

# RMDs - Answers to Your Questions

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Stephen W. Forbes J.D., LL.M.

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Your Presenters  
Today

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# *Lifetime*

## **LIFETIME RMDs**

How long can I leave the money in the plan?  
How much do I need to receive each year?

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## Definitions; Abbreviations



Term	Definition
ERD	Eligible rollover distribution
RMD	Required minimum distribution
DCY	Distribution calendar year
RBD	Required beginning date
ULT	Uniform lifetime table
J&S Table	Joint and survivor table

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## RBD



**If an NHCE is age 74 (not a 5% owner), terminates employment in 2022 and has never taken an RMD, is the RBD 12/31/2022, or can it be extended to 4/1/2023 as a first time distribution?**

- ▶ RBD is April 1 following the year in which the employee terminates employment (4/1/2023)

**Is there a minimum number of hours a non-owner has to be working for the plan sponsor to avoid taking RMDs? For example, if a former full time employee goes down to working 5 hours per week, is this person exempt from taking RMDs?**

- ▶ The regulations do not impose a minimum number of hours per week that the employee must work
- ▶ If the employee, for example, works 5 hours per week, the employee is still working and may delay taking RMDs

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## RBD; De Minimis RMD



**DOB: 1/1/1950 - what age is used for the 2022 RMD (due: 4/1/23) age 72 or 73?**

- ▶ The relevant year for determining the age is the DCY
- ▶ The plan uses age 72 for the 2022 RMD, the age the participant attained during his/her first DCY (2022)

**Is there a de minimis amount? My 80 year old client/owner has a total balance of only \$500.00.**

- ▶ No

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## Uniform RBD; First DCY; Old Table



**A plan may not apply age 70½ as a uniform RBD for all participants? Our doc lets you select that...**

- ▶ The SECURE Act amendment will change that election

**Are all distributions in the DCY counted as RMDs even if you do not turn 72 until later in the year? Any risk if you die before you turn 72?**

- First DCY is the calendar year in which participant attains age 72 (unless he/she has not terminated employment)
- If the individual dies during first DCY (before RBD), the beneficiary will be subject to the death RMD rules
- The application of the RMD rules will depend on the type of beneficiary

**What is the implication of calculating and RMD with the old table? The participant will have taken more than the RMD amount. However, is there any concern for the plan if the participant is fine with the higher distribution amount?**

- ▶ As long as the additional amount does not violate plan terms, there is no problem
- ▶ The excess is an eligible rollover distribution

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## Changing Employer



**When you say "retired," or, still working; you mean with the current employer? So, if a participant (age 73) "retires" from one employer and has a benefit with the plan of that employer, but is hired by another employer. The participant needs to take the RMD from the first employer?**

- ▶ In order for a participant (not a 5% owner) to delay his RBD, the participant must continue working for the employer sponsoring the plan holding his retirement account balance

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## New Plan



**If there is a new plan (effective 1/1/2021), and a participant's RBD is 12/31/21 (> 5% owner; beyond first DCY), and he receives a 2021 employer contribution made in 2022, how is the RMD calculated when there was no 12/31/2020 balance? How would the plan calculate the 12/31/22 RBD?**

- ▶ Contributions made after the close of the DCY are not taken into consideration
- ▶ For an RMD due by 12/31/21, the DCY is 2021 and the applicable valuation date is 12/31/20
- ▶ No account balance on 12/31/20, the RMD would be zero
- ▶ 2022 DCY: the applicable valuation date is 12/31/21
- ▶ 2021 contribution made after 12/31/21, the a/b would be zero, there would be no RMD

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## RBD; 5% Owner



**If a non->5% owner wants to delay taking the RMD because they are still working, are they "required" to have a written waiver?**

- ▶ No written waiver is required

**When does a plan determine whether an employee is a more than 5% owners for purposes of the RMD rules?**

- ▶ A more than 5% owner is an employee who is a more than 5% owner in the plan year ending in the employees' first DCY
- ▶ If the 5% owner sells ownership interest before first DCY, the employee is not a 5% owner  
If the employee becomes a 5% owner after the first DCY, the employee is not a more than 5% owner

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## Family Attribution



**Can you expand on family attribution. For a 100% owner, who's wife and 2 adult son's work for the company. Are you saying all 4 must take an RMD based on their ages?**

