Washington Pulse

Practical and Tactical Actions for Plan Sponsors

Agenda

- Department of Labor (DOL) and IRS enforcement update
- Administration's retirement-related initiatives
- Legislation related to retirement plans and tax reform
- Industry hot topics
- Conclusion

Learning Objectives

- Quantify the enforcement efforts of the DOL
- Understand the IRS and DOL's top enforcement priorities for retirement plans and IRAs
- Comprehend the retirement-related initiatives coming from Washington
- Identify current hot topics in the industry and know key points

DOL and IRS Enforcement Update

DOL 2025 Enforcement Results[1]

$1.4B	**687**	**878**	**253**
2025 monetary results	full-timers assigned to enforcement	civil investigations closed	criminal investigations closed

- 63% of the plans were required to restore losses to the plan or take another type of corrective action to correct plan deficiencies
- 45 individuals (e.g., plan officials, corporate officers and service providers) were indicted for crimes against their plans
- Priorities: Cybersecurity assistance and implementing SECURE Act 2.0 provisions

[1] EBSA FY 2025 Fact Sheet

DOL Top Compliance Concerns

1. Fiduciaries that didn't know and/or don't fulfill their duties
2. Late deposit of deferrals
3. Excessive fees
4. Plan sponsor bankruptcies
5. Abandoned plans
6. Missing participants
7. Hard to value assets
8. Cybersecurity

IRS Top 10 Compliance Concerns

1. Failure to amend the plan for tax law changes
2. Failure to follow the plan's definitions of compensation
3. Failure to include eligible (or exclude ineligible) employees in the plan
4. Plan loans that don't comply with IRC 72(p)
5. Impermissible in-service withdrawals
6. Failure to satisfy RMD rules
7. Employer eligibility failures
8. Failed ADP/ACP nondiscrimination tests and not corrected on time
9. Failure to properly provide the minimum top-heavy benefit or contribution to non-key employees
10. Failure to satisfy IRC Sec. 415 limits

Administration's Retirement-Related Initiatives

Broad Shift Toward De-Regulation

January 20, 2025	60-Day regulatory freeze
January 31, 2025	10-to-1 Deregulation Order
February 19, 2025	Review of agency rules for overreach
Impact:	Potential rollback of several retirement-related regulations

Affected Regulations for Retirement Plans

Fiduciary investment advice	2024 rule vacated March 2026; New rule May 2026?
ESG Rule	2022 rule not being enforced; New, more restrictive rule, Macy 2026?
Cryptocurrency & other Alternative assets	Seen in more favorable light

Timeline of Fiduciary Rules: 2020-2026

06/29/2020—DOL publishes "fiduciary rule package"

12/2020—DOL finalizes PTE 2020-02, effective 02/16/2021

6/30/2020—SEC's Regulation Best Interest compliance deadline

2/16/2021—PTE 2020-02 takes effect

10/25/2021—DOL FAB 2021-02 extends nonenforcement of parts of PTE 2020-02

2/01/2022 must comply with impartial conduct standards and

7/01/2022 must comply with rollover documentation and disclosures

10/2023—DOL released notice of proposed rulemaking

4/2024—DOL released final regulations and amended PTEs

7/2024 federal court orders stays 9/24/2024 effective date

9/2024 DOL appeals federal court order

2/2025 60-day DOL abeyance and presidential freeze on regulations

4/2025 DOL files motion to pause its appeal

7/2025 Federal Court vacates "one-time" rollover as advice

8/2025 DOL seeks further delay to 10/2025

11/2025 Federal court dismisses appeal of delay

DOL requests and federal court vacates the 2024 rule

Tentative: May 2026 DOL to issue new rule

Practical and Tactical Actions: DOL Final Fiduciary Advice Rules

What does it all mean?

- The 2024 final rules are officially vacated (no longer enforceable).
- For now, the investment advice fiduciary "Five-Part Test" continues in force, as well as existing PTEs, without the latest amendments.
- PTE 2020-02 (unamended)
  - Care and loyalty obligations in providing "best interest" advice
  - "Impartial Conduct Standards"
  - Other protective conditions
- PTE 84-24 (unamended): Broad-based exemptive relief for transactions involving the sale of insurance and annuities to ERISA plans and IRAs.
- Information Bulletin 96-1 Participant Investment Education
  - Still valid
  - Education without advice

