How to Upload & Certify Filings

My Plan Administration Account (My PAA)

Last Updated: January 8, 2023

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- Who must certify the uploaded XML file?

  - A premium filing that is uploaded for a plan must be certified by one of the following, with the Upload Preparer role assigned in My PAA for the corresponding plan(s).

    - **<u>Uploader</u>**: The person who uploads a filing must certify that he or she is authorized to submit the filing to the PBGC. The plan administrator has the duty to file and is thus automatically authorized. Anyone else (such as the enrolled actuary) who performs the upload must be authorized by the plan administrator. The authorization need not be in writing.

    - **<u>Plan Administrator</u>**: The plan administrator must certify all of the uploaded information. In addition, if the plan administrator receives certified information from an enrolled actuary that is put into the filing, the plan administrator must certify that the variable-rate premium information filed is the same as the actuary certified.

    - **<u>Enrolled Actuary</u>**: An enrolled actuary must certify the variable-rate premium information that is uploaded for a single-employer plan based on each plan year's certification requirements. For example, for plan years starting 2008, the actuary must certify a filing unless the plan is a multiemployer plan, is exempt from the variable-rate premium, or is eligible for and paying the maximum variable-rate premium and not reporting the uncapped variable-rate premium.

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- ## Where do I make my certification?

  - Depending on the situation, you may make your certification on a screen that My PAA will present to you when you upload your filing, or on a paper copy of the information you are certifying.

    - **On the My PAA screen**: The person who uploads a filing certifies his or her authority to submit the filing to the PBGC directly on the screen during the upload process. The same screen has additional certification language that applies to a plan administrator or enrolled actuary who performs an upload.

    - **On a paper copy of the filing**: A plan administrator or enrolled actuary may make a certification on a paper copy of the filing information before it is uploaded. A copy of the filing information must be created by the private-sector software that is used to upload the filing; the copy must identify each item of information that was uploaded so that the meaning of each item is clear to a person reading the copy. The copy of the filing must be printed and the PBGC filing receipt number for the upload must be written on the paper printout.

    - **On a paper statement of the variable-rate premium information**: An enrolled actuary may certify a paper statement of the variable-rate premium information for a filing before the filing is uploaded. The statement must identify each item of information so that the meaning of each item is clear to a person reading the copy and must identify the filing by stating the EIN and PN of the plan and the starting date of the premium payment year. If this method is used by the enrolled actuary, the plan administrator must certify that the variable-rate premium information that is uploaded is the same as the information certified by the enrolled actuary.
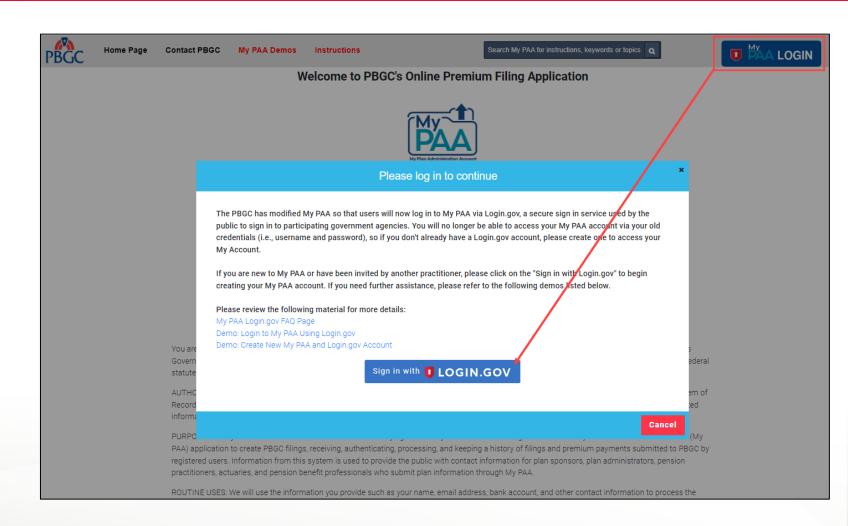
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- What certification language must be used?

