

News

Dold Comments on Key SECURE 2.0 Guidance with Tax Notes

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Groom principal [Elizabeth Thomas Dold](#) was featured in the *Tax Notes* article, “IRS Answers Calls for Additional SECURE 2.0 Guidance,” where she discussed proposed guidance for SECURE 2.0 provisions regarding automatic enrollment and catch-up contributions offered by the Internal Revenue Service (“IRS”).

“The guidance makes it clear that we cannot simply bypass these rules and just offer Roth catch-ups for all,” said Dold.

Tax Notes reported that Dold said that “the proposed regs provide important guidance for those employer plans still looking to offer catch-up contributions for non-high-income earners, but ... ‘there is a bit of complexity for plans subject to nondiscrimination testing as the catch-up feature will need to pass testing.’”

The platform further reported that Dold added that “the guidance provides ‘helpful flexibility for determining what Roth deferrals can be used to meet the Roth catch-up limit, and how to make corrections to comply with these Roth rules.’”

“The guidance provides a number of important clarifications regarding the scope of these rules and which plans are required to offer automatic enrollment,” Dold explained.

According to *Tax Notes*, Dold said that “[she] welcomed a clarification providing that employers with pre-enactment plans can adopt a multiple employer plan or a pooled employer plan regardless of the establishment date of the plan being adopted and retain their grandfathered exempt status.”

To read the article, [click here](#).