

**Insights**

## **SECURE 2.0 TRENDS AND KEY PLAN ELECTIONS FOR 2026**

Apr 22, 2026

2026 is a pivotal year for SECURE 2.0 compliance and plan design changes. Several provisions of SECURE 2.0 become operationally effective, and most plans will also face a year-end amendment deadline, making early plan sponsor decision-making critical.

### **KEY 2026 SECURE 2.0 TRENDS**

#### **ROTH-ONLY CATCH-UP CONTRIBUTIONS FOR HIGHER EARNERS**

Beginning January 1, 2026, employees with more than \$150,000 in prior-year FICA wages will be required to make all catch-up contributions on a Roth basis.

This requirement applies to workers age 50 and older and also affects the enhanced “super catch-up” contributions available to individuals ages 60–63. In 2026, the super catch-up allows for an additional \$11,250 above the standard contribution limit. For employees subject to the Roth-only catch-up rule, those super catch-up contributions must also be made on a Roth basis.

#### **CONTINUED EXPANSION OF LONG-TERM PART-TIME ELIGIBILITY**

The expansion of eligibility for long-term part-time employees continues to reshape plan participation requirements. Beginning in 2025 and continuing through 2026, employees who work at least 500 hours in two consecutive years must be permitted to make elective deferrals to their applicable retirement plan.

### **REQUIRED AMENDMENTS AND PLAN ELECTIONS FOR 2026**

For most plans, SECURE 2.0 amendments must be adopted by **December 31, 2026**. Retirement plan service and document providers are expected to issue amendment packages that include a combination of mandatory provisions and optional elections requiring employer decisions.

Because many SECURE 2.0 provisions are optional, plan sponsors will need to determine whether to adopt features such as:

- Enhanced catch-up contributions for ages 60–63;

- Emergency savings withdrawals;
- Roth employer contributions; and
- Self-certified hardship withdrawals

These decisions will vary by provider and plan design and may affect administration and participant communications. These amendments also provides an opportunity to reassess plan design— particularly where service and document providers take conservative default positions and plan sponsors may need to affirmatively opt in to desired features.

## **OPERATIONAL TRENDS AND EMPLOYER ACTION ITEMS**

Plan sponsors should confirm payroll and administrative readiness to implement Roth-only catch-up contributions for higher earners. This includes tracking prior-year FICA wages and ensuring catch-up amounts are routed correctly. Clear participant communication will also be critical for employees impacted by these changes.

Plan sponsors should also be mindful of anticipated increases to 2026 contribution limits, including:

- Standard deferral limit: \$24,500
- Age 50+ catch-up: \$8,000
- Total possible for ages 60–63 with super catch-up: \$35,750

In addition, plan sponsors should prepare for upcoming plan document restatements. Pre-approved defined contribution plans will need to incorporate SECURE 2.0 and prior legislative updates to remain audit-ready.

## **LOOKING AHEAD**

2026 will require plan sponsors to navigate both mandatory compliance changes and strategic design elections that can shape a plan's future. Reviewing amendment options early, coordinating closely with service providers, and confirming that payroll and administrative processes are aligned will be key to managing risk and avoiding last-minute implementation challenges.

With thoughtful planning, plan sponsors can not only meet SECURE 2.0 requirements but also position their plans to better support participants and long-term organizational goals.

## **RELATED CAPABILITIES**

- Employee Benefits & Executive Compensation

## MEET THE TEAM



### **Lisa A. Van Fleet**

Partner, St. Louis

[lisa.vanfleet@bcplaw.com](mailto:lisa.vanfleet@bcplaw.com)

[+1 314 259 2326](tel:+13142592326)



### **Mckenna E. Gossrau**

Associate, St. Louis

[mckenna.gossrau@bcplaw.com](mailto:mckenna.gossrau@bcplaw.com)

[+1 314 259 2707](tel:+13142592707)



### **Castles R. Hollis**

Partner and Practice Leader -  
Employee Benefits, Atlanta

[cass.hollis@bcplaw.com](mailto:cass.hollis@bcplaw.com)

[+1 404 572 6676](tel:+14045726676)



## **Robert John Lystad**

Partner, Atlanta

[robert.lystad@bclplaw.com](mailto:robert.lystad@bclplaw.com)

+1 404 572 6831

---

This material is not comprehensive, is for informational purposes only, and is not legal advice. Your use or receipt of this material does not create an attorney-client relationship between us. If you require legal advice, you should consult an attorney regarding your particular circumstances. The choice of a lawyer is an important decision and should not be based solely upon advertisements. This material may be "Attorney Advertising" under the ethics and professional rules of certain jurisdictions. For advertising purposes, St. Louis, Missouri, is designated BCLP's principal office and Kathrine Dixon ([kathrine.dixon@bclplaw.com](mailto:kathrine.dixon@bclplaw.com)) as the responsible attorney.