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EBSA Releases Long-Awaited Update to Model Annual Funding Notices Reflecting SECURE 2.0 Changes

Employee Benefits & Executive Compensation Blog on **April 4, 2025**

Following up on our recent blog post, SECURE 2.0's Required Changes to Annual Funding Notice Become Effective in 2025, the Department of Labor released Field Assistance Bulletin 2025-02 on April 3, which addresses compliance questions regarding the required changes to AFNs under SECURE 2.0 and includes two updated model AFNs incorporating these changes.[1][2] FAB 2025-02 informs plan administrators that they can no longer rely on the prior model notices, and instructs plans that have already prepared or begun preparing 2024 AFNs to "consider the guidance in this Bulletin in evaluating whether the disclosures were consistent with a reasonable, good faith interpretation of section 101(f), as amended, and to take appropriate corrective action" if the plan administrator determines that standard was not met.

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[1] Single-employer pension plan model annual funding notice (Appendix 1).

[2] Multiemployer pension plan model annual funding notice (Appendix 2).

View original.

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