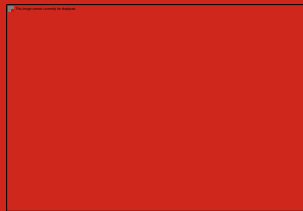


SECURE Act 2.0 (Roth Catch-Up) and One Big Beautiful Bill Overview

Sean Johnson, PMP

Program Manager, ADP Major Accounts,
Compliance and Risk

April 24th, 2026



TODAY'S PRESENTER



SEAN JOHNSON

Program Manager, ADP Major Accounts, Compliance and Risk

Sean has presented to the Chicago Chapter of PayrollOrg previously and is pleased to be with you again for today's presentation.

Sean has been an ADP associate for 29 years and has managed engagement for Statutory and Compliance initiatives within ADP throughout the last eleven years. In addition to SECURE Act 2.0 and One Big Beautiful Bill, examples of the subject matter areas covered in Sean's programs during that time are:

- Affordable Care Act (ACA), particularly Annual Reporting
- State Family and Medical Leave
- Pay Statement Display requirements
- Wage and Hour requirements, particularly Overtime and Regular Rate of Pay

AGENDA

1 Roth Catch-Up Final Guidance and Updates

2 One Big Beautiful Bill: Qualified Overtime

3 One Big Beautiful Bill: Qualified Tips

4 2026 IRS Forms

5 One Big Beautiful Bill: Trump Accounts

6 Discussion and Questions

1

Roth Catch-Up Final Guidance and Updates

Section 603 (Roth Catch-Up)

Requirements and [Final Guidance](#)

The following applies to **High Wage Earners** according to Section 603

Requirements Effective January 1, 2026:

[Final regulations](#) issued by IRS during September 2025

Catch-Up contributions must be made as **Roth** for High Wage Earners

“High Wage Earner” defined as an employee whose FICA wages from the same employer **exceeded \$150,000** during the prior year

Applies to 401(k), 403(b) and 457 plans

Section 603 (Roth Catch-Up)

Highlights from [Final Regulations](#)

SUBJECT EMPLOYEES ([HTTPS://WWW.FEDERALREGISTER.GOV/D/2025-17865/P-73](https://www.federalregister.gov/d/2025-17865/p-73)):

“...a participant who did not have FICA wages exceeding [\$150,000](as adjusted) from the employer sponsoring the plan for the preceding calendar year **would not** be subject to the Roth catch-up requirement under the plan for the current year.”

- Wages not required to be aggregated between **separate, mutually exclusive** employers
- Different rules for **controlled groups** and **common paymasters**

Section 603 (Roth Catch-Up)

Highlights from [Final Regulations](#)

DEEMED EMPLOYEES ([HTTPS://WWW.FEDERALREGISTER.GOV/D/2025-17865/P-37](https://www.federalregister.gov/d/2025-17865/p-37)):

“...a participant who is subject to the Roth catch-up requirement is deemed to have **irrevocably designated** any catch-up contributions as designated Roth contributions...”

“...the application of a deemed Roth catch-up election to a participant would be conditioned on the participant having an **effective opportunity**...to make a new election that is different than the deemed election.”

Section 603 (Roth Catch-Up)

Highlights from [Final Regulations](#)

ROTH PLANS ([HTTPS://WWW.FEDERALREGISTER.GOV/D/2025-17865/P-90](https://www.federalregister.gov/d/2025-17865/p-90)):

“...an applicable employer plan may, but **is not required to**, include a qualified Roth contribution program...”

If Roth is **not included**:

“The plan would be allowed to permit catch-up eligible participants who are not subject to the Roth catch-up requirement to make catch-up contributions but **not permit** catch-up eligible participants who are subject to the Roth catch-up requirement to make catch-up contributions.”

Section 603 (Roth Catch-Up)

Highlights from [Final Regulations](#)

CORRECTION METHODS

Form W-2 Correction Method

“...a plan would be permitted to correct a participant's pre-tax catch-up contribution that was required to be a designated Roth contribution by transferring the elective deferral...from the participant's pre-tax account to the participant's designated Roth account and reporting the contribution...as a designated Roth contribution on the participant's **Form W-2** for the year of the deferral...”

