

No Super Catch-Up Contributions When You Are Sixty-Four...

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PRACTICES Employee Benefits and Executive Compensation

The Beatles asked “will you still need me, will you still feed me, when I’m sixty-four?” Perhaps. But you won’t be permitted to make “Super Catch-Up Contributions.”

As previously reported [here](#) and [here](#), for taxable years beginning after December 31, 2024, the SECURE 2.0 Act permits higher catch-up contributions for participants attaining age 60 through 63.

It has come to our attention that some retirement plan service providers and vendors have advised plan sponsors that Super Catch-Up Contributions can be made by participants who are age 63 at any time during the participant’s taxable year. This would effectively allow participants who attain age 64 sometime during the taxable year to make Super Catch-Up Contributions. The statute and regulations are clear that participants can only make Super Catch-Up Contributions for the years in which they first attain ages 60 through 63.

Plan sponsors who have added Super Catch-Up Contributions to their plan or who may be considering adding Super Catch-Up Contributions, should confirm that service providers have administrative safeguards in place to ensure that only participants attaining ages 60 through 63 during the taxable year are permitted to make Super Catch-Up Contributions. Moreover, plan sponsors should carefully review the terms of their plan documents, summary plan descriptions, and participant communications to ensure that the Super Catch-Up Contribution requirements are accurately described.