



IRA Beneficiary (and Successor Beneficiary) Requirements

All the options recapped below assume separate accounting is completed by no later than December 31st of the year following the calendar year of IRA owner's death, or the beneficiary is the sole Designated Beneficiary as of September 30th of year following the calendar year of the IRA owner's death.

Beneficiary Type	Traditional, SEP or SIMPLE IRA (IRA Owner's Death Before Required Beginning Date) OR Roth IRA	Traditional, SEP or SIMPLE IRA (IRA Owner's Death On/After Required Beginning Date)
Spouse	<ul style="list-style-type: none">• Move to own IRA, or• Maintain Inherited IRA <p>Spouse Beneficiary Move to Own IRA Rather than maintain the inherited IRA funds in an Inherited IRA, a spouse beneficiary may choose to move the inherited IRA funds to their own IRA through a direct transfer (if eligible) or a rollover.</p> <ul style="list-style-type: none">• Transfer to Own Traditional IRA. The deadline for the spouse beneficiary to transfer the inherited funds to their own Traditional IRA is <i>the later of</i> December 31 of the year following the year of the IRA owner's death, or December 31 of the year the spouse beneficiary attains RMD starting age* (based on the spouse's date of birth).• Spouse Beneficiary Rollover to Own Traditional IRA. The spouse beneficiary may choose to roll over the inherited IRA funds to their own Traditional IRA at any time, so long as rollover eligibility requirements are satisfied including, but not limited to the 12-month IRA-to-IRA rollover restriction.	<p>Note: Beneficiary(ies) are required to withdraw any outstanding RMD amounts for the year of the IRA owner's year death</p> <ul style="list-style-type: none">• Move to own IRA, or• Maintain Inherited IRA <p>Spouse Beneficiary Move to Own IRA Rather than maintain the inherited IRA funds in an Inherited IRA, a spouse beneficiary may choose to move the inherited IRA funds to their own IRA through a direct transfer (if eligible) or a rollover.</p> <ul style="list-style-type: none">• Transfer to Own Traditional IRA. The deadline for the spouse beneficiary to transfer the inherited funds to their own Traditional IRA is <i>the later of</i> December 31 of the year following the year of the IRA owner's death, or December 31 of the year the spouse beneficiary attains RMD starting age* (based on the spouse's date of birth).• Spouse Beneficiary Rollover to Own Traditional IRA. The spouse beneficiary may choose to roll over the inherited IRA funds to their own Traditional IRA at any time, so long as rollover eligibility



<p>Note: <i>The RMDs (including hypothetical RMD amounts) are not eligible to be rolled over.</i></p> <p>Spouse Beneficiary Maintain Inherited IRA Option to elect between two distinct distribution options: 1) Life Expectancy Payment option, or 2) the 10-Year Rule</p> <div data-bbox="302 516 1058 1084"><p>Beneficiary Option Election Deadline The deadline for the spouse beneficiary to make the election between the 10-Year Rule and the Life Expectancy Payment option is <i>the earlier of</i></p><ul style="list-style-type: none">• December 31 of the 10th calendar year following the year of the IRA owner's death, or• December 31 of the year in which the IRA owner would have attained RMD starting age* (age 72, 73, or 75 depending on their date of birth).<p>If, however, the IRA owner's death is in the calendar year they attained/would have attained RMD starting age, or in the calendar year immediately following the year they attained RMD starting age, the election deadline for the spouse beneficiary is December 31 of the calendar year following the IRA owner's death.</p></div> <p>Life expectancy payments. Payments begin in the <i>later of</i> the calendar year following the IRA owner's death or the calendar year the IRA owner would have attained RMD starting age.*</p> <p>Payments are calculated each year using the spouse beneficiary's single life expectancy, recalculated.</p>	<p>requirements are satisfied including, but not limited to the 12-month IRA-to-IRA rollover restriction. Note: <i>The RMDs (including hypothetical RMD amounts) are not eligible to be rolled over.</i></p> <p>Spouse Beneficiary Maintain Inherited IRA Required minimum distributions (RMDs) for years following the year of the IRA owner's death. RMDs must continue in subsequent years, and are calculated using the longer of</p> <ul style="list-style-type: none">• the single life expectancy that corresponds to the age the spouse beneficiary attains on their birthday in the distribution year, or• the single life expectancy that corresponds to the age the IRA owner attained/would have attained on their birthday in the year their death, reduced by one for each calendar year that has elapsed since the year of the IRA owner's death. <hr/> <p>Successor Beneficiary Requirements- In the year of the spouse beneficiary's death, the successor beneficiary must take a distribution equal to the amount of the spouse beneficiary's required distribution minus any amount withdrawn by the spouse beneficiary in the year of their death.</p> <p>RMDs for years following the year of the spouse beneficiary's death are determined using the longer of</p> <ul style="list-style-type: none">• spouse beneficiary's single life expectancy in the year of the spouse beneficiary's death (nonrecalculated), or• the single life expectancy of the deceased IRA owner in the year of the IRA owner's death (nonrecalculated). <p>In addition to withdrawing the RMD each year, the successor beneficiary must deplete the entire Inherited IRA by no later than December 31 of the 10th calendar year following the spouse beneficiary's death, or December 31 of the year in which the spouse beneficiary's life expectancy</p>
---	---



