accounting must not include contributions designated for years before the 2024 plan year on line 7a(1).

**Line 7a(3). top** Enter the amount of all other contributions including transfers or rollovers received from other plans valued on the date of contribution.

**Line 7b. top** Enter the current value, at date contributed, of securities or other noncash property.

**Line 7c. top** Enter the total cash, noncash, and other contributions received and/or receivable by the plan from employers and participants during the plan year.

**Line 7d. top** Enter all other plan income for the plan year. Do not include transfers from other plans that are reported on line 7m. Examples of other income received and/or receivable include:

1. Interest on investments (including money market accounts, sweep accounts, etc.)
2. Dividends. (Accrual basis plans should include dividends declared for all stock held by the plan even if the dividends have not been received as of the end of the plan year.)
3. Net gain or loss from the sale of assets.
4. Other income such as unrealized appreciation (depreciation) in plan assets. To compute this amount, subtract the current value of all assets at the beginning of the year plus the cost of any assets acquired during the plan year from the current value of all assets at the end of the year minus assets disposed of during the plan year.

**Line 7e. top** Add the total contributions (line 7c) and other plan income (line 7d) during the plan year. If entering a negative number, enter a minus sign ("-") to the left of the number.

**Line 7f. top** Enter the total amount of benefits paid directly to participants or beneficiaries, including payments made (and for accrual basis filers payments due) to or on behalf of participants or beneficiaries in cash, securities, or other property (including rollovers of an individual's accrued benefit or account balance). Include all eligible rollover distributions as defined in Code section 401(a)(31)(D) paid at the participant's election to an eligible retirement plan (including an IRA within the meaning of Code section 401(a)(31)(E)).

**Line 7g. top** Enter total amount of corrective distributions, including all distributions paid during the plan year of excess deferrals under Code section 402(g)(2)(A)(ii), excess contributions under Code section 401(k)(8), excess aggregate contributions under Code section 401(m)(6), and allocable income distributed. Also include on this line any elective deferrals and employee contributions distributed or returned to employees during the plan year as well as any attributable income that was also distributed.

**Line 7h. top** Enter the total amount of certain deemed distributions of participant loans, including a participant loan that has been deemed distributed during the plan year under the provisions of Code section 72(p) and Treasury Regulations section 1.72(p)-1, only if both of the following circumstances apply:

1. Under the plan, the participant loan is treated as a directed investment solely of the participant's individual account; and
2. As of the end of the plan year, the participant is not continuing repayment under the loan.

If either of these circumstances does not apply, a deemed distribution of a participant loan should not be reported on line 7h. Instead, the current value of the participant loan (including interest accruing thereon after the deemed distribution) must be included on line 6a(1), column (b) (participant loans - end of year), without regard to the occurrence of a deemed distribution.

**Line 7i. top** The amount to be reported for expenses involving administrative service providers (salaries, fees, and commissions) during the plan year includes the total fees paid (or in the case of accrual basis plans, costs incurred during the plan year but not paid as of the end of the plan year) by the plan for, among others:

1. Salaries to employees of the plan;
2. Fees and expenses for accounting, actuarial, legal, investment management, investment advice, and securities



brokerage services;

3. Contract administrator fees; and
4. Fees and expenses for individual plan trustees, including reimbursement for travel, seminars, and meeting expenses.

**Line 7j. [top](#)** Other expenses (paid and/or payable) include other administrative and miscellaneous expenses paid by or charged to the plan during the plan year, including among others office supplies and equipment, telephone, and postage.

**Line 7k. [top](#)** Enter the total of all benefits paid or due reported on lines 7f, 7g, 7h, and all other plan expenses reported on lines 7i and 7j during the plan year.

