

## Special Financial Assistance Final Rule

### SFA Applications Under the Final Rule

*August 4, 2022*





**PBGC does not have information about individual benefits in multiemployer pension plans.**

**If you have questions about your benefits, please contact your plan administrator or your union.**

**To protect your personal information, do not share Social Security numbers or other identifying data during this webinar.**

- Recap of July 28, 2022 Webinar
- Application Process – What Has Changed from the Interim Final Rule
- Application Process – What Has Not Changed from the Interim Final Rule
- Application Walkthrough
  - General Information
  - MPRA Plans
  - Supplemented Applications for IFR Filers that have received SFA
- Expanded Assumptions Guidance
- Appendix



**Recap of July 28, 2022 Webinar**  
**Special Considerations for Plans That Applied Under**  
**the Interim Final Rule and Other Plans Currently**  
**Eligible to Apply**

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# Recap of July 28, 2022 Webinar

- Available on PBGC's ARP Webinars page at <https://www.pbgc.gov/arp-sfa/webinars>, as well as directly linked below:
  - Video: <https://www.youtube.com/watch?v=e4Nsms9rXxo>
  - Slides: <https://www.pbgc.gov/sites/default/files/documents/sfa-final-rule-practitioner-briefing-28-july.pdf>

Topics covered include:

- Special Financial Assistance Final Rule
- Special considerations for:
  - Plans that already received SFA
  - Plans with applications submitted under the Interim Final Rule currently under review, or withdrawn and not yet refiled
  - Other plans currently eligible to apply, but that have not yet applied
- Implementation of two interest rate structure
- MPRA plans

## What has not changed:

- Plan eligibility requirements – statutory criteria
- Basic definition of Special Financial Assistance – consider all plan resources and obligations
- Basic application and review processes
- Reporting and monitoring – post-SFA receipt

## What has changed:

- Permissible investments for SFA assets
- Interest rates used to calculate SFA
- SFA amount for MPRA plans
- Certain conditions
- Certain application requirements



**Application Process – What Has Changed  
from the Interim Final Rule**

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# What Has Changed from the IFR

	Interim Final Rule (IFR)	Final Rule	
Interest Rate(s)	Single rate	<p>Two rates</p> <ul style="list-style-type: none"><li>- Non-SFA rate: lower of<ul style="list-style-type: none"><li>- plan's interest rate</li><li>- lowest third segment rate in a 4-month window + 200 bp</li></ul></li><li>- SFA rate: lower of<ul style="list-style-type: none"><li>- plan's interest rate</li><li>- lowest average of the three segment rates for a single month in a 4-month window + 67 bp</li></ul></li></ul>	<p>The non-SFA and SFA rates do not have to be derived from the same month</p> <p>Refer to the July 28, 2022 webinar for more details</p>

# What Has Changed from the IFR

	Interim Final Rule (IFR)	Final Rule	
SFA Calculation Methodology	Present value of cash flows	<ul style="list-style-type: none"> <li>- Non-MPRA: cash flow model that projects the SFA and non-SFA asset balances separately (basic method)</li> <li>- MPRA:               <ul style="list-style-type: none"> <li>- an additional cash flow method (increasing assets method) and</li> <li>- a different present value method equal to the PV of the MPRA benefit suspensions</li> </ul> </li> </ul>	
Templates	Templates 4, 5, 6	<ul style="list-style-type: none"> <li>- Templates 4A, 5A, 6A</li> <li>- Templates 4B, 5B, 6B (for MPRA plans using the Present Value Method)</li> <li>- Template 9 (for Supplemented Applications)</li> </ul>	Also updated Filing Instructions and new Addendum C (for Supplemented Applications) and Addendum D (for MPRA plans)

# What Has Changed from the IFR (continued)

	Interim Final Rule (IFR)	Final Rule	
Measurement Date	Last day of the <b>calendar quarter</b> immediately preceding the date the plan's initial application is filed	Last day of the <b>third calendar month</b> immediately preceding the date the plan's initial application is filed	The measurement date is part of a plan's base data and is fixed by the date the eligible plan's initial (or lock-in) application is filed, including for plans that initially filed under the IFR
Participant Census Data	<ul style="list-style-type: none"> <li>- As of the first day of the plan year in which the plan's initial application is filed; or,</li> <li>- If the initial filing date is less than 270 days after the beginning of the current plan year and the actuarial valuation for the current year is not complete, as of the first day of the preceding plan year</li> </ul>	Used to prepare the plan's actuarial valuation report either <ul style="list-style-type: none"> <li>- For the plan year that includes the plan's SFA measurement date; or,</li> <li>- If there is no such report for that plan year, for the preceding plan year</li> </ul>	The participant census data is part of a plan's base data and is fixed by the date the eligible plan's initial (or lock-in) application is filed, including for plans that initially filed under the IFR

# What Has Changed from the IFR (continued)

	Interim Final Rule (IFR)	Final Rule	
Contribution Rate Assumption	Per assumptions guidance, PBGC will accept a change in a plan's contribution rate assumption if the plan uses rates according to the terms of the current CBA, unless a substantial contribution rate decrease was negotiated after March 11, 2021	Removed from assumptions guidance, but under the Final Rule, can exclude contribution rate increases agreed to on or after July 9, 2021 (in which case, must exclude any benefit increases resulting from such contribution increases)	



**Application Process – What Has Not  
Changed from the Interim Final Rule**

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# What Has Not Changed from the IFR

- Mandatory use of e-Filing Portal
  - See Appendix for screenshots
  - Refer to the July 22, 2021 webinar at <https://www.pbgc.gov/arp-sfa/webinars> for a walkthrough
- Mandatory use of checklists and Excel-compatible templates
  - Templates 1, 2, 3, 7, 8 mostly unchanged
  - The idea of “Baseline” and “Reconciliation” has not changed



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# **Application Walkthrough**

## **General Information**

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# “Must Have” Documents / Tools

Section 4262  
of ERISA

Final Rule  
effective  
August 8, 2022

Assumptions  
Guidance

Application  
Instructions

Application  
Checklist

Application  
Templates



## Section A – Plan identifying information

- Basic information (plan name, EIN/PN, filer name and role)
- SFA amount requested

## Section B – Plan documents

- Plan documentation, actuarial valuation reports (AVRs), rehabilitation plan, Form 5500, zone certifications, asset and financial statements, withdrawal liability policy/procedures, death audit information, payment enrollment form

## Section C – Plan data

- Templates – details in following slides

## Section D – Plan statements

- SFA request cover letter – Optional except for MPRA plans that must identify which calculation method provided the greatest amount of SFA and, if applicable, a statement that the plan was partitioned under section 4233 of ERISA
- Identification of eligibility criteria satisfied, priority group (if applicable)
- Detailed supporting rationale for all assumption changes
- Detailed narrative description of projected future employer contributions and withdrawal liability payments and reinstatement of benefits, as applicable

## Section E – Checklist, certifications, and SFA-related plan amendments

- SFA checklist – details in following slides
- Plan enrolled actuary certification of eligibility and priority group (if applicable)
- Plan enrolled actuary certification of SFA amount:
  - All applications must identify SFA amount requested
  - MPRA plans must identify additional information with respect to ‘basic method’, ‘increasing asset method’ and ‘present value method’
- Plan sponsor certification:
  - Accuracy of assets used, including relevant supporting information
  - If SFA measurement date is later than the end of the plan year for most recent audited financial statements, must provide a reconciliation from that date to the SFA measurement date
- Executed plan amendment for SFA compliance and rescind partition order (as applicable)
- Proposed plan amendment to reinstate suspended benefits and make-up payments (as applicable)

**Addendum A** – Instructions on additional information required for a plan that engaged in certain events between July 9, 2021 and its SFA measurement date

**Addendum B** – Instructions for notice of reinstatement of benefits required to be issued by a plan sponsor that suspended benefits (MPRA & reduction to PBGC guarantee due to insolvency)

