



Plan Administration User Manual

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Chapter 1: Introduction

I. Plan Administrative User Manual

Welcome! This user manual is a go-to guide for procedural questions related to the day-to-day operation of your retirement plan. Use of this manual for convenient and quick access to recordkeeping and administrative procedures. For a brief tour of the Plan Sponsor Website, please click [here](#). Visit BPAS University at u.bpas.com to access the Participant Portal.

BPAS is constantly making changes to procedures to further streamline the administrative efficiencies offered to clients. As such, the Plan Administrative User Manual is a living document and will be frequently updated. The most recent version will always be located on the plan sponsor website. For announcements and updates during the year, please see the participant and plan sponsor bulletin boards located on <https://www.bpas.com>. Significant changes may also be communicated via blast email.

Your Plan Consultant is your main contact for any plan-related questions. For questions that are not addressed in this manual, please call 1.866.401.5272 and ask to speak to the Plan Consultant assigned to your plan.

II. Retirement Account Information Center

Accessing your retirement plan account is easy. There are two ways to access account information: online via the web or by phone using the Voice Response Unit (VRU).

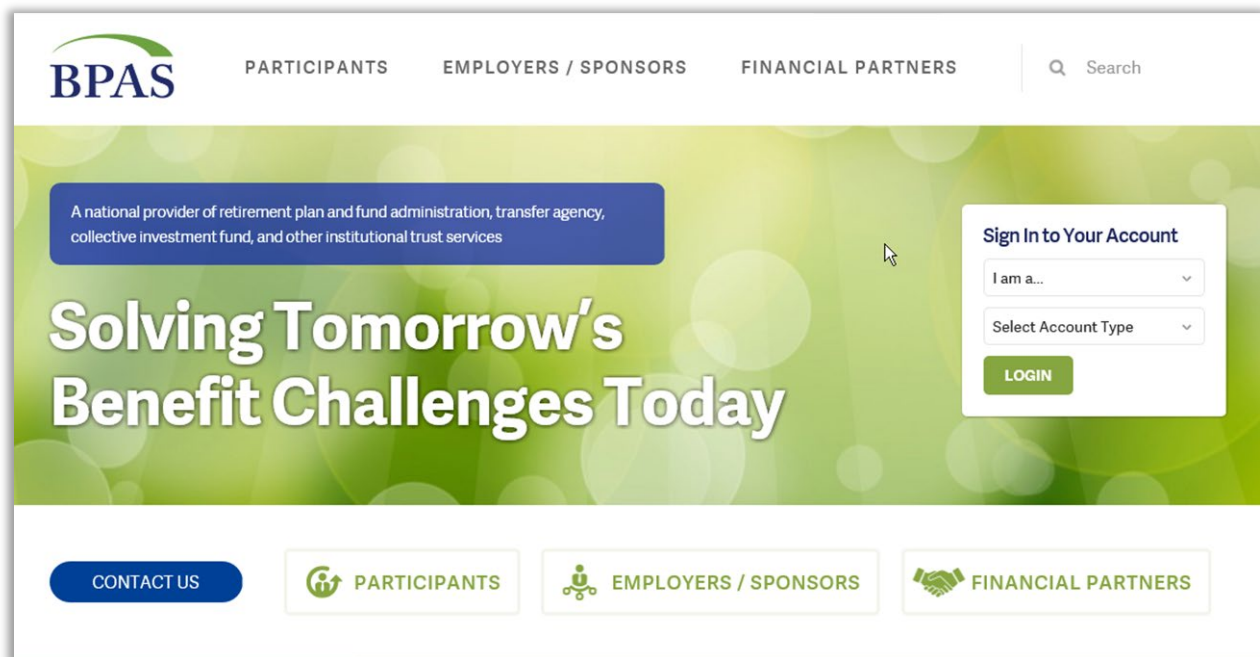
III. Website Plan Access

The BPAS website provides the plan sponsor, advisor, and participant 24/7 online access to view and manage retirement account activity. Users can view reports, utilize special tools, review personal information, and keep up to date with important announcements all through one site.

A. Plan Sponsor Website Access

The website offers several menus and features that can assist you in monitoring plan activity, providing management reports, and general administration. To access the Plan Sponsor Website:

