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Mexico Implements New Deadline to Comply with INFONAVIT Obligations

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On September 11, 2025 the Mexican Institute of the National Housing Fund for Workers (“INFONAVIT”) published on its official website a notice announcing the extension of the deadline for implementing reforms to Article 29 of the INFONAVIT Law, specifically regarding the obligation to make deductions without suspension for absences or disabilities in accordance with Mexico’s Social Security Law. The purpose of this measure is to ensure an orderly transition for companies and to allow for the proper adjustment of payroll systems.

The reform was originally published in the Official Journal of the Federation (“DOF”) on February 21, 2025, marking a regulatory milestone that reconfigures the operation of payroll deductions within the employment relationship. As an immediate precedent, the INFONAVIT Board of Directors unanimously approved, during an extraordinary session held on March 19, 2025, Resolution RCA-14500-03/25, which granted a transitional period to adjust processes and systems. Such resolution was published in the DOF on May 15, 2025, and established a temporary schedule for human resources departments to reorganize their procedures, with practical implementation initially planned for the fourth bimester of the year.

Nevertheless, in response to concerns raised by employers, both individually and through business forums, the INFONAVIT Board of Directors approved the extension of the implementation deadline. Consequently, the application of Article 29 will begin with salary payments corresponding to the sixth bimester of 2025 (November and December), with payment due no later than January 17, 2026. This decision ensures that organizations have sufficient time to adapt their procedures, controls, and payroll configurations without compromising compliance with the obligation to withhold and remit deductions.

From an operational standpoint, companies that have already adjusted their systems and processes in accordance with the reform may continue applying deductions using version 3.6.7 of the Unified Self-Determination System (Sistema Único de Autodeterminación - "SUA"). This scenario applies to organizations that have adopted the rule of non-suspension for absences or disabilities and require continuity and documentary evidence of their calculations. On the other hand, employers wishing to take advantage of the new deadline and begin implementation with the salary payment corresponding to the fourth bimester of 2025 (bimester 2504), which must be made no later than September 17, 2025, should continue using the SUA version they have been operating with for previous periods, provided they have not yet installed version 3.6.7. Those that have already installed such version are required to download version 3.6.8, which will soon be published on the IMSS and/or INFONAVIT portals in the SUA section.

In case employers need technical assistance or specific clarification regarding the use of the SUA or the implementation of the reform in internal processes, the notice states that employers may contact the corresponding INFONAVIT regional office, which acts as a support body to resolve operational details and ensure proper adoption of the new rules.

Regarding key dates, it is important to note that the reform was published in the DOF on February 21, 2025; on March 19, 2025, the Board approved Resolution RCA-14500-03/25; on May 15, 2025, the transitional measure was published; on September 11, 2025, the extension of the deadline was announced on the INFONAVIT portal; on September 17, 2025, the payment corresponding to the fourth bimester (bimester 2504) is due for those beginning in that cycle using SUA version 3.6.7; and, finally, the deadline for full implementation extends through the sixth bimester of 2025 (bimester 2506).

From an internal control and audit perspective, it is recommended to document the details of the calculation that implements the non-suspension rule, record the SUA version in use, and retain evidence of payroll testing and reconciliations. These practices, which are derived from compliance requirements, facilitate traceability in the event of subsequent reviews without imposing additional obligations.

For further information, please consult the full notice at the following link:

<https://portalmx.infonavit.org.mx/wps/wcm/connect/d5213ac2-524f-4e2a-8701-aff8b023681c/Ampliacion%2BPlazoLegal%2BArt29.pdf?MOD=AJPERES>