<p>10-Year Rule.</p> <p>The 10-Year Rule option requires depletion of the entire Inherited IRA by the end of the 10th calendar year following the year of the IRA owner's death. Because the IRA owner passed away before their required beginning date or this is a Roth IRA, under the 10-Year Rule, the spouse beneficiary is not required to take distributions during the first 9 years of the 10-year period.</p> <p>* RMD starting age (based on the IRA owner's date of birth) is</p> <ul style="list-style-type: none">• age 72, for IRA owners born before January 1, 1951,• age 73, for IRA owners born after December 31, 1950, and before January 1, 1960, or• age 75, for IRA owners born after December 31, 1959. <hr/> <p>Successor Beneficiary Requirements</p> <p>The distribution requirements applicable to the successor beneficiaries are dependent on the distribution requirements that the original beneficiary was subject (i.e., Life Expectancy Payment option or the 10-Year Rule) to prior to their death.</p> <p>Life expectancy payment.</p> <p><i>In the year of the spouse beneficiary's death,</i> the successor beneficiary must take a payment equal to the amount of the spouse beneficiary's life expectancy payment minus any amount withdrawn by the spouse beneficiary in the year of their death.</p> <p><i>In subsequent years,</i> the successor beneficiary is required to withdraw life expectancy payments each year, determined using the spouse beneficiary's single life expectancy in the year of the spouse beneficiary's death (nonrecalculated).</p>	<p>is less than (-1-) (even if the RMD is determined using the deceased IRA owner's life expectancy), if earlier.</p>
--	---



	<p><i>In addition to withdrawing the life expectancy payments each year,</i> the successor beneficiary must deplete the entire Inherited IRA by no later than December 31 of the 10th calendar year following the spouse beneficiary's death.</p> <p>Note: <i>If the spouse beneficiary died prior to the date life expectancy payments are required to commence, the spouse beneficiary is treated as the IRA owner, and the distribution options for the successor beneficiary are applied as if the deceased spouse beneficiary was the IRA owner.</i></p> <p>10-Year Rule. The 10-Year Rule requires the successor beneficiary to deplete the entire Inherited IRA by the end of the 10th calendar year following the year of the IRA owner's death.</p>	
<p>Nonspouse Beneficiary Who Qualifies as Eligible Designated Beneficiary Due to Disability or Chronic Illness</p> <p>OR</p> <p>Nonspouse Beneficiary Who Qualifies as Eligible</p>	<p>Option to elect between two distinct distribution options: 1) Life Expectancy Payment option, or 2) the 10-Year Rule</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>Beneficiary Option Election Deadline The deadline for the eligible designated beneficiary (nonspouse) to make the election between the 10-Year Rule and Life Expectancy Payment option is December 31 of the calendar year following IRA owner's death.</p> </div> <p>Life expectancy payments – <i>Payments begin</i> in the calendar year following the year of the IRA owner's death.</p>	<p>Note: <i>Beneficiary(ies) are required to withdraw any outstanding RMD amounts for the year of the IRA owner's year death.</i></p> <p><i>The required minimum distributions (RMD) for the calendar year following year of the IRA owner's death,</i> is calculated using <i>the longer of</i></p> <ul style="list-style-type: none"> the single life expectancy that corresponds to the age the beneficiary attains on their birthday in the calendar year following the year of the IRA owner's death, or the single life expectancy that corresponds to the age of the IRA owner on their birthday in the year of death, reduced by one. <p>Once the applicable denominator is determined for the first distribution year, it is reduced by one in each succeeding year.</p> <p><i>In addition to withdrawing the RMD each year,</i> the beneficiary must deplete the entire Inherited IRA by no later than December 31 of the year in which the beneficiary's life expectancy is less than (-1-) (even if the</p>