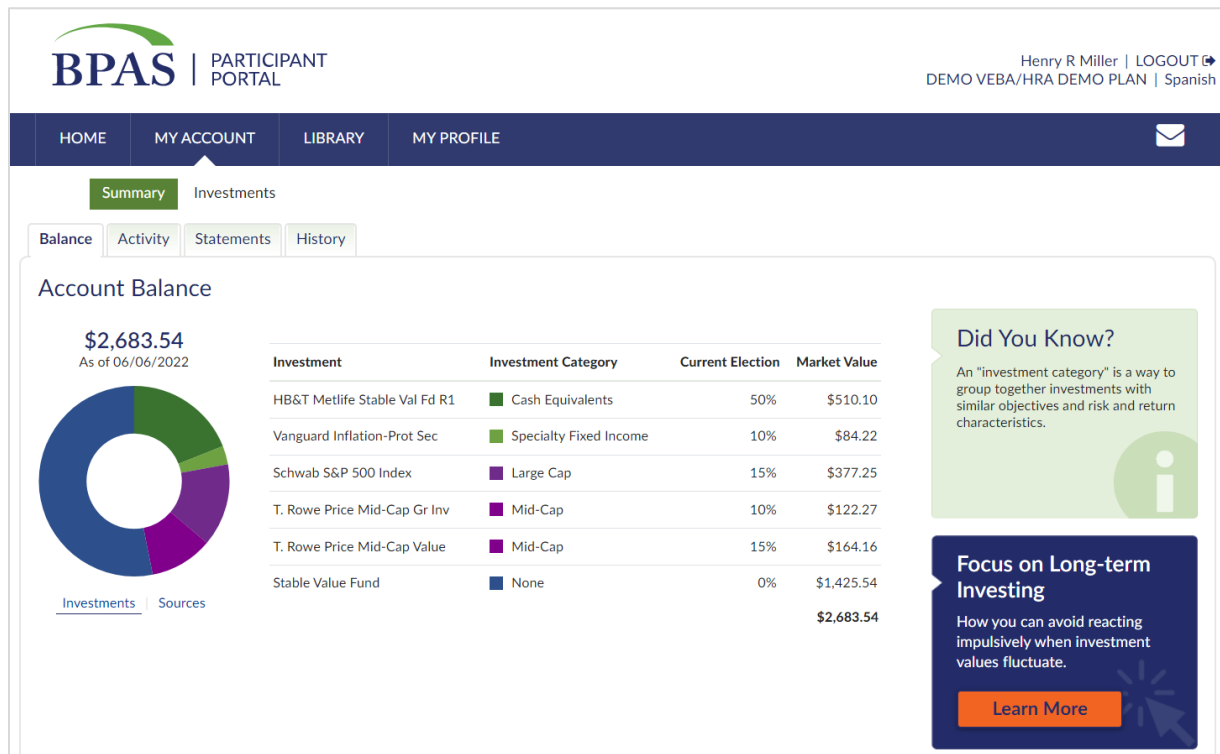
1. Visit www.bpas.com.
2. In the Sign In to Your Account section, click on the drop-down menu under **I am a...** and select **Plan Sponsor/Employer**; then click on the **Select Account Type** drop down menu and select **Retirement Plan**. You can also access other options from this menu as needed.
3. On the Plan Sponsor login screen, enter your User ID and Password, which we send to you separately, and click on the **Login** button.



B. Participant Website Access:

Login information and an initial User ID and PIN will be sent to participants in the mail. Upon receipt, Participants can access account information by doing the following:

1. Visit u.bpas.com.
2. In the Account Login menu, select **Retirement Plan**, select **Login to Your Account**.
3. On the Participant Website login screen, enter User ID and Password and click on **Login** button. The initial user ID is their social security number, and the initial PIN is date of birth in the mmddyyyy format. Participants will be prompted to change both ID and PIN the first time they login to the Participant Website.



The screenshot displays the BPAS Participant Portal interface. At the top, the BPAS logo and 'PARTICIPANT PORTAL' are visible. The user is identified as Henry R Miller, with options for LOGOUT, DEMO VEBA/HRA DEMO PLAN, and Spanish. The navigation menu includes HOME, MY ACCOUNT, LIBRARY, and MY PROFILE. The 'MY ACCOUNT' section is active, showing tabs for Summary, Activity, Statements, and History. The 'Account Balance' is \$2,683.54 as of 06/06/2022, accompanied by a donut chart. A table lists investments with their categories, current election percentages, and market values. A 'Did You Know?' tip explains investment categories, and a 'Focus on Long-term Investing' section offers advice on avoiding impulsive reactions to market fluctuations.

Investment	Investment Category	Current Election	Market Value
HB&T Metlife Stable Val Fd R1	Cash Equivalents	50%	\$510.10
Vanguard Inflation-Prot Sec	Specialty Fixed Income	10%	\$84.22
Schwab S&P 500 Index	Large Cap	15%	\$377.25
T. Rowe Price Mid-Cap Gr Inv	Mid-Cap	10%	\$122.27
T. Rowe Price Mid-Cap Value	Mid-Cap	15%	\$164.16
Stable Value Fund	None	0%	\$1,425.54
			\$2,683.54

IV. Plan Sponsor Website Features

A. Daily Plan Reports

These reports provide summary and/or detailed information at both the Fund and Source levels. They also provide users with the ability to run transaction detail reports and create statements on demand. The Defer Report checkbox allows a user to run a report that may take several minutes to complete and “defer” the results while continuing to navigate through the website. A pop-up message notifies the user when the report is complete, or, if the user has exited the site, the report will be available upon return.

B. Resource Center

This section provides an array of information and interactive links. This is where users will find plan, administrative and government links, general information such as SSAE-16 reports, bond information, newsletters, and notices and that are required to be distributed. The Resource Center also provides essential detail for the day-to-day operations through the Action Items section.

- **Plan Documents and Notices:** where you will find regulation documents that require distribution to participants.
- **Action Items:** require action on the plan sponsor's part including contribution limit alerts, deferral rate changes (if offered), invalid addresses, new loans issued, recent disbursements, and other vital information. Plan Sponsors should review these items for updates prior to their payroll submission.
- **Annual Plan Year Reports:** include results from required testing, allocation reports, contribution limitation testing, Form 5500, etc. These reports are archived for each year the plan has been with BPAS.
- **Administrative Forms:** include beneficiary, rollover, enrollment materials, and loan payoff forms.