  - Depending on the situation, you may make your certification on a screen that My PAA will present to you when you upload your filing, or on a paper copy of the information you are certifying.

    - **Language on the My PAA screen**: If you certify on the My PAA screen, the certification language is provided on the screen.

    - **Language for certifying a paper copy of an uploaded filing**: A certification on a paper copy of an uploaded filing must be manually signed and dated in ink. It must read as follows:

      - **For a plan administrator**: I certify under penalty of perjury, to the best of my knowledge and belief, that all the information in this filing is true, correct and complete and has been determined in accordance with the PBGC's premium regulations and instructions, and that if I received variable-rate premium information certified by an enrolled actuary for this filing, the variable-rate premium information in the filing is the same as the variable-rate premium information certified by the enrolled actuary.

      - **For an enrolled actuary**: I certify under penalty of perjury, to the best of my knowledge and belief, that the variable-rate premium information in the filing is true, correct and complete and has been determined in accordance with the PBGC's premium regulations and instructions.

    - **On a paper statement of the variable-rate premium information**: Language for certifying a paper statement of the variable-rate premium information. A certification on an enrolled actuary's statement of variable-rate premium information for a filing that is provided before the filing is uploaded must be manually signed and dated in ink.

      - You may use the certification language that the PBGC publishes for the "form" and certification you are making.

      - Otherwise, the certification language must be as follows: I certify under penalty of perjury, to the best of my knowledge and belief, that this variable-rate premium information is true, correct and complete and has been determined in accordance with the PBGC's premium regulations and instructions.

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Step-by-Step Instructions

Login

- From the Home Page, click on the "My PAA Login" button to log in.

- You will need to log in to your Login.gov account to access your My PAA account.

  - For more details and step-by-step instructions on how to access your My PAA account via Login.gov please view PBGC's [How to Log in to My PAA Using Login.gov?](#) Published Answer.
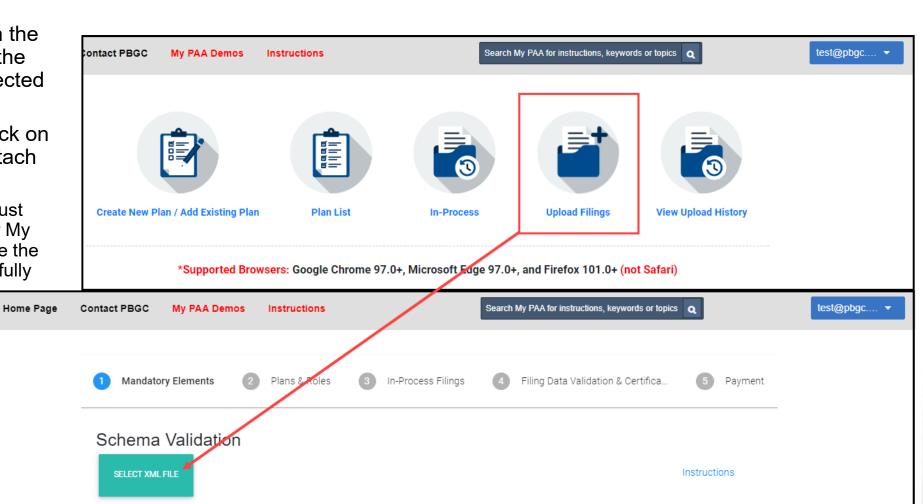
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Upload Filing Page

- Once you have logged in, click on the "Upload Filings" icon or link from the Home Page and you will be redirected to a new page.