DOL ESG Rules

Timeline

- May 28, 2025, the government ceased to defend the current ESG regulations in Fifth Circuit litigation
- DOL will reissue fiduciary guidance (agenda says May 2026), like the prior Trump administration's 2020 regulations
- "Tie-breaker" rule likely to be thrown out
- Focus will likely be exclusively on "pecuniary issues"

DOL ESG Rules

Practical and Tactical Actions

- As with other investment options, plan sponsors are held to a high standard when evaluating and documenting their ESG fund selections.
- No consistent definition of ESG exists, therefore…
  - The committee needs to create a clear definition of what constitutes and ESG fund.
  - Next, what metrics are used to assess if a fund meets the committee's ESG definition?
  - How is performance and ongoing adherence to the definition monitored?
  - Is the monitoring data from a non-conflicted source?
- Update the IPS

Alternative Assets in DC Plans

Timeline

- May 2025 Compliance Assistance Release No. 2025-01: EBSA Now Takes Neutral Stance on Cryptocurrency
  - No longer cautioning plan fiduciaries to exercise “extreme care” before adding cryptocurrency options to 401(k) plan menus
- August 2025 Executive Order: “Democratizing Access to Alternative Assets for 401(k) Investors”
  - DOL to clear way to include alternative investments in DC plans
  - Remove any regulatory stigma attached to the inclusion of “alternative assets” in an asset allocation fund (e.g., a target date or balanced fund); and
  - Relieve any litigation risk with respect to appropriately structured investments in alternative assets.
  - DOL rescinds informal guidance that cautioned small-plan fiduciaries against offering private equity to plan participants
- January 13, 2026: DOL submits proposed rule for review: “Fiduciary Duties In Selecting Investment Alternatives”

SECURE Act 2.0 Provisions for 2026

SECURE 2.0 Provisions Effective 2026

Roth mandatory catch-up contributions for high-income participants

- Catch-up contributions for employees earning above the $150,000 FICA wage threshold must be made on an after-tax Roth basis.
- $150,000 in FICA wages, Box 3 on Form W-2, prior year
  - Sole proprietors and partners excluded (no FICA wages)
  - Consider only FICA wages from the sponsoring employer, not aggregated across affiliates, unless elected
- Catch-up contributions are optional.
- Designated Roth contributions are optional.
- If a plan does not offer a Roth option, participants above the threshold cannot make catch-up contributions.

SECURE 2.0 Provisions Effective 2026

Required paper benefit statements

- Unless a participant elects otherwise, DC plans must provide paper benefit statements at least once annually, and DB plans must do so every 3 years
- Participants may opt out of paper statements
- The DOL released a proposed rule to amend its existing 2002 and 2020 electronic disclosure safe harbor regulations to address paper benefit statements.
  - Comments were due by April 27, 2026.
  - The rules would take effect after finalization.

SECURE 2.0 Provisions Effective 2026

New 10% early withdrawal penalty exception for LTC insurance premiums

- Section 334 of SECURE Act 2.0 created a new exception to the 10% early distribution penalty under IRC §72(t) for withdrawals used to pay premiums for long-term care (LTC) insurance
- Applies to distributions on or after December 30, 2025
- Amount is the lesser of
  - $2,500,
  - The amount paid by the participant for premiums, or
  - An amount equal to 10% of the present value of the vested accrued benefit of the employee under the plan.
  - Insurance coverage must be for the participant, participant's spouse, or other family member

Most Plan Amendments Due December 31, 2026

Notice 2024-02

Qualified Plans

- Non-governmental qualified plans must be amended by December 31, 2026.
- Applicable collectively bargained plans have until December 31, 2028.
- Governmental plans (section 414(d)) have until December 31, 2029.

Section 403(b) Plans

- Non-public school 403(b) plans must be amended by December 31, 2026.
- Applicable collectively bargained plans of tax-exempt organizations have until December 31, 2028.
- Public school 403(b) plans have until December 31, 2029.

Eligible Governmental Plans

- The deadline for eligible governmental plans is the later of December 31, 2029, or the first day of the first plan year beginning more than 180 days after the date of notification regarding inconsistent administration with section 457(b) of the Code.

IRA Amendments

Notice 2024-02

IRAs:

- The deadline for amending the trust governing an IRA or the contract issued by an insurance company for an IRA is December 31, 2026, or a later date prescribed by the Secretary.
- The deadline for amending deemed IRA provisions is the same as the deadline for the plan under which the deemed IRA is established.

