



NATIONAL PENSION COMMISSION

**GUIDELINES FOR VERIFICATION AND ENROLMENT OF
PROSPECTIVE RETIREES OF FEDERAL GOVERNMENT TREASURY-
FUNDED MINISTRIES, DEPARTMENTS AND AGENCIES (MDAs)**

DECEMBER 2025

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1.0 INTRODUCTION

1.1 The Contribution and Bond Redemption Application (COBRA)

The National Pension Commission (the Commission) is saddled with the responsibilities of processing the retirement benefits (i. e. accrued pension rights and outstanding pension contributions) of prospective retirees/retirees of Federal Government of Nigeria (FGN) Treasury-funded Ministries, Departments and Agencies (MDAs).

Accordingly, the Commission conducts annual pre-retirement verification and enrolment exercise for prospective retirees of FGN Treasury-funded MDAs scheduled for retirement within the next fiscal year in order to obtain necessary information that would aid determination of their Accrued Rights and outstanding/excess pension contributions for budgetary provision by the Federal Government.

To facilitate the enrolment exercise which was hitherto conducted physically across the country, the Commission in 2021, deployed an online Enrolment Application with the capabilities to register, verify and enroll the prospective retirees. The **Contribution and Bond Redemption Application (COBRA)** is an upgrade of the earlier Enrolment Application to accommodate additional functions, to be more efficient and provide user friendly interface utilizing the latest technology. A m o n g s t o t h e r functionalities, COBRA has the following functionalities in respect of the enrolment process:

- i) Provides an electronic platform for the upload of employment details of prospective retirees/deceased employees' next of kins (NOKs) by Pension Desk Officers (PDOs) of FGN Treasury-funded MDAs.
- ii) Provides an application interface for prospective retirees/deceased employees' next-of-kin (NOK) of FGN Treasury-funded MDAs to register their basic biodata as well as monitor the status of the processing and payment of their retirement/terminal benefits.
- iii) Provides an interface for the electronic upload of employment documents of prospective retirees of FGN Treasury-funded MDAs by Pension Fund Administrators (PFAs) and any update thereof, (where applicable).
- iv) COBRA provides a more dynamic and user-friendly interface.
- v) Provides an application interface for PFAs to enrol prospective retirees by capturing their live facial image and validate retirees' records as well as submission of the records to the Commission.

- vi) Provides an interface for the Commission to process retirement benefits (i. e. compute accrued rights and outstanding/excess contributions) of prospective retirees of FGN Treasury-funded MDAs and issuance of certified and approved schedules for remittance of accrued rights and outstanding/excess contributions to PFAs/PFCs.
- vii) The application provides end-to-end monitoring of the enrolment processes, payments returns and refunds.
- viii) Provides an electronic platform for the reconciliation of multiple PINs of employees/retirees of FGN Treasury-funded MDAs.
- ix) Provides a platform for the upload of Nominal Roll by FGN Treasury-funded MDAs for computation and remittance of pension contributions for period before MDA's migration to IPPIS.
- x) COBRA provides static and dynamic reports generation as well as statistical analysis of the uploaded, registered and enrolled contributors.

1.2 The Legal Framework

- 1.2.1 Section 15(1) of the Pension Reform Act (PRA) 2014 recognizes the accrued pension rights of employees transiting to the CPS for their past service rendered before the commencement of the scheme.
- 1.2.2 Section 39(1) of the PRA 2014 mandated the Central Bank of Nigeria (CBN) to establish and manage a Retirement Benefits Bond Redemption Fund (RBBRF) for the payment of Accrued Rights. Furthermore, Section 39(2) of the PRA 2014 mandates the Federal Government to be setting aside minimum of 5% of the total monthly wage bill payable to employees in the Public Service into the Fund.
- 1.2.3 Section 39(3) of PRA 2014, stipulates that the "Commission shall, by the end of every calendar year, determine the adequacy of the RBBRF against the projected accrued pension liability of the FGN arising from voluntary and mandatory retirements, death of employees in service and advise the Budget Office of the Federation of shortfall if any" for appropriation.
- 1.2.4 Section 24 of the NDPA sets out key principles governing how personal data must be processed. It requires that data be collected for specified, explicit and legitimate purposes. The section also stipulated that all personal data shall be in compliance with the NDPA 2023 and must implement appropriate security controls including encryption, access restrictions and audit logging.
- 1.2.5 Pursuant to the above statutory requirements, the Commission carries out annual pre-retirement verification and enrolment exercise for prospective retirees of FGN Treasury-funded MDAs.

1.3 Objectives of the Guidelines

- 1.3.1 These Guidelines establish uniform set of rules, standards and procedures for the verification and enrolment of prospective retirees of FGN Treasury-funded MDAs.
- 1.3.2 The Guidelines set out minimum documents to be issued by MDAs to the prospective retirees/deceased employees of FGN Treasury-funded MDAs.
- 1.3.3 They outline the minimum documentation requirements to be provided by the prospective retirees/deceased employee's NOK for verification and uploaded by the PFAs.

