

RETIREMENT PLAN DISTRIBUTION RULES

**(Early Payment Penalties, Rollover Rules and Minimum
Distribution Rules)**

by

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I. Lack of Distribution Rules to Bank Accounts and Brokerage Accounts

There are distribution rules for bank accounts and brokerage accounts, but these are not put in place by the government. Whatever rules there are are usually put in place by the institutions themselves. Take C.D.s, if they are cashed in before the due date, even if the cause is the death of the owner, there will usually be a penalty, frequently the interest accrued to the date of termination.

If you buy into a hedge fund, you usually have to give at least 90 days or more notice before you may take a distribution (if you may take a distribution before the termination of the fund).

Nonetheless, distribution rules relating to retirement benefits are put in place by the government. The rules are numerous and not always logical.

II. Social Security Benefit Distribution Rules.

A. Except for disability benefits, the earliest age at which you may receive Social Security Benefits on your own record is 62. At age 62 however, the full retirement benefit is reduced by 25% and that reduction stays in place for the rest of your life.

B. Full Social Security Benefits are currently paid at age 66.¹

C. The maximized Social Security Benefit is paid at age 70, when the full benefit is increased by 32%.

D. Spousal Benefits.

1. A worker's spouse is entitled to 50% of the full retirement benefit at age 66.

2. Even if both spouses work and are entitled to benefits on their own records, a spouse may receive 50% of the worker's benefit at age 66, if that amount is greater than his/her accrued benefit. The worker may apply for benefits, the spouse may get 50% of the worker's benefit, and the worker may elect to stop getting benefits. When the spouse reaches age 70, he or she may switch to his or her own benefit with the maximum increase (the additional 32%) and if the worker desires, the worker may restart taking benefits.

3. If the spouse and the worker are divorced but were married for at least 10 years,

¹ The next change in normal benefit payments will occur for those born in 1955, when full benefits will not be paid until age 66 and 2 months. For those born in 1960 or later full benefits will be paid at age 67.

the spouse may receive 50% of the worker's full retirement benefit (at age 66), as long as the spouse is unmarried, at least age 62 AND the worker is entitled to social security for retirement or disability benefits.

4. If the worker dies and had worked long enough to receive a benefit, the surviving spouse may receive full benefits at age 66. The spouse may actually begin to receive Social Security at age 50 if disabled and the disability started before or within 7 years of the worker's death.

5. If the surviving spouse remarries at age 60 (or 50 and disabled), his or her eligibility for Social Security spousal benefits will not be affected.

6. The surviving spouse may receive benefits at any age if caring for a deceased worker's child under age 16 or is disabled and receiving benefits on the worker's record.

E. No matter what age Social Security begins, Medicare eligibility begins at age 65, but You may postpone enrolling without being subject to penalty if you or your spouse has group health insurance from an employer or union plan.

III. Distinctions between ERISA Plans and Tax-Qualified Plans.

A. The Employee Retirement Income Security Act of 1974 ("ERISA") is a Federal law that sets minimum standards for retirement, health and life insurance plans in private industry. Other than plans whose participants are only owner-employees and their spouses, most ERISA retirement plans will have "REA"² requirements to provide spousal benefits. ERISA plans include 401(a) plans, 401(k) plans, defined benefit and defined contribution plans, SEP-IRAs and SIMPLE IRAs. Some 403(b) plans are covered by ERISA, some are not.

B. Although most of the retirement plans listed in A are ERISA plans, they all try to be tax qualified, in which case tax deductions are taken for the contributions made to them (provided that the tax-qualification rules of the Internal Revenue Code (the "Code") are followed). Traditional and ROTH individual retirement accounts ("IRAs") and all 403(b) plans are not ERISA plans, unless associated with SEP plans or SIMPLE plans (discussed below) but they are tax-qualified accounts.

C. 403(b) plans are tax-sheltered annuities available to employees of tax-exempt employers or public educational organizations. 403(b) plans subject to ERISA offer annuities to their participants and are subject to REA rules. 403(b) plans not subject to ERISA (or REA

² The Retirement Equity Act of 1984.

rules) are funded exclusively by means of elective employee deferrals and have no employer contributions.

IV. SEP and SIMPLE IRAs.

A. Simplified Employee Pension Plan (“SEP”) is a plan in which an employer makes contributions on a tax-favored basis to traditional IRAs owned by their employees. Employees do not contribute but SEPs must receive employer contributions. They are created under Code³ §408(k).

B. A Savings Incentive Match Plan for Employees (“SIMPLE”) plan is created under §408(p) and is similarly funded with traditional IRAs owned by the employees. The employer is required to contribute annually either: (i) matching contribution up to 3% of compensation or (ii) 2% nonelective contribution for each eligible employee. Employees may elect to contribute but SIMPLE plans must receive employer contributions.

C. Distribution rules for SEPS and SIMPLEs are generally the same as traditional IRAs, except the early distribution penalty for a SIMPLE is 25% for distributions within the first 2 years in such a salary arrangement under Code §72(t)(6).

D. Contributions, whether by employer or employee to a SEP or SIMPLE affect the ability of a worker to make contributions to personal IRAs. As with participation in any tax-qualified plans, such contributions may limit the ability of the worker to make deductible contributions to traditional IRAs.

V. Traditional versus Roth IRAs.

A. 1. A traditional IRA may be created and contributions made and deducted until the owner reaches age 70-1/2, based on income, filing status, and whether or not covered by a retirement plan at work.

2. Distributions from a traditional IRA usually must begin at age 70-1/2 and except for non-deductible contributions made by an IRA owner (which have already been taxed), are taxed as ordinary income.

3. An “Inherited IRA” is received by the beneficiary(ies) of a deceased owner. Distributions are taxed when received and are subject to the rules described below

³ The Internal Revenue Code of 1986, as amended.

B. 1. “ROTH” IRA: has no limit to when it may be created and contributions made. Contributions may never be tax deducted.

2. No distributions from a ROTH IRA are required of an owner and the owner’s surviving spouse if she elects to be treated as an owner. The spouse may not wish to be treated as the owner if she is less than 59-1/2 and wishes to take the money out quickly because of the penalties discussed below. Generally the same distribution rules as for a traditional IRA apply to beneficiaries of “Inherited ROTH IRAs” who are not surviving spouses. Qualified distributions are not taxed.

3. “Qualified Distributions” are distributions from a ROTH IRA that occur after 5 years and occur:

- (a) on or after the date the owner reaches age 59-1/2;
- (b) after the owner’s death;
- (c) and are “attributable to” the owner’s being totally disabled;⁴ or
- (d) as a distribution of up to \$10,000 for certain purchases of a “first home.”⁵

4. The 5 year period begins on January 1 of the first year for which a contribution was made to any ROTH IRA made for that owner and is in effect for all of that owner’s ROTH IRAs,⁶ but not that owner’s inherited ROTH IRAs.

(a) example: Conversion of traditional IRA occurs on September 3, 2014, 5year period starts January 1, 2014 and ends on December 31, 2018.

(b) a deceased owner’s 5 year period carries over to his or her beneficiary, so for the example in (a), if the owner dies in 2015, the distributions required to be taken in 2016-2018 are “non-qualified” distributions.

5. Generally, distributions from a ROTH IRA are deemed to come first out of the owner’s contributions (which are tax-free) and only after the amount the owner contributed is withdrawn are distributions deemed to come out of the earnings of the ROTH IRA (which are taxable and subject to penalties).⁷

⁴ Defined in Code § 72(m)(7).

⁵ Code § 408A(d)(2)(A)(iv); Code § 72(t)(2)(F).

⁶ Code § 408A(d)(2)(B); Reg. § 1.408A-6, A-2.

⁷ Code § 408A(d)(4)(B); Reg. § 1.408A-6, A-9.

VI. Minimum Required Distribution (“MRD”) Rules.

A. Distributions During Lifetime of Participant.

The MRD for any year during a participant’s life is the amount obtained by dividing the account balance as of the last valuation date of the previous year (usually 12/31) by the factor set forth in the “Uniform Table”) for the participant’s age on the participant’s birthday during the distribution year.⁸ The period during which the benefit may be distributed is commonly known as the Applicable Distribution Period (“ADP”).

⁸Reg. §1.401(a)(9)-5, A-3,4.

- B. **Required Beginning Date.** Distributions must begin from a qualified plan or IRA no later than a participant's "Required Beginning Date" ("RBD"). A participant's RBD in IRAs and qualified plans is generally April 1 of the year following the year in which the participant reaches age 70-1/2. A participant of a qualified plan who is not a 5% owner may, however, defer his RBD until April 1 of the year following the year in which such participant retires. The RBD for a 5% owner is April 1 of the year following the year in which the owner reaches age 70-1/2, whether or not he or she is retired.⁹ Code § 416 defines a 5% owner as a person who owns 5% of the outstanding stock of a corporation or stock with more than 5% of the total combined voting power. If the employer is not a corporation, a 5% owner is a person who owns more than 5% of the capital or profits interest. There is ambiguity about how to make such determination. There is no apparent guidance about whether such ownership must exist for one day in the year, for each day in the year, or some combination of days.
- C. **First Distribution Year.** The distribution required to be made on a participant's (or owner's for an IRA) RBD is the distribution for the participant's "first distribution year." The first distribution year is generally the year in which the participant reaches age 70-1/2. (The first distribution year for a qualified plan participant who is not a 5% owner is the later of the year in which the participant reaches age 70-1/2 and the year in which the participant retires.) The year in which the RBD occurs is the second distribution year. The MRD for the first distribution year may be made by December 31 of that year or up to April 1st of the following year (the second distribution year). The required distribution for the second distribution year must be made before December 31 of that year, or 2

⁹ Reg. § 1.401(a)(9)-(2), A-2.

distributions in the second distribution year.¹⁰

Example: Flora is 70-1/2 on August 1, 2015. Her RBD is April 1, 2016. If Flora takes her first MRD in 2015, she will only have to take one distribution by December 31, 2015 and one distribution by December 31, 2016 (over two taxable years). If she waits (as she may) until April 1, 2016, she will have to take two distributions that year: one on April 1, 2016 and the other on December 31, 2016 (in one taxable year).

D. **.Calculating the MRD.** The MRD for any year is calculated by dividing the year-end account balance for the preceding year by the factor from the Uniform Table for the participant's age on his or her birthday during the distribution year.¹¹ Although after age 59-1/2, there is no prohibition against withdrawing more than the MRD in any year, excess distributions taken in one year may not be used to reduce MRDs in another year.¹²

E. **The Uniform Table.** The Uniform Table (See Appendix A) sets forth factors representing the joint, recalculated life expectancy of an individual and another person ten years younger. The Uniform Table is used to calculate MRDs for all distributions during the lifetime of a participant, except as provided below in F.

F. **Rules When the Spouse is 10 Years Younger than the Participant.** If the participant's spouse is more than 10 years younger than the participant, and the participant's

¹⁰ Reg. § 1.401(a)(9)-5.

¹¹ Reg. § 1.401(a)(9)-9, A-2.

¹² Reg. § 1.401(a)(9)-5, A-2.

spouse is the sole beneficiary of the account or plan for the entire year, the participant may use the actual recalculated joint life expectancy of the participant and the spouse. These life expectancy factors are determined using the Joint and Last Survivor Life Expectancy Table (see Appendix B) as required by Treas. Reg. § 401(a)(9)-5, A-4. The participant may use these factors even if the spouse dies during the year or they divorce during the year unless the participant designates a new beneficiary or remarries during the year, in which case, the life expectancy factor will revert to the Uniform Table unless the beneficiary is a new spouse who is more than 10 years younger than the participant.