C. Fund Information

- **Performance:** offers performance in periods of 1 month, 3 months, 1 year, 3 years, 5 years, and 10 years. Additionally, there are links to fund fact sheets.

D. Participant Reports

These reports provide a variety of participant-based data:

- Access to an **Employee List** using various search criteria
- **Login History** that allows users to see login history for the last 90 days
- **Pending Web Transaction**
- **Name & Address Export**
- **Beneficiary List** if you elected to utilize our Online Beneficiary feature
- **Disbursement Status**

E. Access Participant Site

Users can access an individual participant account through this link. To access a participant's account on the Plan Sponsor Web, select **Access Participant Site/View Participant**. Enter Social Security Number (SSN) or the first few letters of the participant's last name. Select **Submit Query**. Choose correct participant link from the list generated. To return, select **Return to Sponsor**.

TIP Enter a space in the last name field to bring up a list of all employees.

F. Maintenance

This section provides the Plan Sponsor the ability to:

- Unlock Accounts for participants that have been locked out of their accounts
- Change Password allows the Plan Sponsor to change their password and select security challenge questions.

G. Notifications

This feature allows the Plan Sponsor to manage notifications to participants:

- **Plan Message:** create and post a message on the Participant Website and set the parameters for when the message appears.
- **Disable Web Message** allows users to change the original date defined to remove a message at any time.
- **Message History:** tracks the messages for historical review.

V. Voice Response Unit

Upon enrollment in the plan, a letter is sent to all eligible participants containing a **Personal Identification Number (PIN)**. This number will be used to access the Voice Response Unit (VRU).

Participants can conveniently access retirement account information 24 hours/day, 7 days/week. A highly trained team of Customer Service Representatives is also available to answer questions Monday through Friday, 8:00 am to 8:00 pm Eastern Standard Time (EST), except on major holidays, by calling 1.866.401.5272.

VI. Accessing the VRU Line

1. Call 1.800.530.1272
2. Enter 1 for English, 2 for Spanish
3. Enter Social Security Number
4. Enter PIN
5. Select the needed Menu Option by pressing the corresponding number:
 - **Press 1: Personal Account Information**
 - Account Balance Information: total balances by investments after total balance is provided
 - Reallocate Current Balance
 - Realign total account using percentages
 - Transfer between investments using dollar amounts
 - Contribution Rate Information (if applicable)
 - Redirect Future Contributions: change future contribution Investment election percentage
 - **Press 2: Loan Information**
 - Current Interest Rate
 - Outstanding Loan Information
 - Calculate a Loan
 - General Purpose Loan
 - Principal Residential Loan

- **Press 6: Change PIN**
 - To continue, enter new PIN
- **Press 7: Repeat Information**
- **Press 8: Return to a Previous Menu**
- **Speak to a Customer Service Representative: Press 0**

Chapter 2: Processing

I. Census Reporting and Contribution Information

Ensuring compliance with both the DOL and IRS Regulations is essential to the operation of your retirement Plan. BPAS is dedicated to accurate census reporting to help ensure the Plan meets compliance deadlines.

The BPAS Census Department issues a Welcome Letter to introduce new users to the proprietary BPAS system for transmitting census files. Periodic payroll data is provided to BPAS electronically using its web-based census data capture application, CensusPRO™. CensusPRO™ provides both manual data entry and file-import capabilities. File specifications for each layout are included in the Welcome Letter. The complete **User Guide and Quick Steps** can also be accessed from the CensusPRO™ Help Menu, once logged in to the account.

When you are ready to log in to CensusPRO™, remember that the Username and Password are case sensitive (note: your credentials are not the same as the plan sponsor web portal). Please feel free to call a member of the census department at 315-292-6970 or email at census@bpas.com with any questions when preparing the census file.

To access and login to CensusPRO™ and the Secure File upload, go to: <https://censuspro.bpas.com>.

A. Census Frequently Asked Questions:

Q: Why do we have to provide YTD hours every time?

Vesting is updated on a real-time basis, as each census file is processed during the year. When participants cross the vesting threshold each year (hours requirement or elapsed time) vested percentages are immediately updated on our website and participant statements. When loan or distribution requests are made, BPAS can process these requests accurately, thereby avoiding the need for a second distribution or an accidental overpayment.

Q: Why do we have to send a full census file every payroll?

BPAS receives census files with each contribution (not merely a payroll file) and checks the file for a variety of edits, such as declining income, missing allocations, contribution suspension due to hardship withdrawal, and inaccurate loan payments. BPAS then notifies the plan sponsor of the corrected amount to be funded by source, as well as any edits/corrections made to the file, via an electronic ACH Debit Verification with corresponding email notification of the verification being created in CensusPRO™. Once the plan sponsor approves the verification form and returns it to BPAS, BPAS initiates trades at the close of business and debits the plan sponsor's account the following business day.