Designated Beneficiary Due to Their Date of Birth Not More Than 10 Years After the IRA Owner's Date of Birth	<p><i>Payment for the first distribution year</i>, are determined using the single life expectancy that corresponds to the age the beneficiary attains on their birthday in the calendar year following the year of the IRA owner's death.</p> <p><i>Payments for subsequent years</i> are determined by using the beneficiary's single life expectancy (in the year following the year of the IRA owner's death), nonrecalculated.</p> <p>10-Year Rule. The 10-Year Rule option requires depletion of the entire Inherited IRA by the end of the 10th calendar year following the year of the IRA owner's death. Because the IRA owner passed away before their required beginning date or this is a Roth IRA, under the 10-Year Rule, the eligible designated beneficiary is not required to take distributions during the first 9 years of the 10-year period.</p> <hr/> <p>Successor Beneficiary Requirements The distribution requirements applicable to the successor beneficiaries are dependent on the distribution requirements that the original beneficiary was subject (i.e., Life Expectancy Payment option or the 10-Year Rule) to prior to their death.</p> <p>Life expectancy payment. <i>In the year of the original beneficiary's death</i>, the successor beneficiary must take a payment equal to the amount of the original beneficiary's life expectancy payment minus any amount withdrawn by the original beneficiary in the year of their death.</p>	<p>required distribution is determined using the deceased IRA owner's life expectancy).</p> <hr/> <p>Successor Beneficiary Requirements- <i>In the year of the original beneficiary's death</i>, the successor beneficiary must take a distribution equal to the amount of original beneficiary's required distribution minus any amount withdrawn by the original beneficiary in the year of their death.</p> <p><i>RMDs for years following the year of the original beneficiary's death</i>, the successor beneficiary must continue taking the RMDs just as the original beneficiary was required.</p> <p><i>In addition to withdrawing the RMD each year</i>, the successor beneficiary must deplete the entire Inherited IRA by no later than December 31 of the 10th calendar year following the year of the original beneficiary's death, or December 31 of the year in which the original beneficiary's life expectancy is less than (-1-) (even if the RMD is determined using the deceased IRA owner's life expectancy), if earlier.</p>
---	---	--