VII. Distributions After Participant's Death.

- A. **Death Before RBD.** In general, all qualified plan and IRA benefits must be distributed on or before December 31 of the year that contains the fifth anniversary of the date of the decedent's death if the participant dies before reaching the participant's RBD. However, if an individual designated beneficiary is named in a beneficiary designation form or by the plan itself, the distributions after the participant's death may be made over the beneficiary's life expectancy, from the Single Life Expectancy Table (see Appendix C), if the beneficiary commences distributions by December 31 of the year following the year of the participant's death.¹³ If the participant's

¹³ Code § 401(a)(9)(B)(iii); Reg. § 1.401(a)(9)-3, A-2.

spouse is the designated beneficiary, special, more generous rules apply. These rules are detailed below.

B. **Individual Designated Beneficiary.** The MRD for an individual designated beneficiary who is not the participant's spouse is determined by the designated beneficiary's life expectancy for his age on his birthday in the year following the year of the participant's death, using the single life expectancy tables contained in the regulations under Treas. Reg. § 401(a)(9)-9, A-1. This is the distribution factor for the first distribution year (the year following the year of the participant's death). The account balance at the end of the year of the participant's death is then divided by the distribution factor. In each subsequent year, the MRD is calculated the same way, after reducing the life expectancy factor for the prior year by one.¹⁴

C. **Death After RBD.** If a participant dies after the participant's RBD, qualified retirement plan and IRA benefits must be distributed "at least as rapidly" as they were being distributed to the participant during the participant's lifetime.¹⁵

D. **No Designated Beneficiary.** If the participant dies after his RBD and has no individual designated beneficiary, post-death distributions are to be made over the participant's remaining life expectancy, without further recalculation. To calculate the MRD for the years following the year of the participant's death, the participant's life expectancy as of the participant's age on his birthday in the year of death is reduced by

¹⁴ Reg. § 1.401(a)(9)-5, A-5(c)(3).

¹⁵ Code § 1.401(a)(9)(B)(i).

one for each year after the year of death.¹⁶

E. **With an Individual Designated Beneficiary.** If the participant has a designated beneficiary, post-death payments may be made from a qualified plan or IRA over the longer of: (a) the participant's remaining life expectancy, and (b) the beneficiary's remaining life expectancy, in either case without recalculation (unless the designated beneficiary is the surviving spouse). The MRD for the year after the year of death is calculated with reference to the beneficiary's life expectancy from the Single Life Expectancy Table¹⁷, as of his or her age on his or her birthday in that year (the year following the year of the participant's death). That age is reduced by one for each succeeding year.¹⁸

Example, John, Sr. who is a widower designated his son John, Jr. as the beneficiary of his IRA. John, Sr. died in 2012 at age 72. John, Jr. was 42 in the year his father died. John, Sr. had not taken his MRD before he died. On December 31, 2011, John, Sr.'s account balance was \$1,000,000. John, Jr. must take \$39,062.50 prior to December 31, 2012, based on a 25.6 factor from the Uniform Table¹⁹ for age 72. On December 31, 2012, the account balance was \$800,000 (stock market down turn). John Jr.'s applicable distribution period ("ADP") is 40.7 from the Single Life Table, based on his age of 43 in the year after his father died. His MRD in 2013 is $\$800,000 \div 40.7$. In 2014, his ADP will be 39.7. In 2015, 38.7, etc.

¹⁶ Reg. § 1.401(a)(9)-5, A-5(c)(3).

¹⁷ Reg. § 1.401(a)(9)-9, A-1.

¹⁸ Reg. § 1.401(a)(9)-5, A-5.

¹⁹ Reg. § 1.401(a)(9)-9, A-2.

VIII. The Surviving Spouse as Designated Beneficiary.

A. Participant's Death Before RBD. If the participant names his or her spouse as the designated beneficiary and dies before his or her RBD, then the spouse may defer post-death distributions until December 31 of the year in which the participant would have attained age 70-1/2. When distributions begin in that year, the spouse's single recalculated life expectancy, from the Single Life Expectancy Table is used to calculate MRDs. The factor for calculating the MRD for the first distribution year is the spouse's life expectancy factor from the Single Life Table based on the spouse's age on the spouse's birthday during the year in which the participant would have reached age 70-1/2, had the participant survived. The factor for calculating the MRD for the next year is the spouse's recalculated life expectancy factor based on the spouse's age on the spouse's birthday during that next year.²⁰ If the spouse dies before distributions to the spouse have commenced, distributions are required to be made from the plan or IRA under the same rules that would have applied if the spouse were the participant and had died before his or her RBD Reg.²¹, i.e., the "5-year rule." However, if the spouse names a designated beneficiary, distributions may be made over the beneficiary's life expectancy, unless the plan requires a 5 year or faster

²⁰Reg. § 1.401(a)(9)-5, A-5(c)(2).

²¹§ 1.401(a)(9)-3, A-5

distribution. If the life expectancy distribution is permitted, the first distribution must be made by December 31 of the year following the year of the spouse's death.

B. **Spouse dies after distributions to Spouse have Begun.** If the spouse dies after distributions have begun, MRDs after the spouse's death are calculated using the spouse's remaining single life expectancy without further recalculation, in the same manner as if the spouse were the participant and had died, without naming a designated beneficiary (whether or not the spouse has designated a beneficiary), after his or her RBD. The MRD for the year of the spouse's death is calculated as if the spouse were living. The factor for the first distribution year after the year of death is the factor corresponding with the spouse's age on the spouse's birthday in the year of the spouse's death, reduced by one.²² This factor is reduced by one in each succeeding year.

C. **Participant's Death After RBD.** If a qualified plan participant or IRA owner dies after the participant's RBD and names his surviving spouse as beneficiary, post-death distributions may be made over the spouse's remaining life expectancy from the Single Life Expectancy Table. However, the surviving spouse is entitled to recalculate the spouse's life expectancy each year. As in all cases when the participant dies after the participant's RBD, a MRD is required for the year of death, and is calculated as if the participant had not died. The distribution factor for the year following the year of death, and the ADP for all subsequent years during the spouse's lifetime, is the spouse's life expectancy,

²² Reg. § 1.401(a)(9)-5, A-5(c).

based on the spouse's age on the spouse's birthday in that distribution year. After the spouse's death, distributions may continue to be made (whether or not the spouse has designated a beneficiary) over the spouse's remaining life expectancy, but without recalculation (minus one for each year thereafter).

D. **Spousal Rollovers.** Until 2007, only a participant's surviving spouse was able to rollover an eligible distribution from a deceased participant's qualified plan or IRA to another qualified plan (if permitted by the plan) or IRA. Reg. § 1.408-2(b)(7)(ii) also permits the surviving spouse, if named as the beneficiary of an IRA, to elect to treat the participant's interest in the IRA as the spouse's own IRA. Thus, a surviving spouse who rolls over an IRA, unlike a non-spousal beneficiary, has all of the income tax deferral opportunities available to the participant during the participant's lifetime, including the right to defer distributions until the spouse's RBD, to measure the spouse's lifetime MRDs using the factors from the Uniform Table and to designate new beneficiaries whose life expectancies may be used to measure distributions from the IRA after the spouse's death.

E. **Other Benefits of Spousal Designation.** There are a number of other advantages, both tax and non-tax, in naming the spouse as the primary beneficiary of a qualified plan or IRA. Perhaps most important of these is the fact that the unrestricted payment of qualified plan and IRA benefits to the surviving spouse should qualify for the federal estate tax marital deduction in the participant's estate, thus deferring any federal estate tax that might otherwise be imposed with respect to the plan benefits. In addition, designating the spouse as the sole primary beneficiary of a qualified plan or IRA avoids any community property or elective share issues that might arise with an IRA or tax-qualified plan, and assures compliance with the Retirement Equity Act of 1984 ("REA")

requirements for a qualified plan.

IX. Early Distribution Penalties (Pre 59-1/2 Distributions)

A. Penalties: Distributions from IRA or from the separate accounts of tax-qualified defined contribution plans (all of which shall be described as IRAs for purposes of this Section) to account owners younger than age 59-1/2 will usually have to pay a 10% penalty on the distribution, as well as the ordinary income tax.²³ The penalty only applies to the portion of a distribution included in gross income.²⁴ The penalty does not apply to a non-spouse beneficiary of an inherited IRA or to the extent a spousal beneficiary does not elect to be treated as the owner of the IRA.

B. Exceptions:

1. Distributions that are part of a “series of substantially equal periodic payments,” (not less frequently than annually) made for life (or life expectancy) of the owner or the joint lives (or joint life expectancies) of the owner and the owner’s designated beneficiary.²⁵

3 methods²⁶: (a) “MRD” method: use prior years balance and divide by factor from Uniform Life Table, Joint and Survivor Life Expectancy Table or Single Life Expectancy Table and continue to do so in following years. These Tables may be updated from time to time by the IRS but the last time the Tables were updated was in 2002.

(b) “Amortization” method: choose reasonable interest rate, one of the three tables mentioned in “a” and take regular payment as if self-amortizing level mortgage. The payment will not change in following years. If smaller payments are desired, use the Uniform Lifetime Table, larger payments, the Single Life Table

(c) “Annuatization” method: choose reasonable interest rate and single or joint life expectancy. Divide the account balance by an annuity factor derived using the mortality table in Revenue Ruling 2002-62. The payment computed also never varies.

2. Modifications:

(a) If the distribution exception is modified without IRS approval, the qualification terminates retroactively to the date the pre-59-1/2 withdrawals first began. The

²³ Code §72(t).

²⁴ Code §72(t)(1); Notice 87-16, 1987-1 C.B. 446, Question D-9.

²⁵ Code §72(t)(2)(A)(iv).

²⁶ All variations and combinations require IRS private letter ruling.

10% penalty is owed for all payments taken, with interest. No new “series of substantially equal periodic payments” may start until the following calendar year.²⁷

(b) If the owner gets divorced in the middle of the distribution exception period, the amount that has to get transferred to the spouse due to a QUADRO²⁸ (or the IRA equivalent²⁹) is usually tax free, but to be penalty free, an IRS private letter ruling will be required.

(c) It is ok to switch from the amortization method or the annuitization method to the MRD method after the first year (no penalty). _____

(d) The period during which the distribution exception may not be modified starts after the first payment and ends with the fifth anniversary of the first payment or when the owner reaches age 59-1/2, if later.

(e) Made to the estate or designated beneficiary on or after the death of the owner.

(f) Attributable to the owner’s disability.

(g) Made after separation of service and attainment of age 55.

(h) Made on account of income tax levy.

(i) Medical expenses.

(j) Pursuant to a QDRO.

(k) Distributions to unemployed for health insurance premiums.

(l) Higher education and first time home buyer’s expenses for IRAs.

X. Penalties on Early Distributions from ROTH IRAs.

A. Pre-age 59-1/2 ROTH distributions are subject to the same 10% penalty as traditional IRAs. Generally a qualified distribution from a ROTH IRA is excluded from gross income and therefore is not subject to the 10% penalty.³⁰

B. Conversions to ROTH IRAs are not subject to an early 10% penalty,³¹ but the penalty would apply to any income tax withheld from the conversion amount.

²⁷ PLR 200033048.

²⁸ Code §414 (p).