**Addendum C** – Instructions for filing a supplemented application for plans that received payment of SFA under the IFR

**Addendum D** – Instructions on additional information to be filed for MPRA plans

## Lock-in Application (Final Rule § 4262.10(g))

- Treated as a plan’s initial application and locks in the plan’s:
  - Measurement date
  - Participant census data
  - Non-SFA interest rate
  - SFA interest rate

## When can eligible plans file a lock-in application?

On or Before March 11, 2023	After March 11, 2023
Haven’t filed an initial application	Haven’t filed an initial application
In Priority Group 5 or Priority Group 6 (and Priority Group is open)	
E-Filing Portal is temporarily closed	

## Where to file?

- Submit to [multiemployerprogram@pbgc.gov](mailto:multiemployerprogram@pbgc.gov), not through the e-Filing Portal

# Summary of Templates

Template	Description	Required?
Checklist	List of items necessary for an application, including document type and file naming convention	Yes
1	Form 5500 projected benefit payments for plan years 2018+ (if applicable)	Depends on participant count
2	Top 15 contributing employers and amounts (if applicable)	Depends on participant count
3	Historical contributions for past 10 plan years	Yes
4A, 4B	SFA calculation – use all proposed assumption changes	Yes
5A, 5B	Baseline calculation – same as Templates 4A, 4B but uses specified assumptions	Depends on assumption changes
6A, 6B	Reconciliation details between assumptions used in Baseline and SFA calculations	Depends on assumption changes
7	Identification of projected assumption changes that differ from the most recent certification of plan status prepared before 1/1/2021 (“pre-2021 zone certification”)	Depends on assumption changes
8	Projected employer contribution and withdrawal liability payments used in Basic Method (Templates 4A)	Yes

All templates include basic plan information (Abbreviated Plan Name, EIN/PN)



Pension Benefit  
Guaranty Corporation

# SFA Application Checklist

Checklist Item #	SFA Filing Instructions Reference	Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention	
<p><b>4. Plan Information, Checklist, and Certifications</b></p>									
4.	Section B, Item (2)	Does the application include the actuarial valuation report for the 2018 plan year and each subsequent actuarial valuation report completed before the filing date of the initial application?  Enter N/A if no actuarial valuation report was prepared because it was not required for any requested year.  Is each report provided as a separate document using the required filename convention?	Yes No N/A	Yes	2018AVR Sample Plan.pdf 2019AVR Sample Plan.pdf 2020AVR Sample Plan.pdf 2021AVR Sample Plan.pdf	N/A	4 reports in total, each one uploaded separately	Most recent actuarial valuation for the plan	YYYYAVR Plan Name
13.	Section C, Item (1)	Does the application include the plan's projection of expected benefit payments that should have been attached to the Form 5500 Schedule MB in response to line 8b(1) on the Form 5500 Schedule MB for plan years 2018 through the last year the Form 5500 was filed by the filing date of the initial application?  Enter N/A if the plan is not required to respond Yes to line 8b(1) on the Form 5500 Schedule MB. See Template 1.  Does the uploaded file use the required filenaming convention?	Yes No N/A	Yes	Template 1 Sample Plan.xlsx	N/A	Uploaded single file	Financial assistance spreadsheet (template)	Template 1 Plan Name
21.	Section D	Was the application signed and dated by an authorized trustee who is a current member of the board of trustees or another authorized representative of the plan sponsor and include the printed name and title of the signer?	Yes No	Yes	SFA App Sample Plan.pdf	1	SFA App Sample Plan.pdf	Financial Assistance Application	SFA App Plan Name
22.a.	Section D, Item (1)	For a plan that is not a MPRA plan, does the application include an optional cover letter?  Enter N/A if the plan is a MPRA plan, or if the plan is not a MPRA plan and did not include an optional cover letter.	Yes N/A	Yes	N/A - included as part of SFA App Plan Name	1	For each Checklist Item #21 through #28.c., identify the relevant page number(s) within the single document.	N/A	N/A - included as part of SFA App Plan Name
24.	Section D, Item (3)	Does the application identify the eligibility criteria in § 4262.3 that qualifies the plan as eligible to receive SFA, and include the requested information for each item that is applicable, as described in Section D, Item (3) of the SFA Filing Instructions?	Yes No	Yes	N/A - included as part of SFA App Plan Name	2	The plan is in critical and declining status within the meaning of section 305(b)(6) of ERISA for 2021	N/A	N/A - included as part of SFA App Plan Name
29.a.	Section E, Item (1)	Does the application include a fully completed Application Checklist, including the required information at the top of the Application Checklist (plan name, employer identification number (EIN), 3-digit plan number (PN), and SFA amount requested)?	Yes No	Yes	App Checklist Sample Plan.xlsx	N/A	Uploaded single file	Special Financial Assistance Checklist	App Checklist Plan Name

# Template 4A – SFA Calculation

## Template 4A Instructions

### 4A-1 non-SFA Interest Rate and SFA Interest Rate

- Details of determination of interest rates used in SFA projection
- Refer to the July 28, 2022 webinar for more details

### 4A-2 SFA Benefit Payments

- Projected benefit payments broken out by participant status (e.g., retiree/beneficiary, term vested, active) and new entrants

### 4A-3 SFA Participant Count and Administrative Expenses

- Projected participant counts, and administrative expenses broken out between PBGC Premiums and other

### 4A-4 SFA Details for Basic Method

- Deterministic cash flow model projecting the SFA and non-SFA asset balances separately through 2051
- Refer to the July 28, 2022 webinar for more details

