

SECURE 2.0: Your Year-End Checklist

As we approach the end of the year, now is the time to make sure you have implemented elements of the SECURE 2.0 Act. This year introduced several new rules for retirement accounts and savings. With many of the law's provisions now in effect, and the plan amendment deadline landing on December 31, 2026, there is an opportunity to evaluate your plan's efforts.

Use the checklist below to confirm where your plan stands.

NOW: Confirm These Are Running Correctly

- ☐ **Roth catch-up for higher earners.** Participants whose prior-year FICA wages from you exceeded the indexed threshold (currently \$145,000) must make catch-up contributions on a Roth basis. If your plan does not offer Roth, those participants cannot make catch-up contributions at all. Confirm payroll is flagging the right people.
- ☐ **Age 60–63 higher catch-up limit.** Participants in this age band are eligible for a larger catch-up amount. Verify payroll applies the higher limit and drops it back at age 64.
- ☐ **Long-term part-time employees.** Employees with two consecutive years of at least 500 hours must be allowed to defer. Confirm you are tracking hours for part-time, seasonal, and variable-schedule workers.
- ☐ **Automatic enrollment.** Plans established after December 29, 2022, must automatically enroll new hires and escalate deferrals each year. Confirm the annual escalation is running, not just the initial enrollment.
- ☐ **Annual paper benefit statement.** Defined contribution plans must deliver at least one paper statement a year unless the participant opts out. Confirm your recordkeeper has this covered.

YEAR-END: Close the Gap Between Practice and Paper

- ☐ **Plan document amendments.** The IRS extended the SECURE 2.0 amendment deadline to December 31, 2026, for most private-sector plans. Operational compliance was already required on each provision's effective date. The amendment requires that your document match what you have been doing.
- ☐ **Reconcile operations to the document first.** Before you amend, verify how your plan has been operating. Amendment season is where mismatches surface, and it is far cheaper to find them now than in an audit.

2027 & BEYOND: No Deadline, Still a Decision

- ☐ **Saver's Match arrives in 2027.** A federal matching contribution will flow directly into eligible participants' accounts. Decide how you will explain it before they see it.
- ☐ **Optional features worth a look.** Student loan matching, emergency savings accounts, penalty-free emergency and long-term care withdrawals, and Roth employer contributions. Each is a retention and recruiting lever, not just a compliance box.

Not sure where your plan stands?

Reach out to your IMA Retirement team.

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For assistance with your retirement needs, contact an IMA Retirement advisor at retirement@imacorp.com or 877.305.1864.

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