

# IRS Plan Document Restatement for Cycle 2 - 403(b) Plans

## 403(b) Plan Document Restatement for Cycle 2

The Internal Revenue Service ("IRS") requires that all pre-approved 403(b) plans be restated every few years to incorporate all regulatory updates since the last restatement period in order to remain compliant. This is referred to as a restatement cycle.

### What is the current restatement cycle?

Known as the "Cycle 2 restatement," this is the second cycle that the IRS has issued opinion letters under the pre-approved retirement plan program for 403(b) plans.

### Why must plans be restated?

Retirement plans are subject to frequent regulatory and statutory changes, often requiring multiple amendments. To help keep plans from becoming too burdened with separate amendments over many years of operation, the IRS requires pre-approved plan documents to be restated on a uniform cycle to maintain their qualified status. This cycle covers changes to the 403(b) requirements on the 2022 Cumulate List in [Notice 2022-8](#).

### When do employers need to complete the Cycle 2 restatement?

The Cycle 2 restatement process for pre-approved 403(b) plans has begun and documents must be signed prior to December 31, 2026.

### What is Sentinel's process for the restatement?

If Sentinel is the sponsor of your 403(b) plan document, we will manage the entire process for you. As part of our service, we will be reviewing your current plan document and transitioning information to our new IRS-approved plan document. Delivery of restated documents are currently slated to begin in 2026. If you need to amend your plan this year, we will discuss restating your plan earlier.

### Is there a cost for the restatement?

If you are enrolled in Sentinel's [Document Subscription Service](#), the cost for the restatement is included and you will not be charged any additional fees.

If you have elected to pay as you go for plan amendments and restatements, the cost of restating the plan will be \$2,000.

### What can I expect next?

When we are ready to begin your plan's restatement, we will review your plan provisions, prepare the restatement, and consult you on any questions regarding changes to plan provisions.

If you have any questions, please contact your Sentinel Plan Consultant.