- From the Upload Filings Page, click on the "Select XML File" button to attach the XML file.
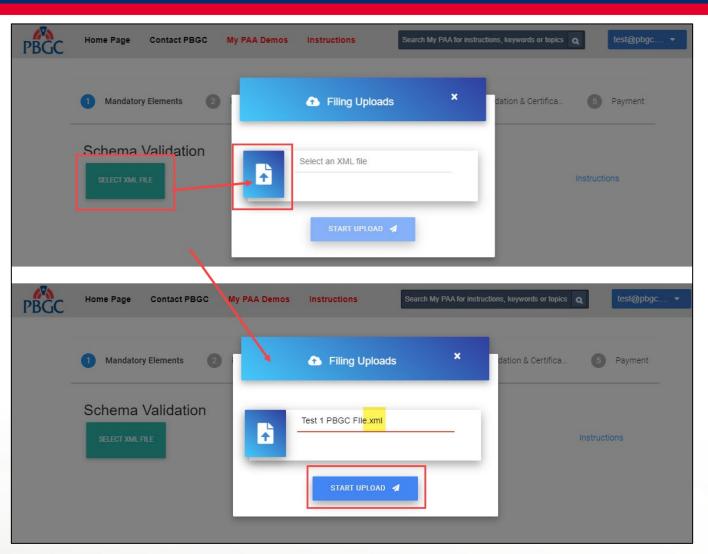
  - It is important to note that you must have the plan associated to your My PAA account, and you must have the Upload Preparer role to successfully upload a filing.
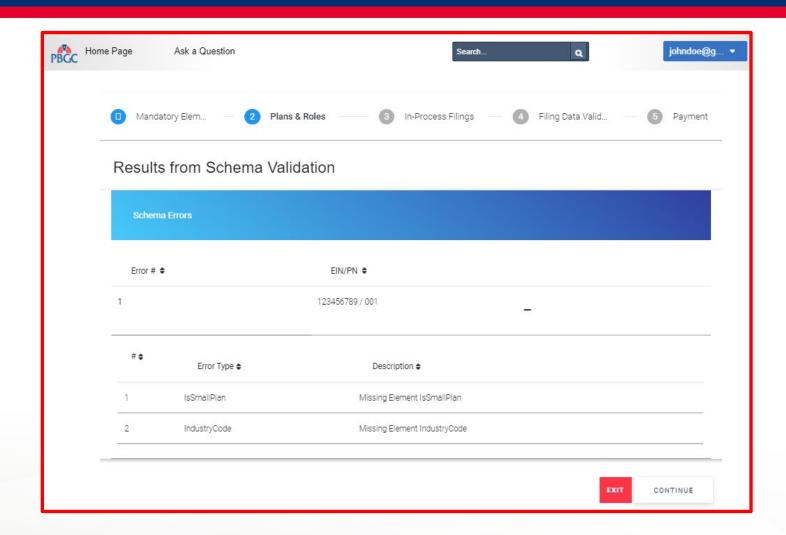
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Filing Uploads

- Once you click on the "Select XML File" button, a pop up to allow you to search your computer for the correct Comprehensive Premium Filing.

  - As you may note in the images to the right, only .xml files will be acceptable files to upload.

- Click on the paper icon with the arrow to select the appropriate XML file, then click the "Start Upload" button.

- The filing will go through several validation checks prior to ensure the XML can be submitted through My PAA. If the first three validation checks does not present any issues/errors, then the Filing Upload interview will skip to the last validation check, Business Rules.

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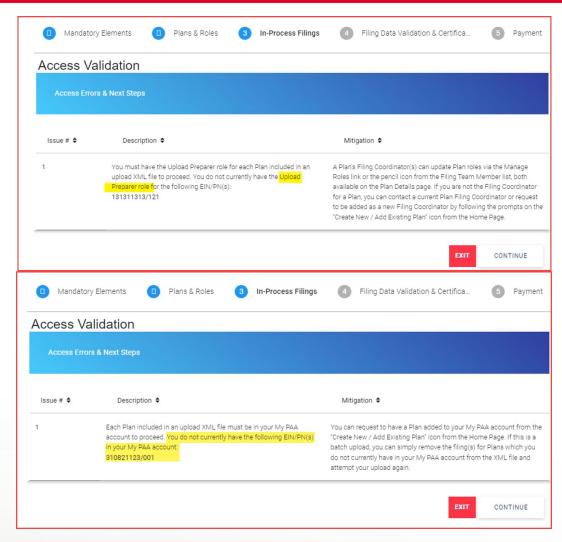
Schema Validation

- The first validation check the upload will encounter is the schema validation. My PAA will scan the XML file to ensure the correct schema has been provided.

