

Board Memo: September 2025 Meeting Agenda Item #5

Date: 09/17/2025

To: Minnesota Secure Choice Retirement Program Board of Directors Members

From: David Bergstrom, Minnesota Secure Choice Retirement Program Interim Executive Director

RE: Program Launch Date

At the December 2024 board meeting, the Minnesota Secure Choice Retirement Program Board of Directors approved a phase-in approach to mandate compliance with Minnesota Statutes 2024, section 187.07 for different sized employers in Minnesota.

A launch date for the first compliance phase needs to be determined, as each subsequent phase start date and penalties for noncompliant covered employers in the first phase will be determined from this date.

A launch date to start phasing in the program will also help determine marketing decisions about which employers and audiences to engage with and when, as well as the type of messaging needed.

Staff Recommendations to the Board

I recommend a soft-launch phase beginning on Jan. 1, 2026, and lasting until March 30, 2026. At that point, employers who want to voluntarily join the program will be able to do so. A notice will be sent to all employers informing them of this opportunity for early enrollment.

I propose an official program launch date of April 1, 2026. Employers with 100 employees or more would be required to comply by June 30, 2026, with Minnesota Statutes 2024, section 187.07, subdivision 1. In the months leading up to the April 1, 2026 official program and first official phase start date, employers with 100 or more employees will be sent a notice stating that they are required to join the Minnesota Secure Choice Retirement Program. It is likely that many of the employers with 100 or more employees already offer a retirement program and will not have to participate.

We will reach out to several employers to participate in a pilot program in December 2025.

The table below lists the recommended program soft launch start date, the official program launch date, as well as when subsequent phases will begin.

Table 1: *Proposed phase durations and start dates for Minnesota covered employers of different sizes to comply with Minnesota Statutes 2024, section 187.07. Employer and employee numbers provided by 2024 Minnesota data from the Bureau of Labor Statistics.*

Number of employees at covered employer	Phase duration and/or start date	Number of employers in this phase	Number of employees in this phase
Soft launch for any sized Minnesota covered employer	Jan. 1, 2026 to March 30, 2026	N/A	N/A
100 or more	April 1, 2026 to June 30, 2026	5,500	1,821,000
50 to 99	July 1, 2026 to Dec.31, 2026	2,861	179,818
25 to 49	Jan. 1, 2027 to June 30, 2027	5,677	187,939
10 to 24	July 1, 2027 to Dec. 31, 2027	14,962	223,243
5 to 9	Jan. 1, 2028 to June 30, 2028	19,000	121,000
Total		48,000	2,533,000