

2025 Federal Retirement Security Blueprint

EXECUTIVE SUMMARY

In recent years, significant enhancements have occurred to bolster retirement security in the United States. However, much more can still be done to address the challenges and obstacles that remain for many of America's workers and retirees in their pursuit of a secure and dignified retirement.

IRI's 2025 Federal Retirement Security Blueprint offers Members of Congress and the White House bipartisan and common-sense policies. These policies are designed to help workers and retirees strengthen their financial security, insuring they have the income to sustain them throughout their retirement years.

Maintain and Augment the Current Tax Treatment of Retirement Savings

Preserve the Tax-Deferred Treatment of Retirement Savings

- » Congress should continue to promote retirement savings by maintaining its tax-deferred treatment as a necessary tool that helps America's workers plan for and achieve a secure and dignified retirement.

Protect the Current Structure & Variety of Workplace Retirement Plans

- » Congress should maintain and protect the diverse array of retirement plan structures rather than attempting to devise a single framework that would eliminate the unique features of the different plan types created to suit the workers who use them.

Provide Favorable Tax Treatment for Guaranteed Lifetime Income

- » Congress should create tax incentives — such as a lower tax rate, an exclusion of a portion of lifetime annuity income from taxation, or an increased catch-up contribution — to encourage greater use of guaranteed lifetime income products.

Expand Opportunities to Save for Retirement

Require Employers to Offer Retirement Plans to Employees

- » Congress should enact the *Automatic IRA Act of 2024* ([H.R.7293-118th Congress](#)).

Allow Catch-Up Contributions for Qualified Caregivers

- » Congress should enact the *Expanding Access to Retirement Savings for Caregivers Act* ([H.R.6772-118th Congress](#)).
- » Congress should enact the *Improving Retirement Security for Family Caregivers Act* ([S.5148/H.R.9765-118th Congress](#)).
- » Congress should enact the *Catching Up Family Caregivers Act* ([S.5149/H.R.9764-118th Congress](#)).

Automatically Re-Enroll Employees Three Years After Opting-Out

- » Congress should enact the *Auto Re-enroll Act of 2022* ([S.2517/H.R.4924-118th Congress](#)).
- » Congress should enact [S.2512-118th Congress](#) to provide a tax credit to employers who include an automatic re-enrollment provision in the retirement plan they offer their employees.

Offer Workplace Retirement Plans to State-Legal Cannabis Businesses

- » Congress should enact legislation such as the *Secure and Fair Enforcement (SAFE) Banking Act* ([S.1323/H.R.2891-118th Congress](#)) or the *SAFER Banking Act* ([S.2860-118th Congress](#)).
- » The *SAFE Banking Act* and the *SAFER Banking Act* should be amended to provide certainty and clarity to broker-dealers and investment advisors to further expand the universe of products and services available to employees of legal cannabis businesses seeking to save for retirement.

Decrease the Age of Participation in Workplace Retirement Plans to Age 18

- » Congress should enact the *Helping Young Americans Save for Retirement Act* ([S.3305/H.R.9281-118th Congress](#)).

Allow Roth IRAs to be Rolled Over into Roth Workplace Plans

- » Congress should enact [H.R.6757-118th Congress](#).
- » Congress should clarify that a rollover from an IRA into an employer-sponsored plan should not be treated as a qualified distribution.

Facilitate the Greater Use of Protected, Guaranteed Lifetime Income Solutions

Require Lifetime Income Options in Defined Contribution Plans

- » Congress should enact legislation that would require defined contribution plans to offer participants the option to invest in protected, guaranteed lifetime income solutions for all or some of their account balances.

Expand the Use of Lifetime Income Products as Default Investment Options

- » Congress should enact the *Lifetime Income for Employees Act* ([H.R.3942-118th Congress](#)).

Encourage the Offering of Protected, Guaranteed Lifetime Income Products as Default Distribution Options

- » Congress should enact legislation providing that employers who offer protected, guaranteed lifetime income solutions as a default distribution option for participants in their defined contribution plans will have satisfied their fiduciary duties under *ERISA* ([P.L.93-406](#)).
- » Congress should enact legislation that would establish a “qualified payout option” (Q-PON) that requires employers to offer a combination of income and payout solutions that plan participants can select from at retirement.

Authorize the Use of Indexed and Variable Annuities in QLACs

- » Congress should enact legislation, such as Section 201(5) of the *Retirement Security and Savings Act of 2021* ([S.1770-117th Congress](#)).

Clarify Fiduciary Status for Providers of General Account Insurance Products in Workplace Retirement Plans

- » Congress should enact the *General Accounts Product Clarifications Act* ([H.R.9515-117th Congress](#)).

Enhance 403(b) Plans to Authorize the Use of CITs and Unregistered Insurance Company Separate Accounts

- » Congress should enact the *Retirement Fairness for Charities and Educational Institutions Act* ([S.424/H.R.1013-119th Congress](#)).

Establish a Safe Harbor for Small Businesses Selecting Annuity Contracts

- » Congress should enact legislation clarifying that the annuity selection safe harbor ([P.L.116-94, Div. O, Section 204](#)) will provide a plan sponsor with the same protections in selecting an annuity contract.

