

Advance Copies of 2025 Form 5500 Series Contain Few Changes

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2025 Form 5500, Schedules, and Instructions

2025 Form 5500 Series

The agencies have released informational copies of the 2025 Form 5500 series, including Form 5500, Form 5500-SF, Form 5500-EZ, and instructions. Changes are minimal. Of interest for 401(k) plans and health and welfare plans is a clarification regarding reporting of delinquent participant contributions on Schedule DCG, Schedule H, or Schedule I, as applicable. The clarification is provided in a “Tip” added to the instructions for each of these Schedules. The instructions specify that the last year to include a delinquent participant contribution on the applicable Form 5500 Schedule (and accompanying attachment) is the plan year in which the violation has been fully corrected. For example, if a delinquent participant contribution for 2022 was first discovered and fully corrected in 2023, it would be reported on the plan’s 2023 Form 5500, but not on the 2024 (or any later) Form 5500.

References to the Voluntary Fiduciary Correction Program have been updated to reflect the most recent version (issued in early 2025). And the reference to the maximum DOL administrative penalty for Form 5500 filing failures has been updated to the current amount (\$2,739 per day). Other changes relate to defined benefit plans.

EBIA Comment: The related [news release](#) reminds filers that these informational copies cannot be used for filing. Filers should monitor the DOL’s [EFAST website](#) for availability of electronic versions for filing. For more information, see EBIA’s 401(k) Plans manual at Section XXXI (“Plan Administration: Annual Form 5500 Reports and SARs”) and EBIA’s ERISA Compliance manual at Section XXII (“Annual Form 5500 Reporting to the DOL”). See also EBIA’s Cafeteria Plans manual at Section XXXIV (“Form 5500 and Other Reporting Requirements”) and EBIA’s Self-Insured Health Plans manual at Section XXIX.B (“Annual Form 5500 Reporting”).

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