**Line 7l. [top](#)** Subtract line 7k from line 7e.

**Line 7m. [top](#)** Include in these figures the value of all transfers of assets or liabilities into or out of the plan resulting from, among other things, mergers and consolidations. A transfer of assets or liabilities occurs when there is a reduction of assets or liabilities with respect to one plan and the receipt of these assets or the assumption of these liabilities by another plan. A transfer is not a shifting of one plan's assets or liabilities from one investment to another. A transfer is not a distribution of all or part of an individual participant's account balance that is reportable on IRS Form 1099-R, Distributions From Pensions, Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance Contracts, etc., (see the instructions for [line 7f](#)). Transfers out at the end of the year should be reported as occurring during the plan year.

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**Line 8. [top](#)** Do not leave blank. Enter all applicable pension plan characteristics codes that applied during the reporting year from the [List of Plan Characteristics Codes](#) on pages 221 and 22 that best describe the characteristics of the plan.

## Part VI - Compliance Questions [Return to top](#)

**Line 9a. [top](#)** Amounts paid by a participant or beneficiary to an employer and/or withheld by an employer for contribution to the plan are participant contributions that become plan assets as of the earliest date on which such contributions can reasonably be segregated from the employer's general assets (see 29 CFR 2510.3-102). In the case of a plan with fewer than 100 participants at the beginning of the plan year, any amount deposited with such plan not later than the 7th business day following the day on which such amount is received by the employer (in the case of amounts that a participant or beneficiary pays to an employer), or the 7th business day following the day on which such amount would otherwise have been payable to the participant in cash (in the case of amounts withheld by an employer from a participant's wages), shall be deemed to be contributed or repaid to such plan on the earliest date on which such contributions or participant loan repayments can reasonably be segregated from the employer's general assets. See 29 CFR 2510.3-102(a)(2).

Plans that check "Yes," must enter the aggregate amount of all late contributions for the year. The total amount of the delinquent contributions must be included on line 9a for the year in which the contributions were delinquent and must be carried over and reported again on line 9a for each subsequent year (or on line 4a of Schedule H or I of the Form 5500 or line 10a of the Form 5500-SF if choosing not to rely on a DCG Form 5500 filing to satisfy the plan's reporting requirement in the subsequent year) until the year after the violation has been fully corrected by payment of the late contributions and reimbursement of the plan for lost earnings or profits. All delinquent participant contributions must

be reported on line 9a at least for the year in which they were delinquent even if violations have been fully corrected by the close of the plan year. If no participant contributions were received or withheld by the employer during the plan year, answer "No."

An employer holding participant contributions commingled with its general assets after the earliest date on which such contributions can reasonably be segregated from the employer's general assets will have engaged in a prohibited use of plan assets (see ERISA section 406). If such a nonexempt prohibited transaction occurred with respect to a disqualified person (see Code section 4975(e)(2)), file IRS Form 5330, Return of Excise Taxes Related to Employee Benefit Plans, with the IRS to pay any applicable excise tax on the transaction.

Participant loan repayments paid to and/or withheld by an employer for purposes of transmittal to the plan that were not transmitted to the plan in a timely fashion must be reported either on line 9a in accordance with the reporting requirements that apply to delinquent participant contributions or on line 9b. See Advisory Opinion 2002-02A, available at [www.dol.gov/ebsa](http://www.dol.gov/ebsa).

**TIP.** For those Schedule DCG filers required to submit an IQPA report, delinquent participant contributions reported on line 9a must be treated as part of the separate schedules referenced in ERISA section 103(a)(3)(A) and 29 CFR 2520.103-1(b) and 2520.103-2(b) for purposes of preparing the IQPA's opinion for such individual plan in a DCG, even though they are not required to be listed on Part III of the Schedule G that is filed on a consolidated basis at the DCG level. If the information reported on line 9a is not presented in accordance with regulatory requirements, i.e., when the IQPA concludes that the scheduled information required by line 9a does not contain all the required information or contains information that is inaccurate or is inconsistent with the plan's financial statements, the IQPA report must make the appropriate disclosures in accordance with generally accepted auditing standards. For more information, see EBSA's Frequently Asked Questions about Reporting Delinquent Contributions on the Form 5500, available on the Internet at [www.dol.gov/ebsa](http://www.dol.gov/ebsa). These Frequently Asked Questions clarify that plans have an obligation to include delinquent participant contributions on their financial statements and supplemental schedules and that the IQPA's report covers such delinquent contributions even though they are no longer required to be included on Part III of the Schedule G. Although all delinquent participant contributions must be reported on line 9a, delinquent contributions for which the DOL Voluntary Fiduciary Correction Program (VFCP) requirements and the conditions of the Prohibited Transaction Exemption (PTE) 2002-51 have been satisfied do not need to be treated as nonexempt party-in-interest transactions.