1.4 Definition of Terms

Serial	Term	Definition
1	PRA 2014	Pension Reform Act 2014
2	PFA	Pension Fund Administrators
3	CPS	Contributory Pension Scheme
4	MDA	Ministries, Departments and Agencies of Federal Government that are funded by the Federal Government Treasury.
5	PDO	Pension Desk Officers of FGN Treasury-funded MDAs that handle pension matters and liaise with PenCom on same.
6	Accrued Pension Rights	Past Pension Liability due to a retiring employee of Federal Government of Nigeria Treasury-funded MDA for service rendered from the Date of First Appointment with the FGN to 30 th June, 2004.
7	Pension Contributions	Employer and Employee Monthly Contributions deducted and remitted into an employee's Retirement Savings Account.
8	Prospective Retirees	Employees of FGN Treasury-funded MDAs who are due to retire that are expected to participate in the pre-retirement verification and enrolment exercise.
9	Retirees	Employees that are retired and have either enrolled or have delayed their enrolment beyond the expected period
10	PIN	Personal Identification Number
11	ECRS	Enhanced Contributors Registration System. ECRS is an electronic platform deployed by PenCom for the submission of contributor registration requests by PFAs and issuance of PIN by PenCom.
12	RBBRF	Retirement Benefits Bond Redemption Fund. A Fund established and maintained by the Central Bank of Nigeria, in line with the provisions of Section 39(1) of the PRA 2014.
13	CTC	Certified True Copy. A copy of any of prospective retiree/retiree documents that has been authenticated by his MDA by affixing signature and official stamp on it.
14	LOFA	Letter of First Appointment

15	DOFA	Date of First Appointment
16	EDOR	Expected Date of Retirement
17	ROS	Record of Service
18	LOI	Letter of Introduction
19	TPEN	Temporary Personal Identification Number, which is opened by an employer with any PFA on behalf of NOK of deceased employee that died without opening Retirement Savings Account
20	NOK	Next-Of-Kin. The alternate contact person provided by prospective retiree/retiree in his records with PFA/MDA.
21	FGN	Federal Government of Nigeria
22	RSA	Retirement Savings Account
23	COBRA	Contribution and Bond Redemption Application
24	DRE	Data Recapture Exercise
25	IPPIS	Integrated Personnel and Payroll Information system
25	PFC	Pension Fund Custodian

1.5 Rules of General Application

- 1.5.1 The Contribution and Bond Redemption Application (COBRA) shall be the medium through which prospective retirees/retirees of FGN Treasury-funded MDAs shall be enrolled for processing of their accrued rights and outstanding contributions.
- 1.5.2 Only prospective retirees/retirees that have been recaptured/registered on the Enhanced Contributor Registration System (ECRS) shall be able to enroll on COBRA.
- 1.5.3 PFAs shall deploy the required IT Infrastructure across their offices for the verification and enrolment of prospective retirees/retirees of FGN Treasury-funded MDAs as may be specified by the Commission, from time to time.
- 1.5.4 PFAs shall abide by the Code of Ethics on Business Practices issued by the Commission, and shall respect the confidentiality of sensitive information of prospective retirees/retirees.
- 1.5.5 PFAs shall comply with the Nigeria Data Protection Act, 2023. PFAs must implement and document appropriate technical and organizational measures to protect personal data processed in connection with this enrolment exercise, and shall maintain a mandate file for each RSA holder (hardcopy or electronic). The retention period for such files shall be as set out in Annex X (Retention Schedule)
- 1.5.6 PFAs must sight, and where applicable retain, the minimum documents specified by the Commission in Sections 2.3 and 2.6 of these Guidelines during verification and enrolment exercise for prospective retirees/retirees.
- 1.5.7 MDAs shall provide the required support/IT Infrastructure for the Pension Department/Unit to ensure seamless upload of their prospective retirees'/retirees' employment details.
- 1.5.8 MDAs shall provide prospective retirees/Next of Kin all the required documents as outlined in 2.3 below, and as may be prescribed by the Commission from time to time.
- 1.5.9 Death benefits for deceased and missing employees who did not open a Retirement Savings Account shall only be processed and paid through a TPEN, Temporary Personal Identification Number, which shall be flagged off upon payment of the benefits.
- 1.5.10 All submissions with regards to dates on COBRA, shall be in the format: DD-MMM-YYYY.

2.0 VERIFICATION AND ENROLMENT PROCESS

2.1 MDA Data Upload

2.1.1 Each MDA shall play a critical role in the verification and enrolment process for its prospective retirees. Accordingly, the Commission shall request each MDA to nominate two senior ranking officers to serve as MDA Admin Users on COBRA, who shall have the privilege of creating MDA Users. Specifically, the MDA shall have the following roles and responsibilities in the enrolment process:

- Creation of MDA User Account;
- User Management;
- Provision of introduction letter and record of service for each prospective Retiree/Retiree/Deceased Employee's NOK;
- Upload of List of Potential Retirees/Deceased Employees's NOK
- Resolution of issues affecting Retirees/NOKs during enrolment exercise; and
- Ensuring that Retirees/NOKs are adequately guided on the required documents needed for the online enrolment and verification with the PFA.