	<p><i>In subsequent years</i>, the successor beneficiary is required to withdraw life expectancy payments each year, just as the original beneficiary would have been required to, if still living.</p> <p><i>In addition to withdrawing the life expectancy payments each year</i>, the successor beneficiary must deplete the entire Inherited IRA by no later than December 31 of the 10th calendar year following the original beneficiary's death.</p> <p>10-Year Rule. The 10-Year Rule requires the successor beneficiary to deplete the entire Inherited IRA by the end of the 10th calendar year following the year of the IRA owner's death.</p>	
<p>Eligible Designated Beneficiary Due to Being the Minor Child of IRA Owner (Child was not yet age 21 on owner's Date of Death of IRA Owner, and is not disabled or chronically ill)</p>	<p>Option to elect between two distinct distribution options: 1) Life Expectancy Payment option (with a 10-Year Depletion Deadline), or 2) the 10-Year Rule</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>Beneficiary Option Election Deadline The deadline for the minor child eligible designated beneficiary to make the election between the 10-Year Rule and Life Expectancy Payment option is December 31 of the calendar year following IRA owner's death.</p> </div> <p>Life expectancy payments – <i>Payments begin</i> in the calendar year following the year of the IRA owner's death.</p> <p><i>Payment for the first distribution year</i>, are determined using the single life expectancy that corresponds to the age the beneficiary attains on their birthday in the calendar year following the year of the IRA owner's death.</p>	<p>Note: <i>Beneficiary(ies) are required to withdraw any outstanding RMD amounts for the year of the IRA owner's year death.</i></p> <p><i>The required minimum distributions (RMD) for the calendar year following year of the IRA owner's death</i>, is calculated using the single life expectancy that corresponds to the age the beneficiary attains on their birthday in the calendar year following the year of the IRA owner's death.</p> <p><i>Payments for subsequent years</i> are determined by using the beneficiary's single life expectancy (in the year following the year of the IRA owner's death), nonrecalculated.</p> <p><i>In addition to withdrawing the RMD each year</i>, the entire Inherited IRA must be depleted no later than December 31 of the calendar year in which the beneficiary attains age 31.</p> <hr/> <p>Successor Beneficiary Requirements- <i>In the year of the original beneficiary's death</i>, the successor beneficiary must take a distribution equal to the amount of original beneficiary's</p>



	<p><i>Payments for subsequent years</i> are determined by using the beneficiary's single life expectancy (in the year following the year of the IRA owner's death), nonrecalculated.</p> <p><i>In addition to withdrawing the life expectancy payments each year</i>, the minor child eligible designated beneficiary must deplete the entire Inherited IRA by no later than December 31 of the year in which they attain age 31.</p> <p>10-Year Rule. The 10-Year Rule option requires depletion of the entire Inherited IRA by the end of the 10th calendar year following the year of the IRA owner's death. Because the IRA owner passed away before their required beginning date or this is a Roth IRA, under the 10-Year Rule, the beneficiary is not required to take distributions during the first 9 years of the 10-year period.</p> <hr/> <p>Successor Beneficiary Requirements The distribution requirements applicable to the successor beneficiaries are dependent on the distribution requirements that the original beneficiary was subject (i.e., Life Expectancy Payment option or the 10-Year Rule) to prior to their death.</p> <p>Life expectancy payment. <i>In the year of the original beneficiary's death</i>, the successor beneficiary must take a payment equal to the amount of the original beneficiary's life expectancy payment minus any amount withdrawn by the original beneficiary in the year of their death.</p>	<p>required distribution minus any amount withdrawn by the original beneficiary in the year of their death.</p> <p><i>RMDs for years following the year of the original beneficiary's death</i>, the successor beneficiary must continue taking the RMDs just as the original beneficiary was required.</p> <p><i>In addition to withdrawing RMDs each year</i>, the successor must deplete the entire Inherited IRA no later than December 31 of the year in which the original beneficiary would have attained age 31, or December 31 of the 10th calendar year following the original beneficiary's death, if earlier.</p>
--	---	---