- ▶ Attribution rules under Code 416
- ▶ If the owner's wife and two adult children worked for the company, all four of the family members would be considered 100% owners

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## DCY; 457 Plans



**Can DCYs be any 365 period, or, from Jan.1 to Dec 31?**

- ▶ DCY is always a calendar year

**Do all of the RMD rules apply to 457 nonqualified plans?**

- ▶ The RMD rules apply to eligible 457(b) plans (governmental and tax-exempt)

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## Roth RMDs



**If the plan participant doesn't roll over the Roth account to a Roth IRA before the first DCY, and therefore has taken an RMD, can the participant stop taking an RMD once he/she has rolled over the Roth account to a Roth IRA?**

- ▶ Yes
- ▶ RMD rules apply with respect to the other portions of the plan

**On the Roth IRA rollover, doesn't the Roth IRA have to be in place for 5 years beforehand to avoid the RMD on the Roth IRA? In your example, wouldn't Jim's IRA have had to be opened by 12/31/2016 and have a few bucks in it to start that clock ticking?**

- ▶ To avoid the lifetime RMD rules, the Roth IRA does not need to satisfy the 5-year holding requirement
- ▶ To receive tax-free distributions, the Roth IRA participant must satisfy the 5-year holding requirement

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## Roth RMD



**Assuming participant has Roth 401(k) and pre-tax balance, when determining RMD, is there a requirement to take pro-rata or can it be source specific?**

- ▶ No. The participant may elect the source of the RMD.

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## In-service withdrawals



**Can a participant take more than the RMD if the plan doesn't allow for in-service withdrawals?**

- ▶ No
- ▶ If plan does not permit in-service withdrawals (other than RMDs), the distribution would be limited to the RMD

**If you take more than the minimum amount, is the amount above the RMD amount subject to mandatory 20% Federal income tax withholding?**

- ▶ Yes.

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## RMD Reporting



**If a participant takes a distribution in their 1st DCY but the recordkeeper doesn't code it as an RMD, can it can still be considered an RMD even though it wasn't coded as RMD on the platform? I think yes, but want to confirm.**

- ▶ The distribution should still qualify as an RMD
- ▶ No special code for RMDs

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## Rollover of RMD



**Participant takes an in-service distribution in February while still working; rolling that distribution over to an IRA. The participant is not an owner, but is over age 72. He/She later retires in December of that year, but no longer has an account balance since it was all rolled over with the in-service distribution. Does the participant need to be notified of that a portion of the amount that was rolled over is ineligible for rollover, or, because it was rolled over while he/she was working, it's in the hands of the IRA now?**

- ▶ Two Forms 1099-R: one Form 1099-R will report the RMD portion of the distribution, and the other Form 1099-R will reflect the balance of the distribution
- ▶ The plan will notify the participant that a portion of the distribution is not eligible for rollover (plus earnings) and will need to be withdrawn from the IRA by the due date of the participant's tax return (plus extensions) to avoid the 6% excise tax

**Can you consider the RMD amount taxable (and report it as such), but roll it into an IRA? Isn't that like cashing your check and then contributing it to your IRA?**

- ▶ No, the distribution (even if taken into income) is not eligible for rollover
- ▶ If an individual is eligible to make an IRA contribution, can use any available funds to make the contribution

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## Valuation



**If a participant's account balance includes employer securities of a closely-held corporation, which is annually valued but not until July of the following year, how does one compute the account balance for RMD purposes?**

- ▶ Plan would use the value of the employer securities from the Valuation Calendar Year (calendar year prior to the DCY (i.e., the previous July valuation)

**How does a non-calendar year plan calculate the RMD?**

- ▶ The last valuation date in the calendar year preceding that DCY (valuation calendar year)
- ▶ Non-calendar year plans: the a/b is increased by the any contributions or forfeitures allocated to the a/b as of date in the valuation calendar year after the valuation date
- ▶ Contributions allocated to the account balance in the VCY after the valuation date, but that are not actually made during the VCY, may be excluded
- ▶ The a/b is decreased by distributions made in the VCY after the valuation date

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## RMD for the Year of Death; Spousal Consent



**Is it correct that if a participant dies and the participant is owed an RMD for the year of death, the RMD is always paid to his/her beneficiary?**

- ▶ Yes
- ▶ The RMD rules do not determine takers. The RMD rules only determine the minimum amount that must be distributed from the plan
- ▶ The plan document, including the beneficiary form, determine who receives the distribution

