

2024 – Required Provisions

Provision	Description	Optional/ Required	Plan Types Impacted
Section 325 Roth plan distribution rules (eliminates the lifetime RMDs for Roth accounts under qualified plans)	<ul style="list-style-type: none"> Eliminates the requirement for participants in qualified plans to receive RMDs for Roth accounts in such qualified plans during their lifetime. That is, the Act brings the Roth RMD rules for qualified plans in line with the existing Roth IRA rules (i.e., no pre-death RMDs). 	Required	All qualified plans
Section 603 Elective deferrals generally limited to regular contribution limit	<p>All catch-up contributions are subject to Roth tax treatment (i.e., contributions are made on a post-tax basis, so income tax applies to the earnings upon distribution).</p> <ul style="list-style-type: none"> There is an exception for participants with compensation of \$145,000 or less. The Roth catch-up requirement does not apply to the 403(b) and 457(b) special catch-up. 	Required	<ul style="list-style-type: none"> 401(k) 403(b) 457(b) SIMPLE 401(k) SIMPLE IRA
Section 327 Surviving spouse election to be treated as employee	<ul style="list-style-type: none"> A surviving spouse may be elected to be treated as the deceased employee for purposes of the RMD rules 	Required	All qualified plans

2024 – Optional Provisions

Provision	Description	Optional/ Required	Plan Types Impacted
Section 314 Penalty-free withdrawal from retirement plans for individual in case of domestic abuse	<ul style="list-style-type: none"> Adds new Section 72(t)(2)(K), which provides that domestic abuse victims have a 1-year period to take a distribution (capped at the lesser of \$10,000 or 50% of account balance on a plan aggregation basis) from an eligible retirement plan. Abuse grounds include abuse of child or household member. Such amounts can be repaid. Victim can self-certify need. The distribution is not eligible for rollover treatment. 	Optional #8	<ul style="list-style-type: none"> 401(a) 401(k) 403(b) 457(b) IRAs

*Noteworthy provisions are highlighted in grey

2024 – Optional Provisions, continued

Provision	Description	Optional/ Required	Plan Types Impacted
Section 110 Treatment of student loan payments as elective deferrals for purposes of matching contributions	<ul style="list-style-type: none"> Allows such employees to receive matching contributions by reason of repaying their student loans. Matching contributions are with respect to “qualified student loan payments.” A qualified student loan payment is broadly defined as any indebtedness incurred by the employee solely to pay qualified higher education expenses of the employee. For purposes of the nondiscrimination test applicable to elective contributions, Section 110 permits a plan to test separately the employees who receive matching contributions on student loan repayments. These matching contributions must also vest under the same schedule as all other matching contributions. The participant must certify annually regarding the loan payments that authorize the matching contribution. 	Optional #9	<ul style="list-style-type: none"> 401(k) 403(b) 457(b) SIMPLE IRA
Section 115 Withdrawals for certain emergency expenses	<ul style="list-style-type: none"> Provides exception from 10% penalty for premature distributions if the distribution is used for emergency expenses. Expenses must be for unforeseeable or immediate financial needs relating to personal or family emergency. Plan sponsor may rely on participant self-certification of the emergency. 1 distribution per year up to \$1,000. Participant has option to repay the distribution within 3 years. No further emergency distributions permitted during 3-year payback period unless repayment occurs, or the participant makes elective contributions at least equal to the amount of the distribution. 	Optional #10	<ul style="list-style-type: none"> 401(a) 401(k) 403(b) 457(b) Traditional IRA
Section 120 Distributions: Auto-Portability	<ul style="list-style-type: none"> Prohibited transaction exemption for service provider providing automatic portability services, such as automatic transfer of a participant’s default IRA (established in connection with a distribution from a former employer’s plan) into the participant’s new employer’s retirement plan, unless the participant elects otherwise. 	Optional #11	Employer Sponsored Plans

*Noteworthy provisions are highlighted in grey

2025 – Required Provisions

Provision	Description	Optional/ Required	Plan Types Impacted
Section 501 Plan Amendments to Conform with SECURE 2.0	<ul style="list-style-type: none"> This provision allows plan amendments made pursuant to this bill to be made by the end of 2025 (2027 in the case of governmental plans) as long as the plan operates in accordance with such amendments as of the effective date of a bill requirement or amendment. Also extends SECURE 1.0 and CARES amendment dates. 	Required	All written plans impacted by SECURE 2.0

2025 – Optional Provisions

Provision	Description	Optional/ Required	Plan Types Impacted
Section 109 Higher catch-up limit for individuals age 60-63	Increases catch-up limit for participants age 60–63: <ul style="list-style-type: none"> To the greater of (1) \$10,000 and (2) 150% of the regular limit. Lower limit for SIMPLE plans of \$5,000 and 150%. The increased amounts are indexed for inflation for tax years beginning after December 31, 2025. 	Optional #14	DC plans with elective deferrals, such as 401(k), 403(b), 457(b)
Section 334 Allows retirement plan distributions to purchase long-term care insurance	<ul style="list-style-type: none"> Participant may withdraw annually up to the lowest of: <ol style="list-style-type: none"> \$2,500 (indexed); the actual amount of the long-term care premium; or 10% of the employee’s vested accrued balance. Exempt from early withdrawal penalties. Limited to policies that provide high-quality coverage (must include cost-of-living adjustment (COLA) and other features). Premium statement must be filed with plan. Insurer must file policy specifics with IRS. 	Optional #15	<ul style="list-style-type: none"> 401(a) 401(k) 403(b) 457(b) IRAs

*Noteworthy provisions are highlighted in grey

2027 – Required Provisions

Provision	Description	Optional/ Required	Plan Types Impacted
Section 103 Saver’s Match (and Section 104: Promotion of Savers Match)	<ul style="list-style-type: none"> Repeals and replaces the current credit for certain individuals who make IRA, retirement plan and Achieving a Better Life Experience Act (ABLE) account contributions. The new law changes the credit from a cash tax refund payment into a federal matching contribution that must be deposited into a taxpayer’s IRA or retirement plan. The match is 50% of the IRA or retirement plan contribution up to \$2,000 per individual. The match phases out at certain income levels. Section 104 requires Treasury to report back to Congress not later than July 1, 2026, on promotion and awareness efforts to low- and moderate-income taxpayers. 	Required	<ul style="list-style-type: none"> Employer sponsored plans IRAs ABLE accounts