²⁹ Code §408(d)(6).

³⁰ Code 72(t)(1); Notice 87-16, 1987-1 C.B. 446, Q-9.

³¹ Code §408A(d)(3)(A)(ii); §402A(c)(4)(D); Reg. §1.408A-4, A-7(b).

C. The 10% penalty also applies to non-qualified distributions of earnings from ROTH IRAs before age 59-1/2.³²

D. Exceptions:

1. Series of substantially equal periodic payments;
2. Converting a traditional IRA to a ROTH IRA,³³ but the owner must continue to make the same periodic payments as were in effect before the conversion.

XI. **Penalties for Failing to Make Minimum Distributions.**

A. In a traditional IRA, if you miss a Minimum Required Distribution (“MRD”), the penalty is 50% of the amount that should have been distributed.³⁴

1. If a distribution is missed Form 5329 needs to be filed.
2. If you miss a distribution but establish to the satisfaction of the IRS that:
 - (a) The missed distribution was due to “reasonable” error, and
 - (b) Reasonable steps are being taken to correct the shortfall,
 - (c) The IRS may waive the 50% penalty³⁵, if explained on Form 5329.
 - (d) The Form asks for payment with the filed Form.

B. ROTH IRA penalties.

1. There are no lifetime MRD rules and therefore no MRDs for the owners of ROTH IRAs.

2. Post-death distributions from a ROTH IRA are, except for a surviving spouse who elects to be treated as an owner, required to be distributed, so a non-distribution by the non-spouse heir(s) will be subject to the 50% penalty to the extent the non-distribution exceeds the amount contributed or converted to the ROTH IRA.

3. If distributions of ROTH IRA funds are being made as a series of substantially equal payments, after a conversion and the payments are modified within 5 years of the first payment or prior to the participant attaining age 59-1/2 or becoming disabled, the 10% penalty will be applicable.³⁶

³² Reg. §1.408A-6, A-5(c).

³³ Reg. §1.408A-4, A-12.

³⁴ Code §4974(a).

³⁵ Reg. §54.4974-2, A-7(a).

³⁶ Reg. §1.408A-4, A-12.

XII. Transfers versus Rollover of Benefits.

A. Eligible Recipients.

1. Almost any type of retirement plan may be rolled over and rolled into. Qualified plans may, but are not required to accept such rollovers.
2. An eligible rollover distribution is any distribution from a qualified plan or IRA, except:
 - (a) A MRD;
 - (b) a series of substantially equal periodic distributions paid at least annually over the life of (i) a participant; (ii) a participant and beneficiary or (iii) a period of 10 or more years.³⁷
 - (c) Inherited plan by anyone other than surviving spouse.
 - (d) Hardship distribution.³⁸
 - (e) Corrective and deemed distributions.³⁹
 - (f) A plan loan deemed distributed.
 - (g) Dividends.
 - (h) Cost of life insurance coverage (PS58 costs).

B. Single Annual Rollover (Interest Free Loan)

1. Beginning in 2015, participants may only make one 60 day rollover in any 12 month period no matter how many IRAs he/she has. This is not a calendar year, but the actual 12 month period from the date of the loan. Loans taken in 2014 won't count in 2015.⁴⁰
2. The 60 day period in which a rollover is out of the plan is like getting a 2 month interest free loan on your money.
3. A ROTH conversion will not count as a rollover.⁴¹

³⁷ Code. §402(c)(4)(A); Reg. §1.402(c)-2, A-5.

³⁸ Code §402(c)(4).

³⁹ Reg. §1.403(c)-2, A-4.

⁴⁰ See Alven L. Bobrow, T.C. Memo 2014-21 (1/27/14); IRS Announcements 2014-15 and 2014-32.

⁴¹ Code §408A(d)(3)(A)(ii); §402A(c)(4)(D); Reg. §1.408A-4, A-7(b); Notice 2008-30, A-3.

C. Trustee to Trustee transfers.

1. When a custodian or plan administrator transfers (usually by electronic transfer) an IRA to another IRA or a qualified plan to another qualified plan or IRA, these are not considered rollovers and are not subject to the once a year rule.
2. A check made payable to the new custodian (not the IRA owner) is deemed a trustee to trustee transfer and escapes the once a year rule.
3. Allocation of After-Tax and Pretax Amounts.

(a) All distributions made at the same time are treated as a single distribution, even if the distribution is to be made to a single recipient or multiple recipients.

(b) If the pretax amount of such a distribution is less than the amount that is transferred by a trustee to trustee transfer, the entire pretax amount is allocated to the recipient plan. If the trustee to trustee transfer is to more than one plan, the participant selects how the pretax amount is allocated between or among the plans by informing the custodian or plan administrator of the allocation prior to the trustee to trustee transfer(s).

(c) If the pretax amount of such a distribution equals or exceeds the amount that is transferred by a trustee to trustee transfer, the pretax amount will be allocated to the recipient plan(s) up to the amount(s) transferred. Any remaining pretax amount will next be allocated to any 60 day rollovers. Again, if there is more than one 60 day rollover and the pretax amount is less than the amounts rolled over, the participant may select how the pretax amounts are allocated among the 60 day rollovers.

(d) After the pretax amount of a distribution is allocated among the transfers and rollovers, any remaining pretax amount is included in the participant's gross income.

(e) If the transfers and rollovers exceed the pretax amounts allocated, any remaining amounts rolled over will be deemed after-tax.⁴²

D. Spousal Rollovers A. Until 2007, only a participant's surviving spouse was able

⁴² IRS Notice 2014-54.

to rollover an eligible distribution from a deceased participant's qualified plan or IRA to another qualified plan (if permitted by the plan) or IRA.⁴³ The surviving spouse (and only the surviving spouse) is permitted, if named as the beneficiary of an IRA, to elect to treat the participant's interest in the IRA as the spouse's own IRA. A surviving spouse who does so may roll over IRA assets and thereby obtain all of the income tax deferral opportunities available to the owner during the owner's lifetime, including the right to defer distributions until the spouse's Required Beginning Date ("RBD"), to measure the spouse's lifetime MRDs using the factors from the Uniform Table and to designate new beneficiaries whose life expectancies may be used to measure distributions from the IRA after the spouse's death. A surviving spouse may also roll over a qualified plan or IRA into a ROTH IRA. There is no deadline by which the surviving spouse must complete a rollover (except if an actual "rollover," within the 60 day period from withdrawal).

E. If the owner dies before the owner's RBD, and the 5 year rule would otherwise apply, since the entire account balance would be the MRD in the 5th year, the surviving spouse can roll over the entire account within the 4th year.⁴⁴

F. There are a number of private letter rulings allowing the spouse to rollover when she is the sole beneficiary of an estate or trust and the sole executor or Trustee⁴⁵.

There was an interesting Private Letter Ruling⁴⁶ which allowed the surviving spouse to rollover her share of an IRA death benefit which was left to the participant's estate and became part of a grantor trust which became irrevocable at the participant's death. The spouse and her Co-Trustee were required under the terms of the Trust to approve the allocation of the death benefit to the marital trust, which was only 1 of 4 subtrusts.

⁴³ Reg. § 1.408-2(b)(7)(ii).

⁴⁴ PLR 200242044

⁴⁵ PLR200324059,200634065k 200637033, 200950053

⁴⁶ PLR 200807025

G. Non-Spousal Rollovers

1. The Pension Protection Act of 2006 permits a Designated Beneficiary⁴⁷ to roll over, by direct trustee to trustee transfer only,⁴⁸ from IRAs, 401(a), 401(k), 403(b), and 457(b) to inherited IRAs. Non-spousal Designated Beneficiaries may not treat the plan or IRA as the Designated Beneficiary's own. A "see-through" trust is eligible to use a non-spousal rollover as well.⁴⁹ If the plan makes a distribution to a non-spouse beneficiary, the distribution may not be rolled over to an "inherited IRA" under any circumstance. An example of title for an inherited IRA would be: Jane Eyre, deceased IRA fbo John Rochester, beneficiary.
2. If the owner had reached his/her RBD prior to death, the Designated Beneficiary must take the balance of the distribution for the year of death (using the Universal table), prior to the rollover. This applies for both spousal and non-spousal designated beneficiaries. The following year, however, the non-spousal designated beneficiary computes his/her life expectancy factor from the single life table and takes that distribution from the rolled over account. In the following year, the non-spousal beneficiary subtracts the number 1 from the prior year's factor, and keeps subtracting 1 for each year thereafter.
3. If the Designated Beneficiary dies before his or her life expectancy, unless the plan document provides for a shorter period, his or her beneficiary (if there is one) must take out the remaining balance over the balance of the original Designated Beneficiary's life expectancy.

⁴⁷ A "Designated Beneficiary" is any individual designated as a beneficiary by the employee. Code §401(a)(9)(E). It can never be an estate or a charity.

⁴⁸ Code §401(a)(31)(A)(ii); Reg. §1.401(a)(31)-1.

⁴⁹ Reg. §1.401(a)(9)-4, A-5, Notice 2007-7, A-16.

APPENDIX A

**Uniform Table for Calculating
Minimum Required Distributions
For IRAs and Qualified Plans**

Age of Employee	Factor	% of Account	Age of Employee	Factor	% of Account
51	45.5	2.1978	84	15.5	6.4516
52	44.6	2.2422	85	14.8	6.7568
53	43.6	2.2936	86	14.1	7.0922
54	42.6	2.3474	87	13.4	7.4627
55	41.6	2.4039	88	12.7	7.8740
56	40.7	2.4570	89	12.0	8.3333
57	39.7	2.5189	90	11.4	8.7719
58	38.7	2.5840	91	10.8	9.2593
59	37.8	2.6455	92	10.2	9.8039
60	36.8	2.7174	93	9.6	10.4167
61	35.8	2.7933	94	9.1	10.9890
62	34.9	2.8653	95	8.6	11.6279
63	33.9	2.9499	96	8.1	12.3457
64	33.0	3.0303	97	7.6	13.1579
65	32.0	3.1250	98	7.1	14.0845
66	31.1	3.2154	99	6.7	14.9254
67	30.2	3.3313	100	6.3	15.8730
68	29.2	3.4247	101	5.9	16.9492
69	28.3	3.5336	102	5.5	18.1818
70	27.4	3.6496	103	5.2	19.2308
71	26.5	3.7736	104	4.9	20.4082
72	25.6	3.9063	105	4.5	22.2222
73	24.7	4.0486	106	4.2	23.8095
74	23.8	4.2017	107	3.9	25.6410
75	22.9	4.3668	108	3.7	27.0270
76	22.0	4.5455	109	3.4	29.4118
77	21.2	4.7170	110	3.1	32.2581
78	20.3	4.9261	111	2.9	34.4615
79	19.5	5.1282	112	2.6	38.4615
80	18.7	5.3476	113	2.4	41.6667
81	17.9	5.5866	114	2.1	47.6191
82	17.1	5.8480	115 and older	1.9	52.6316

APPENDIX β

Joint and Last Survivor (Cont'd)