In-Plan Roth Rollover Correction Method

“...a plan would be permitted to correct a participant's pre-tax catch-up contribution that was required to be a designated Roth contribution through an in-plan Roth rollover...”

“...a plan would directly roll over the elective deferral...from the participant's pre-tax account to the participant's designated Roth account and report the amount of the in-plan Roth rollover on **Form 1099-R**...for the year of rollover.”

Section 603 (Roth Catch-Up)

Highlights from [Final Regulations](#)

CORRECTION METHODS

Form W-2 Correction Method

“...this method would **not be permitted** to be used if the participant's Form W-2 for that year has already been filed or furnished to the participant.”

W-2 Correction Method Questions:

Has the W-2 for the relevant tax year been “filed or furnished” to the employee?

Has the practitioner discussed the need for corrections with the **plan administrator**?

In-Plan Roth Rollover Correction Method

“...the amount directly rolled over to the participant's designated Roth account would be the same as the amount reported on Form 1099-R, and the contribution...would be includible in the participant's gross income for the **year of the rollover.**”

Rollover Correction Method Questions:

What is the “year of the rollover”? Is it the same year deductions were taken or the following year?

Is it understood that the 1099-R needs to be issued by the **plan administrator**?

Section 603 (Roth Catch-Up)

Highlights from [Final Regulations](#)

CORRECTION METHODS

- Discussions with **plan administrators** are the first step whenever corrections are needed
 - Plan administrators are subject to **Trust requirements** and **other requirements** separate from Payroll
- Treasury guidance for Correction Methods should be **emphasized** in those conversations
 - Affected employees may need detailed explanations of this guidance
- Use the guidance in a **practical** way:
 - If the relevant W-2 has been “filed or furnished” to the employee, the plan administrator needs to issue a 1099-R based on Treasury Department guidance
 - If the W-2 has not been “filed or furnished” to the employee, quarterly adjustments and tax filing amendments are **an option**
 - **Plan administrators** should still be consulted regardless of whether W-2 corrections are possible

2

One Big Beautiful Bill: Qualified Overtime

One Big Beautiful Bill: Qualified Overtime

[Questions and answers about the new deduction for qualified overtime compensation | Internal Revenue Service](#)

QUALIFIED OVERTIME IS DESCRIBED AS FOLLOWS IN THE CITED IRS RESOURCE:

“Qualified overtime compensation is overtime compensation paid to an individual required under section 7 of the [Fair Labor Standards Act \(FLSA\)](#)...”

“...if an individual is paid at “one and one-half times” their regular rate for an hour of overtime work as required by the FLSA, the “**half**” portion of the “one and one-half times” paid for an hour of overtime work is qualified overtime compensation.”

“Individuals eligible for overtime under the FLSA generally must receive overtime pay for hours worked **in excess of 40** in a workweek at a rate **not less** than one and one-half times their regular rate of pay.”

“If...the individual’s employer pays more than is required under the FLSA, the qualified overtime compensation is **limited** to the portion of the overtime that is required by the FLSA that is in excess of the regular rate.”

One Big Beautiful Bill: Qualified Overtime

[Questions and answers about the new deduction for qualified overtime compensation | Internal Revenue Service](#)

RELEVANT CONSIDERATIONS:

2025 IRS guidance: “An individual who is ineligible for overtime under the FLSA does not receive qualified overtime compensation regardless of other laws or circumstances...providing for overtime pay.”

Important: Guidance for 2026 and future years is forthcoming.

Do your company’s employees understand that Qualified Overtime is **not inclusive** of all Overtime earnings?

Do your company’s employees understand that Qualified Overtime is only applicable when Overtime is paid for **more than 40 hours worked** during a workweek?

Does your company pay premiums to employees for Overtime or other hours that are higher than 1.5? Is some level of communication to such employees necessary?