Additional benefits of a full census file include:

- Employee updates are made immediately once the payroll has been processed (such as name and address changes)
- New employees are added to the system and an entry date is calculated
- A final year end file is not required if submitting each payroll period

Some of the edit checks BPAS performs on contribution files include:

- Employees with missing or invalid data
- Deferrals or contributions submitted for participants who are not yet eligible
- Employees exceeding 402(g) or catch-up limits
- Employees deferring for whom BPAS has a termination date on file
- Additional loan payments for loans that have already been discharged
- Incorrect loan repayment amounts
- Employees deferring while on hardship suspension
- A variety of other reasonableness checks per plan document specification

Q: Why can't my payroll provider (or I) just FTP transfer the file?

BPAS requires census files to be uploaded through CensusPRO™ to ensure all required data is submitted in a consistent format. The use of CensusPRO™ allows Clients and BPAS to utilize our efficient and automated systems and procedures. CensusPRO™ streamlines the process of segregating and investing contributions, provides many reconciliation reports, allows for manual and electronic pay roll data input or import, delivers the capability for electronic verification as opposed to paper via fax machines, offers the option to maintain employee data between pay roll dates and provides a way of tracking and monitoring the progression of all files and information submitted to BPAS.

BPAS also integrates with some payroll companies which will do part or all of the census submission process for their clients. The Census team member designated to your plan's set up can discuss this with you. If your payroll provider does not offer any integration, we will be happy to provide you a list of payroll companies that do.

B. Reporting New Employees and Employee Changes

If a new employee needs to be added to the plan, he/she should be reported via CensusPRO™. To change an employee's information, such as an address change, termination date, or name change, this information needs to be reported through CensusPRO™ as well.

C. Processing Loan Payments

Payments on traditional and residential loans are reported through CensusPRO™. Payments must be in increments of the contracted amount on the amortization schedule. Employees who want to accelerate loan repayments should contact the plan sponsor's payroll office and make arrangements accordingly. Only multiples of the original loan repayment amount will be accepted. The sponsor will receive notification of any deviant payment amounts that can not be processed. **Note:** MyPlanLoan repayments are not payroll deducted.



For a **loan pay-off**, employees can complete the Loan Payoff form located on the website, under **Resource Center/Administrative Forms/Loan Payoff Form** on both the Plan Sponsor and Participant websites. See the instructions on the form for more detail.

D. Processing Rollovers and Transfers

If the Plan accepts transfers or rollovers from other retirement plans or individual retirement accounts, the rules and laws governing these transfers or rollovers are very complex. Review the Plan Document prior to accepting any rollovers or transfers from employees.



Rollovers are *generally* allowable by employees as of date of hire. Employees should be directed to the website, under **Resource Center/Administrative Forms/ Rollover Verification Form and Beneficiary Form**.

Rollovers checks should be payable to: the Name of the Plan, f/b/o Participant Name. For example: ABC Company Retirement Plan f/b/o John Doe. The check and the completed **Rollover Verification Form** can be forwarded to BPAS directly from the prior custodian, from the employee, or from the Plan Sponsor.



If transfers are allowed, transfers forms can be found on the website under **Resource Center/Administrative Forms/ Transfer**.

E. Quarter-End Processing & Reporting

At the close of each plan year quarter, data is compiled on a cash-basis and valuation reports are produced and published on the plan sponsor web site. Quarterly reports are archived, and include such reports as **Disbursements, Loans, Summary by Funds, and Summary by Source**. Statements are mailed to employees each quarter and archived on participant web for access at any time.



Plan Sponsor reports can be found at **Resource Center/Plan Information and Reports**.

F. Changes to Account Balances

Empowering employees to retire with dignity by taking charge of the future is the BPAS mission. If employees want to make inter-fund transfers or allocation changes on their account, they can do so 24/7 by accessing www.bpas.com or by calling the VRU number at **1.800.530.1272**. For personal assistance in navigating through the system, Customer Service Representatives (CSR) are available Monday-Friday 8:00am to 8:00pm EST at **1.866.401.5272**.

Chapter 3: Distributions and Loans

This section reviews the distribution process for any money taken out of the plan and explains the different distribution methods.

Distribution forms for termination, hardship, and loan distributions can be requested by logging into the Plan Sponsor Website at www.bpas.com. **Please note:** paperwork will generate only for those participants eligible for a distribution or loan.

I. Loan Distributions

BPAS offers several loan programs – traditional loans, residential loans, and MyPlanLoan. Plan Sponsors can choose the loan program(s) that best satisfies the company’s requirements.

1. **Traditional loans** are payroll deducted. Traditional loans are subject to minimum and maximum loan amounts and are usually restricted to a maximum number of loan(s) outstanding. Loan proceeds are usually not restricted by source; however, restrictions can be imposed by the Plan Sponsor. The Loan Policy specifies the loan features for the plan. Please contact the Plan Consultant to make changes to the Policy. Please note: loans allowed for hardship reasons require proof with the application.
2. **Residential loans** are payroll deducted and can extend beyond the five-year limitation set for traditional loans. BPAS’ traditional residential loan repayment time is 25 years. Proof of the purchase of the primary residence is required to be submitted with the application.
3. **MyPlanLoan** is not a payroll deducted loan product; instead, the participant is required to make payments directly to MyPlanLoan. The advantage to this program is that the plan sponsor is not responsible for deducting and collecting payments through payroll deduction, and if there is a severance of the employer/employee relationship, the participant may continue to repay the loan. More information can be found at <https://www.bpas.com/employers/services/ar-mpl/myplanloan>.

