



201 East Main Street, Suite 810, Lexington, KY 40507
(859) 514-9161 • Fax: (859) 514-9188 • www.nagdca.org

August 18, 2025

By Electronic Mail

Ms. Helen Morrison
Benefits Tax Counsel
Office of Tax Policy
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Mr. Philip Lindenmuth
Acting Associate Chief Counsel (EEE)
Internal Revenue Service
1111 Constitution Ave., NW
Washington, DC 20224

Re: Proposed Rule on Catch-Up Contributions

Dear Madam and Sir:

The National Association of Government Defined Contribution Administrators (NAGDCA) writes with feedback on rules on Roth catch-up contributions issued in January 2025. We appreciate the help that the IRS and Treasury have historically provided in clarifying and enhancing the practicality of implementing retirement-related legislation and have previously provided significant guidance and relief on this topic.

NAGDCA's 270 governmental plan sponsor members represent 15,000 governments in 49 states. Participants come from every level of state, territorial, and local government, including counties, cities, public safety agencies, school districts, transportation, and utilities. NAGDCA's members administer governmental deferred compensation and defined contribution plans, including Code section 457(b), 401(k), 401(a), and 403(b) plans. The association provides a forum for working together to improve defined contribution plan operations and outcomes by sharing information on investments, marketing, administration, and the federal laws and regulations governing these plans.

In a March 2023 letter to you, we wrote to discuss, among other things, a delayed implementation date for SECURE 2.0 section 603(b)(1) and (2) concerning designated Roth contributions. We write now to renew the part of our request asking for additional implementation time for governmental plans.

Specifically, in the proposed regulation issued on January 13, 2025, collectively bargained plans were given additional implementation time. We respectfully request that governmental plans receive the same extension. We submit that governmental plans often face complexities in local law enabling requirements, payroll systems, and administration that most private sector employers do not. Indeed, these challenges can be seen as not dissimilar to those faced by collectively bargained plans.

In addition, although governmental plans have been working diligently to be ready for 2026, because final regulations have not been issued, many are waiting on final regulations to complete their implementation steps. Traditionally, Congress and your agencies have been considerate enough to provide governmental plans with extended implementation time. We ask for that consideration now.

If you are able to effectuate our request, we kindly ask that the decision be publicized with all due haste to allow our member governments to make corresponding business decisions.

*

*

*

Thank you for your time and consideration. We would be happy to meet with you to discuss this matter further if it would be helpful. Please call David Levine at 202-861-5436, Brigen Winters at 202-861-6618, or the undersigned at 859-469-5789 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Petersen', with a stylized flourish at the end.

Matt Petersen
Executive Director