IRS Announces Cycle 4 Adoption Deadline for Defined Contribution Pre-Approved Plans

The IRS has announced important timing for employers that maintain defined contribution qualified pre-approved retirement plans. **Announcement 2026-15** addresses the fourth remedial amendment cycle, commonly referred to as Cycle 4, and provides the expected timing for IRS opinion letters, the employer adoption deadline, and the window for eligible employers to request individual determination letters.

Key Dates Announced by the IRS

- **August 31, 2026:** The IRS expects to issue opinion letters for Cycle 4 defined contribution qualified pre-approved plans, or as soon as possible thereafter.
- **October 1, 2026:** The window opens for eligible adopting employers to apply for an individual determination letter.
- **September 30, 2028:** Employers must adopt a newly approved Cycle 4 defined contribution qualified pre-approved plan by this date to be treated as adopting within Cycle 4. This is also the end of the determination letter application window.

Background on the Remedial Amendment Cycle

Revenue Procedure 2023-37 established a recurring remedial amendment cycle system for pre-approved plans, including separate cycles for defined contribution qualified plans, defined benefit qualified plans, and section 403(b) pre-approved plans. For Cycle 4, plan providers were required to update defined contribution qualified pre-approved plans for changes included in the 2023 Cumulative List before submitting them to the IRS for review.

What This Means for Employers

Employers using a defined contribution qualified pre-approved plan should begin planning for the Cycle 4 restatement process once opinion letters are issued. The September 30, 2028 adoption deadline provides a two-year window for most employers to adopt an updated pre-approved plan document. Employers that are eligible to request an individual determination letter should also evaluate whether filing during the October 1, 2026 through September 30, 2028 window makes sense for their circumstances.

Recommended Next Steps

- Plan sponsors should confirm whether their current retirement plan document is a defined contribution qualified pre-approved plan subject to Cycle 4.
- Monitor the issuance of IRS opinion letters expected on or after August 31, 2026.
- Coordinate with the plan document provider, recordkeeper, third-party administrator, and legal or tax advisors to schedule timely adoption.
- Determine whether the Plan is eligible for, and would benefit from, filing an individual determination letter application.
- Track the September 30, 2028 adoption deadline to avoid last-minute compliance issues.

Bottom Line

Announcement 2026-15 gives employers and retirement plan service providers a clear roadmap for the Cycle 4 adoption period. While the deadline is not until September 30, 2028, employers should use the full adoption window to review their plan documents, coordinate with service providers, and address any determination letter considerations well before the deadline.

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