The VFCP describes the specific transactions covered (which transactions include delinquent participant contributions to pension and welfare plans) and acceptable methods for correcting violations. In addition, applicants that satisfy both the VFCP and the conditions of PTE 2002-51 are eligible for immediate relief from payment of certain prohibited transaction excise taxes for certain corrected transactions and are also relieved from the requirement to file the IRS Form 5330 with the IRS. For more information on the VFCP, the specific transactions covered (which transactions include delinquent participant contributions to pension and welfare plans), and acceptable methods for correcting violations, see 71 Fed. Reg. 20261 (Apr. 19, 2006) and 71 Fed. Reg. 20135 (Apr. 19, 2006). All delinquent participant contributions must be reported on line 9a at least for the year in which they were delinquent even if violations have been fully corrected by the close of the plan year. Information about the VFCP is also available on the Internet at [www.dol.gov/ebsa](http://www.dol.gov/ebsa).

**Line 9a Schedule.** [top](#) Attach a Schedule of Delinquent Participant Contributions using the format below if you entered "Yes" on line 9a and you are checking "YES" on line 14 because the report of an IQPA for the plan is required. If you choose to include participant loan repayments on line 9a, you must apply the same supplemental schedule and IQPA

disclosure requirements to the loan repayments as apply to delinquent transmittals of participant contributions.

**Schedule DCG Line 9a – Schedule of Delinquent Participant Contributions**

Participant Contributions Transferred Late to Plan	Total that Constitutes Nonexempt Prohibited Transactions			Total Fully Corrected Under VFCP and PTE 2002-51
Check here if Late Participant Loan Repayments are included:	Contributions Not Corrected	Contributions Corrected Outside VFCP	Contributions Pending Correction in VFCP	

**Line 9b.** **top** Check "Yes" if any nonexempt transaction with a party-in-interest occurred. Do not check "Yes" with respect to transactions that are: (1) statutorily exempt under Part 4 of Title I of ERISA; (2) administratively exempt under ERISA section 408(a); (3) exempt under Code sections 4975(c) or 4975(d); or (4) delinquent participant contributions or delinquent loan repayments reported on line 9a.

You may indicate that an application for an administrative exemption is pending. If you are unsure whether a transaction is exempt or not, you should consult either with a qualified public accountant, legal counsel, or both. If the plan is a qualified pension plan and a nonexempt prohibited transaction occurred with respect to a disqualified person, an IRS Form 5330 is required to be filed with the IRS to pay the excise tax on the transaction. Plans that check "Yes" must enter the amount.

Applicants that satisfy the VFCP requirements and the conditions of PTE 2002-51 (see the instructions for [line 9a](#)) are eligible for immediate relief from payment of certain prohibited transaction excise taxes for certain corrected transactions, and are also relieved from the obligation to file the Form 5330 with the IRS. When the conditions of PTE 2002-51 have been satisfied, the corrected transactions should be treated as exempt under Code section 4975(c) for the purposes of answering line 9b.