Ages	30	31	32	33	34	35	36	37	38	39
54	54.2	53.3	52.4	51.5	50.6	49.8	48.9	48.1	47.2	46.4
55	54.1	53.2	52.3	51.4	50.5	49.7	48.8	47.9	47.1	46.3
56	54.0	53.1	52.2	51.3	50.4	49.5	48.7	47.8	47.0	46.1
57	54.0	53.0	52.1	51.2	50.3	49.4	48.6	47.7	46.8	46.0
58	53.9	53.0	52.1	51.2	50.3	49.4	48.5	47.6	46.7	45.8
59	53.8	52.9	52.0	51.1	50.2	49.3	48.4	47.5	46.6	45.7
60	53.8	52.9	51.9	51.0	50.1	49.2	48.3	47.4	46.5	45.6
61	53.8	52.8	51.9	51.0	50.0	49.1	48.2	47.3	46.4	45.5
62	53.7	52.8	51.8	50.9	50.0	49.1	48.1	47.2	46.3	45.4
63	53.7	52.7	51.8	50.9	49.9	49.0	48.1	47.2	46.3	45.3
64	53.6	52.7	51.8	50.8	49.9	48.9	48.0	47.1	46.2	45.3
65	53.6	52.7	51.7	50.8	49.8	48.9	48.0	47.0	46.1	45.2
66	53.6	52.6	51.7	50.7	49.8	48.9	47.9	47.0	46.1	45.1
67	53.6	52.6	51.7	50.7	49.8	48.8	47.9	46.9	46.0	45.1
68	53.5	52.6	51.6	50.7	49.7	48.8	47.8	46.9	46.0	45.0
69	53.5	52.6	51.6	50.6	49.7	48.7	47.8	46.9	445.9	45.0
70	53.5	52.5	51.6	50.6	49.7	48.7	47.8	46.8	45.9	44.9
71	53.5	52.5	51.6	50.6	49.6	48.7	47.7	46.8	45.9	44.9
72	53.5	52.4	51.5	50.6	49.6	48.7	47.7	46.8	45.8	44.9
73	53.4	52.5	51.5	50.6	49.6	48.6	47.7	46.7	45.8	44.8
74	53.4	52.5	51.5	50.5	49.6	48.6	47.7	46.7	45.8	44.8
75	53.4	52.5	51.5	50.5	49.6	48.6	47.7	46.7	45.7	44.8
76	53.4	52.4	51.5	50.5	49.6	48.6	47.6	46.7	45.7	44.8
77	53.4	52.4	51.5	50.5	49.5	48.6	47.6	47.6	45.7	44.8
78	53.4	52.4	51.5	50.5	49.5	48.6	47.6	46.7	45.7	44.8
79	53.4	52.4	51.5	50.5	49.5	48.6	47.6	44.6	45.7	44.7
80	53.4	52.4	51.4	50.5	49.5	48.5	47.6	46.6	45.7	44.7
81	53.4	52.4	51.4	50.5	49.5	48.5	47.6	46.6	45.7	44.7
82	53.4	52.4	51.4	50.5	49.5	48.5	47.6	46.6	45.6	44.7
83	53.4	52.4	51.4	50.5	49.5	48.5	47.6	46.6	45.6	44.7
84	53.4	52.4	51.4	50.5	49.5	48.5	47.6	46.6	45.6	44.7
85	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.6	45.6	44.7
86	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.6	45.6	44.6
87	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.6	45.6	44.6
88	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.6	45.6	44.6
89	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.6	45.6	44.6
90	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.6	45.7	44.6
91	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.6	45.7	44.6
92	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.6	45.6	44.6
93	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.6	45.6	44.6
94	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.6	45.6	44.6
95	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.5	45.6	44.6
96	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.5	45.6	44.6

APPENDIX B

Joint and Last Survivor (Cont'd)

Ages	40	41	42	43	44	45	46	47	48	49
59	44.9	44.0	43.2	42.4	41.5	40.7	40.0	39.2	38.5	37.8
60	44.7	43.9	43.0	42.2	41.4	40.6	39.8	39.0	38.2	37.5
61	44.6	43.8	42.9	42.1	41.2	40.4	39.6	38.8	38.0	37.3
62	44.5	43.7	42.8	41.9	41.1	40.3	39.4	38.6	37.8	37.1
63	44.5	43.6	42.7	41.8	41.0	40.1	39.3	38.5	37.7	36.9
64	44.4	43.5	42.6	41.7	40.8	40.0	39.2	38.3	37.5	36.7
65	44.3	43.4	42.5	41.6	40.7	39.9	39.0	38.2	37.4	36.6
66	44.2	43.3	42.4	41.5	40.6	39.8	38.9	38.1	37.2	36.4
67	44.2	43.3	42.3	41.4	40.6	39.7	38.8	38.0	37.1	36.3
68	44.1	43.2	42.3	41.4	40.5	39.6	38.7	37.9	37.0	36.2
69	44.1	43.1	42.2	41.3	40.4	39.5	38.6	37.8	36.9	36.0
70	44.0	43.1	42.2	41.3	40.3	39.4	38.6	37.7	36.8	35.9
71	44.0	43.0	42.1	41.2	40.3	39.4	38.5	37.6	36.7	35.9
72	43.9	43.0	42.1	41.1	40.2	39.3	38.4	37.5	36.6	35.8
73	43.9	43.0	42.0	41.1	40.2	39.3	38.4	37.5	36.6	35.7
74	43.9	42.9	42.0	41.1	40.1	39.2	38.3	37.4	36.5	35.6
75	43.8	42.9	42.0	41.0	40.1	39.2	38.3	37.4	36.5	35.6
76	43.8	42.9	41.9	41.0	40.1	39.1	38.2	37.3	36.4	35.5
77	43.8	42.9	41.9	41.0	40.0	39.1	38.2	37.3	36.4	35.5
78	43.8	42.8	41.9	40.9	40.0	39.1	38.2	37.2	36.3	35.4
79	43.8	42.8	41.9	40.9	40.0	39.1	38.1	37.2	36.3	35.4
80	43.7	42.8	41.8	40.9	40.0	39.0	38.1	37.2	36.3	35.4
81	43.7	42.8	41.8	40.9	39.9	39.0	38.1	37.2	36.2	35.3
82	43.7	42.8	41.8	40.9	39.9	39.0	38.1	37.1	36.2	35.3
83	43.7	42.8	41.8	40.9	39.9	39.0	38.0	37.1	36.2	35.3
84	43.7	42.7	41.8	40.8	39.9	39.0	38.0	37.1	36.2	35.3
85	43.7	42.7	41.8	40.8	39.9	38.9	38.0	37.1	36.2	35.2
86	43.7	42.7	41.8	40.8	39.9	38.9	38.0	37.1	36.1	35.2
87	43.7	42.7	41.8	40.8	39.9	38.9	38.0	37.0	36.1	35.2
88	43.7	42.7	41.8	40.8	39.9	38.9	38.0	37.0	36.1	35.2
89	43.7	42.7	41.7	40.8	39.8	38.9	38.0	37.0	36.1	35.2
90	43.7	42.7	41.7	40.8	39.8	38.9	38.0	37.0	36.1	35.2
91	43.7	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.1	35.2
92	43.7	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.1	35.1
93	43.7	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.1	35.1
94	43.7	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.1	35.1
95	43.6	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.1	35.1
86	43.6	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.1	35.1
97	43.6	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.1	35.1
98	43.6	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.0	35.1
99	43.6	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.0	35.1
100	43.6	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.0	35.1

APPENDIX B

Joint and Last Survivor (Cont'd)

Ages	60	61	62	63	64	65	66	67	68	69
60	30.9	30.4	30.0	29.6	29.2	28.8	28.5	28.2	27.9	27.6
61	30.4	29.9	29.5	29.0	28.6	28.3	27.9	27.6	27.3	27.0
62	30.0	29.5	29.0	28.5	28.1	27.7	27.3	27.0	26.7	26.4
63	29.6	29.0	28.5	28.1	27.6	27.2	26.8	26.4	26.1	25.7
64	29.2	28.6	28.1	27.6	27.1	26.7	26.3	25.9	25.5	25.2
65	28.8	28.3	27.7	27.2	26.7	26.2	25.8	25.4	25.0	24.6
66	28.5	27.9	27.3	26.8	26.3	25.8	25.3	24.9	24.5	24.1
67	28.2	27.6	27.0	26.4	25.9	25.4	24.9	24.4	24.0	23.6
68	27.9	27.3	26.7	26.1	25.5	25.0	24.5	24.0	23.5	23.1
69	27.6	27.0	26.4	25.7	25.2	24.6	24.1	23.6	23.1	22.6
70	27.4	26.7	26.1	25.4	24.8	24.3	23.7	23.2	22.7	22.2
71	27.2	26.5	25.8	25.2	24.5	23.9	23.4	22.8	22.3	21.8
72	27.0	26.3	25.6	24.9	24.3	23.7	23.1	22.5	22.0	21.4
73	26.8	26.1	25.4	24.7	24.0	23.4	22.8	22.2	21.6	21.1
74	26.6	25.9	25.2	24.5	23.8	23.1	22.5	21.9	21.3	20.8
75	26.5	25.7	25.0	24.3	23.6	22.9	22.3	21.6	21.0	20.5
76	26.3	25.6	24.8	24.1	23.4	22.7	22.0	21.4	20.8	20.2
77	26.2	25.4	24.7	23.9	23.2	22.5	21.8	21.2	20.6	19.9
78	26.1	25.3	24.6	23.8	23.1	22.4	21.7	21.0	20.3	19.7
79	26.0	25.2	24.4	23.7	22.9	22.2	21.5	20.8	20.1	19.5
80	25.9	25.1	24.3	23.6	22.8	22.1	21.3	20.6	20.0	19.3
81	25.8	25.0	24.2	23.4	22.7	21.9	21.2	20.5	19.8	19.1
82	25.8	24.9	24.1	23.4	22.6	21.8	21.1	20.4	19.7	19.0
83	25.7	24.9	24.1	23.3	22.5	21.7	21.0	20.2	19.5	18.8
84	25.6	24.8	24.0	23.2	22.4	21.6	20.9	20.1	19.4	18.7
85	25.6	24.8	23.9	23.1	22.3	21.6	20.8	20.1	19.3	18.6
86	25.5	24.7	23.9	23.1	22.3	21.5	20.7	20.0	19.2	18.5
87	25.5	24.7	23.8	23.0	22.2	21.4	20.7	19.9	19.2	18.4
88	25.5	24.6	23.8	23.0	22.2	21.4	20.6	19.8	19.1	18.3
89	25.4	24.6	23.8	22.9	22.1	21.3	20.5	19.8	19.0	18.3
90	25.4	24.6	23.7	22.9	22.1	21.3	20.5	19.7	19.0	18.2
91	25.4	24.5	23.7	22.9	22.1	21.3	20.5	19.7	18.9	18.2
92	25.4	24.5	23.7	22.9	22.0	21.2	20.4	19.6	18.9	18.1
93	25.4	24.5	23.7	22.8	22.0	21.2	20.4	19.6	18.8	18.1
94	25.3	24.5	23.6	22.8	22.0	21.2	20.4	19.6	18.8	18.0
95	25.3	24.5	23.6	22.8	22.0	21.1	20.3	19.6	18.8	18.0
96	25.3	24.5	23.6	22.8	21.9	21.1	20.3	19.5	18.8	18.0
97	25.3	24.5	23.6	22.8	21.9	21.1	20.3	19.5	18.7	18.0
98	25.3	24.4	23.6	22.8	21.9	21.1	20.3	19.5	18.7	17.9
99	25.3	24.4	23.6	22.7	21.9	21.1	20.3	19.5	18.7	17.9
100	25.3	24.4	23.6	22.7	21.9	21.1	20.3	19.5	18.7	17.9
101	25.3	24.4	23.6	22.7	21.9	21.1	20.2	19.4	18.7	17.9
102	25.3	24.4	23.6	22.7	21.9	21.1	20.2	19.4	18.6	17.9

