



Mandatory Roth 401(k) and 403(b) Catch-Up Contributions Under the SECURE 2.0 Act

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The SECURE 2.0 Act of 2022 included several changes that may increase Roth treatment of retirement plan contributions. One SECURE 2.0 provision mandates Roth treatment of catch-up contributions made by higher-wage employees. This provision was originally set to be effective for 2024, but the IRS announced an "administrative transition period" until the 2026 via Notice 2023-62. That transition period is nearly over, and final IRS regulations in September 2025 answer many questions about implementing this required change. We have found there is still some confusion about the different approaches for complying with the new rule.

Please see our *client alert* describing key decision points for plan sponsors.