- If there are errors, a list of schema errors will appear. You will not be able to proceed with that XML file. You must correct the errors and try to reupload the file before continuing.

- If there are no errors, you may continue to the Access Validation check.

- You may exit the process anytime, by clicking on the 'Exit' button.

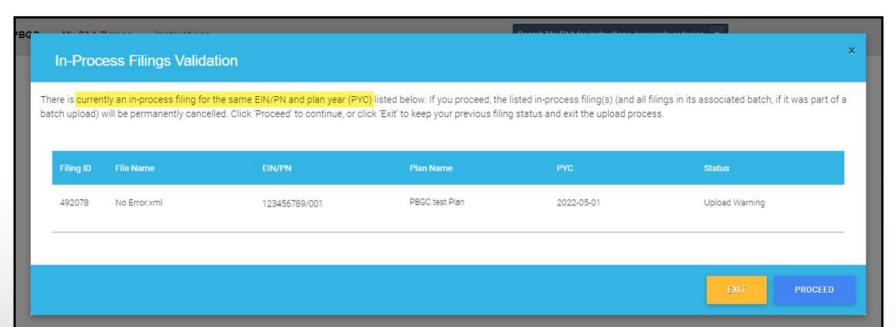Pension Benefit Guaranty Corporation

Access Validation

- After the schema has been validated, My PAA will then verify the that the plan is in your account, and you have the Upload Preparer role for the plan.

- If you do not have the plan and/or upload preparer role associated to your My PAA account, you (or a filing coordinator if you are not assigned that role) must update this accordingly on the Manage Roles Page, via the Plan Details Page.

  - You do not have EIN/PN: ######### / ### in your My PAA account.

  - You do not have the Upload Preparer role for EIN/PN: ######### / ###.

- If there are no errors, you may continue to the In-Process Validation check.

- You may exit the process anytime, by clicking on the 'Exit' button.

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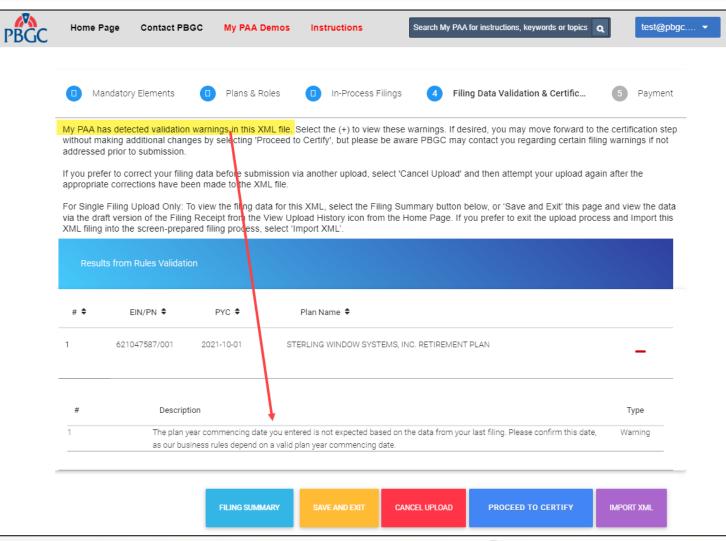
In-Process Filings Validations

- My PAA will then check to see if there are any filings that are currently in-process for the same EIN/PN and PYC combination. This check will be completed for both single and batch uploads.