**Nonexempt transactions.** Nonexempt transactions with a party-in-interest include any direct or indirect:

1. Sale or exchange, or lease, of any property between the plan and a party-in-interest.
2. Lending of money or other extension of credit between the plan and a party-in-interest.
3. Furnishing of goods, services, or facilities between the plan and a party-in-interest.
4. Transfer to, or use by or for the benefit of, a party in-interest, of any income or assets of the plan.
5. Acquisition, on behalf of the plan, of any employer security or employer real property in violation of ERISA section 407(a).
6. Dealing with the assets of the plan for a fiduciary's own interest or own account.
7. Acting in a fiduciary's individual or any other capacity in any transaction involving the plan on behalf of a party (or represent a party) whose interests are adverse to the interests of the plan or the interests of its participants or beneficiaries.
8. Receipt of any consideration for their own personal account by a party-in-interest who is a fiduciary from any party dealing with the plan in connection with a transaction involving the income or assets of the plan.

**Party-in-Interest.** For purposes of this form, party-in interest is deemed to include a disqualified person. See Code section 4975(e)(2). The term "party-in-interest" means, as to an employee benefit plan:

1. Any fiduciary (including, but not limited to, any administrator, officer, trustee, or custodian), counsel, or employee of the plan;

2. A person providing services to the plan;
3. An employer, any of whose employees are covered by the plan;
4. An employee organization, any of whose members are covered by the plan;
5. An owner, direct or indirect, of 50% or more of:
  - a. the combined voting power of all classes of stock entitled to vote or the total value of shares of all classes of stock of a corporation;
  - b. the capital interest or the profits interest of a partnership; or
  - c. the beneficial interest of a trust or unincorporated enterprise which is an employer or an employee organization described in C or D;
6. A relative of any individual described in A, B, C, or E;
7. A corporation, partnership, or trust or estate of which (or in which) 50% or more of:
  - a. the combined voting power of all classes of stock entitled to vote or the total value of shares of all classes of stock of such corporation,
  - b. the capital interest or profits interest of such partnership, or
  - c. the beneficial interest of such trust or estate, is owned directly or indirectly, or held by persons described in A, B, C, D, or E;
8. An employee, officer, director (or an individual having powers or responsibilities similar to those of officers or directors), or a 10% or more shareholder directly or indirectly, of a person described in B, C, D, E, or G, or of the employee benefit plan; or
9. A 10% or more (directly or indirectly in capital or profits) partner or joint venture of a person described in B, C, D, E, or G.

**Line 9c. top** You must check "Yes" if any benefits due under the plan were not timely paid or not paid in full. This would include required minimum distributions to 5% owners who have attained the applicable age as described in Code section 401(a)(9)(C)(v) whether or not retired and/or non-5% owners who have attained the applicable age as described in Code section 401(a)(9)(C)(v) and have retired or separated from service; see Code section 401(a)(9). Include in this amount the total of any outstanding amounts that were not paid when due in previous years that have continued to remain unpaid.

**Note:** In the absence of other guidance, filers do not need to report on this line unpaid required minimum distribution (RMD) amounts for participants who have retired or separated from service, or their beneficiaries, who cannot be located after reasonable efforts or where the plan is in the process of engaging in such reasonable efforts at the end of the plan year reporting period. Plan administrators and employers should review their plan documents for written procedures on locating missing participants. Although the Department of Labor's Field Assistance Bulletin 2014- 01 is specifically applicable to terminated defined contribution plans, employers and plan administrators of ongoing plans may want to consider periodically using one or more of the search methods described in the Field Assistance Bulletin in connection with making reasonable efforts to locate RMD-eligible missing participants.