APPENDIX B

Joint and Last Survivor (Cont'd)

Ages	70	71	72	73	74	75	76	77	78	79
100	17.1	16.4	15.7	15.0	14.3	13.6	12.9	12.3	11.7	11.1
101	17.1	16.4	15.6	14.9	13.6	13.6	12.9	12.3	11.7	11.1
102	17.1	16.4	15.6	14.9	13.6	13.5	12.9	12.2	11.6	11.0
103	17.1	16.3	15.6	14.9	13.5	13.5	12.9	12.2	11.6	11.0
104	17.1	16.3	15.6	14.9	13.5	13.5	12.9	12.2	11.6	11.0
105	17.1	16.3	15.6	14.9	13.5	13.5	12.8	12.2	11.5	10.9
106	17.1	16.3	15.6	14.8	13.5	13.5	12.8	12.2	11.5	10.9
107	17.0	16.3	15.6	14.8	13.4	13.4	12.8	12.1	11.5	10.9
108	17.0	16.3	15.5	14.8	13.4	13.4	12.8	12.1	11.5	10.9
109	17.0	16.3	15.5	14.8	13.4	13.4	12.8	12.1	11.5	10.9
110	17.0	16.3	15.5	14.8	14.1	13.4	12.7	12.1	11.5	10.9
111	17.0	16.3	15.5	14.8	14.1	13.4	12.7	12.1	11.5	10.9
112	17.0	16.3	15.5	14.8	14.1	13.4	12.7	12.1	11.5	10.9
113	17.0	16.3	15.5	14.8	14.1	13.4	12.7	12.1	11.5	10.9
114	17.0	16.3	15.5	14.8	14.1	13.4	12.7	12.1	11.5	10.9
115+	17.0	16.3	15.5	14.8	14.1	13.4	12.7	12.1	11.5	10.9
Ages	80	81	82	83	84	85	86	87	88	89
80	13.8	13.4	13.1	12.8	12.6	12.3	12.1	11.9	11.7	11.5
81	13.4	13.1	12.7	12.4	12.2	11.9	11.7	11.4	11.3	11.1
82	13.1	12.7	12.4	12.1	11.8	11.5	11.3	11.0	10.8	10.6
83	12.8	12.4	12.1	11.7	11.4	11.1	10.9	10.6	10.4	10.2
84	12.6	12.2	11.8	11.4	11.1	10.8	10.5	10.3	10.1	9.9
85	12.3	11.9	11.5	11.1	10.8	10.5	10.2	9.9	9.7	9.5
86	12.1	11.7	11.3	10.9	10.5	10.2	9.9	9.6	9.4	9.2
87	11.9	11.4	11.0	10.6	10.3	9.9	9.6	9.4	9.1	8.9
88	11.7	11.3	10.8	10.4	10.1	9.7	9.4	9.1	8.8	8.6
89	11.5	11.1	10.6	10.2	9.9	9.5	9.2	8.9	8.6	8.3
90	11.4	10.9	10.5	10.1	9.7	9.3	9.0	8.6	8.3	8.1
91	11.3	10.8	10.3	9.9	9.5	9.1	8.8	8.4	8.1	7.9
92	11.2	10.7	10.2	9.8	9.3	9.0	8.6	8.3	8.0	7.7
93	11.1	10.6	10.1	9.6	9.2	8.8	8.5	8.1	7.8	7.5
94	11.0	10.5	10.0	9.5	9.1	8.7	8.3	8.0	7.6	7.3
95	10.9	10.4	9.9	9.4	9.0	8.6	8.2	7.8	7.5	7.2
96	10.8	10.3	9.8	9.3	8.9	8.5	8.1	7.7	7.4	7.1
97	10.7	10.2	9.7	9.2	8.8	8.4	8.0	7.6	7.3	6.9
98	10.7	10.1	9.6	9.2	8.7	8.3	7.9	7.5	7.1	6.8
99	10.6	10.1	9.6	9.1	8.6	8.2	7.8	7.4	7.0	6.7
100	10.6	10.0	9.5	9.0	8.5	8.1	7.7	7.3	6.9	6.6
101	10.5	10.0	9.4	9.0	8.5	8.0	7.6	7.2	6.9	6.5
102	10.5	9.9	9.4	8.9	8.4	8.0	7.5	7.1	6.8	6.4
103	10.4	9.9	9.4	8.8	8.4	7.9	7.5	7.1	6.7	6.3
104	10.4	9.8	9.3	8.8	8.3	7.9	7.4	7.0	6.6	6.3
105	10.4	9.8	9.3	8.8	8.3	7.8	7.4	7.0	6.6	6.2

APPENDIX 8

Joint and Last Survivor (Cont'd)

Ages	80	81	82	83	84	85	86	87	88	89
106	10.3	9.8	9.2	8.7	8.2	7.8	7.3	6.9	6.5	6.2
107	10.3	9.8	9.2	8.7	8.2	7.7	7.3	6.9	6.5	6.1
108	10.3	9.7	9.2	8.7	8.2	7.7	7.3	6.8	6.4	6.1
109	10.3	9.7	9.2	8.7	8.2	7.7	7.2	6.8	6.4	6.1
110	10.3	9.7	9.2	8.6	8.1	7.7	7.2	6.8	6.4	6.0
111	10.3	9.7	9.1	8.6	8.1	7.6	7.2	6.8	6.3	6.0
112	10.2	9.7	9.1	8.6	8.1	7.6	7.1	6.7	6.3	5.9
113	10.2	9.7	9.1	8.6	8.1	7.6	7.2	6.7	6.3	5.9
114	10.2	9.7	9.1	8.6	8.1	7.6	7.1	6.7	6.3	5.9
115+	10.2	9.7	9.1	8.6	8.1	7.6	7.1	6.7	6.3	5.9
Ages	90	91	92	93	94	95	96	97	98	99
90	7.8	7.6	7.4	7.2	7.1	6.9	6.8	6.6	6.5	6.4
91	7.6	7.4	7.2	7.0	6.8	6.7	6.5	6.4	6.3	6.1
92	7.4	7.2	7.0	6.8	6.6	6.4	6.3	6.1	6.0	5.9
93	7.2	7.0	6.8	6.6	6.4	6.2	6.1	5.9	5.8	5.6
94	7.1	6.8	6.6	6.4	6.2	6.0	5.9	5.7	5.6	5.4
95	6.9	6.7	6.4	6.2	6.0	5.8	5.7	5.5	5.4	5.2
96	6.8	6.5	6.3	6.1	5.9	5.7	5.5	5.3	5.2	5.0
97	6.6	6.4	6.1	5.9	5.7	5.5	5.3	5.2	5.0	4.9
98	6.5	6.3	6.0	5.8	5.6	5.4	5.2	5.0	4.8	4.7
99	6.4	6.1	5.9	5.6	5.4	5.2	5.0	4.9	4.7	4.5
100	6.3	6.0	5.8	5.5	5.3	5.1	4.9	4.7	4.5	4.4
101	6.2	5.9	5.6	5.4	5.2	5.0	4.8	4.6	4.4	4.2
102	6.1	5.8	5.5	5.3	5.1	4.8	4.6	4.4	4.3	4.1
103	6.0	5.7	5.4	5.2	5.0	4.7	4.5	4.3	4.1	4.0
104	5.9	5.6	5.4	5.1	4.9	4.6	4.4	4.2	4.0	3.8
105	5.9	5.6	5.3	5.0	4.8	4.5	4.3	4.1	3.9	3.7
106	5.8	5.5	5.2	4.9	4.7	4.5	4.2	4.0	3.8	3.6
107	5.8	5.4	5.1	4.9	4.6	4.4	4.2	3.9	3.7	3.5
108	5.7	5.4	5.1	4.8	4.6	4.3	4.1	3.9	3.7	3.5
109	5.7	5.3	5.0	4.8	4.5	4.3	4.0	3.8	3.6	3.4
110	5.6	5.3	5.0	4.7	4.5	4.2	4.0	3.8	3.5	3.3
111	5.6	5.3	5.0	4.7	4.4	4.2	3.9	3.7	3.5	3.3
112	5.6	5.3	4.9	4.7	4.4	4.1	3.9	3.7	3.5	3.2
113	5.6	5.2	4.9	4.6	4.4	4.1	3.9	3.6	3.4	3.2
114	5.6	5.2	4.9	4.6	4.3	4.1	3.8	3.6	3.4	3.2
115+	5.5	5.2	4.9	4.6	4.3	4.1	3.8	3.6	3.4	3.1
Ages	100	101	102	103	104	105	106	107	108	109
100	4.2	4.1	3.9	3.8	3.7	3.5	3.4	3.3	3.3	3.2
101	4.1	3.9	3.7	3.6	3.5	3.4	3.2	3.1	3.1	3.0
102	3.9	3.7	3.6	3.4	3.3	3.2	3.1	3.0	2.9	2.8

APPENDIX B

Joint and Last Survivor

Ages	20	21	22	23	24	25	26	27	28	29
99	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
100	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
101	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
102	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
103	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
104	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
105	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
106	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
107	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
108	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
109	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
110	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
111	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
112	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
113	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
114	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
115+	63.0	62.1	61.1	60.1	59.1	58.2	57.2	56.2	55.3	54.3
Ages	30	31	32	33	34	35	36	37	38	39
30	60.2	59.7	59.2	58.8	58.4	58.0	57.6	57.3	57.0	56.7
31	59.7	59.2	58.7	58.2	57.8	57.4	57.0	56.6	56.3	56.0
32	59.2	58.7	58.2	57.7	57.2	56.8	56.4	56.0	55.6	55.3
33	58.8	58.2	57.7	57.2	56.7	56.2	55.8	55.4	55.0	54.7
34	58.4	57.8	57.2	56.7	56.2	55.7	55.3	54.8	54.4	54.0
35	58.0	57.4	56.8	56.2	55.7	55.2	54.7	54.3	53.8	53.4
36	57.6	57.0	56.4	55.8	55.3	54.7	54.2	53.7	53.3	52.8
37	57.3	56.6	56.0	55.4	54.8	54.3	53.7	53.2	52.7	52.3
38	57.0	56.3	55.6	55.0	54.4	53.8	53.3	52.7	52.2	51.7
39	56.7	56.0	55.3	54.7	54.0	53.4	52.8	52.3	51.7	51.2
40	56.4	55.7	55.0	54.3	53.7	53.0	52.4	51.8	51.3	50.8
41	56.1	55.4	54.7	54.0	53.3	52.7	52.0	51.4	50.9	50.3
42	55.9	55.2	54.4	53.7	53.0	52.3	51.7	51.1	50.4	49.9
43	55.7	54.9	54.2	53.4	52.7	52.0	51.3	50.7	50.1	49.5
44	55.5	54.7	53.9	53.2	52.4	51.7	51.0	50.4	49.7	49.1
45	55.3	54.5	53.7	52.9	52.2	51.5	50.7	50.0	49.4	48.7
46	55.1	54.3	53.5	52.5	51.7	51.0	50.2	49.5	48.8	48.1
47	55.0	54.1	53.3	52.5	51.7	51.0	50.2	49.5	48.8	48.1
48	54.8	54.0	53.2	52.3	51.5	50.8	50.0	49.2	48.5	47.8
49	54.7	53.8	53.0	52.2	51.4	50.6	49.8	49.0	48.2	47.5
50	54.6	53.7	52.9	52.0	51.2	50.4	49.6	48.8	48.0	47.3
51	54.5	53.6	52.7	51.9	51.0	50.2	49.4	48.6	47.8	47.0
52	54.4	53.5	52.6	51.7	50.9	50.0	49.2	48.4	47.6	46.8
53	54.3	53.4	52.5	51.6	50.8	49.9	49.1	48.2	47.4	46.6