- This validation will help prevent erroneously cancelling any in-process filing.

- Whether you have any in-process filings for the same EIN/PN and PYC combination or not, you will be able to click "Exit" or "Proceed" accordingly.

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Business Rule Validations
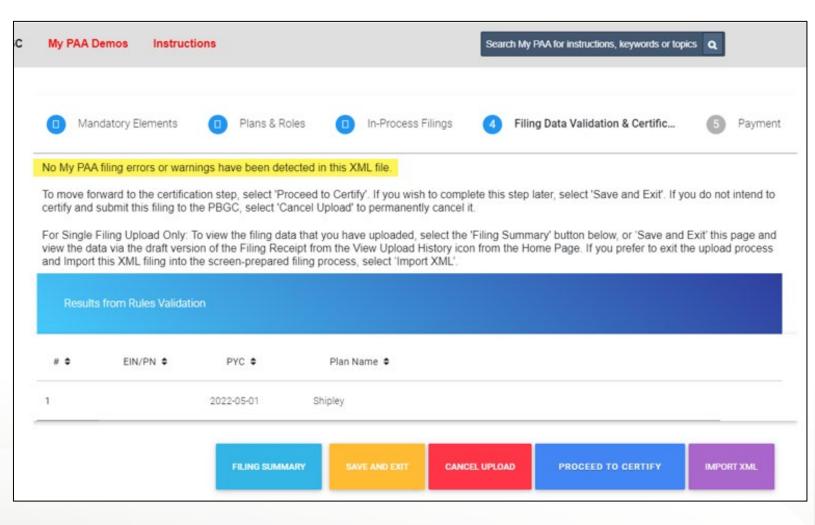## (No Errors and/or Warnings)

- The final validation check My PAA will perform against the XML file are the Business Rule Validations.

- If there are no filing errors and/or warnings for the filing, you may proceed accordingly.

  - To view the data in the Filing, select the "Filing Summary" button.

  - To save the data and to finish certifying the upload at another time, select the "Save and Exit" button.

  - To stop and not proceed with the uploading process, select the "Cancel Upload" button.

  - To continue to the certification step, select the "Proceed to Certify" button.

- The uploaded XML can be converted as an Import and completed through the My PAA data entry screens. Please refer to the 'How to Import a Filing' tutorial for more details.

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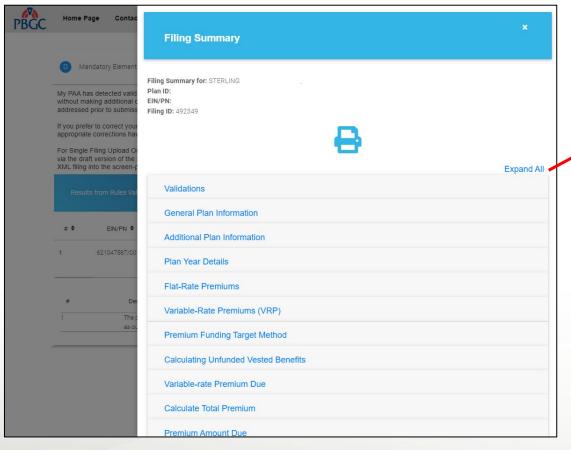## Business Rule Validations (Filing Errors)

- If there are filing errors (may or may not included warnings) for the filing, you may proceed accordingly.

  - To view the data in the Filing, select the "Filing Summary" button.

  - To save the data and to finish certifying the upload at another time, select the "Exit" button.

  - If you would like to correct the filing errors within the My PAA interview screens (without having to upload a new XML), you can select the "Import XML to My PAA Data Entry Screens" button.