A. How to Apply for Loans

1. Select participant, go to **Transactions/Loan Modeling and Request**. The loan modeling section is displayed.
2. Complete the following parameters:
 - a. **General or Residential Loan**
 - b. **Amount available** - the maximum allowed is listed on the page
 - c. **Term** - listed by months or years
 - d. **Application** - online or by mail
 - e. **Model Loan**

Once the loan has been modeled, participants have the option to accept that loan or remodel using different parameters.

3. Once the desired loan has been modeled, the participant can submit the request by selecting

- a. Print documents online, or
- b. Mail documents

To retrieve documents, go to **Transactions/Requested Paperwork** or wait for the forms to be mailed



Resource Center/Action Items provide several loan reports with which users should become familiar.

- **Comprehensive Loan Report** provides loans to date for the current plan year.
- **Loans Completed Report** provides a list of loans that have been paid-in-full.
- **Loans Nearing Default Report** provides information on loans that **need immediate attention**. Please notify your Plan Consultant if there is a valid reason a loan on the Loans Nearing Default report should not be defaulted. Valid reasons include military or medical leave.
- Be sure to review the **New Loan Issues** to verify all loans are being payroll deducted. If an amortization schedule is not received, please contact your Plan Consultant.

III. Hardship Distributions

Once all other means for requesting money from the plan have been exhausted, and if allowed in the plan, a participant may request a hardship distribution. Hardship distributions can be restricted to certain funds and sources according to the terms of the plan.

A. How to Apply for a Hardship Distribution

1. Select Participant, go to **Transactions/Distribution Request**, which provides access to the Distribution Paperwork Request page and indicate the amount available for a hardship.
2. **Select Method of payment:**
 - **Check** - The check will be mailed to the address on record. This election will apply to all future non-rollover withdrawals from the Plan.
 - **Direct Deposit** - Please make sure all of the direct deposit information entered is correct. The distribution could be delayed or deposited to a wrong account if incorrect information is provided. You are solely responsible for any delay or deposit in a wrong account which results from any incorrect direct deposit information you provide. This election will apply to all future non-rollover withdrawals from the plan. By asking BPAS to process a payment via ACH instead of mailing a check to your address of record, you have voluntarily assumed the additional risk in the event that incorrect ACH information is provided. Please note that if the amount being paid directly to you is greater than \$25,000, the distribution will be paid by check instead of ACH.
3. Select either **Print documents online** or **Mail documents**, and submit.
 - If **Print documents online** is selected, retrieve documents by selecting **Transactions/Requested Paperwork**. If **Mail documents** is selected, the forms mailed to the participant at the address on file.
 - The Plan Sponsor is be notified of the request.

Once BPAS receives the hardship request, BPAS verifies the application and documentation provided for the stated hardship. Once the hardship has been processed, the participant is suspended from making elective deferrals into the plan for six-months. If the plan has non-Safe Harbor hardship provisions, the Plan Sponsor is required to approve the hardship.



To view the list of hardship suspensions, on the Plan Sponsor Web go to the **Resource Center/Action Items/Suspension/Hardship File**. An Excel Spreadsheet lists the suspension start date, participant information and the suspension end date.

IV. Termination Distributions

Upon separation from employment and satisfaction of the plan's distribution requirements, a distribution form can be generated for terminated employees. Information such as termination date, hours of service, and year to date compensation should be reported through CensusPRO™.

Forms of distributions available to the Participant are specified in the Adoption Agreement. Participants must have a date of termination on file with BPAS in order to generate distribution paperwork.

A. How to Apply

Select participant, go to **Transactions/Distribution Request**. The Distribution Paperwork Request page will display and general rules about market fluctuations will be explained. Choose **Continue**. Two options appear: 1) Print documents online, and 2) Mail documents.

If **Print Documents Online** is selected, the user will receive a pop-up message indicating that the paperwork is available for printing. The participant should go to **Transactions/Requested Paperwork** to retrieve the application. The forms can be printed, completed by the participant, and sent in as indicated on the application. Forms can be faxed to 1.315.292.6450. A notification will be sent to the sponsor.

Contact your Plan Consultant immediately if the employee is still employed or has been re-hired!

By selecting **Mail Documents**, the application will be mailed to the participant at the address on file. A separate letter will be mailed to the Plan Sponsor. To view recent distributions, see **Resource Center/Action Items/Recent Distributions**.

Once BPAS receives and verifies the paperwork for accurate completion, the distribution will be processed, and a check will be issued within 10 business days. Any questions or concerns about the status of the application should be directed to the Customer Service Department at 1.866.401.5272 or your Plan Consultant.



To view the list of current-year distributions on the Plan Sponsor Web go to the **Resource Center/Action Items/Recent Disbursements**. Data reported includes the individual, tax state,

payment date, disbursement amount, amount paid to the participant, amount paid as a rollover, and taxes withheld.

V. Mandatory Distributions (Force-Outs)

Your Plan document will specify the mandatory distribution provisions for the Plan and BPAS will adhere to these rules. If the company has completed the IRA Custodial Agreement with **Hand Benefits & Trust, a BPAS Company**, these distributions will be automated through the BPAS system, and the administration will be simplified.

