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# 2025 Required Amendments List includes SECURE acts' RMD changes

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## In this article

[About the RA List](#) | [Contents of 2025 RA List](#) | [Changes not specifically referenced on RA List](#) | [Collectively bargained and governmental plans](#) | [Related resources](#)

IRS's 2025 Required Amendments List (RA List) in [Notice 2025-60](#) includes a handful of changes in law or guidance affecting qualified and Section 403(b) retirement plans. Sponsors must amend their plans by Dec. 31, 2027, to reflect items on the list that affect their plans. Notably, this year's list includes changes to the rules for required minimum distributions (RMDs) made by the Setting Every Community Up for Retirement Enhancement Act of 2019 (SECURE 1.0) and certain RMD changes made by the SECURE 2.0 Act of 2022. These provisions now have a plan amendment deadline that is one year later than the deadline that applies to most other SECURE 1.0 and 2.0 provisions.

## About the RA List

When a change in tax law or guidance appears on the annual RA List, sponsors of qualified and 403(b) plans affected by the change have until the end of the second calendar year after the year the list is issued to adopt a conforming plan amendment. The same deadline applies to calendar-year and non-calendar-year plans. Accordingly, sponsors of plans affected by changes on the 2025 RA List must amend their plans for these changes by Dec. 31, 2027. This deadline applies to required amendments to individually designed plans as well as interim amendments to preapproved plans.

The RA List doesn't affect the amendment deadline for discretionary plan-design changes. Sponsors generally must adopt discretionary amendments by the end of the plan year in which the change takes effect (although amendments for certain design changes, such as the addition of a cash or deferred arrangement or an amendment reducing or freezing benefits, must be adopted before the effective date).

**RA List content and organization.** The RA List generally includes only changes in law or guidance that qualified or 403(b) plans must comply with in operation during the calendar year in which the list is published. The RA List has three sections:

- Part A — changes that require amendments to most plans and that don't relate to optional plan provisions previously adopted
- Part B — changes that IRS believes might affect a few plans due to unusual plan provisions and that don't relate to optional plan provisions previously adopted
- Part C — changes in law or guidance that relate to optional plan provisions previously adopted (which may need to be reviewed to ensure they reflect subsequent guidance)

**Some changes excluded.** Not all changes in law or guidance appear on the RA List. The RA List does not include:

- Legislation enacted or guidance issued after the RA List has been prepared
- Changes that can't reasonably be reflected in plan language without guidance, if IRS expects to issue guidance in the future and include it on a later RA List
- Changes in requirements that permit sponsors to adopt optional plan provisions that don't cause existing plan provisions to violate law or guidance
- Changes in tax law that don't cause existing plan provisions to violate law or guidance

## Contents of 2025 RA List

The 2025 RA List includes items on Parts A and B, while Part C is empty.

### Part A: SECURE 1.0 and some SECURE 2.0 changes to RMD rules

Part A includes IRS's 2024 [final regulations](#) on changes to the RMD rules made by SECURE 1.0 and certain RMD changes made by SECURE 2.0. SECURE 1.0 increased the required beginning age to 72 for participants born on or after July 1, 1949, and before 1951, and restricted the availability of "stretch" payments over a beneficiary's lifetime from defined contribution plans and IRAs. The final regulations include these changes and some (but not all) of SECURE 2.0's RMD changes, including the additional increases in the required beginning age to 73 for participants born after 1950 and to 75 for participants born after 1959. For more information about the final regulations, including the other SECURE 2.0 changes they cover, see [IRS finalizes SECURE 1.0 RMD rule changes, proposes 2.0 changes](#) (Aug. 16, 2024).

IRS has also issued [proposed regulations](#) covering the SECURE 2.0 RMD changes that weren't included in the 2024 final regulations. Those changes will appear on a future RA List once the regulations covering the changes have been finalized.