One Big Beautiful Bill: Qualified Overtime

[Questions and answers about the new deduction for qualified overtime compensation | Internal Revenue Service](https://www.irs.gov/pub/irs-pdf/fw2.pdf)

2026 W-2 DISPLAY ([HTTPS://WWW.IRS.GOV/PUB/IRS-PDF/FW2.PDF](https://www.irs.gov/pub/irs-pdf/fw2.pdf)):

The image shows a 2026 W-2 Wage and Tax Statement form. A green box highlights Box 12, which is titled "See instructions for box 12" and contains sub-sections 12a, 12b, 12c, and 12d. An arrow points from this box to the explanatory text on the right. The form includes fields for Employer identification number (EIN), Employee's social security number, Employer's name, address, and ZIP code, Control number, Employee's first name and initial, Last name, Suffix, Employee's address and ZIP code, and various tax and wage information boxes (1-20). The form is labeled "Form W-2 Wage and Tax Statement 2026" and includes the Department of the Treasury - Internal Revenue Service logo and contact information.

“For tax years **2026 and later years**, employers and other payers are **required** to separately report qualified overtime compensation. [Form] W-2...will be updated to allow employers and other payers to provide separate reporting of an individual’s qualified overtime compensation.”

❖ Amounts will display in Box 12 as described below:

TT—Total amount of qualified overtime compensation. Use this amount when determining the qualified overtime compensation deduction in Part III of Schedule 1-A (Form 1040).

“The deduction is up to \$12,500 of qualified overtime compensation earned for the year per return (\$25,000 in the case of a joint return).”

3

One Big Beautiful Bill: Qualified Tips

One Big Beautiful Bill: Qualified Tips

[One, Big, Beautiful Bill provisions – Individuals and workers | Internal Revenue Service](#)

QUALIFIED TIPS ARE DEFINED AS FOLLOWS:

“Effective 2025 through 2028, employees and self-employed individuals may deduct qualified tips they received in occupations the IRS identified as “customarily and regularly receiving tips” on or before Dec. 31, 2024...”

““Qualified tips” include voluntary cash or charged tips received from customers, including shared tips”

<https://www.federalregister.gov/d/2026-07104/p-171>;

“...“qualified tips” only includes amounts that are paid by the customer voluntarily without any impact on the scope or cost of service or any other consequence in the event of nonpayment, are not the subject of negotiation, and are determined by the customer.”

<https://www.federalregister.gov/d/2026-07104/p-89>;

“...service charges, automatic gratuities and any other mandatory amounts automatically added to a customer's bill by the vendor or establishment are not qualified tips, even if the amounts are subsequently distributed to employees.”

List of **Qualifying Occupations** available at <https://www.federalregister.gov/d/2026-07104/p-198>

One Big Beautiful Bill: Qualified Tips

One, Big, Beautiful Bill provisions – Individuals and workers | Internal Revenue Service

RELEVANT CONSIDERATIONS:

Are Tips amounts for **affected employees** recorded through payroll?

Are Tips amounts paid voluntarily?

❖ Is separate input available for non-voluntary payments?

Are your employees included in **Qualifying Occupations** (<https://www.federalregister.gov/d/2026-07104/p-198>)?

Have Treasury Tipped Occupation Codes (TTOC) been assigned to your company's tipped employees?

Will any of your company's employees receive qualified tips under multiple TTOC's?

One Big Beautiful Bill: Qualified Tips

One, Big, Beautiful Bill provisions – Individuals and workers | Internal Revenue Service

