Special Terminal Report For Abandoned Plans - Instructions

The qualified termination administrator (QTA) of each plan terminated under 29 CFR 2578.1 must file the Special Terminal Report for Abandoned Plans (STRAP) in accordance with 29 CFR 2520.103-13.

General Instructions

Follow these instructions to satisfy the requirements set forth in 29 CFR 2520.103-13.

Who Must File

The QTA of each plan terminated pursuant to 29 CFR 2578.1 must file the STRAP.

Where to File

By Email to: qtanotices@dol.gov. To submit the STRAP by email, see Additional Instructions for Email Filers below.

<u>By Mail to</u>: Abandoned Plan Coordinator, Office of Enforcement, Employee Benefits Security Administration, U.S. Department of Labor, 200 Constitution Avenue, NW, Room N-5671, Washington, DC, 20210. Mail Filers must attach the STRAP to the Final Notice.

As an alternative, you may complete and submit the STRAP through the Abandoned Plan Online Filing System. This option is only available if you have submitted your Notice of Intent for the same plan through the online filing system. See https://www.dol.gov/agencies/ebsa/employers-and-advisers/plan-administration-and-compliance/abandoned-plans for information on the online filing system.

Additional Instructions For Email Filers

You must submit the STRAP as an email attachment accompanying the Final Notice in the following manner. First, you must properly complete and sign the STRAP form. Second, attach the PDF file to the email and submit with the Final Notice to the email address listed above. The STRAP should be attached as a separate file from the Final Notice.

Questions: Contact EBSA at 1-866-444-3272.

Specific Instructions for QTAs completing the STRAP

Part I. General Information.

Line A: Enter the plan name.

Line B: Enter three-digit plan number used on the Form 5500 Annual Return/Report.

Line C: Check the appropriate box to indicate if the plan is a "single-employer plan," "multiemployer plan" or "multiple-employer plan."

Line D: Enter the plan type (for example, 401(k), 403(b), ESOP, etc.) based on the best available information.

Lines E.1-E.3: Enter the plan sponsor information, including the plan sponsor's EIN, if known.

Lines F.1-F.4: Enter the QTA's information.

Perjury Statement: The QTA must sign the STRAP under penalty of perjury. You may sign electronically or manually.

Lines G.1-H.3: If the plan's sponsor is in liquidation under chapter 7 of the U.S. Bankruptcy Code, and the bankruptcy trustee is not the QTA, enter the bankruptcy trustee's name and EIN. If the bankruptcy trustee is the QTA, check the box "Same as QTA."

Line I: Enter the plan's total assets as of the date the plan was deemed terminated under 29 CFR § 2578.1(c). This amount should reflect total assets prior to any reduction for termination expenses and distributions to participants and beneficiaries.

Line J. Enter the total expenses paid by the QTA. You will itemize the expenses in Part II of the STRAP.

Line K: Enter the total amount of distributions made pursuant to 29 CFR § 2578.1(d)(2)(vii), including distributions in accordance with 29 CFR § 2550.404a-3.

Line L: Check "Yes" or "No" to indicate whether there were distributions to missing or non-responsive participants or beneficiaries pursuant to 29 CFR 2578.1(d)(2)(vii)(B). This means a person who failed to make a benefit election within 30 days after the notice referred to in 29 CFR § 2578.1(d)(2)(vi) was provided.

Line M. Enter the total number of distributions made pursuant to 29 CFR § 2578.1(d)(2)(vii), including transfers made on behalf of missing or non-responsive participants or beneficiaries.

Line N. Enter the total number of participants and beneficiaries who received distributions pursuant to 29 CFR 2578.1(d)(2)(vii), including distributions made on behalf of missing or non-responsive participants and beneficiaries identified in Line M.

Line O. Check "Yes" or "No" to indicate whether the plan held assets with no readily ascertainable fair market value.

Part II. Itemization of Expenses. Identify each service provider (including the QTA) and amount of fees received, itemized by expense.

For item (d), the NOI is the Notice of Plan Abandonment and Intent to Serve as Qualified Termination Administrator pursuant to 29 CFR 2578.1(c) or the Notice of Intent to Serve as Qualified Termination Administrator pursuant to 29 CFR 2578.1(j)(6). If a service provider was not identified in the NOI enter N/A.

For item (e), the QTA must provide a general description of each expense, selecting from the following categories:

- 1. Plan administration
- 2. Recordkeeping
- 3. Determining abandonment
- 4. Department of Labor notifications & STRAP
- 5. Calculating benefits (including valuation services, e.g., appraisals)
- 6. Searching for missing participants
- 7. Benefit distributions (including participant notification and IRS documents)
- 8. Other (specify)

Any expenses not described in 1 through 7, above, must be identified as "Other" along with a brief description of each such expense, e.g., "Other: legal services." Do not describe such expenses only as "Other."

For item (f), the QTA must indicate the relationship, if any, between each service provider and the QTA (e.g., subsidiary, parent, affiliate, family member, or none).

If you don't have sufficient space to list all service providers and the information required by Part II, attach a schedule labeled "Schedule Part II Itemization of Expenses-Additional Service Providers," using the same format as Part II to report the required information.

Part III. Assets with No Readily Ascertainable Value. If the plan held assets with no readily ascertainable fair market value, check "Yes" or "No" for each category listed. For each category marked "Yes," enter the current value and valuation method for each such asset.

<u>Paperwork Reduction Act Statement: OMB Control Number 1210-0127; expires 05/31/2027</u>

According to the Paperwork Reduction Act of 1995, no person is required to respond to a collection of information unless such collection displays a valid OMB control number.

The Special Termination Report for Abandoned Plans (STRAP) is a collection of information instrument subject to the Paperwork Reduction Act. Collection of this information is authorized by 29 CFR 2578.1. The obligation to respond to this collection is mandatory. The Department estimates that it will take 3 hours and 15 minutes to create and submit the STRAP to satisfy the information collection.

Please send comments regarding the burden estimates or any other aspect of this collection of information, including suggestions for reducing burden to: US Department of Labor, Office of Research and Analysis, Attention: PRA Officer, 200 Constitution Avenue, NW, Room N-5718, Washington, DC 20210 or by email to ebsa.opr@dol.gov, and reference OMB Control Number 1210-0127. Note: Please do not return the completed information collection to this address.