APPENDIX B

Joint and Last Survivor (Cont'd)

Ages	30	31	32	33	34	35	36	37	38	39
97	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.5	45.6	44.6
98	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.5	45.6	44.6
99	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.5	45.6	44.6
100	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.5	45.6	44.6
101	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.5	45.6	44.6
102	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.5	45.6	44.6
103	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.5	45.6	44.6
104	53.3	52.4	51.4	50.4	49.5	48.5	47.5	46.5	45.6	44.6
105	53.3	52.4	51.4	50.4	49.4	48.5	47.5	46.5	45.6	44.6
106	53.3	52.4	51.4	50.4	49.4	48.5	47.5	46.5	45.6	44.6
107	53.3	52.4	51.4	50.4	49.4	48.5	47.5	46.5	45.6	44.6
108	53.3	52.4	51.4	50.4	49.4	48.5	47.5	46.5	45.6	44.6
109	53.3	52.4	51.4	50.4	49.4	48.5	47.5	46.5	45.6	44.6
110	53.3	52.4	51.4	50.4	49.4	48.5	47.5	46.5	45.6	44.6
111	53.3	52.4	51.4	50.4	49.4	48.5	47.5	46.5	45.6	44.6
112	53.3	52.4	51.4	50.4	49.4	48.5	47.5	46.5	45.6	44.6
113	53.3	52.4	51.4	50.4	49.4	48.5	47.5	46.5	45.6	44.6
114	53.3	52.4	51.4	50.4	49.4	48.5	47.5	46.5	45.6	44.6
115+	53.3	52.4	51.4	50.4	49.4	48.5	47.5	46.5	45.6	44.6
Ages	40	41	42	43	44	45	46	47	48	49
40	50.2	49.8	49.3	48.9	48.5	48.1	47.7	47.4	47.1	46.8
41	49.8	49.3	48.8	48.3	47.9	47.5	47.1	46.7	46.4	46.1
42	49.3	48.8	48.3	47.8	47.3	46.9	46.5	46.1	45.8	45.4
43	48.9	48.3	47.8	47.3	46.8	46.3	45.9	45.5	45.1	44.8
44	48.5	47.9	47.3	46.8	46.3	45.8	45.4	44.9	44.5	44.2
45	48.1	47.5	46.9	46.3	45.8	45.3	44.8	44.4	44.0	43.6
46	47.4	47.1	46.5	45.9	45.4	44.8	44.3	43.9	43.4	43.0
47	47.4	46.7	46.1	45.5	44.9	44.4	43.9	43.4	42.9	42.4
48	47.1	46.4	45.8	45.1	44.5	44.0	43.4	42.9	42.4	41.9
49	46.8	46.1	45.4	44.8	44.2	43.6	43.0	42.4	41.9	41.4
50	46.5	45.8	45.1	44.4	43.8	43.2	42.6	42.0	41.5	40.9
51	46.3	45.5	44.8	44.1	43.5	42.8	42.2	41.6	41.0	40.5
52	46.0	45.3	44.6	43.8	43.2	42.5	41.8	41.2	40.6	40.1
53	45.8	45.1	44.3	43.6	42.9	42.2	41.5	40.9	40.3	40.1
54	45.6	44.8	44.1	43.3	42.6	41.9	41.2	40.5	39.9	39.3
55	45.5	44.7	43.9	43.1	42.4	41.6	40.9	40.2	39.6	38.9
56	45.3	44.5	43.7	42.9	42.1	41.4	40.7	40.0	39.3	38.6
57	45.1	44.3	43.5	42.7	41.9	41.2	40.4	39.7	39.0	38.3
58	45.0	44.2	43.3	42.5	41.7	40.9	40.2	39.4	38.7	38.0

APPENDIX *B*

Joint and Last Survivor (Cont'd)

Ages	40	41	42	43	44	45	46	47	48	49
101	43.6	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.0	35.1
102	43.6	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.0	35.1
103	43.6	42.7	41.7	40.8	39.8	38.9	37.9	37.0	36.0	35.1
104	43.6	42.7	41.7	40.8	39.8	38.8	37.9	37.0	36.0	35.1
105	43.6	42.7	41.7	40.8	39.8	38.8	37.9	37.0	36.0	35.1
106	43.6	42.7	41.7	40.8	39.8	38.8	37.9	37.0	36.0	35.1
107	43.6	42.7	41.7	40.8	39.8	38.8	37.9	37.0	36.0	35.1
108	43.6	42.7	41.7	40.8	39.8	38.8	37.9	37.0	36.0	35.1
109	43.6	42.7	41.7	40.7	39.8	38.8	37.9	37.0	36.0	35.1
110	43.6	42.7	41.7	40.7	39.8	38.8	37.9	37.0	36.0	35.1
111	43.6	42.7	41.7	40.7	39.8	38.8	37.9	37.0	36.0	35.1
112	43.6	42.7	41.7	40.7	39.8	38.8	37.9	37.0	36.0	35.1
113	43.6	42.7	41.7	40.7	39.8	38.8	37.9	37.0	36.0	35.1
114	43.6	42.7	41.7	40.7	39.8	38.8	37.9	37.0	36.0	35.1
115+	43.6	42.7	41.7	40.7	39.8	38.8	37.9	37.0	36.0	35.1
Ages	50	51	52	53	54	55	56	57	58	59
50	40.4	40.0	39.5	39.1	38.7	38.3	38.0	37.6	37.3	37.1
51	40.0	39.5	39.0	38.5	38.1	37.7	37.4	37.0	36.7	36.4
52	39.5	39.0	38.3	38.0	37.6	37.2	36.8	36.4	36.0	35.7
53	39.1	38.5	38.0	37.5	37.1	36.6	36.2	35.8	35.4	35.1
54	38.7	38.1	37.6	37.1	36.6	36.1	35.7	35.2	34.8	34.5
55	38.3	37.7	37.2	36.6	36.1	35.6	35.1	34.7	34.3	33.9
56	38.0	37.4	36.8	36.2	35.7	35.1	34.7	34.2	33.7	33.3
57	37.6	37.0	36.4	35.8	35.2	34.7	34.2	33.7	33.2	32.8
58	37.3	36.7	36.0	35.4	34.8	34.3	33.7	33.2	32.8	32.3
59	37.1	36.4	35.7	35.1	34.5	33.9	33.3	32.8	32.3	31.8
60	36.8	36.1	35.4	34.8	34.1	33.5	32.9	32.4	31.9	31.3
61	36.6	35.8	35.1	34.5	33.8	33.2	32.6	32.0	31.4	30.9
62	36.3	35.6	34.9	34.2	33.5	32.9	32.2	31.6	31.1	30.5
63	36.1	35.4	34.6	33.9	33.2	32.6	31.9	31.3	30.7	30.1
64	35.9	35.2	34.4	33.7	33.0	32.3	31.6	31.0	30.4	29.8
65	35.8	35.0	34.2	33.5	32.7	32.0	31.4	30.7	30.0	29.4
66	35.6	34.8	34.0	33.3	32.5	31.8	31.1	30.4	29.8	29.1
67	35.5	34.7	33.9	33.1	32.3	31.6	30.9	30.2	29.5	28.8
68	35.3	34.5	33.7	32.9	32.1	31.4	30.7	29.9	29.2	28.6
69	35.2	34.4	33.6	32.8	32.0	31.2	30.5	29.7	29.0	28.3
70	35.1	34.3	33.4	32.6	31.8	31.1	30.3	29.5	28.8	28.1
71	35.0	34.2	33.3	32.5	31.7	30.9	30.1	29.4	28.6	27.9
72	34.9	34.1	33.2	32.4	31.6	30.8	30.0	29.2	28.4	27.7
73	34.8	34.0	33.1	32.3	31.5	30.6	29.8	29.1	28.3	27.5
74	34.8	33.9	33.0	32.2	31.4	30.5	29.7	28.9	28.1	27.4
75	34.7	33.8	33.0	32.1	31.3	30.4	29.6	28.8	28.0	27.2

APPENDIX B

Joint and Last Survivor (Cont'd)

Ages	50	51	52	53	54	55	56	57	58	59
76	34.6	33.8	32.9	32.0	31.2	30.3	29.5	28.7	27.9	27.1
77	34.6	33.7	32.8	32.0	31.1	30.3	29.4	28.6	27.8	27.0
78	34.5	33.6	32.8	31.9	31.0	30.2	29.3	28.5	27.7	26.9
79	34.5	33.6	32.7	31.8	31.0	30.1	29.3	28.4	27.6	26.8
80	34.5	33.6	32.7	31.8	30.9	30.1	29.2	28.4	27.5	26.7
81	34.4	33.5	32.6	31.8	30.9	30.0	29.2	28.3	27.5	26.6
82	34.4	33.5	32.6	31.7	30.8	30.0	29.1	28.3	27.4	26.6
83	34.4	33.5	32.6	31.7	30.8	29.9	29.1	28.2	27.4	26.5
84	34.3	33.4	32.5	31.7	30.8	29.9	29.0	28.2	27.3	26.5
85	34.3	33.4	32.5	31.6	30.7	29.9	29.0	28.1	27.3	26.4
86	34.3	33.4	32.5	31.6	30.7	29.8	29.0	28.1	27.2	26.4
87	34.3	33.4	32.5	31.6	30.7	29.8	29.0	28.1	27.2	26.4
88	34.3	33.4	32.5	31.6	30.7	29.8	28.9	28.0	27.2	26.3
89	34.3	33.3	32.4	31.5	30.7	29.8	28.9	28.0	27.2	26.3
90	34.2	33.3	32.4	31.5	30.6	29.8	28.9	28.0	27.1	26.3
91	34.2	33.3	32.4	31.5	30.6	29.7	28.9	28.0	27.1	26.3
92	34.2	33.3	32.4	31.5	30.6	29.7	28.8	28.0	27.1	26.2
93	34.2	33.3	32.4	31.5	30.6	29.7	28.8	28.0	27.1	26.2
94	34.2	33.3	32.4	31.5	30.6	29.7	28.8	27.9	27.1	26.2
95	34.2	33.3	32.4	31.5	30.6	29.7	28.8	27.9	27.1	26.2
96	34.2	33.3	32.4	31.5	30.6	29.7	28.8	27.9	27.0	26.2
97	34.2	33.3	32.4	31.5	30.6	29.7	28.8	27.9	27.0	26.2
98	34.2	33.3	32.4	31.5	30.6	29.7	28.8	27.9	27.0	26.2
99	34.2	33.3	32.4	31.5	30.6	29.7	28.8	27.9	27.0	26.2
100	34.2	33.3	32.4	31.5	30.6	29.7	28.8	27.9	27.0	26.1
101	34.2	33.3	32.4	31.5	30.6	29.7	28.8	27.9	27.0	26.1
102	34.2	33.3	32.4	31.4	30.5	29.7	28.8	27.9	27.0	26.1
103	34.2	33.3	32.4	31.4	30.5	29.7	28.8	27.9	27.0	26.1
104	34.2	33.3	32.4	31.4	30.5	29.6	28.8	27.9	27.0	26.1
105	34.2	33.3	32.3	31.4	30.5	29.6	28.8	27.9	27.0	26.1
106	34.2	33.3	32.3	31.4	30.5	29.6	28.8	27.9	27.0	26.1
107	34.2	33.3	32.3	31.4	30.5	29.6	28.8	27.9	27.0	26.1
108	34.2	33.3	32.3	31.4	30.5	29.6	28.8	27.9	27.0	26.1
109	34.2	33.3	32.3	31.4	30.5	29.6	28.7	27.9	27.0	26.1
110	34.2	33.3	32.3	31.4	30.5	29.6	28.7	27.9	27.0	26.1
111	34.2	33.3	32.3	31.4	30.5	29.6	28.7	27.9	27.0	26.1
112	34.2	33.3	32.3	31.4	30.5	29.6	28.7	27.9	27.0	26.1
113	34.2	33.3	32.3	31.4	30.5	29.6	28.7	27.9	27.0	26.1
114	34.2	33.3	32.3	31.4	30.5	29.6	28.7	27.9	27.0	26.1
115+	34.2	33.3	32.3	31.4	30.5	29.6	28.7	27.9	27.0	26.1