2.1.2 First Creation of User Account: MDAs shall forward the details of two officers one (1) of which must not be below the rank of Assistant Director to serve as Admin Users in the format below. Their login details shall be emailed to them via COBRA dedicated email address. COBRA will enable MDA Admin to create other Users for the MDA.

MDA Name	XXXXXXXXXXXXXXXXXX
First Name of Staff	XXXXXXXXXXXXXXXXXX
Surname of Staff	XXXXXXXXXXXXXXXXXX
Staff ID	XXXXXXXXXXXXXXXXXX
Designation	XXXXXXXXXXXXXXXXXX
Email Address	XXXXXXXXXXXXXXXXXX
Phone Number	XXXXXXXXXXXXXXXXXX

2.1.3 User Management: The designated MDA Admin User shall be responsible for management of other Users such as creating other MDA Users, deactivating/reactivating MDA Users, resetting Users' password, assigning roles and any other User Administration.

- 2.1.4 Letter of Introduction and Record of Service for each Retiree: MDA shall issue an Introduction Letter and Record of service detailing bio-data and employment details from date of first appointment to the date of retirement for each prospective retiree. Introduction Letter and Record of Service are part of the **mandatory** documents required for enrolment and verification of retiree.
- 2.1.5 MDA shall adequately assist and guide prospective retirees/NOKs of deceased employees to resolve issues during the process of enrolment and verification exercise.
- 2.1.6 MDA shall ensure that all its prospective retirees/NOKs of deceased employees are adequately guided and assisted on the required documents needed for self-assisted online registration by the Retiree/NOK and also verification of Retiree/NOK by PFA. Any Retiree with health challenge shall be assisted for online registration and PFA verification, provided the Retiree has medical report issued by a recognized Government hospital.
- 2.1.7 MDA shall be responsible for downloading the template provided on COBRA and populating same with required prerequisite bio-data and employment details of each prospective retiree/deceased employee. The two (2) templates below shall be available on COBRA for download by the MDA.

Template for Prospective Retirees

RSA_PIN	FIRSTNAME	OTHERNAME	SURNAME	GENDER	CURRENT_STAFF_ID	PHONE	DATE_OF_BIRTH	DOFA	DATE OF TRANSFER OF SERVICE	DATE_OF_RETIREMENT	LEAVE_OF_ABSENCE START_DATE	LEAVE_OF_ABSENCE END_DATE
PEN100275758211	ZULAI	ABDULMUMINI		F	SEP2019-35	80123456789-35	2-Sep-1959	1-Jun-1996		2-Sep-2019		
EMPLOYMENT_YEAR	EMPLOYER_ID	SALARY_STRUCTURE	GL	STEP								
2004	PU000032A001	HAPPS	4	3								
2007	PU000032A001	CONPSS	4	5								
2010	PU000032A001	CONPSSII	4	8								
2013	PU000032A001	CONPSSII	4	11								
2016	PU000032A001	CONPSSII	4	15								
2019	PU000032A001	CONPSSII	4	15								
2021	PU000032A001	CONPSSII	4	15								
RSA_PIN	FIRSTNAME	OTHERNAME	SURNAME	GENDER	CURRENT_STAFF_ID	PHONE	DATE_OF_BIRTH	DOFA	DATE OF TRANSFER OF SERVICE	DATE_OF_RETIREMENT	LEAVE_OF_ABSENCE START_DATE	LEAVE_OF_ABSENCE END_DATE
PEN100000302131	JULIANA	BOSE	IBIWOYE	F	SEP2019-60	80123456789-60	9-Sep-1959	22-Nov-1990		9-Sep-2019		
EMPLOYMENT_YEAR	EMPLOYER_ID	SALARY_STRUCTURE	GL	STEP								
2004	PU000032A001	HAPPS	12	4								
2007	PU000032A001	CONPSS	13	6								
2010	PU000032A001	CONPSSII	14	8								
2013	PU000032A001	CONPSSII	15	7								
2016	PU000032A001	CONPSSII	15	9								
2019	PU000032A001	CONPSSII	15	9								
2021	PU000032A001	CONPSSII	15	9								

retirees RSA PINs.