Legislation Related to Retirement Plans and Tax Reform

Public Law 119-21 “OBBBA”

One Big Beautiful Bill Act

- Signed July 4, 2025
- Contained necessary budget reconciliation provisions
- Extends and expands some provisions of the 2017 Tax Cuts and Jobs Act
- Among other things, the new law
    - Preserves the current favorable tax treatment of employer-provided health insurance and retirement plans,
    - Expands Health Savings Accounts (HSAs) with several enhancements,
    - **Creates “Trump Accounts” for children**
    - Expands Qualified Small Business Stock exclusion of gains
    - Enhances Achieving a Better Life Experience (ABLE) accounts, and
    - Expands the definition of qualified higher education expenses for 529 plans.

Public Law 119-21 “One Big Beautiful Bill Act”

Trump accounts for U.S. children

- Trump Accounts are tax-advantaged savings accounts (like a traditional IRA) for children created under the BBB 2025
- First accounts allowed July 4, 2026
- Eligible individuals are those who have not attained age 18 before the close of the calendar year and who have a Social Security number
- Basic framework (Notice 2025-68)
  - A $5,000 annual contribution limit,
  - A $2,500 employer contribution,
  - A $1,000 government seed contribution for children born 2025–2028,
  - Limited investments
  - No deductions for contributions, and
  - Distributions are prohibited before age 18.
- Established using Form 4547 or Online Form 4547.

Retirement Fairness for Charities and Educational Institutions Act of 2025

H.R. 1013 and S 424

- Would change securities laws to allow 403(b) plans to invest in collective investment trusts (CITs) and certain insurance company separate accounts
- Identical bills
- H.R. 1013 was introduced in the House by Rep. Frank Lucas (R-OK) on February 5, 2025. As of May 20, 2025, it was ordered reported by the House Financial Services Committee.
- S. 424 was introduced in the Senate by Sen. Katie Britt (R-AL) on February 6, 2025, with bipartisan co-sponsors

Retirement Savings for Americans Act

H.R. 2696 and S. 1526 Reintroduced in 2025

Would create “The American Worker Retirement Plan” (AWRP)

- Aims to assist gig workers, part-time employees, and others lacking access to traditional retirement plans
- Portable, tax-advantaged accounts
- Automatic enrollment
- Government matching contributions
- Investment options similar to Thrift Savings Plan

Helping Young Americans Save for Retirement Act

S. 1707 and H.R. 4718

- Would require 401(k) plan sponsors to allow employees as young as 18 to make contributions
- Not applicable to part-time employees
- Nondiscrimination and top-heavy rules would not apply
- Not counted towards the audit requirement for Forms 5500 initially

Protecting Prudent Investment of Retirement Savings

H.R. 2988

- Clarifies that financial institutions must base investment decisions solely on economic factors.
- States that the decision to exercise a shareholder right is subject to the prudence and loyalty duties under ERISA.
- States that proxies held by ERISA plans must be voted in the economic interest of the plan
- Declares that race, color, religion, sex, or national origin may not be taken into consideration when selecting a fiduciary, counsel, employee, or service provider of an ERISA plan.
- Implements a notice requirement on defined contribution plans explaining the difference between choosing from investments selected by ERISA fiduciaries and choosing from investments through a brokerage window.
- Introduced by Representative Rick Allen (R-GA); passed the House on Jan. 15, 2026

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Other Bills

- **Retirement Simplification and Clarity Act (H.R.6324)**
  - Would allow in-service rollovers at age 50 to I.R. Annuities
- **Small Nonprofit Retirement Security Act (S.2365/H.R.4548)**
  - Makes plan startup credits available to tax-exempt businesses
- **Women's Retirement Protection Act (S.988/H.R.2023)**
  - Strengthens spousal protections under defined contribution plans.
- **Protecting Americans' Retirement Savings Act (S.928/H.R.2067)**
  - Would restrict retirement plan investments of foreign adversaries and sanctioned entities

Other Bills

- **The Retirement Rollover Flexibility Act** (HR 6450 and S.3352)
  - o Would allow individuals to roll Roth IRA assets into designated Roth accounts in 401(k), 403(b), or governmental 457(b) plans.
- **Emergency Savings Enhancement Act of 2025** (HR 6417 and S 3333)
  - o Would increase PLESAs limits from $2,500 to $5,000, expand eligibility to include HCEs, and reduce administrative burden.
- **Form 5500 Filing Simplification Act ([HR 7362]())**
  - o Would reduce Form 5500 complexity and redundancies.
- **Independent Retirement Fairness Act (S.2217)**
  - o Allows independent workers to join pooled plans and broaden SEP access.