APPENDIX B

Joint and Last Survivor (Cont'd)

Ages	60	61	62	63	64	65	66	67	68	69
103	25.3	24.4	23.6	22.7	21.9	21.0	20.2	19.4	18.6	17.9
104	25.3	24.4	23.5	22.7	21.9	21.0	20.2	19.4	18.6	17.8
105	25.3	24.4	23.5	22.7	21.9	21.0	20.2	19.4	18.6	17.8
106	25.3	24.4	23.5	22.7	21.9	21.0	20.2	19.4	18.6	17.8
107	25.2	24.4	23.5	22.7	21.8	21.0	20.2	19.4	18.6	17.8
108	25.2	24.4	23.5	22.7	21.8	21.0	20.2	19.4	18.6	17.8
109	25.2	24.4	23.5	22.7	21.8	21.0	20.2	19.4	18.6	17.8
110	25.2	24.4	23.5	22.7	21.8	21.0	20.2	19.4	18.6	17.8
111	25.2	24.4	23.5	22.7	21.8	21.0	20.2	19.4	18.6	17.8
112	25.2	24.4	23.5	22.7	21.8	21.0	20.2	19.4	18.6	17.8
9.6	25.2	24.4	23.5	22.7	21.8	21.0	20.2	19.4	18.6	17.8
114	25.2	24.4	23.5	22.7	21.8	21.0	20.2	19.4	18.6	17.8
115+	25.2	24.4	23.5	22.7	21.8	21.0	20.2	19.4	18.6	17.8
Ages	70	71	72	73	74	75	76	77	78	79
70	21.8	21.3	20.9	20.6	20.2	19.9	19.6	19.4	19.1	18.9
71	21.3	20.9	20.5	20.1	19.7	19.4	19.1	18.8	18.5	18.3
72	20.9	20.5	20.0	19.6	19.3	18.9	18.6	18.3	18.0	17.7
73	20.6	20.1	19.6	19.2	18.8	18.4	18.1	17.8	17.5	17.2
74	20.2	19.7	19.3	18.8	18.4	18.0	17.6	17.3	17.0	16.7
75	19.9	19.4	18.9	18.4	18.0	17.6	17.2	16.8	16.5	16.2
76	19.6	19.1	18.6	18.1	17.6	17.2	16.8	16.4	16.0	15.7
77	19.4	18.8	18.3	17.8	17.3	16.8	16.4	16.0	15.6	15.3
78	19.1	18.5	18.0	17.5	17.0	16.5	16.0	15.6	15.2	14.9
79	18.9	18.3	17.7	17.2	16.7	16.2	15.7	15.3	14.9	14.5
80	18.7	18.1	17.5	16.9	16.4	15.9	15.4	15.0	14.5	14.1
81	18.5	17.9	17.3	16.7	16.2	15.6	15.1	14.7	14.2	13.8
82	18.3	17.7	17.1	16.5	15.9	15.4	14.9	14.4	13.9	13.5
83	18.2	17.5	16.9	16.3	15.7	15.2	14.7	14.2	13.7	13.2
84	18.0	17.4	16.7	16.1	15.5	15.0	14.4	13.9	13.4	13.0
85	17.9	17.3	16.6	16.0	15.4	14.8	14.3	13.7	13.2	12.8
86	17.8	17.1	16.5	15.8	15.2	14.6	14.1	13.5	13.0	12.5
87	17.7	17.0	16.4	15.7	15.1	14.5	13.9	13.4	12.9	12.4
88	17.6	16.9	16.3	15.6	15.0	14.4	13.8	13.2	12.7	12.2
89	17.6	16.9	16.2	15.5	14.9	14.3	13.7	13.1	12.6	12.0
90	17.5	16.8	16.1	15.4	14.8	14.2	13.6	13.0	12.4	11.9
91	17.4	16.7	16.0	15.4	14.7	14.1	13.5	12.9	12.3	11.8
92	17.4	16.7	16.0	15.3	14.6	14.0	13.4	12.8	12.2	11.7
93	17.3	16.6	15.9	15.2	14.6	13.9	13.3	12.7	12.1	11.6
94	17.3	16.6	15.9	15.2	14.5	13.9	13.2	12.6	12.0	11.5
95	17.3	16.5	15.8	15.1	14.5	13.8	13.2	12.6	12.0	11.4
96	17.2	16.5	15.8	15.1	14.4	13.8	13.1	12.5	11.9	11.3
97	17.2	16.5	15.8	15.1	14.4	13.7	13.1	12.5	11.9	11.3
98	17.2	16.4	15.7	15.0	14.3	13.7	13.0	12.4	11.8	11.2
99	17.2	16.4	15.7	15.0	14.3	13.6	13.0	12.4	11.8	11.2

APPENDIX B

Joint and Last Survivor (Cont'd)

Ages	100	101	102	103	104	105	106	107	108	109
103	3.8	3.6	3.4	3.3	3.2	3.0	2.9	2.8	2.7	2.6
104	3.7	3.5	3.3	3.2	3.0	2.9	2.7	2.6	2.5	2.4
105	3.5	3.4	3.2	3.0	2.9	2.7	2.6	2.5	2.4	2.3
106	3.4	3.2	3.1	2.9	2.7	2.6	2.4	2.3	2.2	2.1
107	3.3	3.1	3.0	2.8	2.6	2.5	2.3	2.2	2.1	2.0
108	3.3	3.1	2.9	2.7	2.5	2.4	2.2	2.1	1.9	1.8
109	3.2	3.0	2.8	2.6	2.4	2.3	2.1	2.0	1.8	1.7
110	3.1	2.9	2.7	2.5	2.3	2.2	2.0	1.9	1.7	1.6
111	3.1	2.9	2.7	2.5	2.3	2.1	1.9	1.8	1.6	1.5
112	3.0	2.8	2.6	2.4	2.2	2.0	1.9	1.7	1.5	1.4
113	3.0	2.8	2.6	2.4	2.2	2.0	1.8	1.6	1.5	1.3
114	3.0	2.7	2.5	2.3	2.1	1.9	1.8	1.6	1.4	1.3
115+	2.9	2.7	2.5	2.3	2.1	1.9	1.7	1.5	1.4	1.2
Ages	110	111	112	113	114	115				
110	1.5	1.4	1.3	1.2	1.1	1.1				
111	1.4	1.2	1.1	1.0	1.0	1.0				
112	1.3	1.1	1.0	1.0	1.0	1.0				
113	1.2	1.1	1.0	1.0	1.0	1.0				
114	1.1	1.0	1.0	1.0	1.0	1.0				
115+	1.1	1.0	1.0	1.0	1.0	1.0				

APPENDIX C

Life Expectancy Tables - Single Life

<u>AGE</u>	<u>DIVISOR</u>	<u>AGE</u>	<u>DIVISOR</u>	<u>AGE</u>	<u>DIVISOR</u>
0	82.4	40	43.6	80	10.2
1	81.6	41	42.7	81	9.7
2	80.6	42	41.7	82	9.1
3	79.7	43	40.7	83	8.6
4	78.7	44	39.8	84	8.1
5	77.7	45	38.8	85	7.6
6	76.7	46	37.9	86	7.1
7	75.8	47	37.0	87	6.7
8	74.8	48	36.0	88	6.3
9	73.8	49	35.1	89	5.9
10	72.8	50	34.2	90	5.5
11	71.8	51	33.3	91	5.2
12	70.8	52	32.3	92	4.9
13	69.9	53	31.4	93	4.6
14	68.9	54	30.5	94	4.3
15	67.9	55	29.6	95	4.1
16	66.9	56	28.7	96	3.8
17	66.0	57	27.9	97	3.6
18	65.0	58	27.0	98	3.4
19	64.0	59	26.1	99	3.1
20	63.0	60	25.2	100	2.9
21	62.1	61	24.4	101	2.7
22	61.1	62	23.5	102	2.5
23	60.1	63	22.7	103	2.3
24	59.1	64	21.8	104	2.1
25	58.2	65	21.0	105	1.9
26	57.2	66	20.2	106	1.7
27	56.2	67	19.4	107	1.5
28	55.3	68	18.6	108	1.4
29	54.3	69	17.8	109	1.2
30	53.3	70	17.0	110	1.1
31	52.4	71	16.3	111+	1.0
32	51.4	72	15.5		
33	50.4	73	14.8		
34	49.4	74	14.1		
35	48.5	75	13.4		
36	47.5	76	12.7		
37	46.5	77	12.1		
38	45.6	78	11.4		
39	44.6	79	10.8		

SOCIAL SECURITY BENEFIT DISTRIBUTION RULES

- Age 62: Earliest age to receive Social Security Benefits w/25% reduction.
- Age 66: Full Social Security Benefits.
- Age 70: Maximized Social Security Benefits increased by 32%.
- Worker's spouse entitled to 50% of full retirement benefits at age 66.
- Plan: Worker applies for benefits, at age 66 spouse applies and gets 50% of worker's benefits; worker elects to stop taking benefits. At age 70, spouse gets maximized benefits on own record.
- Divorce: Spouse and Worker married for at least 10 years, worker is at least 66, spouse at least 62, spouse entitled to 50% of benefits if Worker entitled to Social Security.
- Medicare eligibility begins at age 65.

DISTINCTIONS BETWEEN ERISA PLANS and TAX QUALIFIED PLANS

- The Employee Retirement Income Security Act of 1974 sets minimum standards for retirement, health and life insurance plans in private industry.
- Most ERISA retirement plans have “REA” (Retirement Equity Act of 1984) requirements to provide spousal benefits.
- Tax qualified plans allow income tax deductions for contributions made to them. Not all Tax-qualified plans are ERISA plans.
- 401(a), 401(k), defined benefit and defined contribution plans, SEP-IRAs, SIMPLE IRAs and some 403(b) plans are ERISA plans.
- Traditional and ROTH IRAs are tax-qualified but not ERISA plans, unless associated with SEP or SIMPLE plans.

SEP and SIMPLE IRAs

- Employer (but not employees) are required to make contributions to SEP-IRAs which are traditional IRAs owned by the employees. Created under Code §408(k).