- 2.2.2 Self-Registration: The prospective retirees/NOK of deceased employees shall visit the Commission's website www.pencom.gov.ng and at the home page click on the **Contribution and Bond Redemption Application (COBRA)** to access the **Retiree/NOK Registration Module**. The prospective retirees/NOKs can also access their Registration Module directly through the URL: <https://cobra.pencom.gov.ng> on their browser.
- 2.2.3 Following the display of the application (**COBRA**), the prospective retiree/NOK shall at the top of the page click a button '**Register**' to enable the creation of account using the following information RSA PIN, Surname, Email address or phone number and Password. In respect of the NOK, these details must be those of the deceased employee's. A retiree/NOK must ensure that the email he/she provided for registration is functional and accessible as login and communication shall be via the registered email on COBRA.
- 2.2.4 NOKs of deceased employees that died without opening a Retirement Savings Account shall liaise with the deceased's MDA to open a TPEN, Temporary Personal Identification Number for the deceased employee with any PFA, as retiree/NOK registration shall only be done with a valid RSA PIN or TPEN, as applicable.
- 2.2.5 Upon successful creation of the account, the prospective retiree/NOK shall log on to the registration portal to complete the fields in the registration forms with the information required i.e. Biodata. The prospective retiree/NOK shall review to confirm that the information provided is correct and complete. The prospective retiree/NOK shall click the submit button to conclude the registration process.
- 2.2.6 The prospective retiree/NOK may wish to print the Acknowledgement Slip, or save a softcopy on the Mobile Telephone as evidence of registration on the **COBRA** and proceed to the PFA to complete the physical verification and enrolment exercise.
- 2.2.7 Where the prospective retiree/NOK is not able to conduct self-registration, he/she shall approach his/her PFA to carry out the retiree/NOK registration process.
- 2.2.8 The prospective retiree/NOK shall visit the PFA for physical verification and enrolment with the Originals or CTC of the required documents outlined in 2.3.1 below.
- 2.2.9 PFA Assisted Registration: PFAs shall assist prospective retiree/NOK that are unable to complete the online Registration on **COBRA**. PFAs shall

guide the prospective retiree/NOK with the steps outlined in 2.2.2 to 2.2.5 above, to ensure the successful registration on **COBRA**.

2.2.10 PFA shall also check the prospective retiree/NOK biodata details to ensure that the information provided by the prospective retiree/NOK are correct and complete. PFA may provide the prospective retiree/NOK with the evidence of registration on **COBRA** such as the printed Acknowledgement Slip.

2.3 Minimum Documentation Requirements

2.3.1 During the enrolment process, PFAs shall ensure that the original/CTC of the following documents are sighted from prospective retirees/NOKs of deceased employees and copies uploaded on COBRA:

Serial	Document Type	Upload Status	Explanatory Notes
1	Letter of First Appointment/Gazette/Attestation (Police)	Mandatory	This establishes DOFA and LOS. CTC of LOFA is acceptable, where original is not available.
2	Letter of Introduction (LOI)	Mandatory	LOI must be addressed to the DG PenCom. It ties retiree to exit MDA and provides his/her career progression summary. Original must be retained by the PFA.
3	Record of Service (ROS)	Mandatory	ROS provides retiree's detailed employment history. Original/CTC must be retained by the PFA.
4	Copy of Staff ID Card	Non-mandatory	To associate the employee with his organization.
5	Promotion Letter & Payslip as at 30 June, 2004 (if applicable)	Conditionally Mandatory	This is to ascertain the grade level and step of the prospective retiree as at 30 June 2004
6	Promotion Letter & Payslip between 01 July, 2004 and December 2006 (if applicable)	Conditionally Mandatory	The highest grade level and steps of the prospective retiree between these periods is to be adopted.
7	Promotion Letter & Payslip between January 2007 and December 2009 (if applicable)	Conditionally Mandatory	The highest grade level and steps of the prospective retiree between these periods is to be adopted.

Serial	Document Type	Upload Status	Explanatory Notes
8	Promotion Letter & Payslip between January 2010 and December 2012 (if applicable)	Conditionally Mandatory	The highest grade level and steps of the prospective retiree between these periods is to be adopted.
9	Promotion Letter & Payslip between January 2013 and December 2015 (if applicable)	Conditionally Mandatory	The highest grade level and steps of the prospective retiree between these periods is to be adopted.
10	Promotion Letter & Payslip between January 2016 and December 2018 (if applicable)	Conditionally Mandatory	The highest grade level and steps of the prospective retiree between these periods is to be adopted.
11	Promotion Letter & Payslip between January 2019 and December 2021 (if applicable)	Conditionally Mandatory	The highest grade level and steps of the prospective retiree between these periods is to be adopted.
12	Promotion Letter & Payslip between January 2022 and December 2024 (if applicable)	Conditionally Mandatory	The highest grade level and steps of the prospective retiree between these periods is to be adopted.
13	Last Promotion Letter & Pay slip (Current) (if applicable)	Conditionally Mandatory	This is to ascertain the grade level and step of the prospective retiree as at enrolment
14	Evidence of Change of Name (if applicable)	Conditionally Mandatory	
15	Evidence of Transfer of Service (if applicable)	Conditionally Mandatory	Transfer of service to FGN treasury-funded MDA beyond 30 th June 2004 is not recognized.
16	Evidence of Acceptance of Transfer of Service (if applicable)	Conditionally Mandatory	Acceptance of transfer of service after 30 th June 2004 by FGN treasury-funded MDA is deemed invalid.
17	Evidence of Extension of Service (If applicable)	Conditionally Mandatory	
18	Letter from the MDA Introducing the PDO (In case of Critical Health Condition)	Conditionally Mandatory	
19	Copy of Staff ID Card of the PDO (In case of Critical Health Condition)	Conditionally Mandatory	
20	Medical Report (if applicable)	Conditionally Mandatory	Medical Report must be from a Government Hospital
21	Letter of Acceptance of Retirement or Disengagement	Mandatory	