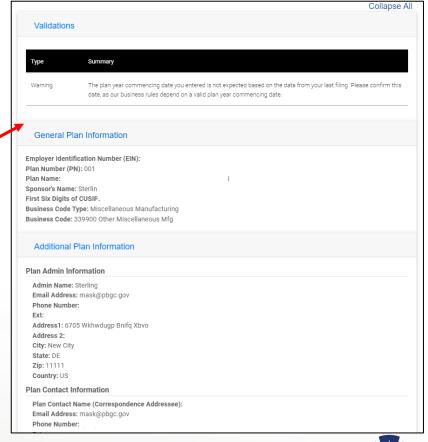   - Please refer to the "How to Import a Filing" tutorial for more details.

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Filing Summary

- You may select each filing section to display the filing data or click the "Expand All" link to reveal every section at once.

- You may also collapse each section by clicking on the title again or collapse all sections by clicking the "Collapse All" link.
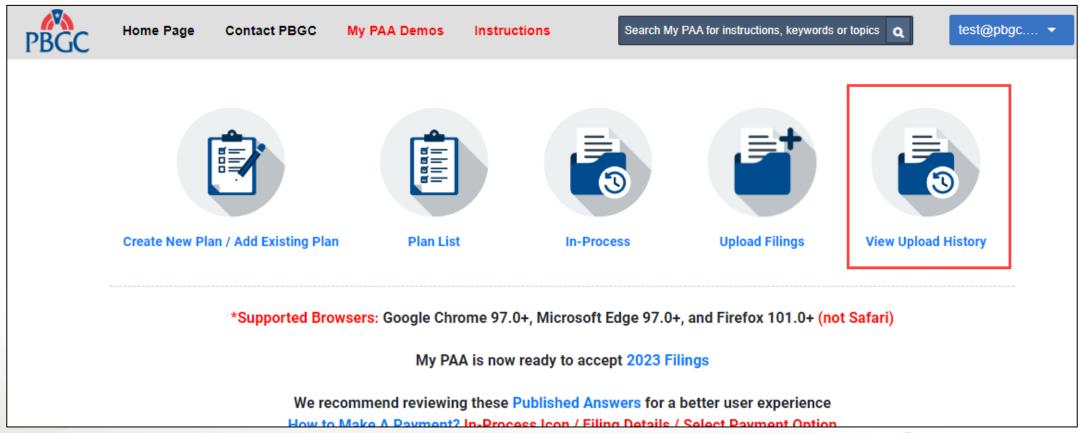
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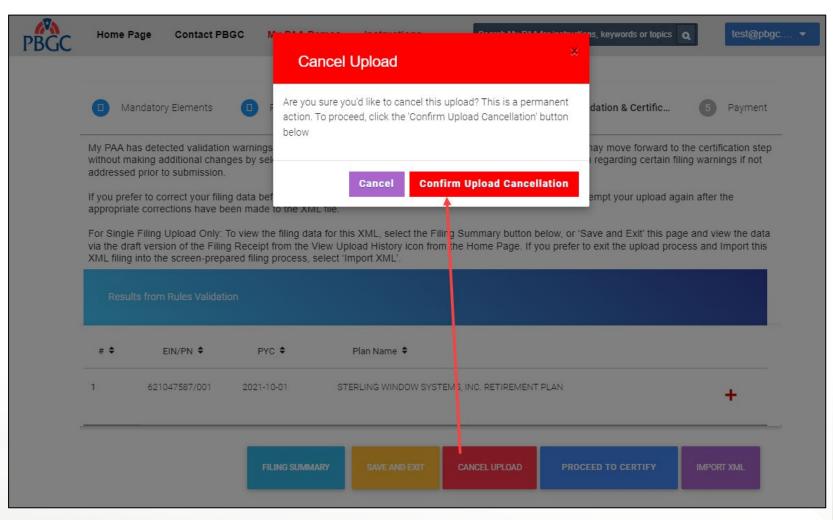Guaranty Corporation