Industry Hot Topics

2027 to Bring New Ways to Save

Trump Federal Plan and Saver's Match

- State of the Union Address: Allow individuals without workplace plan coverage to save through a low-cost national retirement account structure.
  - A federal matching contribution of up to $1,000 per year to qualifying accounts
  - May use income-based eligibility
  - Details are sketchy at this point.

- SECURE Act 2.0 Saver's Match
  - Beginning in 2027, the Saver's Match will allow eligible individuals to receive a federal matching contribution deposited directly into their IRAs or employer retirement plans when they make contributions.
  - Formerly, the Saver's Credit

USPS Changes "Timely Mailed, Timely Filed" Rule

"Postmark" reflects the date an item reaches the first USPS processing facility

- Affects the "timely mailed, timely filed" rule under IRC §7502.
- Effective December 24, 2025, a postmark now reflects the date an item is received at the first USPS processing facility—*not the date the item is deposited at a local post office, mailbox, or retail counter.*
- Self-service postage labels and online "Click-N-Ship" labels do not qualify as postmarks for purposes of establishing timely mailing.
- The change impacts
  - Tax returns, payments, and extensions;
  - Benefit claims and appeals where administrative deadlines often hinge on postmark evidence;
  - Compliance and reporting filings that require mailed submissions by a specific date; and
  - ERISA-required notices and communications that are mailed.

ERISA Litigation Reform

- Daniel Aronowitz, confirmed as new head of the Employee Benefits Security Administration (EBSA)
  - President of a fiduciary liability insurance firm
  - Regular critic of plaintiffs' attorneys suing plan administrators
- Supreme Court Decision in *CASEY CUNNINGHAM, ET AL., PETITIONERS v. CORNELL UNIVERSITY, ET AL.*
  - In their initial pleading, plaintiff does not have to address whether an exemption applies—only that a PT took place.
  - Clarifies the pleading standards for PT claims, potentially making it easier for plaintiffs to bring such cases.
  - Resolves a circuit split, providing a uniform standard across federal courts.
  - May lead to increased scrutiny of retirement plan fiduciaries and their management practices.

How Lower Courts Screen Claims — Before and After Cornell

Step	Before Cunningham (Some Circuits)	After Cunningham (Supreme Court Rule)
1. Complaint filed	Plaintiffs had to allege detailed facts, such as why fees were too high, or services were not needed.	Plaintiffs only need to allege that a prohibited transaction occurred; they do not need to address legality or exemptions at this stage
2. Motion to Dismiss[1]	Cases could be dismissed if plaintiffs did not refute possible defenses (e.g., "fees were reasonable").	Cases should proceed unless clearly invalid on their face; affirmative defenses like "reasonable fees" come later.
3. Discovery	Some cases never reached Discovery because they were tossed out before evidence was exchanged.	Plaintiffs now may gather evidence about fees, services, and fiduciary decisions during discovery.
4. Summary Judgement[2]	Defendants could win by showing now dispute about the facts.	The same rule applies, but only after both sides have had a fair chance to collect evidence.
5. Trial	Rare, many ERISA claims did not survive dismissal.	More cases are expected to survive to trial or settlement, as fewer are dismissed early.

Example: *Williams-Linzey et. al. v. Empower Advisory Group* (3:25-cv-14660; New Jersey)

[1] One party argues that there is no real dispute about the key facts of the case and that they are entitled to win as a matter of law.
[2] A pre-trial ruling granted when the evidence shows no genuine dispute of material fact, allowing the judge to decide the case legally without a full trial.

Plan Forfeitures

Growing trend of litigation scrutinizing forfeiture usage in 401(k) plans

- Case law is mixed, but tending to favor plan sponsors
  - [Hutchins v. HP Inc., No. 5:23-cv-05875-BLF (N.D. Cal. Feb. 5, 2025)]-- Plan fiduciaries did not violate their ERISA duties by using forfeited plan assets to reduce employer contributions
  - *Becerra v. Bank of America Corporation, et al*—Court sided with the plaintiff, finding that a claim that the use of committee discretion to allocate forfeitures to reduce employer contributions rather than to pay plan expenses violated ERISA
- Most courts and regulators continue to uphold the long-standing practice of using forfeitures to offset employer contributions, provided plan document language allows it, and employer discretion is minimized.