### 4A-5 SFA Details for Increasing Asset Method

- For MPRA plans only



# Template 4A – SFA Calculation

SFA Measurement Date / Plan Year Start Date		(1) Contributions	(2) Withdrawal Liability Payments	(3) Other Payments to Plan (excluding financial assistance and SFA)	(4) Benefit Payments (should match total from Sheet 4A-2)	(5) Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	(6) Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA; should match total from Sheet 4A-3)	(7) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	(8) SFA Investment Income Based on SFA Interest Rate	(9) Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	(10) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	(11) Non-SFA Investment Income Based on Non-SFA Interest Rate	(12) Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
12/31/2021	12/31/2021	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$812,954,368	\$0	\$0	\$1,595,340,000
01/01/2022	12/31/2022	\$139,526,000	\$21,175,000	\$0	-\$307,043,000	\$0	-\$9,220,000	-\$316,263,000	\$19,351,180	\$516,042,548	\$0	\$88,589,253	\$1,844,630,253
01/01/2023	12/31/2023	\$141,147,000	\$21,175,000	\$0	-\$310,515,000	\$0	-\$9,403,000	-\$319,918,000	\$10,538,762	\$206,663,310	\$0	\$101,819,031	\$2,108,771,284
01/01/2024	12/31/2024	\$140,455,000	\$21,175,000	\$0	-\$313,629,000	\$0	-\$7,836,000	-\$206,663,310	\$0	\$0	-\$114,801,690	\$112,776,649	\$2,268,376,243
01/01/2025	12/31/2025	\$139,750,000	\$18,673,000	\$0	-\$316,137,000	\$0	-\$8,029,000	\$0	\$0	\$0	-\$324,166,000	\$115,669,693	\$2,218,302,936
01/01/2026	12/31/2026	\$139,017,000	\$13,676,000	\$0	-\$318,142,000	\$0	-\$8,227,000	\$0	\$0	\$0	-\$326,369,000	\$112,813,692	\$2,157,440,628
01/01/2027	12/31/2027	\$138,335,000	\$13,702,000	\$0	-\$319,235,000	\$0	-\$8,430,000	\$0	\$0	\$0	-\$327,665,000	\$109,543,110	\$2,091,355,738
01/01/2028	12/31/2028	\$137,706,000	\$13,702,000	\$0	-\$319,209,000	\$0	-\$8,638,000	\$0	\$0	\$0	-\$327,847,000	\$106,026,045	\$2,020,942,783
01/01/2029	12/31/2029	\$137,135,000	\$13,681,000	\$0	-\$318,335,000	\$0	-\$8,850,000	\$0	\$0	\$0	-\$327,185,000	\$102,303,028	\$1,946,876,811
01/01/2030	12/31/2030	\$136,576,000	\$13,631,000	\$0	-\$316,723,000	\$0	-\$9,069,000	\$0	\$0	\$0	-\$325,792,000	\$98,405,407	\$1,869,697,218
01/01/2031	12/31/2031	\$135,450,000	\$13,462,000	\$0	-\$314,205,000	\$0	-\$9,597,000	\$0	\$0	\$0	-\$323,802,000	\$94,340,753	\$1,789,147,970
01/01/2032	12/31/2032	\$133,806,000	\$13,167,000	\$0	-\$311,069,000	\$0	-\$9,834,000	\$0	\$0	\$0	-\$320,903,000	\$90,104,762	\$1,705,322,733
01/01/2033	12/31/2033	\$132,202,000	\$13,167,000	\$0	-\$306,847,000	\$0	-\$10,077,000	\$0	\$0	\$0	-\$316,924,000	\$85,732,416	\$1,619,500,149
01/01/2034	12/31/2034	\$130,627,000	\$8,771,000	\$0	-\$301,456,000	\$0	-\$10,326,000	\$0	\$0	\$0	-\$311,782,000	\$81,170,757	\$1,528,286,906
01/01/2035	12/31/2035	\$129,102,000	\$4,311,000	\$0	-\$296,096,000	\$0	-\$10,582,000	\$0	\$0	\$0	-\$306,678,000	\$76,322,574	\$1,431,344,480
01/01/2036	12/31/2036	\$127,635,000	\$4,256,000	\$0	-\$289,842,000	\$0	-\$10,843,000	\$0	\$0	\$0	-\$300,685,000	\$71,311,054	\$1,333,861,535
01/01/2037	12/31/2037	\$126,199,000	\$3,752,000	\$0	-\$282,994,000	\$0	-\$11,111,000	\$0	\$0	\$0	-\$294,105,000	\$66,275,353	\$1,235,982,887
01/01/2038	12/31/2038	\$124,782,000	\$1,247,000	\$0	-\$275,660,000	\$0	-\$11,386,000	\$0	\$0	\$0	-\$287,046,000	\$61,179,477	\$1,136,145,364
01/01/2039	12/31/2039	\$123,392,000	\$1,237,000	\$0	-\$267,907,000	\$0	-\$11,668,000	\$0	\$0	\$0	-\$279,575,000	\$56,056,580	\$1,037,255,945
01/01/2040	12/31/2040	\$122,010,000	\$250,000	\$0	-\$259,941,000	\$0	-\$11,957,000	\$0	\$0	\$0	-\$271,898,000	\$50,963,918	\$938,581,862
01/01/2041	12/31/2041	\$120,636,000	\$55,000	\$0	-\$251,398,000	\$0	-\$12,252,000	\$0	\$0	\$0	-\$263,650,000	\$45,918,442	\$841,541,304
01/01/2042	12/31/2042	\$119,279,000	\$55,000	\$0	-\$243,321,000	\$0	-\$12,556,000	\$0	\$0	\$0	-\$255,877,000	\$40,952,512	\$745,950,816
01/01/2043	12/31/2043	\$117,941,000	\$55,000	\$0	-\$235,020,000	\$0	-\$12,867,000	\$0	\$0	\$0	-\$247,887,000	\$36,069,454	\$652,129,270
01/01/2044	12/31/2044	\$116,613,000	\$55,000	\$0	-\$226,612,000	\$0	-\$13,185,000	\$0	\$0	\$0	-\$239,797,000	\$31,282,844	\$560,283,114
01/01/2045	12/31/2045	\$115,297,000	\$55,000	\$0	-\$218,243,000	\$0	-\$13,208,000	\$0	\$0	\$0	-\$231,451,000	\$26,607,730	\$470,791,844
01/01/2046	12/31/2046	\$114,006,000	\$55,000	\$0	-\$209,966,000	\$0	-\$12,711,000	\$0	\$0	\$0	-\$222,677,000	\$22,069,016	\$384,244,861
01/01/2047	12/31/2047	\$112,736,000	\$55,000	\$0	-\$201,760,000	\$0	-\$12,219,000	\$0	\$0	\$0	-\$213,979,000	\$17,684,620	\$300,741,480
01/01/2048	12/31/2048	\$111,476,000	\$55,000	\$0	-\$193,514,000	\$0	-\$11,724,000	\$0	\$0	\$0	-\$205,238,000	\$13,462,614	\$220,497,094
01/01/2049	12/31/2049	\$110,229,000	\$55,000	\$0	-\$185,300,000	\$0	-\$11,231,000	\$0	\$0	\$0	-\$196,531,000	\$9,412,460	\$143,662,554
01/01/2050	12/31/2050	\$109,007,000	\$55,000	\$0	-\$177,338,000	\$0	-\$10,753,000	\$0	\$0	\$0	-\$188,091,000	\$5,536,369	\$70,169,923
01/01/2051	12/31/2051	\$107,808,000	\$55,000	\$0	-\$169,577,000	\$0	-\$10,288,000	\$0	\$0	\$0	-\$179,865,000	\$1,832,077	\$0

Same as example in the July 28, 2022 webinar

# Template 4A – SFA Calculation

(7) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	(8) SFA Investment Income Based on SFA Interest Rate	(9) Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	(10) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	(11) Non-SFA Investment Income Based on Non- SFA Interest Rate	(12) Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
\$0	\$0	\$812,954,368	\$0	\$0	\$1,595,340,000
-\$316,263,000	\$19,351,180	\$516,042,548	\$0	\$88,589,253	\$1,844,630,253
-\$319,918,000	\$10,538,762	\$206,663,310	\$0	\$101,819,031	\$2,108,771,284
-\$206,663,310	\$0	\$0	-\$114,801,690	\$112,776,649	\$2,268,376,243
\$0	\$0	\$0	-\$324,166,000	\$115,669,693	\$2,218,302,936
\$0	\$0	\$0	-\$326,369,000	\$112,813,692	\$2,157,440,628
\$0	\$0	\$0	-\$327,665,000	\$109,543,110	\$2,091,355,738
\$0	\$0	\$0	-\$327,847,000	\$106,026,045	\$2,020,942,783
\$0	\$0	\$0	-\$327,185,000	\$102,303,028	\$1,946,876,811
\$0	\$0	\$0	-\$325,792,000	\$98,405,407	\$1,869,697,218
\$0	\$0	\$0	-\$323,802,000	\$94,340,753	\$1,789,147,970
\$0	\$0	\$0	-\$320,903,000	\$90,104,762	\$1,705,322,733
\$0	\$0	\$0	-\$316,924,000	\$85,732,416	\$1,619,500,149
\$0	\$0	\$0	-\$311,782,000	\$81,170,757	\$1,528,286,906

Same as example in the July 28, 2022 webinar

# Templates 5A, 6A, and 7 – Assumption Changes

## Identification and supporting rationale for changed assumptions

- Identify assumption changes
- Quantify assumption changes, as applicable
- Summarize rationale for assumption changes, as applicable
  - Should correspond to full rationale required in Section D of instructions

# Template 5A – Baseline

## Same Information and Structure as Template 4A

- Instructions, projected benefit payments, projected participant counts and administrative expenses, and SFA details
- Use “Baseline” assumptions

## Baseline Assumptions

- Pre-2021 zone certification assumptions except:
  - If the plan proposed changed assumptions that are “acceptable”, as described in Section III.A of PBGC’s assumptions guidance (other than the “acceptable” assumption change for “missing” terminated vested participants described in Section III.E. of PBGC’s assumptions guidance), use the proposed acceptable assumptions
  - If the plan’s proposed CBU assumption or administrative expense assumption is not an “acceptable” extension, then use the “acceptable” extension in Template 5A