**Line 9d. top** Plans that check "Yes" must enter the aggregate amount of fidelity bond coverage for all claims. Check "Yes" only if the plan itself (as opposed to the plan sponsor or administrator) is a named insured under a fidelity bond from an approved surety covering plan officials and that protects the plan from losses due to fraud or dishonesty as described in 29 CFR Part 2580. Generally, every plan official of an employee benefit plan who "handles" funds or other property of such plan must be bonded. Generally, a person shall be deemed to be "handling" funds or other property of a plan, so as to require bonding, whenever their duties or activities with respect to given funds are such that there is a risk

that such funds could be lost in the event of fraud or dishonesty on the part of such person, acting either alone or in collusion with others. ERISA Section 412 and 29 CFR Part 2580 describe the bonding requirements, including the definition of "handling" (29 CFR 2580.412-6), the permissible forms of bonds (29 CFR 2580.412-10), the amount of the bond (29 CFR Part 2580, subpart C), and certain exemptions such as the exemption for unfunded plans, certain banks and insurance companies (ERISA section 412), and the exemption allowing plan officials to purchase bonds from surety companies authorized by the Secretary of the Treasury as acceptable reinsurers on federal bonds (29 CFR 2580.412-23). Information concerning the list of approved sureties and reinsurers is available on the Internet at [www.fiscal.treasury.gov/surety-bonds/list-certified-companies.html](http://www.fiscal.treasury.gov/surety-bonds/list-certified-companies.html). For more information on the fidelity bonding requirements, see Field Assistance Bulletin 2008-04, available on the Internet at [www.dol.gov/ebsa](http://www.dol.gov/ebsa).

**Note.** Plans are permitted under certain conditions to purchase fiduciary liability insurance. These fiduciary liability insurance policies are not written specifically to protect the plan from losses due to dishonest acts and cannot be reported as fidelity bonds on line 4e.

**Line 9e. top** Check "Yes," if the plan suffered or discovered any loss as a result of any dishonest or fraudulent act(s) even if the loss was reimbursed by the plan's fidelity bond or from any other source. If "Yes" is checked enter the full amount of the loss. If the full amount of the loss has not yet been determined, provide an estimate and disclose that the figure is an estimate as determined in good faith by a plan fiduciary. You must keep, in accordance with ERISA section 107, records showing how the estimate was determined.

**Caution!** *Willful failure to report is a criminal offense. See ERISA section 501.*

**Line 10. top** Enter information concerning assets and/or liabilities transferred from this plan to another plan(s) (including spinoffs) during the plan year. A transfer of assets or liabilities occurs when there is a reduction of assets or liabilities with respect to one plan and the receipt of these assets or the assumption of these liabilities by another plan. Enter the name, plan sponsor EIN, and plan number of the transferee plan(s) involved on lines 10a, 10b, and 10c, respectively.

Do not use a SSN in place of an EIN or include an attachment that contains visible SSN.

**Note.** A distribution of all or part of an individual participant's account balance that is reportable on Form 1099-R should not be included on line 10.

**Caution!** *IRS Form 5310-A, Notice of Plan Merger or Consolidation, Spinoff, or Transfer of Plan Assets or Liabilities; Notice of Qualified Separate Lines of Business, must be filed at least 30 days before any plan merger or consolidation or any transfer of plan assets or liabilities to another plan. There is a penalty for not filing IRS Form 5310-A on time.*

**Line 11. top** Check "Yes" if this is a defined contribution plan subject to the minimum funding requirements of Code section 412.

**Line 12a. top** Check "Yes" if this plan was permissively aggregated with another plan to satisfy the requirements of Code sections 410(b) and 401(a)(4). Generally, each single plan must separately satisfy the coverage and nondiscrimination requirements. However, generally, an employer may designate two or more separate plans as a single plan for purposes of applying the ratio percentage test of Treasury Regulations section 1.410(b)-2(b)(2) or the nondiscriminatory classification test of Treasury Regulations section 1.410(b)-4. Two or more plans that are permissively aggregated and treated as a single plan for purposes of the minimum coverage test of Code section 410(b) must also be treated as a single plan for purpose of the nondiscrimination test under Code section 401(a)(4).

See Treasury Regulations sections 1.410(b)-7(d) and 1.401(a)(4)-9(a) for more information.

