

Important Information for 2015 Form 5500 Reporting

Pension Benefit Plans and Funded Welfare Benefit Plans

05.05.16

As you may know, there have been several new items added to the 2015 Form 5500 series. Specifically, these are:

- Preparer Information at the bottom of page 1 of Form 5500 and Form 5500-SF
- Schedule H, Lines 4o-p, and 6a-d
- Schedule I, Lines 4o-p and 6a-d
- Schedule R, New Part VII (Lines 20a-c, 21a-b, 22a-d and 23)
- Form 5500-SF, Lines 10j, 14a-d, and New Part IX (Lines 15a-c, 16a-b, 17a-d, 18, 19 and 20)

Schedule H (Financial Information) and Schedule I (Financial Information-Small Plan) are for pension benefit plans and welfare benefit plans *other than* welfare benefit plans that are fully insured, unfunded, or a combination of unfunded/insured welfare plans and certain fully insured pension plans.

Schedule R (Retirement Plan Information) is for both tax-qualified and nonqualified pension benefit plans that are required to file Form 5500.

Form 5500-SF is a Short Form Annual Return for Small Employee Benefit Plans that meet the criteria for filing the short form.

Both the 2015 Instructions for Form 5500 and the IRS website state that “The IRS has decided not to require plan sponsors to complete these questions for the 2015 plan year and plan sponsors should skip these questions when completing the form.” Government officials have announced that some of these questions may be deleted or revised for post-2015 filings.

The proper way to answer some of the new items is not clear and may be clarified in the future. However, because plan sponsors sign Form 5500 under penalties of perjury, we strongly advise plan sponsors **NOT TO** complete the questions listed in the bullet points above on the 2015 Form 5500 filing.

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