2026 W-2 DISPLAY ([HTTPS://WWW.IRS.GOV/PUB/IRS-PDF/FW2.PDF](https://www.irs.gov/pub/irs-pdf/fw2.pdf)):

22222		VOID <input type="checkbox"/>	Employee's social security number		For Official Use Only OMB No. 1545-0029	
b Employer identification number (EIN)			1 Wages, tips, other compensation	2 Federal income tax withheld		
c Employer's name, address, and ZIP code			3 Social security wages	4 Social security tax withheld		
			5 Medicare wages and tips	6 Medicare tax withheld		
			7 Social security tips	8 Allocated tips		
d Control number			9	10 Dependent care benefits		
e Employee's first name and initial			Last name		Suff.	
f Employee's address and ZIP code			11 Nonqualified plans		12a See instructions for box 12	
			13 Statutory employee <input type="checkbox"/> Retirement plan <input type="checkbox"/> Third-party sick pay <input type="checkbox"/>		12b	
			14a Other		12c	
			14b Treasury Tipped Occupation Code(s)		12d	
15 State	Employer's state ID number	16 State wages, tips, etc.	17 State income tax	18 Local wages, tips, etc.	19 Local income tax	20 Locality name

“Effective 2025 through 2028, employees and self-employed individuals may deduct qualified tips they received in occupations the IRS identified as “customarily and regularly receiving tips” on or before Dec. 31, 2024, and are reported on a Form W-2...”

- Amounts will display in Box 12 as described below:

TP—Total amount of cash tips reported to the employer. “Cash tips” includes tips received in cash, charged, or under a tip-sharing arrangement. Use this amount when determining the qualified tip deduction in Part II of Schedule 1-A (Form 1040).

Box 14b. Employers use this box to report up to two Treasury Tipped Occupation Code(s) for your tipped occupation(s). Use this code(s) and the amount of tips reported in box 12 (code TP) when determining the qualified tip deduction in Part II of Schedule 1-A (Form 1040). If the occupation code 000 is used, **and no other code is included in box 14b**, your cash tips are not qualified tips; do not use the amount reported in box 12 (code TP) for the deduction for qualified tips.

“Maximum annual deduction is \$25,000”

Form W-2 Wage and Tax Statement 2026 Department of the Treasury—Internal Revenue Service

Copy A—For Social Security Administration. Send this entire page with Form W-3 to the Social Security Administration; photocopies are **not** acceptable.

For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions. Cat. No. 10134D Created 1/7/26

Do Not Cut, Fold, or Staple Forms on This Page

4

2026 IRS Forms

Final Version of 2026 W-4 Form

[2026 Form W-4](#)

RELEVANT SECTION FOR QUALIFIED OVERTIME AND QUALIFIED TIPS SHOWN:

Form W-4 (2026)

Page 4

Step 4(b) – Deductions Worksheet *(Keep for your records.)*



See the Instructions for Schedule 1-A (Form 1040) for more information about whether you qualify for the deductions on lines 1a, 1b, 1c, 3a, and 3b.

1 Deductions for qualified tips, overtime compensation, and passenger vehicle loan interest.

a **Qualified tips.** If your total income is less than \$150,000 (\$300,000 if married filing jointly), enter an estimate of your qualified tips up to \$25,000

1a \$

b **Qualified overtime compensation.** If your total income is less than \$150,000 (\$300,000 if married filing jointly), enter an estimate of your qualified overtime compensation up to \$12,500 (\$25,000 if married filing jointly) of the “and-a-half” portion of time-and-a-half compensation

1b \$

Draft 2026 IRS Forms

Form 1099-MISC (Rev. December 2026); <https://www.irs.gov/pub/irs-dft/p1099--dft.pdf>

DRAFT 2026 1099-MISC FORM

TREASURY/IRS AND OMB USE ONLY DRAFT									
9595 <input type="checkbox"/> VOID <input type="checkbox"/> CORRECTED									
PAYER'S name				1 Rents		OMB No. 1545-0115			
Street address				\$		Form 1099-MISC			
Room or suite no.		Telephone number		2 Royalties		(Rev. December 2026)			
City or town		State or province		\$		For calendar year			
Country		ZIP or foreign postal code		3 Other income		4 Federal income tax withheld			
PAYER'S TIN		RECIPIENT'S TIN		\$		\$			
RECIPIENT'S name				5 Fishing boat proceeds		6 Medical and health care payments			
Street address		Apt. no.		\$		8 Substitute payments in lieu of dividends or interest			
City or town		State or province		9 Crop insurance proceeds		10 Gross proceeds paid to an attorney			
Country		ZIP or foreign postal code		\$		12 Section 409A deferrals			
FATCA filing requirement <input type="checkbox"/>		2nd TIN not. <input type="checkbox"/>		11 Fish purchased for resale		13a Cash tips			
Account number (see instructions)				\$		13b TIOC			
				14 Overtime compensation		15 Nonqualified deferred compensation			
				\$		\$			
				16 State tax withheld		17 State/Payer's state no.			
				\$		18 State income			
				\$		\$			

