

Things to Watch for in 2026: A Forecast for Retirement Plans

The continued rollout of SECURE 2.0 and other updates means 2026 will likely be a busy year for regulatory guidance. Below are a few items that are likely to matter to advisors in 2026.

1. More SECURE 2.0 guidance expected. Treasury and the IRS are still working through a long list of SECURE 2.0 projects, and their 2025-26 Priority Guidance Plan calls out multiple SECURE 2.0 deliverables, including student loan matching contributions, long-term part-time employees, automatic enrollment requirements, pension-linked emergency savings accounts, and required minimum distributions.

In 2025, the IRS finalized regulations regarding the Roth catch-up contribution requirement for high earners. Advisors should bear in mind that the Roth catch-up contribution requirement generally applies now, but the specific provisions of the final regulations generally aren't mandatory until tax years beginning after December 31, 2026.

2. New plan corrections guidance. The 2025-26 Priority Guidance Plan indicates the IRS hopes to provide a new version of the Employee Plans Compliance Resolution System (EPCRS) to reflect changes since the most recent (2021) version.

3. Cybersecurity enforcement. The DOL's enforcement focus for fiscal year 2026 names cybersecurity a national enforcement project, signaling DOL investigations will treat cyber risk as a priority ERISA compliance issue. Advisors should expect investigators to ask not just whether a plan has policies, but whether fiduciaries have a documented process for selecting and monitoring recordkeepers and other vendors, negotiating and enforcing cybersecurity-related contract terms, and obtaining evidence of controls. The shift builds on EBSA's recent clarification that its cybersecurity guidance is intended to apply broadly across employee benefit plans.

4. Other enforcement priorities. For 2026, DOL has identified enforcement priorities (in addition to cybersecurity) that include protecting benefit distributions, retirement asset management, and criminal abuse of contributory benefit plans. Collectively, this indicates heightened scrutiny of distribution safeguards (including fraud prevention and service-provider oversight), fiduciary oversight of investments and fees, and timely handling and remittance of participant contributions.

DOL also stated it will reduce its focus on missing participants following establishment of the Retirement Savings Lost and Found Database, though plan fiduciaries should still maintain reasonable missing-participant procedures.

Apart from the expected new guidance and focus areas, advisors should remember that for many plans, amendments to plan documents for recent law changes will be required by December 31, 2026.

Reminders:

- March 15, 2026: For calendar-year 401(k) plans that failed 2025 ADP/ACP testing, the plan generally must distribute/recharacterize excess contributions by March 15, 2026, to avoid a 10% excise tax (a later deadline applies to certain EACAs).
- March 31: Deadline to e-file 2025 Forms 1099-R for plan distributions.
- April 1, 2026: First RMD deadline for individuals whose first RMD year was 2025 (generally those who turned 73 in 2025), subject to the still-working exception for certain employer plans and excluding Roth employer accounts.

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