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How Plan Sponsors Can Prepare for the 2026 Amendment Deadline

For many nongovernmental 401(k) plans and 403(b) plans, the December 31, 2026, SECURE 2.0 amendment deadline is quickly approaching. While the deadline is often viewed as a plan document exercise, retirement plan sponsors should view it as a broader opportunity to review plan operations, confirm compliance, and evaluate whether recent legislative changes align with their organizationâ??s retirement benefits strategy.

The deadline generally applies to amendments related to the CARES Act, SECURE Act, SECURE 2.0 Act, the Bipartisan American Miners Act, and the Taxpayer Certainty and Disaster Tax Relief Act of 2020.

Why the 2026 Retirement Plan Amendment Deadline Matters

Many retirement plan provisions introduced since 2020 have already been implemented operationally. The amendment process is an opportunity to ensure those decisions are accurately reflected in plan documents and supported by administrative processes.

Plan sponsors should confirm their:

- Plan documents reflect operational changes already in place
- Payroll systems are administering provisions correctly
- Recordkeeper and TPA records are aligned with plan operations
- Optional provisions were properly adopted and implemented
- Legal and compliance reviews have been completed

Failure to align documentation and operations can create unnecessary compliance risks and administrative challenges.

Key SECURE 2.0 Provisions to Review

As part of the amendment process, plan sponsors may want to revisit several provisions that can have a meaningful impact on plan administration and participant outcomes, including:

- Long-term part-time employee eligibility
- Roth catch-up contributions
- Automatic enrollment requirements for new plans
- Required minimum distribution (RMD) age changes
- Student loan matching contributions
- Emergency savings account features
- Expanded Roth contribution options
- Enhanced catch-up contribution limits

Not every provision applies to every plan, but reviewing these changes can help sponsors ensure their plan design remains aligned with organizational goals and workforce needs.

Questions Plan Sponsors Should Be Asking Now

With the deadline approaching, plan fiduciaries should begin evaluating several key questions:

1. Which required and optional provisions has the plan already implemented?
2. Are plan documents, payroll systems, and recordkeeper administration fully aligned?
3. Has the planâ??s document provider, recordkeeper, or TPA provided an amendment timeline?
4. Are there optional provisions worth reconsidering as part of a broader plan design review?
5. Has ERISA counsel reviewed the amendment before execution?

Addressing these questions early can help avoid last-minute issues and create more time for thoughtful decision-making.

Start Planning Early

Retirement plan amendments often require coordination among multiple service providers, including recordkeepers, TPAs, payroll vendors, and ERISA counsel. Waiting until the end of 2026 could limit flexibility and create unnecessary administrative pressure.

Instead, plan sponsors should begin reviewing their amendment requirements now, confirm past operational decisions, and work with their advisors and legal counsel to develop a clear implementation strategy.

The upcoming SECURE 2.0 amendment deadline for 401(k) and 403(b) plans is more than a compliance requirement. Itâ??s an opportunity to verify plan administration, evaluate plan design enhancements, and position the retirement plan to better serve participants in the years ahead.

Source:

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