For example, if the mandatory limits are between \$200 and \$5,000, terminated participants whose account balance is less than \$5,000 (excluding rollover contributions) will receive paperwork automatically indicating that they are required to take a distribution. If, after 60-days, BPAS has not received the completed application, the funds will be rolled into an IRA on behalf of the participant. Former participants will be required to complete an IRA Adoption Agreement, provide proper identification, and complete a distribution form from the IRA account to receive a distribution from the IRA. More information on this program can be found at <http://www.autorollovers.com>.

Participants with account balances is under \$200 are sent a check for the amount available after the distribution fee as tax withholding is not required for amounts under \$200. No paperwork is required.

A. How to Apply

There is no application process required if the plan sponsor is using the AutoRollovers program. If the plan sponsor is not using this feature, the employer needs to contact the Plan Consultant to indicate which participants can be forced out of the Plan. For more information about the AutoRollovers program, visit www.autorollovers.com.



To view the list of forced distributions on the Plan Sponsor Web go to the **Resource Center/Action Items/Forced Rollovers**. An Excel Spreadsheet will list date, participant name, amount of distribution, fee, and tax year.

VI. In-Service Distributions

The Plan document specifies the rules for In-Service distributions for the Plan. To take an In-Service distribution, please contact Customer Service at 1.866.401.5272 or the Plan Consultant for the application.

VII. Disability Distributions

Many Plan Documents provide for 100% vesting in the event of termination due to disability, which is defined in the Plan Document. The employer may need to verify that a disability has occurred and contact the Plan Consultant. To take a disability distribution, please contact Customer Service at 1.866.401.5272 or your Plan

Consultant for the application. The disabled participants should complete the Application for Benefits form and if applicable, attach evidence of the disability determination.

VIII. Age 70½ Distributions

Each year, BPAS runs reports to identify participants subject to the **Required Minimum Distribution (RMD)**. The employer is contacted if BPAS is missing information. Once the list is completed, an RMD form is sent to the participants explaining their available options.

- If no longer working or a more than 5% owner, the participant must take a distribution

This process typically takes place during the second half of the year. However, participants may call in to elect an RMD at **any time** during the year.

A. How BPAS Processes an RMD

1. Identify participants eligible for an RMD
2. Paperwork is mailed to the participant: this includes options and a required return date for the paperwork
3. Paperwork is returned to BPAS
4. BPAS verifies the application for completeness
5. Application gets processed and a check is issued within 10 business days

Note: If forms are not returned to BPAS by the return date, the distribution is paid out to terminated participant and 10% Federal tax is withheld. For non-terminated participants, BPAS confirms the participant's active status and ensures he/she has not had an RMD in the past.

IX. Death Distributions

At the time employees enter the Plan and when they have life changing events such as marriage or divorce, the Employer must make sure participants complete a **Beneficiary Form**. If there is no form on file, the plan document determines the default Beneficiary at the time of death.

B. How to Apply

1. Employer contacts the Plan Consultant to notify of the participant's death
2. Employer provides the most recent Beneficiary form to the Plan Consultant. If plan uses Online Beneficiary Designation, then BPAS will ask the Plan Sponsor to verify the online beneficiary.
3. Plan consultant sends Beneficiary Application(s) as indicated on the form
4. Beneficiary completes form and sends in
 - Completed application
 - Copy of the Death Certificate (if not already submitted by the Employer)

Once BPAS receives and verifies the paperwork for completion, it will be processed, and check(s) issued within 10 business days. If there is more than one beneficiary, all applications are required to be submitted before the distribution occurs. Any questions or concerns about the status of the application should be directed to the Customer Service Department at 1.866.401.5272 or your Plan Consultant.

X. Qualified Domestic Relations Order (QDRO)

As a rule, Plan Assets are not subject to the claims of creditors. There is an exception to this rule – the Qualified Domestic Relations Order, or QDRO. A QDRO is an order, issued by a state court, which gives a spouse, former spouse, child or other legal dependent of the Participant the right to some part of the Participant’s interest in the Plan.

If a Domestic Relations Order (DRO) is received, the document is forwarded it to an ERISA Attorney, who determines whether the DRO is qualified. A copy of the DRO should also be sent to BPAS. BPAS will determine whether the DRO is qualified if the Plan Sponsor does not want to engage an attorney. Once the DRO becomes qualified (QDRO), and is received by BPAS, BPAS proceeds with distributing the assets as mandated by the Order.

Chapter 4: Testing

This section outlines the testing procedures to ensure regulatory compliance. Each year, BPAS sends the Plan Sponsor an annual Compliance Questionnaire to inform BPAS of any changes that were made to the plan or employer structure during the previous 12 months. If BPAS does not receive completed census data for a plan throughout the year, a census file will be requested at year-end.