Serial Document Type	Upload Status	Explanatory Notes
(for those who retired or disengaged before their enrolment date)		
22 Letter of confirmation of period of continuous service in the university system (for Professors)	Conditionally Mandatory	This is to establish eligibility of University Professors with relevant Sections of UMPAA 2012 and PRA 2014.

2.4 Appointment of Enrolment and Validation Officers

- 2.4.1 In the minimum, PFAs shall appoint in each of their offices/branches/service centres two (2) officers of different rank to carry out the verification and enrolment of retirees/NOKs. The lower ranking officer (i. e. PFA Enroller) shall be responsible for verification of retiree/NOK documents and enrolment of the retiree/NOK on COBRA.
- 2.4.2 The higher ranking officer (i. e. PFA Supervisor) shall review and validate the retiree's/deceased employee's records enrolled on COBRA, prior to submitting to PenCom Module.

2.5 Documents Verification by PFA

- 2.5.1 PFAs shall have access to view and edit the records/information of the prospective retirees/NOKs already registered on COBRA. PFAs shall ensure that the prospective retiree/NOK presents all the required documents in line with 2.3.1 above. PFAs shall not collect or accept incomplete documentation from prospective retirees/NOKs as COBRA does not allow incomplete documentation.
- 2.5.2 PFAs shall sight the Originals or CTC of all the required documents in line with 2.3.1 above, presented by the prospective retiree/NOK. PFAs shall crosscheck the documents provided to ensure that the names therein align with the prospective retiree's/deceased employee's biodata.

2.6 Retiree/Next-of-Kin Enrolment by PFA

- 2.6.1 PFAs shall scan and upload the prospective retiree's/deceased employee's documents, both mandatory and conditionally mandatory (where applicable) on COBRA and must ensure that the scanned documents are clear, readable, complete and correct.
- 2.6.2 PFAs shall ensure that the prospective retiree's/deceased employee's employment information being inputted/captured on COBRA align with the

information on the documents, while the scanned documents being uploaded are complete and tally with the hard copies presented.

- 2.6.3 Upon confirmation of the above, the enrolment officer shall proceed to capture the retiree/NOK. In this regard, PFAs shall capture a facial image (live image) and an electronic signature of the prospective retiree/NOK on COBRA. In addition, PFAs shall capture the electronic signature of the prospective retiree/NOK on COBRA.

2.7 Registration, Verification and Enrolment of Sick/Incapacitated Prospective Retiree

- 2.7.1 The Next-of-Kin (NOK) of a critically health challenged prospective retiree shall inform the Pension Desk Officer of the condition that would prevent the physical appearance of the prospective retiree for verification and enrolment exercise. The PDO shall proceed to upload the details of the sick/incapacitated prospective retiree as specified in 2.1.6 to 2.1.8 above.
- 2.7.2 The NOK shall visit the Commission's website www.pencom.gov.ng and register on COBRA as outlined in 2.2.2 to 2.2.7 above.
- 2.7.3 Upon the successful registration of the details of the sick/incapacitated prospective retiree, the PDO/NOK shall proceed to the PFA with the evidence of registration on COBRA such as Acknowledgement Slip.
- 2.7.4 The registration, verification and enrolment of sick/incapacitated prospective retiree shall be accompanied with the following additional documents: **Original Medical Report** from a recognised Government Hospital and **Original MDA Letter** stating that the prospective retiree is sick/incapacitated and unable to appear physically for the enrolment exercise.
- 2.7.5 PFA shall, having satisfied with all the conditions in 2.5.1 to 2.5.2 above, enrol the sick/incapacitated prospective retiree on COBRA. PFA shall capture the live photograph of the PDO on behalf of the sick/incapacitated prospective retiree who is unable to physically appear for biometrics (photograph capturing) based on critical medical condition. The record shall be tagged "Health Challenge".
- 2.7.6 In addition to PDO live photograph, the PFAs shall also upload certified recent passport photo of retiree and the reverse side duly certified by NOK/MDA, as a level validation

2.8 Original Documents to be Retained by PFA

- 2.8.1 PFAs shall, in respect of each enrolled prospective retiree/deceased employee, keep custody of electronic and hard copies of the Original of Record of Service, Letter of Introduction and, where applicable, the Medical Report from a recognized Government Hospital and MDA Letter on the condition of the sick/incapacitated prospective retiree.
- 2.8.2 PFAs shall ensure that the Original Copies maintained in 2.8.1 above, are stored in a safe, secure and conducive environment and shall also put in place adequate arrangement to ensure that the Original Copies are protected against loss, damage or alteration.
- 2.8.3 In addition, access to the stored Original Records shall be restricted and tightly controlled and documented while ensuring that the Original Records are easily retrievable. The hard copies of the Original Records shall only be retained by PFAs for the period specified by the Archival Laws of the Federal Government of Nigeria.