	<p><i>In subsequent years</i>, the successor beneficiary is required to withdraw life expectancy payments each year, just as the original beneficiary would have been required to, if still living.</p> <p><i>In addition to withdrawing the life expectancy payments each year</i>, the successor must deplete the entire Inherited IRA no later than December 31 of the year in which the original beneficiary would have attained age 31, or December 31 of the 10th calendar year following the original beneficiary's death, if earlier.</p> <p>10-Year Rule. The 10-Year Rule requires the successor beneficiary to deplete the entire Inherited IRA by the end of the 10th calendar year following the year of the IRA owner's death.</p>	
Noneligible Designated Beneficiary	<p>10-Year Rule. The 10-Year Rule option requires depletion of the entire Inherited IRA by the end of the 10th calendar year following the year of the IRA owner's death. Because the IRA owner passed away before their required beginning date or this is a Roth IRA, under the 10-Year Rule, the beneficiary is not required to take distributions during the first 9 years of the 10-year period.</p> <hr/> <p>Successor Beneficiary Requirements 10-Year Rule. The 10-Year Rule requires the successor beneficiary to deplete the entire Inherited IRA by the end of the 10th calendar year following the year of the IRA owner's death.</p>	<p>Note: <i>Beneficiary(ies) are required to withdraw any outstanding RMD amounts for the year of the IRA owner's year death.</i></p> <p><i>The required minimum distributions (RMD) for the calendar year following year of the IRA owner's death</i>, is calculated using the single life expectancy that corresponds to the age the beneficiary attains on their birthday in the calendar year following the year of the IRA owner's death.</p> <p><i>RMDs for subsequent years</i> are determined by using the beneficiary's single life expectancy (in the year following the year of the IRA owner's death), nonrecalculated.</p> <p><i>In addition to withdrawing the RMD each year</i>, the beneficiary must deplete the entire Inherited IRA by no later than December 31 of the 10th calendar year following the year of the IRA owner's death.</p> <hr/> <p>Successor Beneficiary Requirements-</p>



		<p><i>In the year of the original beneficiary's death</i>, the successor beneficiary must take a distribution equal to the amount of original beneficiary's required distribution minus any amount withdrawn by the original beneficiary in the year of their death.</p> <p><i>RMDs for years following the year of the original beneficiary's death</i>, the successor beneficiary must continue taking the RMDs just as the original beneficiary was required.</p> <p><i>In addition to withdrawing the RMD each year</i>, the successor beneficiary must deplete the entire Inherited IRA by no later than December 31 of the 10th calendar year following the year of the IRA owner's death.</p>
<p>Nonperson Beneficiary (includes nonqualified trusts (i.e., trusts that are not qualified see-through trusts), estates, and other entities</p>	<p>5-Year Rule. The 5-Year Rule requires depletion of the entire Inherited IRA by the end of the 5th calendar year following the year of the IRA owner's death. The beneficiary may but is not required to take distributions during the first 4 years of the 5-year period.</p> <p>Note: Pursuant to the CARES Act, in scenarios in which an IRA owner died before January 1, 2020, 2020 is not to be counted in the 5-year period that determines the deadline for an IRA beneficiary to deplete an inherited IRA under the 5-year rule. Effectively, such beneficiaries have a 6- year period rather than a 5-year period to deplete the Inherited IRA.</p>	<p>Note: Beneficiary(ies) are required to withdraw any outstanding RMD amounts for the year of the IRA owner's year death.</p> <p>The required minimum distributions (RMD) for the calendar year following year of the IRA owner's death is calculated using the single life expectancy that corresponds to the age the life expectancy that corresponds to the age the IRA owner attained/would have attained on their birthday in the year of their death, reduced by one.</p> <p>RMDs for subsequent years are determined by using the IRA owner's single life expectancy that corresponds to the age the IRA owner attained/would have attained on their birthday in the year of their death, reduced by one for each year since the year of death.</p>
<p>Qualified See-Through Trusts (Including Applicable Multi-</p>	<p>Distribution requirements are dependent on the underlying trust beneficiaries that must be considered. Consulting clients call for trust guidance.</p> <p>Note: Due to the complexity of determining which underlying trust beneficiaries must be considered, trustees of a trust</p>	<p>Note: Beneficiary(ies) are required to withdraw any outstanding RMD amounts for the year of the IRA owner's year death.</p> <p>Distribution requirements are dependent on the underlying trust beneficiaries that must be considered. Consulting clients call for trust guidance.</p>