Save and Exit

- Once you click the "Save and Exit" button, you will be redirected to the Home Page.
- You will be able to retrieve your in-process upload filing by clicking on the "View Upload History" icon/link.
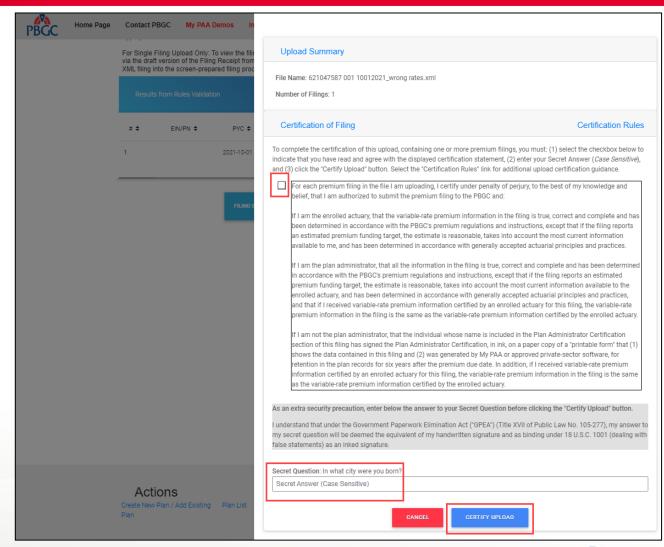
Cancel Upload

- Once you click the "Cancel" button a pop-up will appear confirming you would like to cancel the upload file you have in-process.

- Once you confirm you will be redirected to the Home Page, and the cancelled file will be documented in your Upload History.

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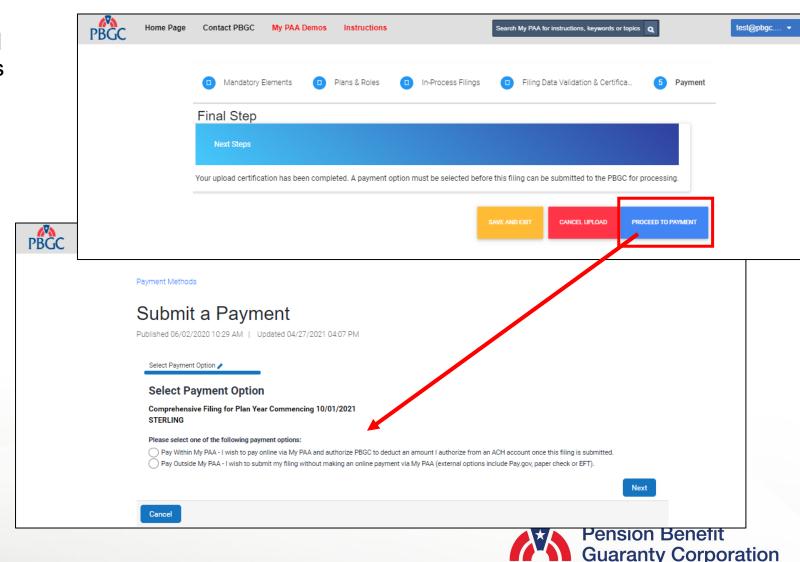
Proceed to Certify

- If you click the "Proceed to Certify" button, a popup will appear requiring you to read and accept the certification rules, and answer your secret question to verify your identity/role.

- Once you certify the filing and answer your secret question correctly, click on the "Certify Upload" button to proceed.

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Select Payment Option

- The final step in the upload process and once the filing certification is complete is to select a payment method.

- Click the "Proceed to Payment" button and you will be redirected to the Submit a Payment Page where you can elect to make a payment within or outside of My PAA.

  - For more information on how to submit a payment, please view the [online demonstration](#).

- You may choose to save the data and select a payment method at another time by clicking the "Save and Exit" button.

- You may choose to stop and not proceed with the uploading process by clicking the "Cancel Upload" button.

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Plan Details Page

- Once the upload has been completed and a payment method has been selected you will see that your filing has been submitted in the Premium Filings Section.

- To download a copy of the submitted filing click on the "Filing Receipt" button for a PDF file.