2.9 Validation of Retiree/Deceased Employee Records by PFA

- 2.9.1 Upon successful completion of retiree/NOK enrolment, PFAs shall assign officers (mentioned in 2.4.2 above) to carry out first-level review and validation of enrolled retiree's/deceased employee's records on COBRA. Validation officers shall ensure that all bio-data and employment information captured by the Enrolment officer in respect of each enrolled prospective retiree/deceased employee are complete and correct and are supported by documents uploaded.
- 2.9.2 Where there is any inconsistency between the information captured and what is indicated on the documents, the Validation officers shall amend the information as may be appropriate. Validation officers shall review and ensure that documents uploaded are clear, legible, correct and properly scanned unto COBRA.
- 2.9.3 Upon completion of the validation successfully, validation officers shall submit the retiree records to the PenCom Module on the COBRA for further processing.

2.10 Minimum ICT Requirements for PFAs and MDAs

- 2.10.1 PFAs shall ensure deployment of adequate IT infrastructure in all their branches that shall support seamless enrolment exercise for prospective retirees/NOKs of deceased employees. In this regard, PFAs shall have the following minimum ICT requirements in all their branch offices for

enrolment purpose:

- Desktop/Laptop Computer with minimum Hard Disk free space of 50GB and minimum RAM of 8GB;
- USB Web Camera(s);
- Document Scanner(s);
- Document printer(s); and
- Internet/LAN Access.
- E-Signature Pad
- Updated Antivirus Software
- Active Firewalls
- Data Encryption for stored and transmitted information
- Daily Automated Backups across all devices and networks used for enrolment and data processing
- Bio metric scanner

2.10.2 PFAs shall provide and ensure at all times adequate storage facilities that would allow for scalability as may arise from time to time.

2.10.3 In order to fulfill their critical role of uploading retirees'/deceased employees' biodata and employment details in the enrolment process, MDAs shall also ensure that the following minimum IT equipment are provided for the Pension Unit/Office:

- Laptop/Desktop Computer (At Least 8GB RAM, 1TB Hard Disk);
- Microsoft Office tool; and
- Dedicated Internet Service.

2.10.4 MDAs shall ensure regular targeted training of their relevant officers who are handling the enrolment process on Computer appreciation and other relevant areas that shall build their capacity and ensure their optimal performance in the enrolment process.

2.10.5 The Commission shall review the minimum IT infrastructure requirements from time to time and PFAs and MDAs shall meet the minimum ICT requirements set by the Commission.

3.0 RETIREE RECORD UPDATE

3.1 Update Request

- 3.1.1 PFA shall be able to request for amendment of submitted records of prospective retirees/deceased employees whom they have completed their enrolment and validation. COBRA shall allow multiple requests from PFA for amendment on a record yet to be validated by the Commission.
- 3.1.2 Where a prospective retiree's/deceased employee's record has been validated by the Commission, such record shall be unavailable for amendment and PFA shall contact the Commission to bring to the attention of the Commission for further action.
- 3.1.3 PFAs shall only be allowed amendments of prospective retirees' records in editable data fields and update of document(s).

3.2 Authorization

- 3.2.1 The Commission shall receive and review all requests for amendment submitted by PFAs through COBRA, if the records have not been validated by the Commission.
- 3.2.2 Upon review, the Commission shall approve or reject such requests for amendments and where a record is rejected/not approved for amendments, the Commission shall provide a reason(s) for such decision.

3.3 Update Re-submission

- 3.3.1 Upon approval of a request, the prospective retiree/deceased employee record shall automatically be open to the PFA for editing. Upon completion of the amendment of editable fields and/or upload of document, the PFA shall save the amended record and the application shall restrict editing of any field after saving.
- 3.3.2 However, PFA may be allowed to make another request for amendment of the same record, where cogent reason(s) are provided by the PFA. Records authorized/approved for amendment(s) by the Commission shall be re-submitted within two (2) working days by the PFA.

4.0 OVERSIGHT FUNCTIONS

4.1 Processing of Retirement Benefits

4.1.1 Upon completion of enrolment and validation, PFAs shall submit the enrolled record to PenCom Module on COBRA. The Commission shall validate the retiree's records and, where there are issues that require further action by the PFA, the Commission shall return the record to the PFA's portal.

4.1.2 Where the retiree's/deceased employee's record is validated successfully, the Commission shall proceed to process the retirement/death benefits of the retiree/deceased employee

4.2 Remittance Schedules to PFAs/PFCs

4.2.1 Subject to availability of funds, the Commission shall issue remittance schedules to PFAs and PFCs in respect of retirees/NOKs of deceased employees whose retirement/death benefits have been processed by the Commission.