***Template 5A is not required if the requested amount of SFA is determined using Baseline assumptions***

# Template 5A – Sample Plan Baseline

Assumption	Pre-2021 Zone Certification	SFA Calculation (Template 4A)	Baseline (Template 5A)
Mortality	RP-2014, projection scale AA	Pri-2012 Blue Collar with recent projection scale	Pri-2012 Blue Collar with recent projection scale
CBU	3% decline per year	Used acceptable change in Section III.A of assumptions guidance	Used acceptable change in Section III.A of assumptions guidance
Administrative Expense	Level (0% assumed increase)	2% increase per year	See acceptable change in Section III.A of assumptions guidance
“Missing” Older Term Vesteds	Assumed all missing term vesteds over age 75 would not collect benefit	Assumed missing term vesteds over age 75 to age 85 will collect benefit	Measured based on same methodology and assumption used in pre-2021 zone certification
All Other	2019 AVR	Same as 2019 AVR	Same as 2019 AVR

# Template 6A – Reconciliation

## Template 6A Instructions

### 6A-1 Reconciliation

- Summary of changes in assumptions from Baseline (Template 5A) to SFA calculation (Template 4A)
- Total SFA amount and change in amount with each incremental change in assumption

### 6A-2 (through 6A-5) Reconciliation Details

- For each incremental change in assumption, provide cash flow projections
- Same structure as Templates 4A and 5A

***Template 6A is not required if the requested amount of SFA is determined using Baseline assumptions***



# Template 6A – Sample Plan Reconciliation

Item number	Basis for Assumptions/Methods Change	Change in SFA Amount	SFA Amount	Comments
1	Baseline	N/A	\$100,000,000	From Template 5A
2	“Missing” term vested assumption change	\$12,000,000	\$112,000,000	See “6A-2 Reconciliation Details”
3	Increase in administrative expense assumption from 0% to 2%	\$2,000,000	\$114,000,000	From Template 4A

# Template 7a – Assumption/Method Changes SFA Eligibility

## Template 7a – Assumption/Method Changes for SFA Eligibility

- **List assumptions/methods that differ from those used in the pre-2021 zone certification:**
  - Must include brief explanations as to why using the original assumptions/methods is no longer reasonable
  - Must include brief explanations as to why the changed assumptions/methods are reasonable
  - This table should identify all changed assumptions/methods
  - Explanations should be an abbreviated version of information provided in Section D, Item (6)a of the general SFA filing instructions

## Template 7a is not required if:

- Plan is eligible based on pre-2021 zone certification
- Plan had an approved MPRA suspension on or before March 11, 2021
- Plan became insolvent on or after December 16, 2014 and remained insolvent without terminating as of March 11, 2021
- Plan is eligible based on certification of plan status completed after December 31, 2020, and uses the same assumptions as the pre-2021 zone certification



# Template 7b – Assumption/Method Changes SFA Amount

## Template 7b – Assumption/Method Changes for SFA Amount

- **List assumptions/methods that differ from those used in the pre-2021 zone certification:**
  - Must include brief explanations as to why using the original assumptions/methods is no longer reasonable
  - Must include brief explanations as to why the changed assumptions/methods are reasonable
  - This table should identify all changed assumptions/methods (including those that are reflected in the Baseline provided in Template 5A or Template 5B)
  - Explanations should be an abbreviated version of information provided in Section D, Item (6)b of the general SFA filing instructions
  - Include an indicator as to whether the changed assumption falls under Section III.A, Acceptable Assumption Changes in the assumptions guidance

**Template 7b is generally required**

# Template 8 – Contribution Details

## Template 8 – Contribution and Withdrawal Liability Payment Details

- **Provide details of projected contributions**
  - Total CBUs assumed
  - Average contribution rate
  - Reciprocity contributions, if applicable
  - Additional rehabilitation plan contributions, if applicable
  - Other contributions, if applicable
- **Provide details of projected withdrawal liability payments (if applicable)**
  - Payments being made from employers who withdrew before the SFA measurement date
  - Withdrawal liability payments for projected future withdrawals
- **Projected number of active participants at beginning of plan year**
  - Including new entrants



**Application Walkthrough**  
**MPRA Plans**



PBGC

# Three Methods of Determining SFA for MPRA Plans

- Amount of SFA payable to plans that implemented benefit suspensions under MPRA will be the greatest of three amounts:
  - *Basic Method*: SFA determined in the same manner as that used for non-MPRA plans
  - *Increasing Assets Method*: SFA determined as the lowest amount such that as of the end of the SFA coverage period, the sum of projected SFA assets and projected non-SFA assets is greater than the amount of such sum as of the end of the immediately preceding plan year
  - *Present Value Method*: SFA equal to the present value of the MPRA benefit suspensions

Refer to the July 28, 2022 webinar for more details

## Addendum D – specific instructions for MPRA plans

### Template 4A

- **4A-4 SFA Details for the Basic Method under § 4262.4(a)(1)**
  - Must provide the Basic Method calculation regardless
- **4A-5 SFA Details for the Increasing Assets Method under § 4262.4(a)(2)(i)**
  - Must also provide the Increasing Assets Method calculation, using all the same cash flows as in the Basic Method

# Template 4B – Present Value Method

- Only required if the requested amount of SFA is determined using the Present Value Method
- If the requested amount of SFA is determined using the Increasing Assets Method, the plan is not required to submit Template 4B and should instead include a statement in the plan's enrolled actuary certification that the amount of SFA determined under the Present Value Method is not the greatest amount of SFA under § 4262.4(a)(2)

# Template 4B – Present Value Method

## Template 4B Instructions

### 4B-1 SFA Benefit Payments

- Projected benefit payments broken out by participant status (*e.g.*, retiree/beneficiary, term vested, active) and new entrants
- Separately identify projected benefit payments after reinstatement, and the reduced benefit payments under the approved benefit suspension before any reinstatement

### 4B-2 SFA Details for Present Value Method

- PV of the difference in benefit payments due to reinstatement, plus the PV of make-up payments to be paid to restore the previously suspended benefits

### 4B-3 SFA Exhaustion Year for SFA amount determined under the Present Value Method

- Same cash flows and formulas as Template 4A, but with the SFA amount determined under the Present Value method

# Template 4B – Sample SFA Details

SFA Measurement Date:	12/31/2021
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$92,989,867
SFA Interest Rate:	2.95%

PRESENT VALUE as of the SFA Measurement Date of Projected Amounts for:	
PV of (1)	PV of (2)
Difference in Benefit Payments due to Reinstatement	Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date
\$76,460,961	\$16,528,906

On this Sheet, show all benefit payment amounts as positive amounts.

SFA Measurement Date / Plan Year Start Date	Plan Year End Date	(1) Difference in Benefit Payments due to Reinstatement (should match total from Sheet 4B-1)	(2) Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date
12/31/2021	12/31/2021	\$0	\$0
01/01/2022	12/31/2022	\$4,500,000	\$3,552,000
01/01/2023	12/31/2023	\$4,547,000	\$3,552,000
01/01/2024	12/31/2024	\$4,571,000	\$3,552,000
01/01/2025	12/31/2025	\$4,580,000	\$3,552,000
01/01/2026	12/31/2026	\$4,586,000	\$3,552,000
01/01/2027	12/31/2027	\$4,560,000	\$0
01/01/2028	12/31/2028	\$4,483,000	\$0
01/01/2029	12/31/2029	\$4,414,000	\$0
01/01/2030	12/31/2030	\$4,395,000	\$0
01/01/2031	12/31/2031	\$4,362,000	\$0



# Template 4B – Sample SFA Exhaustion

MPRA Plan?	Yes
If a MPRA Plan, which method yields the greatest amount of SFA?	Present Value Method
SFA Measurement Date:	12/31/2021
Fair Market Value of Assets as of the SFA Measurement Date:	\$93,703,000
SFA Amount as of the SFA Measurement Date under the method calculated in Sheet 4B-2:	\$92,989,867
Projected SFA exhaustion year:	01/01/2026
Non-SFA Interest Rate:	5.29%
SFA Interest Rate:	2.95%

Meets the definition of a MPRA plan described in § 4262.4(a)(3)?

