



Interim Amendments for SECURE 2.0 Act Available!

The SECURE 2.0 Interim Amendments for Cycle 3 defined contribution plans and Cycle 2 403(b) plans are now available in the DGEM Plan Document System.

ASC's Interim Amendments have been drafted as "Provider-level" amendments. This allows you, as the document Provider, to select your preferred default provisions and adopt the Interim Amendment on behalf of your plan sponsors. Plan sponsors that accept the Provider defaults do not need to execute the Interim Amendment.

This DGEM Plan Docs Update provides an overview of the process for adopting and generating these interim amendments.

PROVIDER INTERIM AMENDMENT ADOPTION PACKAGES

The SECURE 2.0 Act IA Provider Adoption Packages (Provider Packages) are located on the DGEM **Download** page under **2 DGEM Plan Documents > Interim Plan Amendments > SECURE 2.0 Act Interim Amendments**. (A link to the Download page is in the bottom menu bar in DGEM.)

The following documents are included in each Provider Package:

- General information and Plan Provider Q&As;
- Adoption of the Pre-Approved Plan SECURE 2.0 Act Interim Amendment by Pre-Approved Plan Provider;
- SECURE 2.0 Act Interim Amendment and Elective Provisions; and
- Sample letter for adopting employers.

To begin, select the Provider Package(s) applicable to the plan document type(s) that you sponsor (i.e. Defined Contribution (DC) or 403(b)). Then review the General Information and Q&As provided in each Adoption Package, paying close attention to the detailed instructions for adopting the Interim Amendment. After reviewing the Interim Amendment, select your Provider defaults under the Elective Provisions section and sign the "Adoption of the Pre-Approved Plan SECURE 2.0 Act Interim Amendment by Pre-Approved Plan Provider" page included in the Provider Package to formally adopt each applicable Interim Amendment.

SECURE 2.0 ACT INTERIM AMENDMENTS FOR DEFINED CONTRIBUTION PLANS AND CYCLE 2 403(b) PLANS

Separate Interim Amendments are available for:

- Cycle 3 Defined Contribution plans (DC S2IA)
- Cycle 2 403(b) plans (403(b) S2IA)

These interim amendments may be generated either in batch or individually, using ASC's **SECURE 2.0 Act IA Wizard** ("S2IA Wizard"). Access the S2IA Wizard by clicking on the **SECURE 2.0 Act IA Wizard** link located at the bottom of any DGEM screen. Detailed instructions for using the Interim Amendment Wizard are in the DGEM User Guide, Chapter 9.

The S2IA Wizard will generate interim amendments and customized Summary of Material Modifications ("SMMs") for ASC's pre-approved Cycle 3 defined contribution and Cycle 2 403(b) plans. If you use our integrated e-sign functionality, interim amendments that require employer signatures may be sent out for e-sign directly through the S2IA Wizard.

In addition, the S2IA has been incorporated into the Adoption Agreement Checklist, allowing it to be automatically included when creating new plans or processing plan amendments.

Note: Participant communications (Plan Summary, Safe Harbor Notices and Summary of Material Modifications for Plan Amendments) will be updated and available in April.

SECURE 2.0 ACT INTERIM AMENDMENTS FOR DEFINED BENEFIT AND CASH BALANCE PLANS

The SECURE 2.0 Act Interim Amendment Provider Adoption Package for Defined Benefit Plans (DB S2IA) is also available on the DGEM Download page. This Interim Amendment covers defined benefit plans, cash balance plans and governmental defined benefit and cash balance plans. The DB S2IA Wizard will be released in DGEM within the next few months. This amendment has been designed to simplify adoption and includes only one elective provision. As a result, few plan sponsors should need to adopt the DB S2IA.

CARES/SECURE ACTS INTERIM AMENDMENTS

The CARES/SECURE Acts Interim Amendment (CSIA) has been available for all plan types since September 2022. (See [DGEM Plan Docs Update](#), “[Interim Amendment for CARES/SECURE Acts](#)”, September 2022.)

Cycle 3 Defined Contribution and DB/CB Plans:

Providers must ensure the CSIA has been adopted for all applicable plans, **no later than December 31, 2026. (December 31, 2029 for governmental entities.)**

403(b) Plans:

Cycle 2 Plans. CSIA provisions have been incorporated into Cycle 2 403(b) documents. No separate CSIA adoption is required.

Cycle 1 403(b) plans. If you previously adopted the CSIA, those elections will automatically map to the appropriate sections in the Cycle 2 restatement. If you have not previously adopted the CSIA, you do not need to adopt it now, as the Cycle 2 document includes the CSIA provisions.

DEADLINES TO ADOPT THE SECURE 2.0 INTERIM AMENDMENT

As a plan document Provider, you must select and adopt your “default elections” and provide the SECURE 2.0 Act Interim Amendment to your Employers **no later than December 31, 2026.**

NOTE: Employers that do **not** accept your default elections must execute the SECURE 2.0 Act Interim Amendment **no later than December 31, 2026. (December 31, 2029 for governmental entities.)**

S2IA INTERIM AMENDMENT TRAINING VIDEOS

John Griffin will present an overview of the Interim Amendments and available adoption options, and Dawn Johnson will provide step-by-step instructions on using the S2IA Wizard in separate recorded training sessions available mid-April. **Links to these training sessions will be posted on the DGEM landing page once they become available.**

If you have any questions about our documents or DGEM in general, please contact us at support@asc-net.com or simply click on the Support link at the bottom of any DGEM page.