I. Non-Discrimination Testing

Once all data has been verified, the appropriate annual non-discrimination testing is completed. To view the list of completed tests, go to the **Resource Center/Action Items/Annual Plan Year Reports**. Select the year and test for review. View the current [Cost of Living Adjustments limits](#). The following tests are completed based on the plan provisions:

- Actual Deferral Percentage Test | ADP
- Actual Contribution Percentage Test | ACP
- Excess Deferral Test | 402(g)
- Minimum Coverage Test | 410(b)
- Non-Discrimination Test | 401(a)(4)
- Top Heavy Test | 416
- Annual Additions Test | 415
- Annual Compensation Test | 414(s)
- Employer Deductibility
- Plan Level Limitation

II. Compliance Calendar

Contributions	Deadlines
Return of excess contributions to correct a failed ADP/ACP test without excise tax	2 ½ months after Plan year end
Return of excess contributions to correct a failed ADP/ACP test with 10% excise tax	12 months after the end of the Plan year
Return of 401(k) Deferrals in excess of 402(g) limit	By April 15th of the following year
Funding of Employer Contributions	Earlier of the due date of the filing of the Company's Tax Return, or with extension 8 ½ months after the end of the Plan Year
Allocation of QNEC to correct ADP/ACP test failure	12 months after the end of the Plan year that is used to calculate the percentage

III. Reporting Calendar

Report or Form	When Due	Report Recipient
Form 5500 Annual Report with appropriate Schedules	7 months after each Plan Year end (2 ½ month extension available)	DOL – provide copy to each Participant if requested in writing.
Form 5500EZ Annual Report (1Participant with assets > \$100,000)	7 months after each Plan Year end (2 ½ month extension available)	DOL – provide copy to each Participant if requested in writing.
Summary Annual Report (SAR)	9 months after each Plan Year end (2 ½ month extension available)	Participants and Beneficiaries.
Form 1099-R distribution. (Recipients of distributions from Plan)	January 31st following Calendar Year of distribution	Participant receiving Copy to IRS w/ Transmittal Form 1096.
Form 945 (Annual Return of Withholding Federal Income Tax)	January 31st following year of withholding	IRS
Form 8109 (Federal Tax Deposit Coupon)	Same as ER's payroll Tax Deposit Schedule	IRS
Form W-4P (Withholding Certificate for Pension or Annuity Payments)	See instructions to form	IRS
Form 1096 (Annual Summary and Transmittal of Information Returns)	February 28th following Calendar Year of distribution	IRS
Form 990-T (Unrelated business income of Plan's Trust in excess of \$1,000)	By 15th day of 4th month following Plan Year end	IRS with payment.
Safe Harbor Notices	30 – 90 days prior to the beginning of the Plan Year	Eligible Employees
QACA – Qualified Automatic Contribution Arrangement	30 – 90 days prior to the beginning of the Plan Year	Eligible Employees
QDIA – Qualified Default Investment Arrangement	30 – 90 days prior to the beginning of the Plan Year	Eligible Employees
ACA – Automatic Contribution Arrangement (original negative election)	30 – 90 days prior to the beginning of the Plan Year	Eligible Employees

Chapter 5: Form 5500 Preparation

The following is a step-by-step guide to submitting Form 5500.

After year-end testing is completed, Form **5500 Annual Return/Report of Employee Benefit Plan** will be completed by BPAS. Please note that this is only for full-service clients.

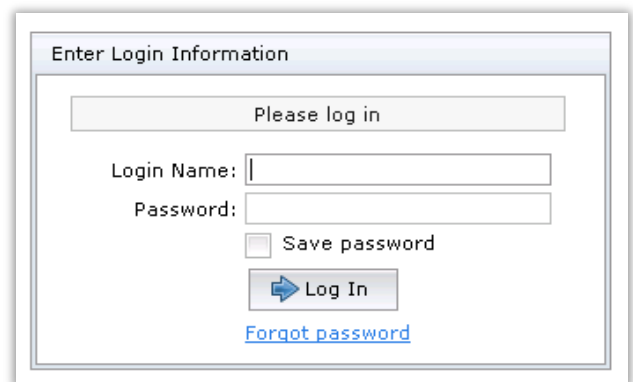
For large plans requiring an annual independent audit, a draft Form 5500 will be prepared along with other compliance reports. Once completed, you will receive an email indicating that the audit package is available on a Secure File Transfer Protocol (SFTP) site.

I. Electronically Signing Form 5500

Once the Form 5500 has been prepared by BPAS, notification will be sent **via email** that it is ready to electronically sign, using the following procedures:

A. Electronic Signature Process:

1. Click on the **link provided in the email** or cut and paste the link to the browser
2. Upon accessing the site, enter the Login Name and Password provided. Once logged in, access to the Form 5500 Filing is provided.
3. **Select Plan Year** to access
4. Select **Print and Sign 5500** to view the form.
Review form carefully.
 - If no changes are required, proceed to next step
 - If changes are required, contact the Plan Consultant as soon as possible



Note: Any problems accessing the website or signing Form 5500 should be directed to the Plan Consultant.

5. **Print Paper Copy** of Form 5500. The Form 5500 **must** be printed before the form is signed electronically.
6. **Review and Sign Paper Copy** before filing
 - Once the filing has been reviewed and determined to be acceptable, sign the printed copy with a “wet” signature. Keep a signed copy in a safe place for your records.
 - Only the electronic copy will be sent once electronically signed.
7. **Enter/Review EFAST Credentials**
 - Verify Name, User ID, and PIN match exactly (including punctuation and spacing) with the credentials received from the DOL registration process
 - If it does not match exactly, click the Change Name button
8. Sign and File Electronically

- Read: “Under penalties of perjury and other penalties set forth in the instructions, I declare that I have examined this return/report, including accompanying schedules, statements and attachments, as well as electronic version of this return/report, and to the best of my knowledge and belief, it is true, correct and complete.”
- Select Sign 5500 button
- The filing status of the return will be immediately issued. If you receive a “Not Accepted” status, contact your BPAS Plan Consultant.

