

ROTH CATCH-UP REPORTING CHECKLIST FOR EMPLOYERS

Communicate with Employees

- ☐ Notify affected employees of Roth catch-up requirement.
- ☐ Provide clear instructions for opting out or adjusting deferrals.
- ☐ Include Roth catch-up details in annual enrollment materials.

Coordinate with Plan Providers

- ☐ Share Roth catch-up eligibility data with recordkeepers (investment company) or TPAs.
- ☐ Confirm systems are ready to accept Roth catch-up contributions.
- ☐ Verify that plan documents support Roth catch-up provisions.

Reporting and Documentation

- ☐ Maintain documentation of eligibility determinations.
- ☐ Retain employee opt-out elections for audit purposes.
- ☐ Prepare for annual reporting as required (pending final guidance).

Plan Amendments

- ☐ Amend plan documents to reflect Roth catch-up rules by December 31, 2026.

Please reach out directly to your Third Party Administrator if you have any questions at [\(320\) 214-2909](tel:3202142909) about Roth Catch-up Contribution Requirements for High Earners starting January 1, 2026.