

COMMENT LETTER

October 24, 2023

ICI Comment Letter to IRS on New Roth Catch-Up Requirement Under SECURE 2.0 Act

On October 24, 2023, ICI submitted the attached comment letter to IRS and Treasury in response to IRS Notice 2023-62. Notice 2023-62, issued August 25, 2023, effectively provides for a 2-year delay (until taxable years beginning after December 31, 2025) of the applicability of section 603 of the SECURE 2.0 Act (Act), which requires that catch-up contributions made by certain higher-earning participants in 401(k) and similar retirement plans must be made on a Roth basis.

Read more in the [comment letter](#).

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