Cybersecurity and Retirement Plans

Lawsuits

- 2020 lawsuit: *Bartnett v Abbott Laboratories et al.*, No. 2020 CV 2127, (N.D. Ill. filed April 3, 2020)
  - Plaintiff seeking to recover $245,000, plus interest and other fees for the alleged breaches of fiduciary duty
  - Hacker gained access to the participant's online retirement account
- 2024 settlement $8.7M *Sherwood, et al v Horizon Actuarial*
  - Cybercriminals breached two servers of Horizon
  - More than 100,000 participants in 25 different multi-employer plans administered by Horizon were affected in the breach

Cybersecurity and Retirement Plans

DOL Best Practices

- The DOL requires plan sponsors to ensure the electronic systems they use for plan administration keep participants' personal information confidential.
- No comprehensive federal regulatory regime to provide guidance
- DOL has three cybersecurity "best practices"
    - Tips for Hiring a Service Provider
    - Cybersecurity Program Best Practices
    - Online Security Tips
- Compliance Assistance Release No. 2024-01 clarified that cybersecurity guidance applies to employee retirement plans and health and welfare plans.
- Financial advisors can play a critical role in supporting their plan sponsor clients in this new area of concern.

In-Plan Lifetime Retirement Income Solutions

Greenwald In-Plan Insights Program

- 83% of participants think employers should offer in-plan income options.
- Sponsors recognize the benefit but express concerns about complexity (59%), higher fees, and administration overhead.
- 1 in 3 plans already offer an in-plan option, with 37% considering

Practical & Tactical Actions:
In-Plan Lifetime Retirement Income Solutions

Questions and considerations

- Does the plan sponsor offer a DB plan?
  - If so, the DB plan is likely the primary retirement plan, and the DC plan can serve as an ancillary arrangement.
  - In addition, the DB plan can be structured to receive DC assets to augment retirement income.
- Are lifetime retirement income products available to the participant through an IRA or similar arrangements that are comparable to what is available in a DC plan?
- Are there cost savings if the lifetime retirement income product is purchased through the plan?
- Does the plan document permit lifetime retirement income products?
- Will the IPS need to be amended to include retirement income evaluation, selection, and monitoring language?

Opportunity for Alternative Investments

- May 2025 DOL releases Compliance Assistance Release No. 2025-01
  - EBSA now takes a neutral stance on cryptocurrency
  - Rescinds 2022 guidance Compliance Assistance Release No. 2022-01
- August 7, 2025, President releases Executive Order: "Democratizing Access to Alternative Assets for 401(k) Investors"
  - Directs federal agencies (e.g., DOL, SEC, IRS) to re-evaluate regulations and guidance that have historically discouraged or prevented defined contribution plans from offering alternative assets
  - Includes broad definition of "alternative assets," including private equity, private credit, real estate, and digital assets like cryptocurrency
- August 12, 2025, DOL rescinds 2021 supplemental statement on alternative assets in 401(k) plans
  - Cautioned small-plan fiduciaries against offering private equity to participants
  - DOL 2020 information letter still valid: Allows fiduciaries to offer a professionally managed asset allocation fund with a private equity component as a designated investment alternative in a 401(k) plan

Practical & Tactical Actions: Alternative Assets

Questions and considerations

- As always, plan fiduciaries should make plan investment decisions that are in the best interests of plan participants by applying ERISA's standards of prudence, loyalty, and diversification
- Stay informed and monitor guidance
  - Track DOL upcoming guidance (currently under review).
  - Monitor SEC developments around accredited investor definitions, disclosure, and fund structures.
  - Watch how large recordkeepers and asset managers roll out products.
- Don't rush to add alternatives or crypto to the lineup
  - Use this transition period to shore up the governance process, engage providers, prepare your IPS, and train committee members for the possibility.
  - Early adopters should focus on institutional-quality vehicles with transparency, liquidity, and education support.
- Seek expert guidance and support.

Don’t Overlook the Impact of Family Attribution Changes

Took effect in 2024

- May disregard community property laws for ownership attribution
- Removed attribution through minor children
- Example:
  - Chrissy and John are a married couple in CA, a community property state.
  - John owns 100% of a piano company, and Chrissy owns 100% of a modeling firm.
  - Each company has its own retirement plan, with different contribution formulas.
  - Before 2024, under CA community property laws, John was considered a 50% owner of Chrissy's company, and vice versa. This meant their two separate businesses were considered a single controlled group, which made plan administration more difficult.
  - For 2024 and later years, SECURE 2.0 disregards community property laws for this purpose.
  - John’s and Chrissy’s businesses are no longer treated as a controlled group.
  - Now each can maintain a separate 401(k) plan, with plan designs and nondiscrimination tests based only on their individual company's employees.

