October 9, 2026

Internal Revenue Service
Attn: CC:PA:01:PR (Notice 2026-48)
Room 5503
P.O. Box 7604, Ben Franklin Station
Washington, D.C. 20044
www.regulations.gov

Re: IRS Notice 2026-48, Intent to Issue Regulations with Respect to Saver's Match Contributions

Dear IRS:

PayrollOrg requests that the Saver's Match regulations do not include a Saver's Match Destination Number on Form W-2, Wage and Tax Statement.

About PayrollOrg

PayrollOrg is a nonprofit and nonpartisan association representing more than 20,000 payroll professionals throughout the United States. PayrollOrg's primary mission is to educate its members and the payroll industry regarding best practices associated with paying America's workers while complying with applicable federal, state, and local laws.

PayrollOrg's Government Relations Task Force works with government to help payroll professionals with complex compliance requirements, while minimizing the administrative burden on government, employers, and individual workers.

Explanation of Position

PayrollOrg recognizes the need of the U.S. Department of the Treasury and IRS to provide simple forms to implement the SECURE 2.0 Act's provisions on Saver's Match contributions. However, the retirement plans that employers must identify on Form W-2 are not required to offer a Saver's Match.

In addition, the Form W-2 is already at capacity with new information required by the One Big Beautiful Bill Act (OB3) for overtime and tip pay relief. Payroll software developers have spent significant time and resources updating their systems to accommodate these changes. Payroll professionals spent time learning the new requirements and are now if the final stages of preparing for year-end reconciliation.

To make additional changes to the Form W-2 places payroll operations in jeopardy of data inaccuracies and missing filing deadlines. Please note that OB3 compliance must be separated from state and local wage and employment tax requirements, such that the changes needed to payroll management systems and processes are not simple. State and local governments also use the Form W-2 for income tax reporting.

To add unique identifiers to the Form W-2 also creates a fragmented system for recording retirement information. For example, employees usually receive information about their retirement plans through plan providers. These plan providers supply employees with separate tax forms that are part of accurate filing of Form 1040, U.S. Individual Income Tax Return, e.g., Forms 1099.

The Form 8880-A allows individuals to claim a nonrefundable tax credit for contributions to qualified retirement accounts. The information needed to place on the form comes from retirement plan providers not employers. Employers do not know all of the details about an employee's retirement account, even if the plan is offered by an employer.

The Saver's Match program created by the SECURE 2.0 Act does not require payroll management. For payroll departments to get information from retirement plan providers to add to Forms W-2 when the providers already provide information directly to employees seems inefficient.

PayrollOrg asks the Treasury Department and IRS to reconsider its approach and consolidate retirement information to one form other than the Form W-2 for purposes of federal tax reporting and filing.

Thank you for the opportunity to comment. PayrollOrg appreciates its partnership with the IRS. To reach PayrollOrg, please contact me at ajacobsohn@payroll.org or 202-669-4001.

Sincerely,



Alice P. Jacobsohn, Esq.
Director, Government Relations

For: Government Relations Task Force – Federal Issues Subcommittee
Cochairs Rebecca Harshberger, CPP; Mindy Mayo, CPP; and Jon Schausten, CPP