**Line 12b. top** Check the applicable method used to satisfy the nondiscrimination requirements of Code section 401(k). A safe harbor 401(k) plan is similar to a traditional 401(k) plan but, among other things, it must provide for employer contributions. These contributions may be employer matching contributions, limited to employees who defer, or employer contributions made on behalf of all eligible employees, regardless of whether they make elective deferrals. The safe harbor 401(k) plan is not subject to the complex annual nondiscrimination tests that apply to traditional 401(k) plans.

Check "Design-based safe harbor method" if this is a safe harbor 401(k) plan, that is, a SIMPLE 401(k) plan under Code section 401(k)(11), a safe harbor 401(k) plan under Code section 401(k)(12), or a qualified automatic contribution arrangement under Code section 401(k)(13). If the plan, by its terms, does not satisfy the safe harbor method, it generally must satisfy the regular nondiscrimination test, known as the actual deferral percentage (ADP) test. Check the appropriate box to indicate if the plan uses the "current year" ADP test or the "prior year" ADP test. Check "current year" ADP test if the plan uses the current year testing method under which the ADP test is performed by comparing the current plan year's ADP for highly compensated employees (HCEs) with the current plan year's (rather than the prior plan year's) ADP for nonhighly compensated employees (NHCEs). Check all boxes that apply for a plan that tests different groups of employees on a disaggregated basis. Check "N/A" if the plan is not required to test for nondiscrimination under Code section 401(k)(3), such as a plan in which no HCE is benefiting.

**Line 13. top** If a plan sponsor or an employer adopted a pre-approved plan that relied on a favorable Opinion Letter of a Pre-approved Plan, enter the date of the most recent favorable Opinion Letter issued by the IRS and the Opinion Letter serial number listed on the letter. A "Pre-approved Plan" is a plan approved by the IRS with a favorable Opinion Letter that is made available by a Provider for adoption by employers, including a standardized plan or a nonstandardized plan. A Pre-approved Plan may utilize either of two forms: a basic plan document with an adoption agreement or a single plan document. The employer is permitted to make minor modifications to the plan. An "Adopting Employer" is an employer that adopts a Pre-approved Plan offered by a Provider, including a plan that is word-for-word identical to, or a minor modification of, a plan of a Mass Submitter. If a plan was modified in such a way that negates the Opinion Letter, then the plan sponsor is now no longer an Adopting Employer of a Pre-approved Plan, and the plan is treated as an individually designed plan. An "Opinion Letter" is a written statement issued by the IRS to a Provider or Mass Submitter as an opinion on the qualification in form of a plan under Code section 401(a), Code section 403(a), or both Code sections 401(a) or 403(a) and 4975(e)(7). See Revenue Procedure 2017-41 for more information. The Opinion Letter serial number is a unique combination of a capital letter and a series of six numbers assigned to each Opinion Letter.

## Part VII - Accountant's Opinion Information for Large and Certain Small Participating Plans [Return to top](#)

**Line 14. top** Each defined contribution plan participating in a DCG determines the number of plan participants used to determine "large plan" or "small plan" status by counting plan participants at the individual plan level using information on participants with account balances reported on lines 5d(1) and 5d(2) of Schedule DCG, including the "80 to 120" rule at 29 CFR 2520.103-1(d). See [Section 4: What to File](#).

A DCG participating plan must be audited and an IQPA report and audited financial statements for such plan must be attached to the Schedule DCG for that participating plan unless the plan is a small plan (plan that covered fewer than 100 participants with account balances as of the beginning of the plan year) eligible for the waiver of the annual



examination and report of an IQPA under 29 CFR 2520.104-46. The audit and its report must follow the same rules as required for a plan that is filing its own Form 5500 Annual Return/Report and not having any of its reporting obligations satisfied by the filing of a Form 5500 by a DCG. See Instructions to [Schedule H, line 3](#).

Lines 14a(1) through 14a(4). These boxes identify the type of opinion offered by the IQPA.