Miscellaneous Information

Copy A

For Internal Revenue Service Center

For filing information, Privacy Act, and Paperwork Reduction Act Notice, see the **General Instructions for Certain Information Returns.**

www.irs.gov/Form1099

Form **1099-MISC** (Rev. 12-2026) Created 3/13/26 Cat. No. 14425J www.irs.gov/Form1099MISC Department of the Treasury - Internal Revenue Service

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Draft 2026 IRS Forms

Form 1099-NEC (Rev. December 2026); <https://www.irs.gov/pub/irs-dft/p1099--dft.pdf>

DRAFT 2026 1099-NEC FORM

TREASURY/IRS AND OMB USE ONLY DRAFT							
7171		<input type="checkbox"/> VOID		<input type="checkbox"/> CORRECTED			
PAYER'S name						OMB No. 1545-0116	
Street address		Room or suite no.				Form 1099-NEC	
City or town		Telephone number				(Rev. December 2026)	
State or province		Country		ZIP or foreign postal code		For calendar year	
PAYER'S TIN		RECIPIENT'S TIN		1a Nonemployee compensation			
				\$			
				1b Cash tips		1c TLOC	
				\$		\$	
RECIPIENT'S name			1d Overtime compensation				
			\$				
Street address		Apt. no.		2 Payer made direct sales totaling \$5,000 or more of consumer products to recipient for resale <input type="checkbox"/>			
City or town				3 Excess golden parachute payments			
State or province		Country		ZIP or foreign postal code		\$	
			4 Federal income tax withheld			\$	
Account number (see instructions)		2nd TIN not <input type="checkbox"/>		5 State tax withheld		6 State/Payer's state no.	
				\$		\$	
				\$		7 State income	
				\$		\$	

Nonemployee Compensation

Copy A

For Internal Revenue Service Center

For filing information, Privacy Act, and Paperwork Reduction Act Notice, see the **General Instructions for Certain Information Returns.**

www.irs.gov/Form1099

Form **1099-NEC** (Rev. 12-2026) Created 3/13/26 Cat. No. 72590N www.irs.gov/Form1099NEC Department of the Treasury - Internal Revenue Service

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Draft 2026 IRS Forms

Form 1099-K (Rev. December 2026); <https://www.irs.gov/pub/irs-dft/p1099--dft.pdf>

DRAFT 2026 1099-K FORM

TREASURY/IRS AND OMB USE ONLY DRAFT									
1010		<input type="checkbox"/> VOID		<input type="checkbox"/> CORRECTED					
FILER'S name				1a Gross amount of payment card/third party network transactions		OMB No. 1545-2205		Payment Card and Third Party Network Transactions	
Street address		Room or suite no.		\$		Form 1099-K			
City or town		Telephone number		1b Card Not Present transactions		(Rev. December 2026)		Copy A For Internal Revenue Service Center	
State or province		Country	ZIP or foreign postal code	\$		For calendar year			
Check to indicate if FILER is a (an):		Check to indicate transactions reported are:		1c Cash tips		1d TIOC		E-file at www.irs.gov/IRIS or use Form 1096 to paper file up to nine returns.	
Payment settlement entity (PSE) <input type="checkbox"/>		Payment card <input type="checkbox"/>		2 Merchant category code		3 Number of payment transactions			
Electronic Payment Facilitator (EPF)/Other third party <input type="checkbox"/>		Third party network <input type="checkbox"/>		4 Federal income tax withheld				For Privacy Act and Paperwork Reduction Act Notice, see the current General Instructions for Certain Information Returns.	
FILER'S TIN		PAYEE'S TIN		\$					
PAYEE'S name				5a January		5b February		www.irs.gov/Form1099	
Street address		Apt. no.		\$		\$			
City or town		Country		5c March		5d April		2nd TIN not. <input type="checkbox"/>	
State or province		Country	ZIP or foreign postal code	\$		\$			
PSE'S name and telephone number				5e May		5f June		8 State	
Account number (see instructions)				\$		\$			
				5g July		5h August			
				\$		\$			
				5i September		5j October			
				\$		\$			
				5k November		5l December			
				\$		\$			
				6 State income tax withheld		7 State identification no.			
				\$					
				\$					

