

Internal Revenue Service Releases its 2025-2026 Priority Guidance Plan

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PRACTICES Employee Benefits and Executive Compensation

The IRS recently released its 2025-2026 Priority Guidance Plan, which contains several significant retirement, executive compensation, and health and welfare initiatives for this year in connection with the One, Big, Beautiful Bill Act (the “**OBBBA**”) and the SECURE 2.0 Act, some of which were already published as noted below. For further information regarding the OBBBA and SECURE 2.0 Act, please refer to our prior articles [here](#) and [here](#), respectively.

Employers should be aware of the following items on the IRS’s proposed schedule of rulemaking and related guidance:

One, Big, Beautiful Bill Act

- Guidance regarding deductions for qualified tips and overtime compensation, including transition relief.
- Guidance regarding “Trump Accounts,” which are tax-advantaged savings accounts for children under the age of 18.
- Guidance regarding paid family and medical leave credits.
- Regulations under Code Section 162(m) rules regarding excessive employee remuneration from controlled group members and the allocation of the \$1,000,000 deduction limit.
- Guidance regarding changes to health savings accounts and high-deductible health plans.

SECURE 2.0 Act

- Guidance implementing several SECURE 2.0 Act provisions including the retirement plan saver’s match, qualified student loan matching contributions, long-term part-time employee eligibility, pension-linked emergency savings accounts, rollover rules, qualified long-term care distributions, and guidance regarding the application of the 10% early distribution rule under Code Section 72(t) relating to repayment provisions for certain distributions.
- Updates to the Employee Plans Compliance Resolution System, addition of a new Compliance Resolution System for Individual Retirement Account (“**IRAs**”), and guidance on the amendment deadline for IRAs.
- Final regulations related to Required Minimum Distributions. Prior regulations were published on July 19, 2024, as we previously reported [here](#).
- Final regulations and related guidance on the exception to the unified plan rule for multiple employer plans. Proposed regulations were published on March 28, 2022
- Final regulations on automatic enrollment requirements. Proposed regulations were published on January 10, 2025.
- Final regulations on updates to catch-up contribution rules which were published on September 16, 2025, as we previously reported [here](#).
- Guidance on uncashed checks from retirement plans which was published on August 4, 2025, as we previously reported [here](#).

The full IRS 2025-2026 Priority Guidance Plan is available [here](#).