MPRA increasing assets method described in § 4262.4(a)(2)(i).  
MPRA present value method described in § 4262.4(a)(2)(ii).

Only required on this sheet if the requested amount of SFA is based on the "present value method".  
Plan Year Start Date of the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets.

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

SFA Measurement Date / Plan Year Start Date	Plan Year End Date	(1) Contributions	(2) Withdrawal Liability Payments	(3) Other Payments to Plan (excluding financial assistance and SFA)	(4) Benefit Payments (should match total from Sheet 4A-2)	(5) Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	(6) Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA; should match total from Sheet 4A-3)	(7) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	(8) SFA Investment Income Based on SFA Interest Rate	(9) Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	(10) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	(11) Non-SFA Investment Income Based on Non-SFA Interest Rate	(12) Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
12/31/2021	12/31/2021	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$92,989,867	\$0	\$0	\$93,703,000
01/01/2022	12/31/2022	\$9,944,000	\$0	\$0	-\$20,255,000	-\$3,552,000	-\$547,000	-\$24,354,000	\$2,386,590	\$71,022,457	\$0	\$5,216,518	\$108,863,518
01/01/2023	12/31/2023	\$9,944,000	\$0	\$0	-\$20,166,000	-\$3,552,000	-\$559,000	-\$24,277,000	\$1,739,679	\$48,485,136	\$0	\$6,018,510	\$124,826,028
01/01/2024	12/31/2024	\$9,944,000	\$0	\$0	-\$20,076,000	-\$3,552,000	-\$573,000	-\$24,201,000	\$1,075,941	\$25,360,078	\$0	\$6,862,926	\$141,632,954
01/01/2025	12/31/2025	\$9,944,000	\$0	\$0	-\$19,908,000	-\$3,552,000	-\$586,000	-\$24,046,000	\$396,022	\$1,710,099	\$0	\$7,752,013	\$159,328,967
01/01/2026	12/31/2026	\$9,944,000	\$0	\$0	-\$19,723,000	-\$3,552,000	-\$600,000	-\$1,710,099	\$0	\$0	-\$22,164,901	\$8,109,425	\$155,217,491
01/01/2027	12/31/2027	\$9,944,000	\$0	\$0	-\$19,498,000	\$0	-\$615,000	\$0	\$0	\$0	-\$20,113,000	\$7,945,501	\$152,993,992
01/01/2028	12/31/2028	\$9,944,000	\$0	\$0	-\$19,191,000	\$0	-\$629,000	\$0	\$0	\$0	-\$19,820,000	\$7,835,528	\$150,953,520
01/01/2029	12/31/2029	\$9,944,000	\$0	\$0	-\$18,913,000	\$0	-\$645,000	\$0	\$0	\$0	-\$19,558,000	\$7,734,428	\$149,073,948
01/01/2030	12/31/2030	\$9,944,000	\$0	\$0	-\$18,674,000	\$0	-\$660,000	\$0	\$0	\$0	-\$19,334,000	\$7,640,847	\$147,324,795



# Templates 5A, 5B, 6A, 6B – Baseline and Reconciliation

- MPRA plans only have to complete the Baseline and Reconciliation for the calculation method under which the requested amount of SFA is determined
  - Templates 5A and 6A – use if Increasing Assets is the “winning” method
  - Templates 5B and 6B – use if Present Value is the “winning” method
- Same concept as under the Basic Method, but provide the SFA amount, change in amount, and projections for each incremental change in assumption using the “winning” method

***Templates 5A and 6A are not required if the requested amount of SFA is determined using the Present Value Method and using Baseline assumptions***

***Templates 5B and 6B are not required if the requested amount of SFA is determined using the Increasing Assets Method and using Baseline assumptions***



**Supplemented Application Walkthrough**  
**IFR Filers that have received SFA**

PBGC

# Contents of Supplemented Application

## Must not change:

- Plan's SFA measurement date
- Fair market value of assets
- Participant census data
- Any projection assumptions except:
  - Implementation of the two interest rate structure, and
  - Exclusion of contribution rate increases agreed to on or after July 9, 2021

Refer to the July 28, 2022 webinar for more details on Supplemented Applications

# Additional Instructions / Templates for Supplemented Applications

- **Addendum C – specific instructions for Supplemented Applications**
- **Application Checklist – Supplemented**
  - Simplified version of the Application Checklist
- **Template 9**
  - Reconciliation similar to Template 6A
  - Identify assumption/method changes in the applicable order described in Addendum C

## If the plan is not seeking additional SFA under the Final Rule

- Very minimal information is required
  - Section A – Plan identifying information
  - Section D – SFA request cover letter
- No templates or checklists are required

# Supplemented Applications – What to File

## **If the plan is seeking additional SFA under the Final Rule**

- If the plan is not a MPRA plan
  - Provide Template 4A showing the Basic Method
- If the plan is a MPRA plan and the requested amount of SFA is determined using the Increasing Assets Method
  - Provide Template 4A showing the Basic Method and the Increasing Assets Method
- If the plan is a MPRA plan and the requested amount of SFA is determined using the Present Value Method
  - Provide Template 4A showing the Basic Method and the Increasing Assets Method
  - Provide Template 4B showing the Present Value Method
- All plans seeking additional SFA under the Final Rule must provide Template 9

# Template 9 – Sample Plan Reconciliation

Item number	Basis for Assumptions/Methods Change	Change in SFA Amount	SFA Amount	Comments
1	SFA amount from the approved IFR application	N/A	\$114,000,000	From Template 4 of the application that was approved under the IFR
2	Basic Method under Final Rule with no assumption changes other than using the non-SFA and SFA interest rates	\$750,000	\$114,750,000	See “9-2 Reconciliation Details”
3	Basic Method under Final Rule reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021	\$225,000	\$114,975,000	From “4A-4 SFA Details for the Basic Method under § 4262.4(a)(1)” of Template 4A
4	Increasing Assets Method under Final Rule	\$37,500,000	\$152,475,000	From “4A-5 SFA Details for the Increasing Assets Method under § 4262.4(a)(2)(i)” of Template 4A



**Expanded Assumptions Guidance**  
**SFA 22-07**

PBGC



**Pre-2021 zone certification** – This is the most recent certification of plan status (“zone certification”) completed before January 1, 2021

- Identifies assumptions used to determine plan’s zone status
  - Many zone certifications reference assumptions in the most recently published Actuarial Valuation Report (AVR) and identifies any assumptions that are different
    - Example for calendar year plan: Zone certification for 2020 plan year is completed on 3/25/2020. This is the pre-2021 zone certification and it references the 2019 AVR assumptions and separately identifies any assumptions that are different from the 2019 AVR
- Most zone certifications are for a period of 20 years or less

# SFA Assumptions (except interest rates)

**SFA Assumptions** – Assumptions used to determine the SFA amount requested

- Mortality (healthy, disabled, improvement scale(s))
- Demographic assumptions (retirement, turnover, payment form, active population growth/decline, new entrant profile, percent married/age difference, etc.)
- Contribution base units
- Contribution rate(s)
- Withdrawal liability payments assumed (may reflect assumption to reflect amounts expected to be uncollectible)
- Administrative expenses
- Other as applicable

**Is there a change  
in assumption?**

**Section 4262.5(c):  
Identification &  
Supporting Rationale**

**Assumptions Guidance  
(PBGC SFA 22-07):**  
Acceptable  
Generally Acceptable  
Generally Not Acceptable

## Generally, all plans will have an assumption change

- Zone certification assumptions are generally not utilized for 30 years
- Extensions of a pre-2021 zone certification assumption is an assumption change (for example: CBUs, contribution rates, administrative expenses and withdrawal liability payments)