Foster Innovation, Modernization, Education, and Advice

Advocate for Appropriate and Consistent Standards of Conduct for Financial Professionals

- » Congress and the Administration should take appropriate steps to support and uphold the existing frameworks across the SEC, the states, and DOL that are in place to ensure that financial professionals act in the best interest of their clients and prevent retirement savers from being harmed by the “Retirement Security Rule: Definition of an Investment Advice Fiduciary.”

Provide Retirement Income Education

- » Congress and the Administration should consider updating and amending ERISA to ensure workplace retirement plans focus on helping workers attain a secure retirement income.

Streamline How Consumers Receive Electronic Documents

- » Congress should enact the *E-SIGN Modernization Act* ([S.3715-117th Congress](#)).
- » Congress should enact the *Improving Disclosure for Investors Act* ([S.3815/H.R.1807-118th Congress](#)).

Authorize the National Use of Remote & Electronic Notarizations

- » Congress should enact the *Securing and Enabling Commerce Using Remote and Electronic Notarization Act* ([S.1212/H.R.1059-118th Congress](#)).

Include Retirement in Federal Student Loan, Job Training, & Apprenticeship Counseling

- » Congress should enact the *Financial Fitness Act* ([H.R.8612-118th Congress](#)).
- » Congress should also extend this resource to the recipients of federally funded job training and apprenticeship programs.

Authorize Portability for SIMPLE IRA Savers

- » Congress should enact the *SAVE Act* ([H.R.4637-115th Congress](#)).

Expand the Use of Single Filing of Form 5500 to Group of Plans of All Sizes

- » Congress should enact legislation clarifying that plans filing under a Group of Plans should be allowed to file a single Form 5500 regardless of size.

Require the Inclusion of Longevity Risk Language in Annual Plan Notices

- » The Department of Labor should be directed to add as required language at the top of annual plan notices information that highlights the risks of an individual outliving their savings.

Authorize Consistent Registrations for Non-Variable Products

- » The SEC should authorize using the revised Form N-4 to register Registered Market-Value Adjusted Annuities, Contingent Deferred Annuities, and all other non-variable annuities.
- » The SEC should amend Form N-6 in a manner consistent with the *RILA Act* and permit the registration of registered index-linked insurance products and all other non-variable insurance products on the amended Form N-6.
- » If the SEC does not authorize the use of Forms N-4 and N-6, Congress should enact legislation directing the Commission to allow the use of amended appropriate registration forms.

Statement on the Intersection of Retirement Savings and Long-Term Care

- » Congress should explore enacting legislation that can make long-term care insurance more accessible, affordable, and tax-advantaged to retirement savers to ensure that an individual's retirement assets are not completely erased to fund their long-term care insurance, such as the *Long-Term Care Affordability Act of 2022* ([H.R.7107-117th Congress](#)).

Boost Protections to Safeguard Consumers

Increase Protections and Resources to Combat Financial Fraud and Exploitation

- » Congress should enact the *Empowering States to Protect Seniors from Bad Actors Act* ([S.4371/H.R.8478-118th Congress](#)).
- » Congress should enact the *Elder Justice Reauthorization and Modernization Act* ([S.1198/H.R.2718-118th Congress](#)).
- » Congress should enact the *Senior Security Act* ([S.955-118th Congress/H.R.1469-119th Congress](#)) to establish a task force at the Securities and Exchange Commission to investigate the challenges facing older Americans and make recommendations to Congress about measures to further protect them from the economic impact and consequences of financial exploitation.
- » Congress should enact the *Financial Exploitation Prevention Act* ([S.1481/H.R.500-118th Congress](#)).

Increase Protections & Safeguards for Personal Financial Information

- » Congress should enact legislation establishing uniform standards for privacy, security, and notification requirements that preempt the growing patchwork of state regulatory regimes.
- » Congress should consider the unique aspects of different industries by providing a broadly applicable framework that takes existing federal protections – such as those provided under the *Gramm-Leach-Bliley Act* ([P.L.106-102](#)) – into consideration.
- » Congress should ensure that legislation enacted relies on regulatory enforcement rather than a private right of action.

Prohibit the Private Collection of tax Debt Owed by Older Americans

- » Congress should amend the law mandating the IRS's use of private debt collection agencies to prohibit the assignment of tax debt of any individual over the age of 65 to any authorized private debt collection agency.

Ensure a Balanced Approach to the Regulation of Environmental, Social, and Governance Investments

- » Congress should enact legislation that codifies the principle of neutrality in considering ESG and non-ESG factors, so long as the principles of prudence and loyalty are met by a plan fiduciary.

Increase Awareness of Account Takeover Fraud

- » IRI will work with Congress, law enforcement, and state regulators to emphasize the need for increased resources to investigate and prosecute the bad actors committing these crimes against Americans' financial security.

Establish a Federal Regulatory Framework to Govern the Use of Cryptocurrency in Retirement Plans

- » Congress should examine and develop an appropriate federal regulatory framework to effectively oversee cryptocurrencies and the cryptocurrency market in general, as well as the potential use of cryptocurrencies in retirement in particular.

Strike a Balanced Approach to Regulating the Use of AI by the Insured Retirement Industry

- » Congress and the Administration should examine the growing use of generative AI and consider existing insurance regulations, such as the NAIC's Model Bulletin on the Use of Artificial Intelligence by Insurers, before developing a federal regulatory framework to govern its use by the insured retirement industry.