Beneficiary Trusts)	<p><i>named as an IRA beneficiary are strongly encouraged to seek assistance from a competent tax or legal advisor.</i></p>	<p>Note: Due to the complexity of determining which underlying trust beneficiaries must be considered, trustees of a trust named as an IRA beneficiary are strongly encouraged to seek assistance from a competent tax or legal advisor.</p>
Nonspouse Beneficiary Death of IRA Owner Before 2020	<p>Option to elect between two distinct distribution options: 1) Life Expectancy Payments, or 2) the 5-Year Rule</p> <div data-bbox="302 553 1058 732" style="border: 1px solid black; padding: 5px;"> <p>Beneficiary Option Election Deadline The deadline for the minor child eligible designated beneficiary to make the election between the 5-Year Rule and Life Expectancy Payment options is December 31 of the calendar year following IRA owner's death.</p> </div> <p>Life expectancy payments – Payments begin in the calendar year following the year of the IRA owner's death.</p> <p>Payment for the first distribution year, are determined using the single life expectancy that corresponds to the age the beneficiary attains on their birthday in the calendar year following the year of the IRA owner's death.</p> <p>Payments for subsequent years are determined by using the beneficiary's single life expectancy (in the year following the year of the IRA owner's death), nonrecalculated.</p> <p>5 Year Rule. The 5-Year Rule option requires depletion of the entire Inherited IRA by the end of the 5th calendar year following the year of the IRA owner's death. The beneficiary is not required</p>	<p>Note: Beneficiary(ies) are required to withdraw any outstanding RMD amounts for the year of the IRA owner's year death.</p> <p>The required minimum distributions (RMD) for the calendar year following year of the IRA owner's death, is calculated using the longer of</p> <ul style="list-style-type: none"> the single life expectancy that corresponds to the age the beneficiary attains on their birthday in the calendar year following the year of the IRA owner's death, or the single life expectancy that corresponds to the age of the IRA owner on their birthday in the year of death, reduced by one. <p>Once the applicable denominator is determined for the first distribution year, it is reduced by one in each succeeding year.</p> <p>In addition to withdrawing the RMD each year, the beneficiary must deplete the entire Inherited IRA by no later than December 31 of the year in which the beneficiary's life expectancy is less than (-1-) (even if the required distribution is determined using the deceased IRA owner's life expectancy).</p> <hr/> <p>Successor Beneficiary Requirements- In the year of the original beneficiary's death, the successor beneficiary must take a distribution equal to the amount of original beneficiary's required distribution minus any amount withdrawn by the original beneficiary in the year of their death.</p>



to take distributions during the first 4 years of the 5-year period.

Note: Pursuant to the CARES Act, in scenarios in which an IRA owner died before January 1, 2020, 2020 is not to be counted in the 5-year period that determines the deadline for an IRA beneficiary to deplete an inherited IRA under the 5-year rule. Effectively, such beneficiaries have a 6- year period rather than a 5-year period to deplete the Inherited IRA.

Successor Beneficiary Requirements

The distribution requirements applicable to the successor beneficiaries are dependent on the distribution requirements that the original beneficiary was subject (i.e., Life Expectancy Payment option or the 5-Year Rule) to prior to their death.

Life expectancy payment.

In the year of the original beneficiary's death, the successor beneficiary must take a payment equal to the amount of the original beneficiary's life expectancy payment minus any amount withdrawn by the original beneficiary in the year of their death.

In subsequent years, the successor beneficiary is required to withdraw life expectancy payments each year, just as the original beneficiary would have been required to, if still living.

When the original beneficiary dies in 2020 or later, in addition to withdrawing the life expectancy payments each year, the successor must deplete the entire Inherited IRA no later than December 31 of the 10th calendar year following the original beneficiary's death.

RMDs for years following the year of the original beneficiary's death, the successor beneficiary must continue taking the RMDs just as the original beneficiary was required.

In addition to withdrawing the RMD each year, the successor beneficiary must deplete the entire Inherited IRA by no later than December 31 of the 10th calendar year following the year of the original beneficiary's death, or December 31 of the year in which the original beneficiary's life expectancy is less than (-1-) (even if the RMD is determined using the deceased IRA owner's life expectancy), if earlier.