4.2.2 All remittance schedules for accrued rights and outstanding/excess contributions shall be issued to respective PFAs and PFCs through COBRA and PFAs shall be required to credit the Retirement Savings Accounts of the affected retirees within 48 hours of receipt of funds in their accounts.

4.3 Off-site Review of Enrolment Exercise

4.3.1 On COBRA, the Commission shall closely monitor and supervise the enrolment process and documents being uploaded by the PFAs as well MDAs' upload of prospective retirees'/deceased employees' employment details and retiree/NOK registration.

4.3.2 Where necessary, the Commission shall engage any of the relevant stakeholders on the portal on areas of concern or issues of violation of the enrolment process.

4.4 On-site Target Inspection of PFAs

4.4.1 The Commission shall, in addition to the routine examinations, conduct target inspection of any of the branches of the PFAs to ascertain deployment of the minimum IT infrastructure specified in 2.10.1 above as well as PFA adherence to the stipulated procedures and standards during the enrolment exercise.

4.4.2 The Commission may, from time to time, call for the Original Copies of the required documents retained by PFAs in 2.8.1 above of any prospective retiree/retiree and shall also carry out spot checks on the PFA offices to ascertain maintenance of the Original Records by the PFAs, as required in 2.8.2 and 2.8.3 above.

5.0 MULTIPLE PIN RESOLUTION FOR FGN TREASURY-FUNDED MDAs

5.1 Procedure for Resolution of Multiple PIN

5.1.1 Employees/retirees of FGN Treasury-funded Ministries, Departments and Agencies with multiple RSA PIN shall only be able to resolve such multiple registrations when he/she has done the Data Recapture Exercise (DRE) on ECRS with any of the PINs of his/her choice.

5.1.2 Notwithstanding 5.1.1 above, where an RSA holder had retired with one of the multiple PINs prior to the request for merger of the PINs, then such PIN becomes his/her valid PIN and he/she must undergo DRE with the PIN. Where the retiree had recaptured with the invalid PIN, the Commission will invalidate the data recapture to enable the retiree recapture with the valid PIN.

5.1.3 The Commission shall carry out a reconciliation exercise of the remittances of pension contributions made into the multiple PINs. In carrying out the reconciliation, PFAs shall be required to provide information on the balances in the invalid PINs to the Commission to ascertain remittances made by the Commission and investment income earned for the period as well as remittances made from other sources, as indicated in the Template provided for transaction history of the invalid PIN.

5.1.4 PFAs shall ensure that the transaction history of the invalid PIN provided to the Commission is complete and accurate as requested in the template.

5.1.5 The Commission's policy on reconciliation of multiple RSA registrations is that where the PINs are funded, the RSA balances in the invalid PINs shall be refunded to the Contributory Pension Account domiciled with the Central Bank of Nigeria. Where the PIN(s) is/are unfunded, the Commission shall carry out reconciliation exercise on the PINs.

5.1.6 The outcome of the reconciliation shall be communicated to the PFA of the invalid PIN by the Commission and the PFA shall notify the RSA holder that his/her RSAs have been reconciled. Depending on the outcome of the reconciliation exercise, the RSA holder may be required to liaise with his/her employer to submit his/her nominal roll for the period prior to date

of migration of his/her MDA to IPPIS platform to the Commission.

6.0 REPORTS

6.1 Reports Available to Retiree/MDA

6.1.1 The following reports shall be available to the MDA Users:

- i. List of potential retirees per period; and
- ii. List of enrolled retirees per period
- iii. List of retirees not yet registered
- iv. List of retirees not yet enrolled
- v. Status of Retirees Enrolment.

6.1.2 Upon registration, a retiree/NOK shall view and download his/her acknowledgement slip, and when subsequently enrolled, he/she can track the processing of his/her retirement/death benefits and receive email notification from COBRA on remittance of his/her retirement/death benefits.

6.2 Reports Available to PFAs/PFCs

6.2.1 The following reports shall be available to the PFA Users on COBRA:

- i. Summary of Registered Retirees
- ii. Detailed List of Potential Retirees by Period of Retirement;
- iii. Summary of Potential Retirees per MDA;
- iv. Summary of Potential Retirees by Period of Retirement;
- v. Summary of Potential Retirees by Month of Retirement.
- vi. Detailed List of Retirees yet to complete enrolment;
- vii. Detailed List of Enrolled Retirees; and
- viii. Summary of Enrolled Retirees.
- ix. List of computed RSAs with details of payments

6.2.2 PFAs shall analyze the reports and ensure that they encourage their clients that are due to retire to participate in the enrolment exercise within the stipulated timeframe by the Commission. Specifically, PFAs shall contact potential retirees uploaded by MDAs but yet to register and/or registered retirees that are yet to enroll, to visit any of their nearest branches to undergo the enrolment exercise.

