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IRS finalizes rules for SECURE 2.0 “super catch-up” contributions

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In this article

[SECURE 2.0's super catch-up limit](#) | [Universal availability requirement](#) | [Applicability date and good-faith compliance](#) | [Related resources](#)

IRS has finalized its [regulations](#) on the optional higher “super catch-up” contribution limit for defined contribution plan participants ages 60-63 under the SECURE 2.0 Act of 2022 ([Div. T of Pub. L. No. 117-328](#)). The final regulations generally track what IRS proposed earlier this year, with a handful of clarifications. Though plans can allow super catch-up contributions starting in 2025, the regulations don't apply until the 2027 tax year. Plans can follow the regulations sooner but, in any case, must comply with the statutory provisions in good faith until the regulations apply.

The regulations also address SECURE 2.0's other change to the catch-up contribution rules for employer-sponsored plans: the new requirement that catch-up contributions — including super catch-ups — by certain high-earning employees must be made as designated Roth contributions. That portion of the regulations is addressed in [IRS finalizes rules on Roth catch-up mandate for high earners](#) (Sept. 23, 2025).

SECURE 2.0's super catch-up limit

Catch-up contributions are elective deferrals exceeding the Internal Revenue Code (IRC) annual limit on elective deferrals (i.e., the Section 402(g) limit for 401(k) and 403(b) plans and the Section 457(e)(15) limit for governmental 457(b) plans), the limit on annual additions under Section 415(c) or a lower limit set by the plan. Before SECURE 2.0, the IRC allowed all participants ages 50 and older to make catch-up contributions up to a single annual dollar limit. For tax years starting in 2025 and later, SECURE 2.0 increases the catch-up limit for participants turning age 60, 61, 62 or 63 during the year. These higher amounts are commonly known as super catch-up contributions.

Both the regular and super catch-up contribution limits are adjusted for inflation. In 2025, the regular catch-up limit is \$7,500, and the super catch-up limit is \$11,250 (Mercer projects the limits will increase to \$8,000 and \$12,000, respectively, for 2026).

SECURE 2.0 makes a similar change to the catch-up contribution limits under savings incentive match plans for employees (SIMPLE plans), but those catch-up contributions are beyond the scope of this article.

Super catch-up limit is optional. In [proposed regulations](#) issued last January, IRS confirmed that plans aren’t required to offer super catch-up contributions to participants turning ages 60-63. IRS said plans can “limit the catch-up contributions for those participants to the same applicable dollar catch-up limit that applies for all other catch-up eligible participants.” IRS generally reiterates this position in the preamble to the final regulations.

However, employers that are part of a controlled group may have less flexibility in deciding whether to offer super catch-up contributions. The preamble to the final regulations says that if any plan in a controlled group offers super catch-up contributions, then all plans in the controlled group generally must do so to comply with the universal availability requirement for catch-up contributions (discussed [below](#)).

Special catch-up contributions under 403(b) plans. Certain 403(b) plans can allow employees with at least 15 years of service to make special catch-up contributions. The preamble to the final rule explains that these employees can make those special catch-up contributions in addition to super catch-up contributions in the years they turn age 60, 61, 62 or 63.

Plan amendments. The preamble also says IRS expects plan documents to clearly state whether the super catch-up limit is available. If a plan amendment is needed, it is subject to the same amendment deadline as SECURE 2.0’s other changes — i.e., Dec. 31, 2026, except governmental and collectively bargained plans may have more time (see [After empty 2023 RA List, IRS delays amendment deadlines for new laws](#) (Dec. 21, 2023)).

Universal availability requirement

After SECURE 2.0’s enactment, many employers and administrators were unsure how a rule in the [IRC](#) and IRS’s [regulations](#) known as the “universal availability requirement” applied to the super catch-up limit. Broadly, this rule says a plan that offers catch-up contributions will not satisfy the nondiscrimination rules unless all catch-up-eligible participants are provided with an effective opportunity to make the same dollar amount of catch-up contributions (though certain exceptions apply — e.g., for collectively bargained employees). This requirement generally applies to all plans sponsored by employers in the same controlled group.

If a plan offers super catch-up contributions, participants turning ages 60-63 can make catch-up contributions up to a higher dollar amount than other catch-up-eligible participants. This appears to violate the universal availability requirement. To address this situation, the final regulations say plans offering super catch-up contributions won’t violate universal availability if all catch-up eligible participants

can defer up to the statutory dollar amount that applies to them under the IRC. The regulations include two exceptions to this rule:

- A plan won’t be considered to violate the universal availability requirement merely because collectively bargained employees can’t make catch-up contributions or can’t make them to the same extent as other employees.
- A plan that’s dual-qualified under the US and Puerto Rico tax codes won’t violate the requirement if participants who are subject to the Puerto Rico code are limited to making catch-up contributions up to that code’s limit (\$1,500, not indexed for inflation).

Applicability date and good-faith compliance

The super catch-up limit took effect in 2025. However, the regulations generally don’t apply until the 2027 and later tax years. Plans must comply with the statutory provisions in good faith until the regulations apply and can elect to follow the final regulations for the 2025 and 2026 tax years. Unlike the Roth catch-up contribution mandate for high earners, the portion of the regulations on super catch-up contributions do not have a later applicability date for governmental and collectively bargained plans.

Related resources

Non-Mercer resources

- [Final regulations](#) (Federal Register, Sept. 16, 2025)
- [News release](#) (IRS, Sept. 15, 2025)

Mercer Law & Policy resources

- [User’s Guide to SECURE 2.0](#) (regularly updated)
- [IRS finalizes rules on Roth catch-up mandate for high earners](#) (Sept. 23, 2025)
- [IRS confirms SECURE 2.0 age 60-63 “super catch-ups” are optional](#) (Jan. 10, 2025)
- [Lawmakers release SECURE 2.0 corrections bill for beta testing](#) (Jan. 12, 2024)

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