Form **1099-K** (Rev. 12-2026) Created 3/12/26 Cat. No. 54118B www.irs.gov/Form1099K Department of the Treasury - Internal Revenue Service

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Pending Guidance

Not all IRS forms and instructions have been finalized

THE FOLLOWING ITEMS ARE PENDING:

Draft instructions for some 1099 forms are not currently available

- <https://www.irs.gov/pub/irs-dft/p1099--dft.pdf> contains **general** instructions for 1099-M and 1099-NEC forms

Drafts of IRS schedules (for example, Schedule A) for 2026 personal income tax returns are also not currently available

5

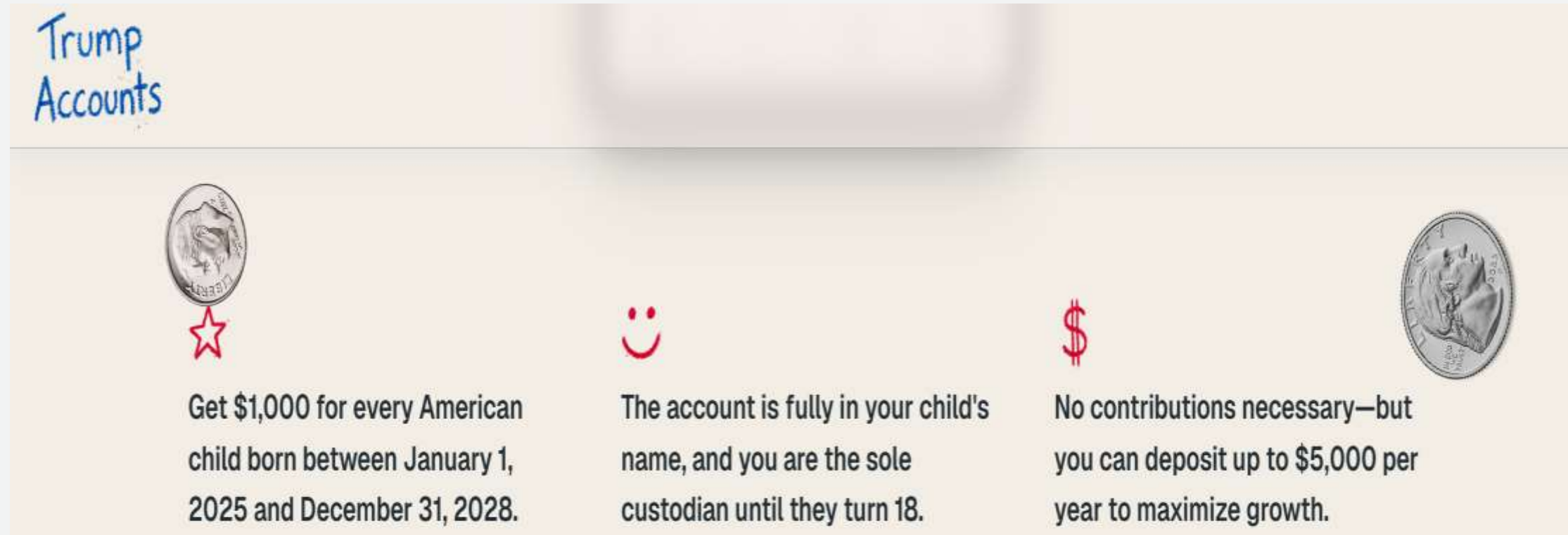
One Big Beautiful Bill: Trump Accounts





One Big Beautiful Bill: Trump Accounts


[Trump Accounts - Jumpstarting the American Dream](#); [Investment Accounts for Children](#) | [Invest America](#) | [Trump Accounts](#)