## Section 4262.5(c) – Identification and Supporting Rationale

- Describe why the original assumption is no longer reasonable;
- Propose to use a different assumption (the changed assumption); and
- Demonstrate the changed assumption is reasonable (see Section D(6) of instructions for examples of supporting rationale)

## Assumptions Guidance

- Provides acceptable extensions of assumptions beyond date of insolvency or 20 years, as applicable
- Provides examples
- Allows for minimal supporting rationale for specified acceptable assumption changes
- Is nonbinding – Plans do not have to use the guidance to select assumptions used to determine the SFA amount

**PBGC SFA 22-07 Expanded assumptions guidance has the following sections:**

## **Section I: Table of Contents**

## **Section II: Changes since prior publication**

- Clarified guidance is related to the extension of the assumption and not to the unchanged assumption in the pre-2021 zone certification
- Clarified (see Example #1) that PBGC will accept an assumption extension listed in Section III (“acceptable” assumption changes) if PBGC determines that the pre-2021 zone certification assumption is reasonable

## Section III: Acceptable assumption changes

- CBU assumption extension, administrative expense assumption extension
- Healthy and disabled mortality assumption, mortality improvement projection scale
- New entrant profile – Identify the new entrant profile and include experience analysis separately for each of the last five plan years
- Contribution rate –
  - Final Rule notes that any contribution increases agreed to after July 9, 2021 do not need to be reflected in the SFA determination

## Section III: Acceptable assumption changes (continued)

- “Missing” terminated vested participants –If a plan proposes a change in assumptions that has the effect of including benefits for some or all participants previously excluded, PBGC will accept such a change provided benefits for participants older than 85 are excluded. In addition, applicant must provide the following:
  - A listing of the participants who were previously excluded but included for SFA purposes
  - Description of plan policies and procedures for locating missing participants and specific efforts the plan has made to locate such participants
  - Details of recent death audit (not earlier than one year prior to SFA measurement date)

## Section IV: Generally acceptable assumption changes

- CBU assumption
  - The guidance applies to the total aggregated CBU assumption rather than projections for individual employers
  - Additional examples where the COVID period (3/1/2020 through 12/31/2021) falls within different 10-year historical period
  - Example #4 is an instance when PBGC will not accept a plan using the generally acceptable assumption change because of additional relevant facts that would impact the CBU projection
- Mortality assumption – Reflecting partial or fully credible mortality experience, use 26 CFR 1.430(h)(3)-2 for single employer plans
- Reflect significant plan experience between participant census data and SFA measurement date



## Section IV: Generally acceptable assumption changes (continued)

- Assumptions used in approved MPRA applications – PBGC will generally accept a change from the pre-2021 zone certification assumption to an assumption used in a plan’s approved MRPA application

## Section V: Generally NOT acceptable assumption changes

- CBU assumption extension that would include speculative industry changes
- Explicit investment expense assumption
- Changes to participant census data reflecting short term plan experience between the participant census date and the date SFA application is filed

## Section VI: Additional information

- Withdrawal liability payment assumption – consider reflecting a reasonable allowance for amount considered uncollectible
- “Missing” terminated vested participants – If plan chooses to use an assumption other than the acceptable assumption noted in Section III of the assumptions guidance, then the plan should provide experience data that supports its assumption that those previously excluded but are included for SFA purposes will eventually apply for benefits

Webpage: <https://www.pbgc.gov/arp-sfa>

## Webinar series targeting trustees and practitioners

- July 28, 2022 – focus is plans currently eligible to apply; decisions before August 8, 2022
- Today – all eligible plans; overview of changes in the Final Rule, application process, and expanded assumptions guidance
- TBD – permissible investments, conditions applicable to SFA recipients

For SFA Practitioner Related Questions or to Request a Pre-Application Consultation:

Email [multiemployerprogram@pbgc.gov](mailto:multiemployerprogram@pbgc.gov)

# Thank you!





# Appendix



PBGC

# Template Flow Chart

Plan applying for SFA under Final Rule

Not a MPRA plan

Templates 1, 2, 3  
Templates 7, 8

Basic Method  
4262.4(a)(1)

Template 4A  
(basic method)

Templates 5A, 6A  
(basic method)

Basic Method  
4262.4(a)(1)

Template 4A  
(basic method)

Increasing Assets Method wins

Increasing Assets Method  
4262.4(a)(2)(i)

Template 4A  
(increasing assets method)

Templates 5A, 6A  
(increasing assets method)

Statement that PV Method doesn't win

MPRA plan  
4262.4(a)(2)

Templates 1, 2, 3  
Templates 7, 8

PV Method wins

Basic Method  
4262.4(a)(1)

Template 4A  
(basic method)

Increasing Assets Method  
4262.4(a)(2)(i)

Template 4A  
(increasing assets method)

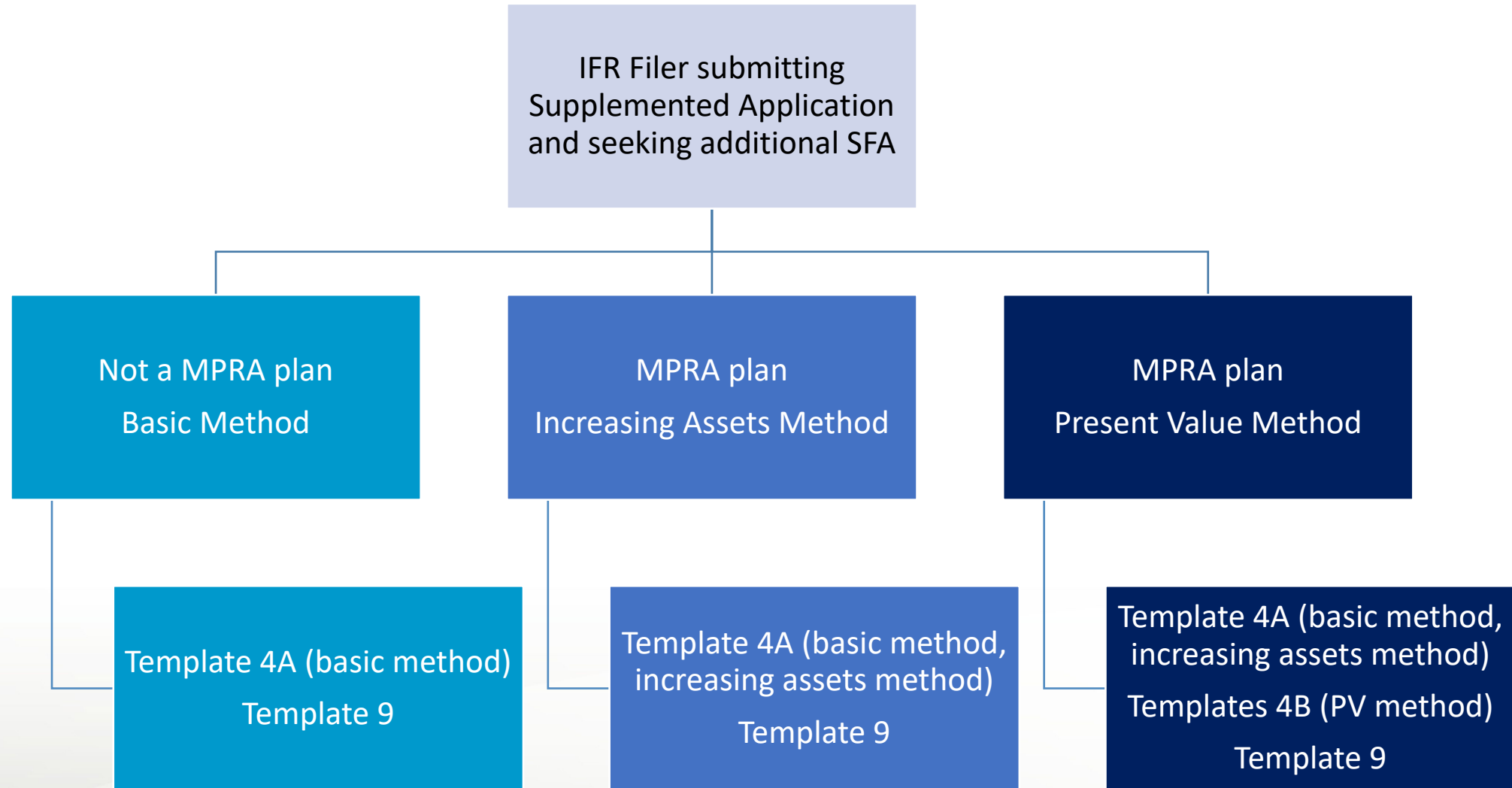
PV Method  
4262.4(a)(2)(ii)