**If plan requires spousal consent, does provider need spousal consent to disburse RMD?**

- ▶ The spousal consent rules apply to the form of the distribution (e.g., lump sum; j&s annuity) and not to the timing (or eligibility) of the distribution
- ▶ If the plan is subject to the spousal consent requirements, the employer will need to distribute the RMD in the form of a joint and survivor annuity unless the spouse consents to another form

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## Missing and Uncooperative Participants



### What happens when a participant is lost and would be due an RMD?

- ▶ IRS 10/19/17 Field Directive
- ▶ The IRS not to challenge a qualified plan for RMD failure of a missing participant or beneficiary if the plan takes the following steps:
  - Searched the plan and related plan, sponsor and publicly available records for alternative contact information;
  - Used any of these search methods: a commercial locator service; a credit reporting agency; or a proprietary internet search tool;
  - Attempted contact via U.S. Postal service certified mail to last known mailing address.

### Should a plan sponsor process involuntary RMDs late in the year for participants who refuse or otherwise don't bother making a distribution request?

- ▶ The plan may want to wait until the latter portion of the year to make the RMD
- ▶ However, the plan may not want to wait too late in the year

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## 50% Excise Tax; RMD Correction



### If the employer miscalculates the RMD, and the participant becomes subject to a 50% excise tax, can the employer be held liable to pay the excise tax?

- ▶ Potentially
- ▶ That would be a matter resolved between the participant and the employer
- ▶ The IRS would not be involved in that issue

### If there were negative earnings, would it reduce the RMD that was missed, or do you assume \$0.00 earnings?

- ▶ Unlike DOL correction procedures, EPCRS permits (but does not require) an employer to adjust for losses. EPCRS §5.04; EPCRS §6.02(4)(a).

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## Excise Tax; 1099-R Reporting



**Have you ever heard of the IRS imposing the excise tax for an RMD failure?**

- ▶ Unfortunately, yes.

**Is using a bad TPA who miscalculated RMD a reasonable cause to avoid the 50% excise tax?**

- ▶ That should qualify as a strong case for a reasonable cause waiver.

**Do you receive one Form 1099-R for an RMD distribution?**

- ▶ If you receive only the RMD for the year, you will only receive one Form 1099-R
- ▶ If you receive more than the RMD for the year, the plan will issue two Forms 1099-R

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## Form 1099-R



**If an RMD is made after the end of the year (4/1) and the participant wants to file with his tax return for that year, what does he/she do about the fact that a Form 1099-R won't be available?**

- ▶ The first RMD is not due until 4/1 following the DCY
- ▶ The distribution is taxable in the year distributed and not for the DCY for which it is distributed
- ▶ The Form 1099-R for the 2023 distributions are generally to be distributed by January 31, 2024

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## RMD Responsibility



**Whose responsibility is it to distribute the RMD? The trustee or the recipient?**

- ▶ The Plan Administrator
- ▶ The participant will want to avoid the excise tax

**A couple of investment companies have made all distribution requests electronic and do not allow the plan sponsor to initiate. Only a participant can.**

- ▶ The Plan Administrator must have the ability to force a distribution to protect the plan's qualification
- ▶ The Plan Administrator will need to make certain the investment companies comply with these requirements

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## Improper Rollover



**If a participant rolled over the RMD amount to an IRA, does he unwind the improper rollover by returning the funds to the plan?**

- ▶ No
- ▶ The plan met the RMD by distributing the amount from the plan (amount rolled over to the IRA)
- ▶ The plan needs to correct the reporting error (i.e., report the RMD on a separate Form 1099-R that indicates the amount is not eligible for rollover)
- ▶ The participant needs to correct the improper rollover by removing the RMD amount (plus earnings) by the due date of his tax return deadline (plus extensions)

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## Improper Rollover



**Participant turns age 72 in 2021. He terminates employment in 2021 and directly rolled over his entire retirement account to an IRA. The participant receives a letter that he should have taken the RMD prior to the rollover. Participant then takes RMD by 4/1/22 from IRA. Has the participant resolved the failure?**

- ▶ Yes
- ▶ The plan needs to correct the reporting by issuing two Forms 1099-R: one showing the RMD amount that is not eligible for rollover and a second one showing the amount that was directly rolled over to the IRA
- ▶ To correct the rollover failure, the participant needs to remove the RMD amount plus earnings from the IRA by 4/15/22 (plus extensions) to avoid the 6% excise tax

