



SECURE Act 2.0 Roth Catch-Up Compliance Checklist

1. Identify Impacted Employees

- Run payroll reports to determine employees with prior-year wages > \$150,000 (indexed annually).
- Flag these employees for Roth catch-up eligibility.

2. Coordinate with Retirement Record Keeper

- Confirm plan amendments to allow Roth catch-up contributions.
- Validate system readiness for Roth contributions and IRS reporting.
- Align contribution codes and limits with IRS requirements.

3. Update Payroll Systems

- Configure payroll codes for Roth catch-up vs. pre-tax catch-up.
- Ensure correct tax treatment and W-2 reporting.
- Test integration with record keeper systems.

4. Employee Communication

- Draft targeted communication for high earners explaining:
 - The \$150K threshold.
 - Roth catch-up requirement.
 - Election process and deadlines.
- Provide FAQs and support channels.

5. Monitor Effective Date & Compliance

- IRS transition relief: enforcement begins January 1, 2026.
- Track IRS updates and adjust processes accordingly.
- Schedule periodic audits to ensure compliance.

Resources

Fidelity, Vanguard, and other major providers have detailed guidance and FAQs on SECURE Act 2.0 provisions.