Template 4B  
(PV method)

Templates 5B, 6B  
(PV method)



# Template Flow Chart – Supplemented Applications



# e-Filing Portal: Log In/Create Account

<https://efilingportal.pbgc.gov/site/Login.aspx>

Top of Page – Includes Link to SFA Instructions

Bottom of Page – Apply for an Account or Log in



Log In

[Help](#)

## Welcome to PBGC's e-Filing Portal

You can use PBGC's e-Filing Portal to submit important information to PBGC including:

1. **4010 Filings** - Annual filings required under section 4010 of ERISA
2. **Reportable Events** - Filings required under section 4043 of ERISA (Forms 10, 10-Advance, and 200)
3. **Settlement Requirements** - Documents required for Settlement Agreements
4. **Multiemployer Filings** - Filings required under certain multiemployer sections of ERISA, including financial assistance applications, termination notices and related information, insolvency notices, and various funding notices. [Please see the attached instructions.](#)
  - **Special Financial Assistance** – Applications for Special Financial Assistance are to be submitted here. Please see [these instructions](#) for applying under 29 CFR 4262.

Click [here](#) to access a user manual with step-by-step instructions on how to create and manage your e-Filing Portal account.

New to e-Filing Portal? [Apply for an Account](#)

Already Have an Account? Log in.


User ID:  [Forgot your User ID?](#)

Password:  [Forgot your password?](#)

Login

# e-Filing Portal (continued)

Screen to Create a New ME Filing after logging in:



[Log Out](#) | [Manage Account](#) | [Change Password](#) | [Help](#)

**e-Filing Portal Home Page**

**e-4010: Controlled Group Filing Drafts**

Information	Date	Name
Year-end	Created	

**e-4010: Controlled Group Filings Submitted to PBGC**

Information	Original	Amended	Name
Year-end	Submission	Submission	
	Date	Date	

**e-4043 Reportable Events: Filing Drafts**

EIN/PN	Plan Name	Type of Event	Date Created
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**e-4043 Reportable Events: Filings Submitted to PBGC**

EIN/PN	Plan Name	Type of Event	Original	Amended
			Submission	Submission
			Date	Date

**Multiemployer Events: Filing Drafts**

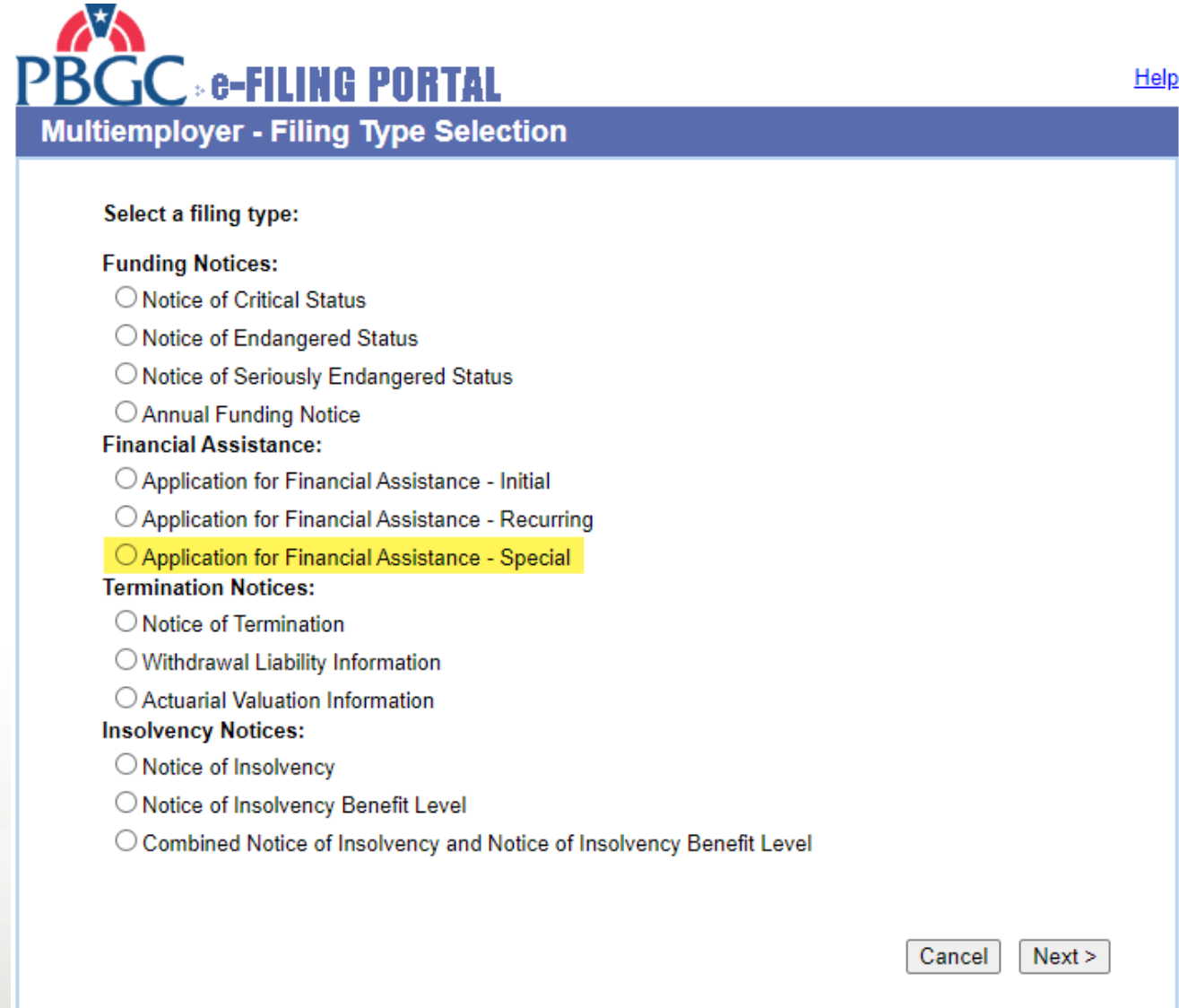
EIN/PN	Plan Name	Type of Event	Date Created
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**Multiemployer Events: Filings Submitted to PBGC**



# e-Filing Portal (continued)

Screen to select a filing type after clicking “Create New ME Filing” after logging in:




The screenshot shows the PBGC e-Filing Portal interface. At the top left is the PBGC logo, and at the top right is a "Help" link. The main heading is "Multiemployer - Filing Type Selection". Below this, the instruction "Select a filing type:" is followed by several categories of filing types, each with radio button options:

- Funding Notices:**
  - Notice of Critical Status
  - Notice of Endangered Status
  - Notice of Seriously Endangered Status
  - Annual Funding Notice
- Financial Assistance:**
  - Application for Financial Assistance - Initial
  - Application for Financial Assistance - Recurring
  - Application for Financial Assistance - Special
- Termination Notices:**
  - Notice of Termination
  - Withdrawal Liability Information
  - Actuarial Valuation Information
- Insolvency Notices:**
  - Notice of Insolvency
  - Notice of Insolvency Benefit Level
  - Combined Notice of Insolvency and Notice of Insolvency Benefit Level

At the bottom right of the form area are two buttons: "Cancel" and "Next >".