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## RMDS AFTER DEATH



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## Definitions - Abbreviations



Term	Meaning
Beneficiary	Gets the money after death
DesBen	Designated Beneficiary; individual
NotDesBen	Beneficiary that is not DesBen (e.g., estate or charity)
EDB	Eligible Designated Beneficiary; DesBen in several categories
ODB	Other Designated Beneficiary; DesBen that isn't EDB
Spouse	Surviving spouse; Could include QDRO alternate payee
SLT	Single Life Table
SECURE Effective Date	Gov't plans: Participants who die after 2021 Union plans: Generally participants who die after 2020 Other plans: Participants who die after 2019

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## Year of death RMD



► **78 year old in RMD status passes away in January 2022 and has 6 non-spousal beneficiaries. So, each bene needs to have RMD in 2022, and factor is based on deceased participant's age, not each beneficiary's age using the new 2022 ULT table?**

- Correct; year of death RMD same as though participant had lived
- For 2023 Use SLT based on oldest beneficiary
  - Unless separate share, payout, etc.

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## Who is an ODB under proposed regs?



- ▶ Designated beneficiary (individual) who is more than 10 years younger than participant, other than:
  - ▶ Spouse
  - ▶ Child under age 21
    - ▶ Use it now; don't wait for final regulation
  - ▶ Disabled
  - ▶ Chronically ill

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## Other EDB questions:



- ▶ **Can my nephew be an EDB if he is disabled?**
  - ▶ Yes if disabled on date of your death and documentation provided by 10/31 of following year
- ▶ **Is the plan able to rely on the beneficiary's certification that they are an EDB and should obtain documentation proving they are an EDB?**
  - ▶ You need medical certification of disabled/chronically ill status
  - ▶ No documentation required for spouse/minor child

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## No beneficiary? Estate beneficiary



### ► For a death RMD, if there is no beneficiary, what happens?

- Never happens
- If participant doesn't designate, use plan defaults
  - If it's an individual, it's still DesBen

### ► If a payment goes to an estate, who is responsible for the INCOME tax? And, if the estate is under the estate tax threshold, is there NO tax?

- Issue 1099-R to estate
- Estate subject to income tax even if exempt from estate tax
- Estate beneficiaries taxed on distributions from estate (K-1)

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## Multiple beneficiaries



### ► If there are multiple DesBen, which age is used?

- Oldest beneficiary except as example below

### ► What is the rule if the beneficiary designation list 2 primary beneficiaries: disabled sister and adult child?

- Starting point: ODB, age of older beneficiary
- Strategies:
  - Separate shares by 12/31 of year following death
    - Adult child is ODB
    - Sister is EDB
  - Pay out adult child by 9/30 of year following death
    - Sister is EDB

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## Minor child payouts



### ► Does the 10-year rule take effect in the year the child reaches age 21 or the following year?

- Child is EDB because under 21 when participant dies
- Child uses life expectancy rule
- First RMD to child is due 12/31 of year following death
- RMDs continue annually thereafter
  - Final payout is 12/31 of year of 10<sup>th</sup> anniversary of earlier of:
    - Year child dies
    - Year child attains 21

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## Example



- Mom dies in 2022 before RBD leaving account to child
- Child turned 19 in 2022; EDB
- Assume plan uses life expectancy rule
- First RMD due 12/31/2023
  - Based on child's age in 2023
  - Subtract one each year
- Entire remaining balance is RMD in 2034

Year	Age	Denominator
2023	20	65.0
2024	21	64.0
2025	22	63.0
2026	23	62.0
2027	24	61.0
2028	25	60.0
2029	26	59.0
2030	27	58.0
2031	28	57.0
2032	29	56.0
2033	30	55.0
2034	31	1.0

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## Disclaimers; waivers



- ▶ **If a beneficiary doesn't want the benefit, what should we get for documentation to be able to reallocate to other beneficiaries?**
  - ▶ A qualified disclaimer under Code §2518
  - ▶ Allows you to treat beneficiary as predeceased
- ▶ **Does the qualified disclaimer still have 9 months to be signed?**
  - ▶ Yes, unless the beneficiary is under age 21
    - ▶ Even then deadline for RMD purposes is 9/30 of year following death

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## Payout systems after death in 2022