	<p>5-Year Rule. The 5-Year Rule requires the successor beneficiary to deplete the entire Inherited IRA by the end of the 5th calendar year following the year of the IRA owner's death.</p> <p>Note: Pursuant to the CARES Act, in scenarios in which an IRA owner died before January 1, 2020, 2020 is not to be counted in the 5-year period that determines the deadline for an IRA beneficiary to deplete an inherited IRA under the 5-year rule. Effectively, such beneficiaries (including successor beneficiaries) have a 6-year period rather than a 5-year period to deplete the Inherited IRA.</p>	
<p>Spouse Beneficiary Death of IRA Owner Before 2020</p>	<ul style="list-style-type: none">• Move to own IRA, or• Maintain Inherited IRA <p>Spouse Beneficiary Move to Own IRA Rather than maintain the inherited IRA funds in an Inherited IRA, a spouse beneficiary may choose to move the inherited IRA funds to their own IRA through a direct transfer or a rollover.</p> <ul style="list-style-type: none">• Transfer to Own Traditional IRA. Further guidance is needed to know for certain if the deadline, as proposed in the proposed RMD regulations, for a spouse to transfer IRA funds to their own IRA is applicable to scenarios where the IRA owner died before 2020.• Spouse Beneficiary Rollover to Own Traditional IRA. The spouse beneficiary may choose to roll over the inherited IRA funds to their own Traditional IRA at any time, so long as rollover eligibility requirements are satisfied including, but	<p>Note: Beneficiary(ies) are required to withdraw any outstanding RMD amounts for the year of the IRA owner's year death.</p> <ul style="list-style-type: none">• Move to own IRA, or• Maintain Inherited IRA <p>Spouse Beneficiary Move to Own IRA Rather than maintain the inherited IRA funds in an Inherited IRA, a spouse beneficiary may choose to move the inherited IRA funds to their own IRA through a direct transfer or a rollover.</p> <ul style="list-style-type: none">• Transfer to Own Traditional IRA. Further guidance is needed to know for certain if the deadline, as proposed in the proposed RMD regulations, for a spouse to transfer IRA funds to their own IRA is applicable to scenarios where the IRA owner died before 2020.• Spouse Beneficiary Rollover to Own Traditional IRA. The spouse beneficiary may choose to roll over the inherited IRA funds to their own Traditional IRA at any time, so long as rollover eligibility



<p>not limited to the 12-month IRA-to-IRA rollover restriction. Note: <i>The RMDs are not eligible to be rolled over.</i></p> <p>Spouse Beneficiary Maintain Inherited IRA Option to elect between two distinct distribution options: 1) Life Expectancy Payment option, or 2) the 5-Year Rule</p> <div data-bbox="302 516 1058 1125"><p>Beneficiary Option Election Deadline The deadline for the spouse beneficiary to make the election between the 5-Year Rule and Life Expectancy Payment option is <i>the earlier of</i></p><ul style="list-style-type: none">• December 31 of the 5th calendar year following the year of the IRA owner's death, or• December 31 of the year in which the IRA owner would have attained RMD starting age* (age 72, 73, or 75 depending on their date of birth).<p>If, however, the IRA owner's death is in the calendar year they attained/would have attained RMD starting age, or in the calendar year immediately following the year they attained RMD starting age, the election deadline for the spouse beneficiary is December 31 of the calendar year following the IRA owner's death.</p></div> <p>Life expectancy payments – Payments begin in the <i>later of</i> the calendar year following the IRA owner's death or the calendar year the IRA owner would have attained RMD starting age.*</p> <p>Payments are calculated each year using the spouse beneficiary's single life expectancy, recalculated.</p>	<p>requirements are satisfied including, but not limited to the 12-month IRA-to-IRA rollover restriction. Note: <i>The RMDs are not eligible to be rolled over.</i></p> <p>Spouse Beneficiary Maintain Inherited IRA <i>Required minimum distributions (RMDs) for years following the year of the IRA owner's death.</i> RMDs must continue in subsequent years, and are calculated using the <i>longer of</i></p> <ul style="list-style-type: none">• the single life expectancy that corresponds to the age the spouse beneficiary attains on their birthday in the distribution year, or• the single life expectancy that corresponds to the age the IRA owner attained/would have attained on their birthday in the year their death, reduced by one for each calendar year that has elapsed since the year of the IRA owner's death. <hr/> <p>Successor Beneficiary Requirements- <i>In the year of the spouse beneficiary's death,</i> the successor beneficiary must take a distribution equal to the amount of the spouse beneficiary's required distribution minus any amount withdrawn by the spouse beneficiary in the year of their death.</p> <p><i>RMDs for years following the year of the spouse beneficiary's death</i> are determined using <i>the longer of</i></p> <ul style="list-style-type: none">• spouse beneficiary's single life expectancy in the year of the spouse beneficiary's death (nonrecalculated), or• the single life expectancy of the deceased IRA owner in the year of the IRA owner's death (nonrecalculated). <p><i>In addition to withdrawing the RMD each year,</i> the successor beneficiary must deplete the entire Inherited IRA by no later than December 31 of the 10th calendar year following the spouse beneficiary's death, or December 31 of the year in which the spouse beneficiary's life expectancy</p>
---	--