6.2.3 In respect of reports available to PFCs, the PFCs shall view and download all payment schedules of accrued rights and outstanding/excess contributions, in respect of PFAs they provide custodial services to.

6.3 Returns Rendition to PenCom

6.3.1 PFAs shall render returns to the Commission through COBRA. In addition, the Commission shall also generate reports from the Retiree Registration Module Submissions, the MDA Module Submissions and the PFA Module Submissions. All reports shall be generated in PDF and/or MS Excel format and shall also allow download/export for all fields. All reports shall be available to the PenCom Module, which shall include the following:

1. Retiree Registration Report;
2. List of registered retirees by Organization Sector;
3. List of registered retirees by period of retirement;
4. Summary of registered retirees by MDA;
5. Summary of registered retirees per PFA;
6. Summary of registered retirees per PFA per MDA;
7. Summary of registered retirees by period of retirement;
8. Summary of registered retirees by month of retirement;
9. Summary of registered retirees by year of retirement;
10. Summary of registered retirees by year of registration.
11. MDA Submission Report;
12. List of potential retirees per MDA;
13. List of potential retirees by period of retirement;
14. Summary of potential retirees submitted by MDAs;
15. Summary of potential retirees per PFA per MDA;
16. Summary of potential retirees by period of retirement;
17. Summary of potential retirees by month of retirement.
18. PFA Submission Report (Enrolment);
19. List of retirees yet to complete enrolment (all PFAs);
20. List of retirees yet to complete enrolment (per PFA);
21. List of enrolled retirees per MDA;
22. List of enrolled retirees (per PFA);

23. List of enrolled retirees by Organization Sector;
24. Summary of enrolled retirees by MDA
25. Summary of enrolled retirees per PFA;
26. Summary of enrolled retirees by period of retirement;
27. Summary of enrolled retirees by month of retirement;
28. Summary of enrolled retirees by year of retirement;
29. Comprehensive enrolment records;
30. Comprehensive enrolment records for the computation of accrued right;
31. Comprehensive enrolment record for the computation of outstanding contribution;
32. List of sick/incapacitated retirees;
33. List of enrollees that are in “Yet to be Paid” database of the Commission;
34. List of enrollees with validation issues;
35. Comprehensive report of validated records;
36. Reports of validations by validators; and
37. Summary of enrolment exercise.

7.0 ADMINISTRATIVE SANCTIONS AND PENALTIES

7.1 The Commission shall impose administrative sanctions on PFAs for violating the procedures and requirements set out in these Guidelines, as specified in Sections 7.2 to 7.14 of these Guidelines.

S/No.	Description of Infraction	Monetary Penalty for Non -Compliance
7.2	Failure to collect Original copies of Record of Service and Introduction Letter.	₦50,000 per record.
7.3	Failure to collect Original of Medical Report, MDA Letter on condition of sick/incapacitated retiree.	₦50,000 per record.
7.4	Failure to scan and upload Original/CTC of prospective retiree/retiree/Deceased valid and confirmed Mandatory documents	₦100,000 per retiree.
7.5	Upload of unclear/illegible/incomplete documents on COBRA.	₦50,000 per record.
7.6	Upload of wrong document for a retiree.	₦50,000 per retiree.
7.7	Failure to assist prospective retiree with registration who is unable to do so on COBRA.	₦100,000 per retiree.
7.8	Failure to provide information on Branch Offices to prospective retirees for enrolment exercise.	₦100,000 per retiree per week.
7.9	Non-compliance with the Guidelines on Data Protection and Privacy in the enrolment process.	₦100,000 per retiree.
7.10	Non-upload of report on COBRA on RSAs credited after receipt of accrued rights and/or outstanding contributions.	₦50,000 per RSA daily until uploaded
7.11	Submission of wrong/misleading information/validation/report.	₦100,000 per retiree.
7.12	Non-deployment of specified minimum IT infrastructure to support the enrolment exercise/process	₦500,000 one-off for the period of the examination.
7.13	Submission of wrong/misleading information on RSA transaction history for reconciliation of Multiple PINs	₦100,000 per TH.
7.14	Delay in refund of recalled funds into Contributory Pension Account domiciled at CBN	₦500,000 one-off.

8.0 REVIEWS AND ENQUIRIES

8.1 Reviews

8.1.1 These Guidelines shall be subject to periodic reviews by the Commission in line with prevailing conditions as and when the need arises.

8.2 Enquiries

8.2.1 A helpdesk has been created at the Commission to attend to all enquiries and complaints by PFAs, PDOs and prospective retirees on the enrolment process. The contact details of the helpdesk are as follows:

- Email address: cbrd@pencom.gov.ng
- Telephone Numbers: (0700-225-573-6266) +23494603930

8.2.2 All enquiries regarding these Guidelines shall be directed to:

The Director General
National Pension Commission
174, Adetokunbo Ademola Crescent Wuse II
Abuja, Nigeria