System	Payout	Death	Recipient
5-year rule	100% by 12/31/2027	Participant dies before RBD	NotDesBen; Death before SECURE and plan elects
10-year rule	100% by 12/31/2032	Participant dies before RBD	ODB; Death after SECURE and plan elects to apply to EDB
Life expectancy	Annual SLT payouts begin 12/31/2023	All other situations	

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## Cut off of RMDs



- ▶ Cut-off applies to participants who die after SECURE effective date (with one exception)
- ▶ Must distribute entire account by 12/31 of earliest of the following years:
  - ▶ 10<sup>th</sup> year after participant's death year if beneficiary is ODB
  - ▶ 10<sup>th</sup> year after death of EDB
  - ▶ 10<sup>th</sup> year after minor child EDB reaches age of majority
    - ▶ Unless child is disabled or chronically ill
  - ▶ Year beneficiary's life expectancy does not exceed one (if based on employee life expectancy)

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## Example 1



- ▶ **Can you give an example of the Post-Secure RMD for a person, assuming he died before RBD, and then the same person if he died after RBD?**
  - ▶ Assumptions:
    - ▶ Participant dies in 2022
    - ▶ Recipient: Participant's adult daughter, born in 1980; ODB
  - ▶ If participant dies before RBD:
    - ▶ Must pay 100% of account by 12/31/2032
    - ▶ No required payments before then
    - ▶ Daughter can roll to IRA prior to 1/1/2032

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## Example 1, death on or after RBD



### ► Assumptions:

- Participant dies in 2022
- Recipient: Participant's adult daughter, born in 1980; ODB

### ► If participant dies on or after RBD:

- First post-death RMD due 12/31/2023
- 2023 denominator based on SLT, age 43: 42.9

Year	Age	Denominator
2023	43	42.9
2024	44	41.9
2025	45	40.9
2026	46	39.9
2027	47	38.9
2028	48	37.9
2029	49	36.9
2030	50	35.9
2031	51	34.9
2032	52	1.0

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## Example 2



### ► Assumptions:

- Participant dies in 2022
- Recipient: Participant's estate

### ► If participant dies before RBD:

- Must pay 100% of account by 12/31/2027
- No required payments before then
- No rollover allowed

### ► If participant dies after RBD

- Assume age in year of death is 74
- SLT factor for 74 is 15.6
- First post-death RMD due 12/31/2023

Year	Denominator
2023	14.6
2024	13.6
2025	12.6
2026	11.6
2027	10.6
2028	9.6
2029	8.6
2030	7.6
2031	6.6
2032	1.0

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## Who's life expectancy



- On an RMD after Secure for a participant that dies after RBD - who's life expectancy is used for an ODB?

Measuring life to use		
Recipient	Participant died before RBD	Participant died on or after RBD
Spouse	Spouse	Younger of spouse or participant
EDB	EDB	Younger of EDB or participant
ODB	Life expectancy not available	Younger of ODB or participant
NotDesBen	Life expectancy not available	Participant

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## Example 3



- Assumptions:
  - Participant dies in 2022 at age 73
  - Recipient: participant's mother, EDB born 2030
- If participant dies before RBD:
  - Plan could elect (or allow mother to elect 10-year rule)
    - Pay 100% by 12/31/2032
  - Otherwise, life expectancy rule based on mother, 4.6
- If participant dies after RBD
  - Base on participant's SLT
  - SLT factor for 73 is 16.4
  - First post-death RMD due 12/31/2023

Year	Before RBD	After RBD
2023	4.6	15.4
2024	3.6	14.4
2025	2.6	13.4
2026	1.6	12.4
2027	1.0	1.0
2028		
2029		
2030		
2031		
2032		

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## Recalculation



### ► Do beneficiaries always use recalculation, or is straight-line still used in certain cases?

- The only beneficiary who recalculates is spouse
  - Look at the SLT every year
- Everyone else using life expectancy rule subtracts 1.0 each year
  - That's different from straight-line; straight-line doesn't apply to RMDs
- Example shows denominators for spouse or brother age 62 when participant dies in 2022

Year	Spouse	Brother
2023	24.5	24.5
2024	23.7	23.5
2025	22.9	22.5
2026	22.0	21.5
2027	21.2	20.5
2028	20.4	19.5
2029	19.6	18.5
2030	18.8	17.5
2031	18.0	16.5
2032	17.2	15.5
2033	16.4	14.5
2034	15.6	13.5