	<p>5 Year Rule.</p> <p>The 5-Year Rule option requires depletion of the entire Inherited IRA by the end of the 5th calendar year following the year of the IRA owner's death. The beneficiary is not required to take distributions during the first 4 years of the 5-year period.</p> <p>Note: Pursuant to the CARES Act, in scenarios in which an IRA owner died before January 1, 2020, 2020 is not to be counted in the 5-year period that determines the deadline for an IRA beneficiary to deplete an inherited IRA under the 5-year rule. Effectively, such beneficiaries have a 6- year period rather than a 5-year period to deplete the Inherited IRA.</p> <p>* RMD starting age (based on the IRA owner's date of birth) is</p> <ul style="list-style-type: none">• age 72, for IRA owners born before January 1, 1951,• age 73, for IRA owners born after December 31, 1950, and before January 1, 1960, or• age 75, for IRA owners born after December 31, 1959. <hr/> <p>Successor Beneficiary Requirements</p> <p>The distribution requirements applicable to the successor beneficiaries are dependent on the distribution requirements that the spouse beneficiary was subject (i.e., Life Expectancy Payment option or the 5-Year Rule) to prior to their death.</p> <p>Life expectancy payment.</p> <p><i>In the year of the spouse beneficiary's death</i>, the successor beneficiary must take a payment equal to the amount of the original beneficiary's life expectancy payment minus any</p>	<p>is less than (-1-) (even if the RMD is determined using the deceased IRA owner's life expectancy), if earlier.</p>
--	--	---



	<p>amount withdrawn by the spouse beneficiary in the year of their death.</p> <p><i>In subsequent years</i> the successor beneficiary is required to withdraw life expectancy payments each year, determined using the spouse beneficiary's single life expectancy in the year of the spouse beneficiary's death (nonrecalculated).</p> <p><i>When the original beneficiary dies in 2020 or later, in addition to withdrawing the life expectancy payments each year,</i> the successor must deplete the entire Inherited IRA no later than December 31 of the 10th calendar year following the spouse beneficiary's death.</p> <p>Note: <i>If the spouse beneficiary died prior to the date life expectancy payments are required to commence, the spouse beneficiary is treated as the IRA owner, and the distribution options for the successor beneficiary are applied as if the deceased spouse beneficiary was the IRA owner.</i></p> <p>5-Year Rule. The 5-Year Rule requires the successor beneficiary to deplete the entire Inherited IRA by the end of the 5th calendar year following the year of the IRA owner's death.</p> <p>Note: <i>Pursuant to the CARES Act, in scenarios in which an IRA owner died before January 1, 2020, 2020 is not to be counted in the 5-year period that determines the deadline for an IRA beneficiary to deplete an inherited IRA under the 5-year rule. Effectively, such beneficiaries (including successor beneficiaries) have a 6-year period rather than a 5-year period to deplete the Inherited IRA.</i></p>	
--	--	--



CONVERGENT
RETIREMENT PLAN SOLUTIONS, LLC