

Law and Policy Group

**GRIST**

# 2025 informational Form 5500 includes new DB characteristic codes

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The Department of Labor (DOL), IRS and the Pension Benefit Guaranty Corp. (PBGC) have [released](#) informational copies of the Form 5500 series, *Annual Return/Report of Employee Benefit Plan*, along with related schedules and instructions, for 2025 plan year filings. The 2025 forms are largely the same as the 2024 versions, but include the following new defined benefit (DB) plan characteristic codes on Line 8a of Form 5500:

- 1G for a plan using a variable annuity benefit formula — this code also applies to the Form 5500-SF and Form 5500-EZ
- 1J for a PBGC-covered multiemployer plan that terminated by mass withdrawal
- 1K for a PBGC-covered multiemployer plan that terminated by plan amendment
- 1L for a PBGC-covered multiemployer plan that was insolvent as of the end of the plan year

Additionally, DB plan characteristic code 1H — for a PBGC-covered plan that was terminated and closed out — was modified to clarify that it applies only to single-employer plans.

Informational copies may not be used to submit filings; DOL will update its [EFAST2](#) e-filing system with these forms at a future date. IRS will release paper copies of Form 5500-EZ and instructions on its website separately.

## Related resources

### Non-Mercer resources

- [Press release](#) (DOL, Dec. 15, 2025)
- [Form 5500 series](#) (DOL website)

## Mercer Law & Policy resource

- [Form 5500 trilogy concludes with latest set of changes](#) (March 13, 2023)

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