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## New rule for participant who dies before SECURE effective date



- If oldest DesBen dies after SECURE effective date, then entire account must be paid by 12/31 of 10<sup>th</sup> year after DesBen
- Example
  - Jack died 5/1/2018
  - Left account to sister, Jill
  - Jill taking life expectancy RMDs
  - Jill dies in 2023, leaving account to Bill
  - Bill continues to take RMDs using Jills life expectancy
  - Complete payout 12/31/2033

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## Plan can provide more rapid payout



- ▶ **Can the plan force distribution to participant who die after RBD to all beneficiaries as soon as administratively possible?**
  - ▶ Yes
- ▶ **Can the plan provide for lump sum distribution 1-year from year of death instead of life expectancy payouts?**
  - ▶ Yes
- ▶ **Can plans elect to keep the 5-year rule after SECURE for Participants who die before RBD?**
  - ▶ Yes

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## NotDesBen payout



- ▶ **When must an RMD be paid for a participant who dies after RBD with an NotDesBen? In the same year as the participant's death (i.e. 2021) or by the end of December of the following year?**
- ▶ **Year of death RMD (based on ULT) must be paid by 12/31 of year of death**
  - ▶ To participant or to recipient
    - ▶ Regardless of who recipient is
  - ▶ First RMD based on SLT due 12/31 of year following year of death
    - ▶ If NotDesBen, use participant's age in year of death, minus 1.

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## Delays



► **If I learn I am an ODB of my uncle who died 12 years ago after his RMD started, is my 10 years up? and what happens to my uncle's account?**

- If your uncle died before SECURE, no 10-year cutoff
  - Take accumulated RMDs and ask for waiver of penalty
- If your uncle died after SECURE:
  - Life expectancy distributions due
  - 100% due 10 years after death
  - Take entire account and ask for waiver of penalty

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## Rollovers



► **100% of account must be distribution... assume that means distributed as cash (taxable) or can they roll it over?**

- Entire amount is RMD in any year which requires complete distribution:
  - 5-year rule
  - 10-year rule
  - Cutoffs
- None of it is an eligible rollover distribution

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## Rollovers



► **What about beneficiaries who want to roll the entire death benefit to an IRA, how long do they have to do this? At what point does the RMD portion become ineligible for rollover?**

- Current and prior year RMDs aren't eligible for rollover
- Participant dies in 2022 before RBD
  - Leaves account to ODB; roll before 1/1/2032
  - Leaves account to EDB; roll before 1/1/2023
- Participant dies in 2022 after RBD
  - Current year RBD cannot be rolled over

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## Elections



► **If you have a plan document that has not gone through restatements yet, and it does not mention anything regarding the 10-year rule, does the beneficiary have the option of the 10-year rule? If the new restated documents do not mention the 10-year rule, and say they only give the option of the 5-year and/or life expectancy rule, does the beneficiary not have the option of the 10-year rule?**

- You have whatever options are provided in SECURE amendment
- Using 10-year rule for EDBs REQUIRES plan provision

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## Spouse options



- ▶ Regardless of participant's age, spouse can roll eligible rollover distribution to
  - ▶ Spouse's own IRA or retirement plan account of employer
    - ▶ Wait until spouse reaches spouse's RBD; use SLT
  - ▶ Inherited IRA
    - ▶ Distribute using SLT with recalculation
- ▶ Spouse can delay taking RMDs until 12/31 of year participant would have turned 72
  - ▶ Regardless of spouse's age

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## Thank you!



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- ▶ Derrin's books are available at [ERISApedia.com](http://ERISApedia.com)
  - ▶ Who's the Employer (8<sup>th</sup> ed)
  - ▶ 403(b) Plan eSource
  - ▶ 457 Plan eSource
  - ▶ Plan Correction eSource (with Ilene Ferenczy and Alison Cohen)
- ▶ Coming this year:
  - ▶ Plan distribution eSource

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## A Few Reminders



- ▶ ASPPA/NIPA certificates will be emailed within a day or two. ERPA certificates may take up to two weeks.
- ▶ Go to ERISApedia.com WEBCAST tab to retrieve previous certificates.
- ▶ After the webcast you will be presented with a short Google Forms survey. Please let us know how we are doing.

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## For Further Study



Joanne Pecina will demonstrate how to find more information on today's topic from the ERISApedia.com resources.

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