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Spencer Fane Team Provides Summary of Final Regulations on Roth Catch-Up Rules for Retirement Plans

Spencer Fane attorneys Beth Miller and Eric Miller recently authored the *HR.com* article, Roth Catch-Up Rules For 401(k), 403(b), And 457(b) Plans, which gives an overview of important requirements for Roth catch-up contributions.

In the article, which originated as a firm blog post, the team discusses the finalization of the SECURE 2.0 rules requiring high-earning employees to make all catch-up contributions on a Roth basis beginning in 2026. The regulations clarify how employers must determine who is subject to the rule, how to handle elections and corrections, and when different types of plans must comply. Overall, the guidance underscores the need for employers and service providers to coordinate closely and to accurately update plan documents.

"The final regulations provide critical information about the implementation, administration, and correction of mandatory Roth catch-up contributions under SECURE 2.0," the team wrote. "The regulations also demonstrate how critical it will be for employers, their legal counsel, and their service providers to coordinate their efforts in order to ensure that the plan document accurately reflects the plan's administration of the Roth catch-up requirement."

Beth is a member of the Employee Benefits team with significant experience in the industry. She helps clients by identifying practical solutions to a wide variety of legal matters in the areas of employer-sponsored retirement plans, executive compensation, fiduciary obligations, and advisory services.

With nearly 25 years of experience, Eric advises clients on plan design; compliance and drafting issues for qualified retirement plans, which include 401(k) and other defined contribution plans; health and welfare plans and programs; and executive compensation plans.

Read the team's full article here.