B. Additional Notes About Electronic Signature

- If you have not received Form 5500 electronic signing credentials, please visit <http://www.efast.dol.gov/> to register as a signer.
- If the User ID or PIN has been lost or forgotten, please contact DOL EFAST2 support at 866-463-3278 or visit the website <http://www.efast.dol.gov/> (click on **Login** and then **Forgot User ID** or **Forgot Password**).

Chapter 6: Plan Documents

This chapter reviews the importance of keeping the plan document updated with legislative changes and discretionary amendments.

The Employee Retirement Income Security Act of 1974 (ERISA) is governed by two Administrative Departments – the Department of Labor (DOL) and the Internal Revenue Service (IRS). Compliance with legislation is imperative to maintain tax qualifications for both the employer and participant alike.

I. Adherence to the Plan Document is crucial

During the conversion or establishment of the Plan, a decision to engage BPAS to provide document services or to hire another document provider will be made. If BPAS is not engaged for document services, forward a copy of your most recent plan document and any amendments.

- The **Plan Document** must be kept current with all **legislative changes** required by law. If BPAS provides document services, BPAS will keep the plan sponsor apprised of any such mandates.
- It is important to follow the terms of the Plan. If, at any time, you feel that your current plan provisions are not meeting your needs, please contact your Plan Consultant. They will be able to discuss with you whether an amendment is needed.

II. Amendments

Requests for an amendment to the plan should be directed to the Plan Consultant. Once the amendment is complete, you must distribute a Summary of Material Modifications (SMM) to all employees within 210 days after the end of the plan year in which the amendment is adopted.

Important Note:

If the Plan Document is written and maintained by an **outside provider**, please work with them directly for any mandatory or discretionary amendments. BPAS **cannot** amend a document that is maintained by an outside provider. Please forward a copy of all current documents and amendments to BPAS for proper administration of the Plan.

III. Summary Plan Description Updates

New employees must receive a copy of the most recent Summary Plan Description (SPD) within 90 days of satisfaction of the eligibility requirements of the Plan. Plan Sponsors are not required to file a copy of the SPD with Department of Labor (DOL), although they are required to furnish it upon request by the DOL.

If the Plan is amended or any change is made to the information in the SPD, each Participant and beneficiary must receive a Summary of Material Modifications (SMM). The SMM must be furnished within 210 days after the close of the plan year in which the modification was made.

IV. Annual Participant Notices

Below is a list and description of the annual participant notices that may be applicable to your Plan.

A. Safe Harbor Notice

To avoid the requirement for annual ADP/ACP testing the employer may make a specified minimum matching or non-elective contribution to the plan if certain requirements are met. It is a requirement under Internal Revenue Code 401(k) and 401(m) that each eligible employee receive a copy of this notification at least 30 and no more than 90 days before the start of each plan year.

B. Automatic Enrollment

The automatic enrollment notice explains to participants that a portion of compensation will be automatically withheld each payroll period and that amount will be contributed to the Plan unless they elect otherwise. This notice must be distributed at least 30 and no more than 90 days before the start of each plan year.

There are several types of automatic enrollment options: Eligible Automatic Contribution Arrangement (EACA), Qualified Automatic Contribution Arrangement (QACA), and Automatic Contribution Arrangement (ACA). Please speak to your Plan Consultant to learn more about these opportunities to increase participation in the plan.

- If your plan has both the Safe Harbor and Automatic Enrollment feature, the notice is typically combined. If BPAS is the document provider for your plan or if you forward a copy of your notice, you will find the notice under the Safe Harbor Notice link in the **Resource Center** of the website.

C. Qualified Default Investment Alternative (QDIA)

Based on Department of Labor (DOL) regulations the employer may select a fund for the investment of participant contributions (in a participant-directed plan), when the participant does not affirmatively elect any investment. In order to receive fiduciary protection under ERISA section 404(c)(5) participants must receive a copy of this notice at least 30 days and no more than 90 days before the beginning of each plan year. Any new employee must be given a copy of this notice before any contributions are invested into the QDIA, to inform them about the default in to the QDIA and their right to direct the investment of their account

D. 404a5 Fee Disclosure

For qualified plans, the Department of Labor requires the plan fees to be disclosed to all participants (both active, terminated and beneficiaries) that can direct their account balances. This notice should describe the plan administrative fees, participant level fees, investment fees, expenses, returns and benchmark information. The notice must be provided initially upon enrollment and annually thereafter.

If any of the fee disclosure information changes, the new information must be provided to participants at least 30, but not more than 90, days before the date of the change unless the change is the result of unforeseeable circumstances.

E. Electronic Delivery and the Go-Green Initiative

To ensure compliance with electronic delivery methods, a person must voluntarily consent and provide their email address (including a work email address) to receive notices electronically.

Participants can elect the BPAS Go Green e-delivery option and will be sent an email notifying them when the quarterly statements and annual notice(s) are posted to the website.

You can view the participant detail report on the Plan Sponsor Website under the **Resource Center/Action Items/Participant Details**. This report provides a list of who has requested to receive electronic delivery and who will need paper delivery.