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REQUIRED MINIMUM DISTRIBUTIONS (RMDs) TO BENEFICIARY UNDER IRC § 401(a)(9)
ROTH IRAs

Beneficiary	Beneficiary	Beneficiary	Beneficiary		
Spouse - Inherited IRA (No rollover)	Spouse may defer required distributions until the end of the year the owner would have reached age 70 1/2. In this year, the RMD is calculated based upon spouse's life expectancy by referencing her attained age for the year of distribution based on the Single Life Table of Treas. Reg. § 1.401(a)(9)-9. For each succeeding year, the surviving spouse references his or her age under the Single Life Table for that particular year. Upon the death of the surviving spouse: (1) If the surviving spouse dies prior to the end of the year in which the owner would have been age 70 1/2, the spouse is deemed to be the owner/participant and a beneficiary is determined as of September 30th of the year following the year of the spouse's death. In this year, such beneficiary must begin to receive RMDs based upon his or her corresponding life expectancy under the Single Life Table. For each succeeding year, the initial factor is reduced by one for each subsequent year. (2) If the surviving spouse dies on or after the end of the year in which the owner would have reached age 70 1/2, an RMD for the current year must be taken. Thereafter, RMDs are calculated based upon the now deceased spouse's life expectancy by reference to his or her attained age in the year of death by reference to the Single Life Table. For each succeeding year, the initial factor is reduced by one for each subsequent year.	Non-Spouse Individual Designated Beneficiary	The first year distribution (year after the year of death) is determined based upon corresponding life expectancy factor for the designated beneficiary's age in the year of the first distribution by reference to the Single Life Table. For succeeding years, this initial factor is reduced by one for each subsequent year.	Charity	Entire balance must be distributed no later than December 31st of the year containing the fifth anniversary of the decedent's death. However, consider the potential to cash out the charity or segregate interests where multiple beneficiaries exist.
Spouse - Rollover	No RMDs required during spouse's life.	Multiple Individual Beneficiaries	As long as the account is segregated into separate accounts no later than December 31st of the year following the year of death, each beneficiary may independently calculate RMDs. Thus, with respect to each beneficiary, the first year distribution (year after the year of death) is determined based upon corresponding life expectancy factor for the beneficiary's age in the year of the first distribution by reference to the Single Life Table. For succeeding years, this initial factor is reduced by one for each subsequent year.	Estate	Entire balance must be distributed no later than December 31st of the year containing the fifth anniversary of the decedent's death.
		Designated Beneficiary Trust See PLRs 200317041, 200317043 and 200317044 for separate shares in relation to a trust. See also PLRs 200228025 and 200235039.	The first year distribution (year after the year of death) is determined based upon corresponding life expectancy factor for the oldest trust beneficiary's age in the year of the first distribution by reference to the Single Life Table. For succeeding years, this initial factor is reduced by one for each subsequent year. If the trust is designed to create "one pot" for the benefit of multiple beneficiaries, RMDs are based upon the oldest trust beneficiary's life expectancy. However, if the Beneficiary Designation is payable to separate sub-trusts, each separate sub-trust beneficiary may be able to use their respective life expectancies to calculate RMDs. A PLR should be requested if separate share treatment is desired.	Conduit Trust for the Benefit of Spouse	During the life of the surviving spouse: Spouse may defer required distributions until the end of the year the deceased owner would have reached age 70 1/2. In this year, the RMD is calculated based upon spouse's life expectancy by referencing her attained age for the year of distribution based on the Single Life Table. For each succeeding year, the surviving spouse references his or her age for that particular year under the Single Life Table. Upon the death of the surviving spouse (1) If the surviving spouse dies prior to the end of the year in which the owner would have been age 70 1/2, the spouse is deemed to be the owner/participant and a beneficiary is determined as of September 30th of the year following the year of death. In this year, such beneficiary must begin to receive RMDs based upon his or her corresponding life expectancy under the Single Life Table. For each succeeding year, the initial factor is reduced by one. If the surviving spouse has no designated beneficiary, the five year rule applies. In PLR 200644022, the IRS held that the spouse did not have a designated beneficiary even though the trust for her benefit had contingent beneficiaries. (2) If the surviving spouse dies on or after the end of the year in which the owner would have reached age 70 1/2, an RMD for the current year must be taken. Thereafter, RMDs are calculated based upon the now deceased spouse's life expectancy by reference to his or her attained age in the year of death by reference to the Single Life Table. For each succeeding year, the initial factor is reduced by one for each year that has passed.
		Non Designated Beneficiary Trust: See PLRs 200228025 and 200235039.	Entire balance must be distributed no later than December 31st of the year containing the fifth anniversary of the decedent's death. However, consider the potential to cash out non-individual beneficiaries where, and if, possible to save the designated beneficiary status of the trust.		

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