

# **MEMORANDUM**

DATE: November 25, 2025

**TO:** City Employees

FROM: Samantha Hardy, Human Resources Manager Januartha Hardy

**SUBJECT:** Effective 1/1/2026 - New Requirement for 457(b) Age-Based Catch-Up Contributions

(Secure Act 2.0)

Dear City Employees,

Effective January 1, 2026, Section 603 of the SECURE 2.0 Act of 2022 enacts a mandatory Roth catch-up contribution rule for age-based catch-up contributions. This change affects the City's voluntary 457(b) plan.

# What is changing?

Starting January 1, 2026, if you:

- Turn age 50 or older; and
- Had FICA<sup>1</sup> wages from the City of Sacramento exceeding \$150,000 in the prior year (W-2, Box 3).

## THEN:

• All age-based catch-up contributions must be made as Roth (after-tax) contributions.

Traditional (pre-tax) catch-up contributions will not be allowed for individuals in this category. The \$150,000 threshold will be adjusted annually by the IRS for cost-of-living adjustments.

#### Who Is Affected?

This rule applies to:

- Standard age-based catch-up contributions (available to employees turning age 50 and older);
- Higher "super" catch-up contributions (available to employees ages 60 through 63).

This rule does not apply to:

- Three-year pre-retirement catch-up contributions under the 457(b) plan.
- Employees with City of Sacramento FICA wages at or below \$150,000 in the prior calendar year.
  - Sworn police and fire safety employees do not pay into Social Security at the City of Sacramento and therefore do not have reportable FICA wages.
- New hires with no FICA wages from the City in the prior calendar year.

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<sup>&</sup>lt;sup>1</sup> Note: This requirement does not apply to sworn police and fire safety employees, as those employees do not participate in Social Security and therefore do not have reportable FICA wages.

 Wages earned with other employers; only City of Sacramento wages (W-2, Box 3) count toward the threshold.

### What You Should Know:

You do not need to take action now. However, if you will be turning 50 or older in 2026 or approaching eligibility for age-based catch-up contributions, we recommend:

- Reviewing your W-2, Box 3 wages from the City of Sacramento for 2025 and future years.
- Planning ahead if you currently make or intend to make age-based catch-up contributions.
- Speaking with your financial advisor about the impact of Roth (after-tax) contributions, including the impact on your withholdings for state and federal income taxes.
- Reviewing your current 457(b) contributions and updating your contribution amount in your
  Nationwide account as necessary.
- Reviewing your W-4 Withholdings in eCAPS Employee Self Service > My Payroll and HR Info > Payroll and adjusting as necessary.
- Reviewing information from Nationwide about catch-up contributions.

Changes to your 457(b) contribution amount(s) should be made directly in your Nationwide account at <a href="https://www.cityofsacretplan.com/rsc-preauth/">https://www.cityofsacretplan.com/rsc-preauth/</a>. Please note it can take up to two paychecks to see your contribution change on your paycheck.

To evaluate your eligibility for the three-year pre-retirement catchup contribution provision, please contact Rick Watson, Nationwide Retirement Specialist, at <a href="mailto:rick.watson@nationwide.com">rick.watson@nationwide.com</a>.

The City's 457(b) plan already accepts contributions on an after-tax basis. The City will provide additional information in January 2026 on its monitoring of age-based catch-up contributions.

Sincerely,

Samantha Hardy

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**Human Resources Manager**