HIGH-LEVEL OVERVIEW; EFFECTIVE DATE JULY 4TH, 2026

Trump Accounts



- 

Get \$1,000 for every American child born between January 1, 2025 and December 31, 2028.
- 
The account is fully in your child's name, and you are the sole custodian until they turn 18.
- 
No contributions necessary—but you can deposit up to \$5,000 per year to maximize growth.



One Big Beautiful Bill: Trump Accounts

[Trump Accounts - Jumpstarting the American Dream](#); [Investment Accounts for Children | Invest America](#) | [Trump Accounts](#)

CURRENT IRS AND TREASURY DOCUMENTATION

- [Federal Register :: Public Inspection: Trump Accounts](#)
- [Form 4547 \(December 2025\)](#); [Instructions at Instructions for Form 4547](#) [Form 4547 \(Rev. December 2025\)](#)
 - Must be completed to open a Trump Account
- [One, Big, Beautiful Bill provisions | Internal Revenue Service](#)

Trump Accounts under the Working Families Tax Cuts (Section 70204)

Overview of Trump Accounts

- Parents, guardians, or others can establish a Trump Account for an eligible child
- Trump Accounts cannot be funded before July 4, 2026
- The federal government will make a one-time \$1,000 contribution for each eligible child's account
- Authorized contributions from individuals and employers are allowed up to \$5,000 per year
- Employers can contribute up to \$2,500 per year toward an employee's or dependent's Trump Account without it counting as taxable income for the employee
- Funds must be invested in certain mutual funds or exchange-traded funds that track a U.S. stock index such as the S&P 500

One Big Beautiful Bill: Trump Accounts

<https://www.irs.gov/pub/irs-dft/fw2--dft.pdf>

2026 W-2 DISPLAY

TREASURY/IRS AND OMB USE ONLY DRAFT

22222		VOID <input type="checkbox"/>	a Employee's social security number	For Official Use Only OMB No. 1545-0029									
b Employer identification number (EIN)			1 Wages, tips, other compensation	2 Federal income tax withheld									
c Employer's name, address, and ZIP code			3 Social security wages	4 Social security tax withheld									
			5 Medicare wages and tips	6 Medicare tax withheld									
			7 Social security tips	8 Allocated tips									
d Control number			9	10 Dependent care benefits									
e Employee's first name and initial Last name Suff.			11 Nonqualified plans										
			13 <table border="1"><tr><td>Statutory employee</td><td>Retirement plan</td><td>Third-party sick pay</td></tr><tr><td><input type="checkbox"/></td><td><input type="checkbox"/></td><td><input type="checkbox"/></td></tr></table>			Statutory employee	Retirement plan	Third-party sick pay	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12a See instructions for box 12	
			Statutory employee	Retirement plan	Third-party sick pay								
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>								
14a Other			12b										
14b Treasury Tipped Occupation Code(s)			12c										
f Employee's address and ZIP code			12d										
15 State	16 State wages, tips, etc.	17 State income tax	18 Local wages, tips, etc.	19 Local income tax	20 Locality name								

Form **W-2** Wage and Tax Statement **2026** Department of the Treasury—Internal Revenue Service

Copy A—For Social Security Administration. Send this entire page with Form W-3 to the Social Security Administration; photocopies are not acceptable.

For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions. Cat. No. 10134D Created 12/18/25

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TA—Employer contributions under a section 128 Trump account contribution program paid to a Trump account of an employee or a dependent of an employee.

Code TA represents permissible pre-tax contributions under Section 128, up to \$2500 per employee per year.

If an employer does not contribute the full \$2500, an employee can make up the difference.

6

Discussion and Questions

SECURE Act 2.0 (Roth Catch-Up) and One Big Beautiful Bill

Overview

Thanks for your participation!

