

## Deadlines for Retirement Plans<sup>1</sup> to Adopt SECURE Act<sup>2</sup>, Miners Act<sup>3</sup> and CARES Act<sup>4</sup> Amendments

Categories of Amendments	Extended Amendment Deadline December 31, 2025 <sup>5</sup>	Current Amendment Deadline December 31, 2022 <sup>6</sup>
All SECURE Act amendments, required or optional	401(k) plans, defined benefit plans, money purchase plans, and 403(b) plans not maintained by public schools	Non-governmental 457(b) plans
CARES Act waiver of 2020 RMDs		
CARES Act coronavirus-related distributions	N/A	401(k) plans, defined benefit plans, money purchase plans, and 403(b) plans not maintained by public schools
CARES Act special loan terms <sup>7</sup> for participants affected by coronavirus		
Miners Act provision lowering age for in-service distributions from 62 to 59½ <sup>8</sup>	Defined benefit plans and money purchase plans	N/A

<sup>1</sup> Tax-qualified plans, 403(b) plans not maintained by public schools, and non-governmental 457(b) plans.

<sup>2</sup> Setting Every Community Up for Retirement Enhancement Act of 2019.

<sup>3</sup> Bipartisan American Miners Act of 2019.

<sup>4</sup> Coronavirus Aid, Relief, and Economic Security Act.

<sup>5</sup> Extended by the IRS Notice 2022-33, the December 31, 2025, deadline is a fixed date, independent of plan year end.

<sup>6</sup> For calendar-year plans the deadline is December 31, 2022. For non-calendar plans the deadline is the last day of the first plan year beginning in 2022.

<sup>7</sup> Here is a [link](#) to our blog post explaining CARES Act special loan terms and coronavirus-related distributions.

<sup>8</sup> This optional change may be made at any time; the extended deadline applies only where the change has been put into effect in a prior plan year.