**Caution!** *The Plan Administrator should confirm with the IQPA of the participating plan subject to audit whether the opinion was an unmodified, qualified, disclaimer of, or adverse opinion before answering line 14a.*

**Line 14a. top** These boxes identify the type of opinion offered by the IQPA. The plan administrator should confirm with the IQPA whether the opinion was an unmodified, qualified, disclaimer of, or adverse opinion before answering line 14a.

**Line 14a(1). top** Check if an unmodified opinion was issued under SAS 136. Generally, an unmodified opinion is issued when the IQPA concludes that the plan's financial statements are presented fairly, in all material respects, in accordance with the applicable financial reporting framework (generally accepted accounting principles (GAAP) or another basis such as modified cash or cash basis). This also includes the form of opinion that SAS 136 permits an IQPA to issue when the IQPA has performed an ERISA section 103(a)(3)(C) audit under 29 CFR 2520.103-8 or 29 CFR 2520.103-12, or both, and had no modifications. Under 29 CFR 2520.103-8, the examination and report of an IQPA does not need to extend to statements or information regarding assets held by a bank, similar institution, or insurance carrier that is regulated and supervised and subject to periodic examination by a state or federal agency provided that the statements or information are prepared by and certified to by the bank or similar institution or the insurance carrier. The term "similar institution" as used here does not extend to securities brokerage firms (see DOL Advisory Opinion 93-21A). Under 29 CFR 2520.103-12, an audit of an employee benefit plan does not need extend to the investments in a pooled investment fund that files a separate audited Form 5500 as a 103-12 IE. For more information on filing requirements for 103-12 IEs, see [Section 4: What to File](#). Neither of these regulations exempt the plan administrator from engaging an IQPA nor from attaching the IQPA's report to the Schedule DCG.

**Line 14a(2). top** Check if a qualified opinion was issued. Generally, a qualified opinion is issued by an IQPA when (a) the IQPA, having obtained sufficient appropriate audit evidence, concludes that misstatements, individually or in the aggregate, are material but not pervasive to the financial statements or (b) the IQPA is unable to obtain sufficient appropriate audit evidence on which to base the opinion, but the auditor concludes that the possible effects on the financial statements of undetected misstatements, if any, could be material but not pervasive.

**Line 14a(3). top** Check if a disclaimer of opinion was issued. A disclaimer of opinion is issued when the IQPA is unable to obtain sufficient appropriate audit evidence on which to base the opinion, and the IQPA concludes that the possible effects on the financial statements of undetected misstatements, if any, could be both material and pervasive.

**Line 14a(4). top** Check if the plan received an adverse accountant's opinion. Generally, an adverse opinion is issued by an IQPA when the IQPA having obtained sufficient appropriate audit evidence, concludes that misstatements, individually or in the aggregate, are both material and pervasive to the financial statements.

**Line 14b. top** Check "DOL Regulation 2520.103-8" or "DOL Regulation 2520.103-12(d)" (or both boxes, if applicable) if the IQPA performed an ERISA section 103(a)(3)(C) audit of the plan's financial statements under DOL regulations 29 CFR 2520.103-8, 29 CFR 2520.103-12(d), or under both. If it was not performed under 29 CFR 2520.103-8 or 29 CFR 2520.103-12(d), check box (3). Note. These regulations do not exempt the plan administrator from engaging an IQPA or from attaching the IQPA's report to the Schedule DCG. If you check box 103-8 or 103-12(d) or both, you must also check the appropriate box on line 14a to identify the type of opinion offered by the IQPA.

**Line 14c.** [top](#) Enter the name and EIN of the accountant (or accounting firm) in the space provided on line 14c. Do not use a SSN or any portion thereof in lieu of an EIN. The Schedule DCG is open to public inspection, and the contents are public information and are subject to publication on the Internet. Because of privacy concerns, the inclusion of a SSN or any portion thereof on this Schedule DCG may result in the rejection of the filing.

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