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FIDUCIARY BRIEF

SECURE 2.0 in 2026: Three Deadlines Your Plan Can't Miss

Most plan sponsors think SECURE 2.0 compliance is done. It isn't — and 2026 is the year several major provisions stop being optional.

WHY IT MATTERS NOW

Three SECURE 2.0 requirements are active or landing this year, and plans that haven't adjusted their payroll systems, plan documents, or recordkeeper settings may already be operating outside current law. Formal plan amendments aren't due until December 31, 2026 for most calendar-year plans — but operational compliance is required now, which means fiduciary exposure starts well before the paperwork deadline.

THE THREE PROVISIONS TO CHECK

Provision	What Changed	Who's Affected
Mandatory Roth catch-up	Participants earning $150,000+ in FICA wages must make all catch-up contributions on a Roth (after-tax) basis	High earners age 50+
Enhanced catch-up limits	Participants ages 60–63 can contribute up to $11,250 in catch-up contributions (vs. $8,000 standard)	Employees nearing retirement
Mandatory auto-enrollment	New 401(k)/403(b) plans established after 12/29/2022 must include an Eligible Automatic Contribution Arrangement with a 3–10%+ escalating default rate	Newly established plans

WHAT THIS MEANS FOR YOUR PLAN

- If your plan offers Roth contributions but hasn't confirmed your recordkeeper is correctly routing high-earner catch-ups to Roth, you may have an operational compliance gap right now.
- If your plan was established after December 2022, confirm your auto-enrollment default rate and escalation schedule match the statutory minimums — plan documents that predate this rule may not reflect it.
- A new requirement also takes effect this year: plans must provide at least one paper benefit statement annually unless a participant has affirmatively elected electronic delivery.

CWM'S TAKE

Compliance gaps like these rarely surface until a participant complaint or DOL inquiry brings them to light — by which point the fiduciary exposure has already accrued. A plan review that checks these three items against your actual plan documents and payroll configuration takes less time than most sponsors expect.

Curious whether your plan is fully aligned? A complimentary CWM Fiduciary Benchmarking Study will confirm it.

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