**Other SECURE 1.0 and 2.0 plan amendment deadlines.** In [Notice 2024-2](#), IRS set Dec. 31, 2026, as the deadline to amend plans for SECURE 1.0 and 2.0, with later deadlines for collectively bargained and governmental plans (see [below](#)). (These deadlines also apply to the Bipartisan American Miners Act of 2019 provision that lowered the age for in-service distributions to 59-1/2 and the retirement plan relief

provisions in the Coronavirus Aid, Relief and Economic Security Act and the Taxpayer Certainty and Disaster Relief Act of 2020.) The 2025 RA List now gives sponsors an additional year to amend their plans for SECURE 1.0's RMD changes and some of SECURE 2.0's changes (SECURE 2.0's other RMD changes will have an even later deadline). Presumably, this is because the 2024 final regulations became applicable in 2025, and, as noted [above](#), the RA List generally only includes changes in law or guidance that plans must comply with in operation during the year the RA List is issued.

At least one other SECURE 2.0 change will also have a later amendment deadline. In a footnote to the 2025 RA List, IRS says that it anticipates including SECURE 2.0's Roth catch-up contribution mandate for certain high-earning employees on the 2027 RA List, which would give sponsors until Dec. 31, 2029, to amend their plans for this change. IRS explains this is because plans don't have to comply with its [final regulations](#) on the Roth catch-up mandate until 2027.

## **Part B: Changes to partnership and trust attribution rules**

Part B includes IRS [final regulations](#) that extend the partnership and trust attribution rules to the determination of whether a participant-subsidary controlled group exists under Internal Revenue Code (IRC) Section 414(c). This change applies to plan years beginning on or after Jan. 1, 2025. Because these regulations appear in Part B of the RA List, IRS suggests that few plans will need amendments. However, plans that don't incorporate the controlled group rules by reference will need review to see if amendments are needed by Dec. 31, 2027.

## **Changes not specifically referenced on RA List**

Each RA List automatically includes certain periodic updates, such as cost-of-living adjustments, spot segment rates used to determine the IRC Section 417(e)(3) applicable interest rate and the Section 417(e) applicable mortality table for the year in which the changes are effective. IRS anticipates that few plans will need amendments for these updates, which plans typically incorporate by reference to an IRC section or index. Plans that don't incorporate these updates by reference will need amendments by Dec. 31, 2027, for changes that take effect in 2025.

## **Collectively bargained and governmental plans**

Collectively bargained plans generally do not receive later plan amendment deadlines for items on the RA List, and governmental plans may have later deadlines tied to their legislative calendars if legislative action is necessary to adopt plan amendments. However, in Notice 2024-2, IRS set Dec. 31, 2028, as the deadline for collectively bargained plans to be amended for SECURE 1.0 and 2.0 (as well as the Miners, CARES and Disaster Relief acts), and Dec. 31, 2029, as the deadline for governmental plans. The 2025 RA List doesn't address whether these later deadlines for collectively bargained and governmental plans still apply to the RMD changes on the 2025 RA List. Clarification from IRS would be helpful.

## Related resources

### Non-Mercer resources

- [Notice 2025-60](#) (IRS, Dec. 4, 2025)
- [Required amendments list](#) (IRS)
- [Rev. Proc. 2023-37](#) (IRS, Nov. 21, 2023) (plan amendment rules for preapproved plans)
- [Rev. Proc. 2022-40](#) (IRS, Nov. 7, 2022) (plan amendment rules for individually designed plans)
- [Amend or update a plan](#) (IRS)

### Mercer Law & Policy Group resources

- [User's guide to SECURE 2.0](#) (regularly updated)
- [IRS delays effective date for portion of upcoming RMD regulations](#) (Jan. 15, 2025)
- [IRS finalizes rules on Roth catch-up mandate for high earners](#) (Sep. 23, 2025)
- [IRS finalizes SECURE 1.0 RMD rule changes, proposes 2.0 changes](#) (Aug. 16, 2024)
- [After empty 2023 RA List, IRS delays amendment deadlines for new laws](#) (Dec. 21, 2023)

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