2026 IRA Limits

IRA Limits	2026	2025	2024
IRA Contribution Limit	$7,500	$7,000	$7,000
IRA Catch-Up Contributions	$1,100	$1,000	$1,000
Joint Return covered by workplace retirement plan	$129,000–$149,000	$126,000–$146,000	$123,000–$143,000
Single or Head of Household covered by workplace retirement plan	$81,000–$91,000	$79,000–$89,000	$77,000–$87,000
Joint Return spouse not covered by workplace retirement plan	$242,000–$252,000	$236,000–$246,000	$230,000–$240,000
Married filing separately covered by workplace plan	$0–$10,000	$0–$10,000	$0–$10,000
Roth IRA Joint Return	$242,000 – $252,000	$236,000 – $246,000	$230,000–$240,000
Roth IRA Single or Head of Household	$153,000 – $168,000	$150,000 – $165,000	$146,000–$161,000
Roth IRA Married filing separately	$0–$10,000	$0–$10,000	$0–$10,000

2026 Retirement Plan Limits

Employer Plan Limits	2026	2025	2024
Elective Deferral Limit (401(k), 403(b), 457(b) and SARSEP)	$24,500	$23,500	$23,000
Age 50 Catch-Up Contribution Limit	$8,000	$7,500	$7,500
Roth Catch-Up Threshold (NOTE: Reflects FICA wages paid in 2025)	$150,000	N/A	N/A
Ages 60-63 Catch-Up Limit	$11,250	$11,250	N/A
Annual Defined Benefit Limit	$290,000	$280,000	$275,000
Annual Defined Contribution Limit	$72,000	$70,000	$69,000
Annual Compensation Limit	$360,000	$350,000	$345,000
Highly Compensated Employee Dollar Threshold	$160,000	$160,000	$155,000
SIMPLE Standard Contribution Limit	$17,000	$16,500	$16,000
SIMPLE Small Employer Special Contribution Limit	$18,100[1]	$17,600[1]	$17,600
SIMPLE Standard Age-50 Catch-Up Contribution Limit	$4,000	$3,500	$3,500
SIMPLE Small Employer Special Age-50 Catch-Up Contribution Limit	$3,850[2]	$3,850[2]	$3,850
SIMPLE Age 60-63 Catch-Up Contribution Limit	$5,250	$5,250	N/A
SEP Coverage Minimum Comp.	$800	$750	$750
SEP Compensation Limit	$360,000	$350,000	$345,000
Top-Heavy Key Employee Comp.	$235,000	$230,000	$220,000
Social Security Taxable Wage Base	$184,500	$176,100	$168,600
ESOP maximum amount subject to a 5-year distribution period	$1,455,000	$1,415,000	$1,380,000
ESOP maximum amount for lengthening of the 5-year period	$290,000	$280,000	$275,000

1For SIMPLE plans with 25 or fewer employees and SIMPLE plans with 26-100 participants if 4% match or 3% nonelective employer contribution provided

2For SIMPLE plans with 25 or fewer employees and SIMPLE plans with 26-100 participants if 4% match or 3% nonelective employer contribution provided

HSA Dollar Limits Increase for 2026

Revenue Procedure 2025-19

Account Type	2025 Limit	2026 Limit	Change
HSA Contribution Self-Only	$4,300	$4,400	+$100
HSA Contribution Family	$8,550	$8,750	+$200
HSA Catch-up (Age 55+)	$1,000	$1,000	No Change
HDHP Minimum Deductible: Self	$1,650	$1,700	+$50
HDHP Minimum Deductible: Family	$3,300	$3,400	+$100
HDHP Max Out-of-Pocket: Self	$8,300	$8,500	+$200
HDHP Max Out-of-Pocket: Family	$16,600	$17,000	+$400
Excepted Benefit HRA Max	$2,150	$2,200	+$50

Conclusion

- DOL enforcement remains a priority despite budget constraints
- Administration shifting to deregulation and reduced litigation
- But Supreme Court decision may allow more cases to survive to trial or settlement
- 2026
  - Prepare for Roth mandatory catch-up contributions for high-income participants
  - Paper benefit statements
  - Distributions for LTC insurance premiums
  - SECURE 2.0 amendments due end of 2026 plan year (2029 for governmental plans)
- Hot topics
  - Use of plan forfeitures
  - Cybersecurity
  - Lifetime income solutions
  - Alternative assets

Any questions?

[Meeting Name]

[Date]