SECURE 2.0 Act Roth catch-up

intellicents®

new update as of November 13, 2025

The IRS released new Cost of Living Adjustments on November 13. As part of these changes, the indexed limit has increased from $145,000 to $150,000, potentially affecting eligibility and planning for the coming year.

at a glance

Effective Jan 1, 2026, the Roth Catch-up provision from the Secure 2.0 goes into effect. This means all catch-up contributions are required to be contributed on a Roth basis for participants earning $150,000 (indexed annually) or more in FICA earnings in the previous year.

what do you need to do?

- Ensure that you have the Roth provision available in your 401(k) Plan. If you do not, then participants' ability to make catch-up contributions could be impacted. Adding the Roth provision will require a plan amendment, and we recommend beginning the amendment process as soon as possible. You will also need to notify your payroll provider.
- Contact your payroll provider to discuss their system programming and any potential action items that may be required on your end.
- Your record-keeper may require additional information from you or your payroll to appropriately "flag" the individuals who are age 50 and older (i.e. catch-up eligible) and made $150,000 or more in 2025. Be sure to read any communication sent by the record-keepers on how they are addressing this provision and action required.
- Provide communication to your employee group who will potentially be impacted by this provision. intellicents has sample communication available for you to use.
- Use your intellicents consultants as a resource for SECURE 2.0 questions.

source: irs.gov