# e-Filing Portal (continued)

## Basic Information Screen:



[Help](#)

### Application for Financial Assistance - Special

**\*Required fields**

\*Plan name:

\*EIN:  (ex. 33-3333333) \*PN:  (ex. 333)

\*Notice filer name:

\*Role of filer:

\*Total amount requested: \$

# e-Filing Portal (continued)

Document Uploading Page (partial – the full list of document types is shown in the screenshot on the next page):



The screenshot shows the PBGC e-Filing Portal interface for an "Application for Financial Assistance - Special". It includes a "Help" link, a "Attached Documents" section with a link to filing instructions, a "Comments" text area, a "File" section with a "Choose File" button and "No file chosen" text, a "Document Type" dropdown menu, and an "Attach" button. A red warning message states: "Maximum file size is 25MB. It may take a minute or two to attach large files. Please click only once. To send files larger than 25MB, please contact multiemployerprogram@pbgc.gov for additional instructions. For additional assistance, send us an email or call 202-229-3018 or 202-229-6047." At the bottom, a list of required documents is provided: 1. Financial assistance request letter, 2. Financial Assistance Application, and 3. Special Financial Assistance Checklist.

**PBGC e-FILING PORTAL** [Help](#)

**Application for Financial Assistance - Special**

**Attached Documents**

[Click here to access filing instructions.](#)

All documents are required for this filing. If any of these documents are not available, provide an explanation in the "Comments" box below.

Comments:

File:  No file chosen

Document Type:

**Maximum file size is 25MB. It may take a minute or two to attach large files. Please click only once. To send files larger than 25MB, please contact [multiemployerprogram@pbgc.gov](mailto:multiemployerprogram@pbgc.gov) for additional instructions. For additional assistance, send us an email or call 202-229-3018 or 202-229-6047.**

1. Financial assistance request letter
2. Financial Assistance Application
3. Special Financial Assistance Checklist

## Document Uploading Page (full list of document types):

1. Financial assistance request letter
2. Financial Assistance Application
3. Special Financial Assistance Checklist
4. Financial assistance spreadsheet (template)
5. Plan's most recent financial statement (audited, or unaudited if audited not available)
6. List of all cash and investment accounts maintained for the plan
7. Bank/Asset statements for all cash and investment accounts
8. Rehabilitation plan (or funding improvement plan, if applicable)
9. Zone certification
10. Benefit calculations and supporting data (i.e. accrued benefit, years of service, and etc.)
11. Pension plan documents, all versions available, and all amendments signed and dated
12. Contributing Employers
13. Participant database
14. Latest annual return/report of employee benefit plan (Form 5500)
15. Most recent actuarial valuation for the plan
16. Projections for special financial assistance (estimated income, benefit payments and expenses)
17. Historical Plan Financial Information (CBUs, contribution rates, contribution amounts, withdrawal liability payments)
18. Other



The system will prompt a confirmation before submission:



## Event Filing Submission Page

You have indicated you wish to submit an event filing to PBGC for the plan MEPD Test Plan.

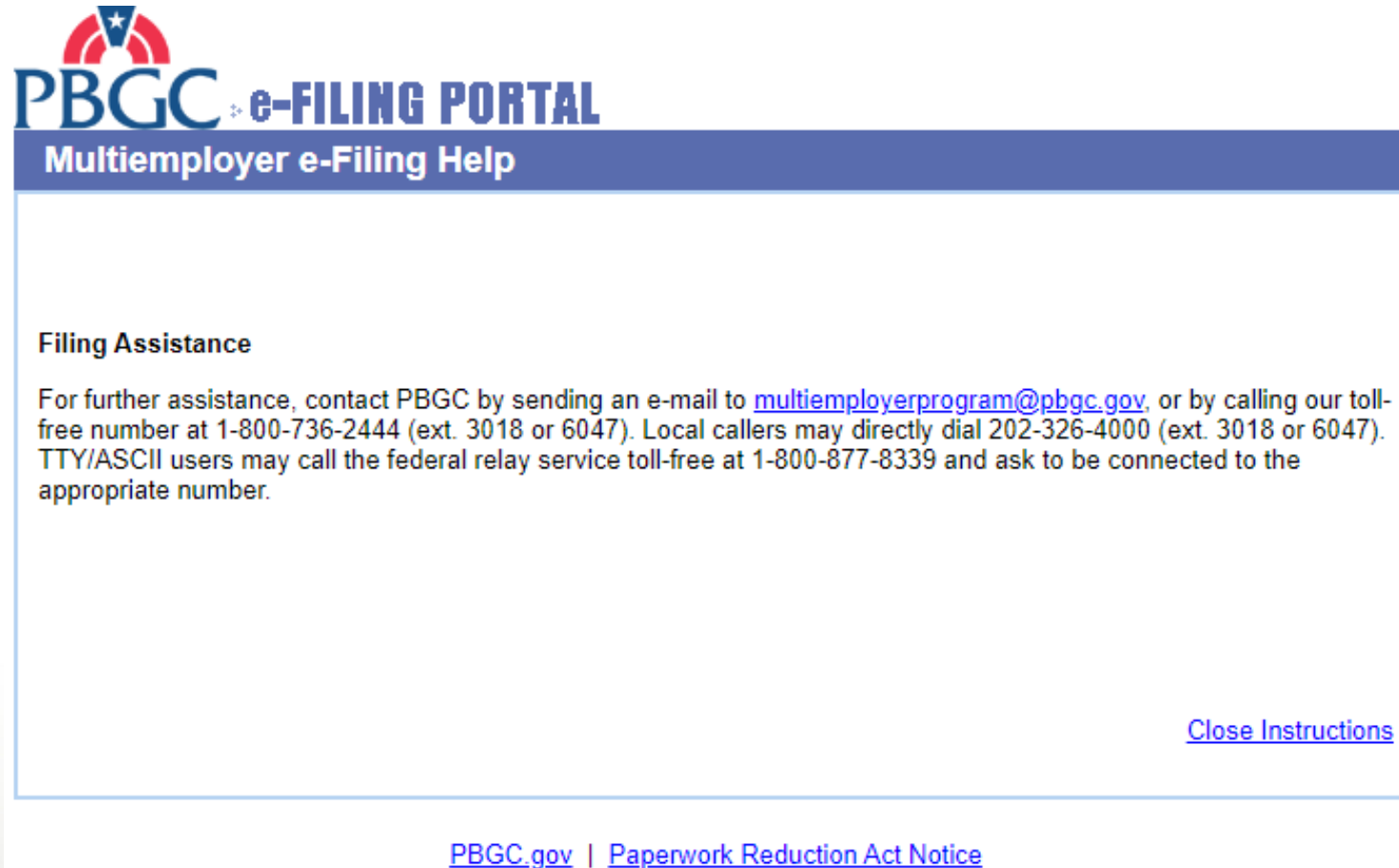
Please click on the "Submit" button below to submit your filing to PBGC.

Submit

Return to Previous Page

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If you click on the “Help” link, you see this screen:



The screenshot shows the PBGC e-Filing Portal interface. At the top left is the PBGC logo, which consists of a red and white stylized shield with a blue star. To the right of the logo, the text "PBGC e-FILING PORTAL" is displayed in blue. Below this, a dark blue header bar contains the text "Multiemployer e-Filing Help" in white. The main content area is white and contains the following text:

**Filing Assistance**

For further assistance, contact PBGC by sending an e-mail to [multiemployerprogram@pbgc.gov](mailto:multiemployerprogram@pbgc.gov), or by calling our toll-free number at 1-800-736-2444 (ext. 3018 or 6047). Local callers may directly dial 202-326-4000 (ext. 3018 or 6047). TTY/ASCII users may call the federal relay service toll-free at 1-800-877-8339 and ask to be connected to the appropriate number.

[Close Instructions](#)

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