- SIMPLE IRAs annually require employers to contribute either up to a 3% matching contribution or a 2% nonelective contribution for each eligible employee. Created under Code §408(p).
- Distribution rules for SEPs and SIMPLEs generally same as Traditional IRAs, but penalty for early distribution is 25% within first 2 years.
- Contributions to SEPs or SIMPLEs affect ability of worker to make contributions to personal IRAs.

TRADITIONAL VERSUS ROTH IRAs

- Traditional IRA may be created and contributions made and deducted until the IRA owner reaches age 70-1/2.
- Distributions from traditional IRAs must begin at age 70-1/2 and are taxed as ordinary income.
- “Inherited IRAs” received by the beneficiary(ies) of deceased owner. Distributions are taxed when received.
- ROTH IRAs have no limits to when they may be created and contributions made. Contributions are not tax-deductible.

- “Qualified Distributions” from ROTH IRAs: 5 years after initial contribution and
 1. On or after owner reaches 59-1/2;
 2. After owner’s death;
 3. are attributable to owner’s total disability; or
 4. as distribution of up to \$10,000 for 1st home purchase.
- 5 year period begins on 1/1 of 1st year a ROTH contribution is made to any of owner’s ROTH IRAs except inherited ROTH IRAs.

MINIMUM REQUIRED DISTRIBUTION (“MRD”) RULES

During Lifetime of Participant

- MRD in any year is determined by dividing account balance of last Valuation date of previous year by factor from “Uniform Table” for participant’s age on birthday in current distribution year.
- Applicable Distribution Period (“ADP”) period during which benefit may be distributed.

Required Beginning Date

- Generally April 1 of year following year in which participant attains age 70-1/2.
- Participant of qualified plan who is not 5% owner is generally April 1 of year following year participant retires.

First Distribution Year

- Generally year in which participant attains age 70-1/2 (RBD).
- For qualified plan, non-5% owner: later of year in which participant attains age 70-1/2 or retires.
- RBD occurs in 2nd distribution year.
- MRD of 1st distribution year may be made up to April 1 of 2nd distribution year.
- 2 distributions must be made if MRD is not taken until April 1 of 2nd year: 1st distribution: April 1; 2nd distribution: December 31 of same year.

Uniform Table

- Contains factors showing the joint, recalculated (each year) life expectancy of participant and another individual 10 years younger.

Spouse is More than 10 years younger than Participant

- If spouse more than 10 years younger than Participant, and spouse is sole beneficiary of plan for entire year, use factor set forth in Joint and Last Survivor Life Expectancy Table, recalculated each year.
- If spouse dies or is divorced during year, may still use Joint Table unless Participant remarries or designates new spouse during year.

DISTRIBUTIONS AFTER PARTICIPANT'S DEATH

Death before RBD

- Generally, all benefits must be distributed by December 31 of the year that contains 5th anniversary of date of Participant's death.
- If non-spouse individual named beneficiary in beneficiary designation form or plan itself, distributions commencing by December 31 of year after Participant's death may be made over beneficiary's life expectancy from Single Life Expectancy Table, non-recalculated each year.
- Distribution Factor for first distribution year determined by age of designated beneficiary on birthday in year AFTER Participant's death. Divide account balance at end of year of Participant's death by Factor. Thereafter original factor minus 1 for each year divided into account balance of previous year.

Death After RBD

No Designated Beneficiary

- Distributions made over Participant's remaining life expectancy, no recalculation :
- MRD calculated by dividing prior year's account balance by factor determined by participant's age on birthday in year of death, reduced by 1 for each year thereafter.

With Individual Designated Beneficiary

- Over longer of Participant's remaining life expectancy or Beneficiary's remaining life expectancy, with no recalculation, unless designated beneficiary is surviving spouse, using Single Life Expectancy Table.

SURVIVING SPOUSE AS DESIGNATED BENEFICIARY

Participant's Death Before RBD

- Spouse may defer post-death distributions until 12/31 of year in which participant would have attained age 70-1/2.
- MRD calculated by dividing prior year's account balance by factor based on spouse's age on birthday in year Participant would have attained age 70-1/2 from Single Life Expectancy Table. Next years, recalculate using spouse's age on birthday in each succeeding year.
- If spouse dies before distributions to spouse are required to commence, use same "5 year" rule as if spouse were the Participant if spouse had not named designated beneficiary.
- If spouse had named designated beneficiary before distributions to spouse were required to commence, distributions may be made over the designated beneficiary's life expectancy with 1st distribution by 12/31 of year following spouse's death.

Spouse Dies after Distributions to Spouse have Begun

- MRDs after spouse's death are calculated using the spouse's remaining life expectancy using the factor corresponding with spouse's age on birthday in year of spouse's death, reduced by 1 for each succeeding year.

Participant's Death after RBD

- If spouse designated beneficiary, MRDs made over spouse's remaining life expectancy from Single Life Table, recalculated based on spouse's birthday in each distribution year.
- After spouse's death, no recalculation: reduce factor by 1 each year after spouse's death.

Spousal Rollovers

- Until 2007, only a participant's surviving spouse could rollover from a deceased participant's qualified plan or IRA to her own IRA or qualified plan (if permitted by the plan), or elect to treat participant's interest in IRA as spouse's own IRA.
- Only spouse can defer distributions to spouse's RBD, use Uniform Table, recalculate, designate beneficiaries whose life expectancy (oldest) may be used to measure distributions from inherited IRA after spouse's death.

EARLY DISTRIBUTION PENALTIES (PRE 59-1/2 DISTRIBUTIONS)

- 10% penalty on distribution, as well as ordinary income tax
- Does not apply to non-spouse beneficiary of inherited IRA or if spouse does not elect to be treated as owner of IRA.

Exceptions:

- Distributions that are “series of substantially equal periodic payments” (not less frequently than annually).

3 Methods:

- “MRD”: Each year, divide prior years balance by factor from Uniform, Joint Life or Single Life Expectancy Table.
- “Amortization”: Like self-amortizing level mortgage, using reasonable interest rate and Uniform, Joint Life or Single Life Table.
- “Annuatization: Choose reasonable interest rate, single or joint life expectancy, then divide account balance by annuity factor derived from mortality table in Appendix B of Rev. Rul. 2002-62.
- Can switch from Amortization or Annuatization method to MRD method after first year, otherwise if exception distribution modified without IRS approval, qualification terminates to date pre-59-1/2 withdrawals began, 10% penalty and interest owed. No new “series of substantially equal periodic payments may start until next calendar year.
- Other exceptions: death, permanent disability, after separation from service and age 55 (from qualified plans), higher education and up to \$10,000 of first-time homebuyer expense (from IRAs).

Appendix B

Mortality Table Used to Formulate the Single Life Table in § 1.401(a)(9)-9, Q&A-1

age	q_x	l_x	age	q_x	l_x
0	0.001982	1000000	58	0.004736	941078
1	0.000802	998018	59	0.005101	936621
2	0.000433	997218	60	0.005509	931843
3	0.000337	996786	61	0.005975	926709
4	0.000284	996450	62	0.006512	921172
5	0.000248	996167	63	0.007137	915173
6	0.000221	995920	64	0.007854	908641
7	0.000201	995700	65	0.008670	901505
8	0.000222	995500	66	0.009591	893689
9	0.000241	995279	67	0.010620	885118
10	0.000259	995039	68	0.011778	875718
11	0.000277	994781	69	0.013072	865404
12	0.000292	994505	70	0.014519	854091
13	0.000306	994215	71	0.016139	841690
14	0.000318	993911	72	0.017950	828106
15	0.000331	993595	73	0.019958	813241
16	0.000344	993266	74	0.022198	797010
17	0.000359	992924	75	0.024699	779318
18	0.000375	992568	76	0.027484	760070
19	0.000392	992196	77	0.030582	739180
20	0.000411	991807	78	0.034010	716574
21	0.000432	991399	79	0.037807	692203
22	0.000454	990971	80	0.042010	666033
23	0.000476	990521	81	0.046652	638053
24	0.000501	990050	82	0.051766	608287
25	0.000524	989554	83	0.057392	576798
26	0.000547	989035	84	0.063583	543694
27	0.000567	988494	85	0.070397	509124
28	0.000584	987934	86	0.077892	473283
29	0.000598	987357	87	0.086124	436418
30	0.000608	986767	88	0.095238	398832
31	0.000615	986167	89	0.105068	360848
32	0.000619	985561	90	0.115518	322934
33	0.000622	984951	91	0.126487	285629
34	0.000625	984338	92	0.137876	249501
35	0.000629	983723	93	0.149419	215101
36	0.000636	983104	94	0.161176	182961
37	0.000657	982479	95	0.173067	153472
38	0.000696	981834	96	0.185008	126911
39	0.000749	981151	97	0.196920	103431
40	0.000818	980416	98	0.210337	83063.4
41	0.000904	979614	99	0.224861	65592.1
42	0.001007	978728	100	0.241017	50843.0
43	0.00113	977742	101	0.259334	38589.0
44	0.00127	976637	102	0.280356	28581.6
45	0.001426	975397	103	0.303142	20568.6
46	0.001597	974006	104	0.329482	14333.4

PENALTIES ON EARLY DISTRIBUTIONS FROM ROTH IRAs

- Pre-59-1/2 ROTH IRA distributions and earnings generally subject to same 10% penalty.
- Qualified distribution from ROTH excluded from gross income & penalty.
- Exceptions: conversions to ROTH IRAs (penalty applies to any income tax withheld); series of substantially equal periodic payments.

PENALTIES FOR FAILING TO MAKE MINIMUM DISTRIBUTIONS

Qualified Plans and Traditional IRAs

- 50% penalty on missed MRD.
- File Form 5329 and try to establish to IRS: missed distribution due to “reasonable” error and steps are being taken to correct shortfall.

ROTH IRAs

- No MRD rules and no MRDs for ROTH owners and surviving spouses.
- Post-death non-distributions by non-spouse beneficiary subject to 50% penalty to extent it exceeds amount contributed or converted to ROTH.
- If ROTH IRA being distributed in series of substantially equal periodic payments and payments modified within 5 years of first payment, prior to owner attaining 59-1/2, 10% penalty applicable.

TRANSFERS VERSUS ROLLOVER OF BENEFITS

Eligible Recipients

- Almost any type of retirement plan may be rolled over or rolled into.
- Eligible rollover distribution: any distribution from qualified plan or IRA, EXCEPT: MRD; series of substantially equal periodic distributions paid at least annually over life of participant, participant and beneficiary, period of 10 or more years; inherited plan by non-surviving spouse; hardship distribution; corrective and deemed distributions; loans; dividends; PS58 costs.

Single Annual Rollover

- Beginning in 2015, only one 60 day rollover permitted in any 12 month period per owner.
- ROTH conversion doesn't count as rollover.

Trustee to Trustee Transfers or Direct Rollover

- From plan administrator or IRA custodian directly to other plan administrator or custodian (usually by electronic transfer), not deemed rollover and not limited to 1 a year.

Allocation of After-Tax and Pretax Amounts (Notice 2014-54)

Apply to Distributions made on or after 1/1/15:

- All distributions made at same time treated as single distribution, whether to single or multiple recipient plans.
- Pre-tax amount of direct rollover less than amount transferred, entire pretax amount allocated to recipient plan. More than 1 plan recipient, participant selects how pretax amount allocated between plans.

- Pre-tax amount of direct rollover equals or exceeds amount transferred to 1 or more plans, pretax amount allocated up to amounts transferred. Any remaining pre-tax amounts allocated to 60 day rollovers.
- Any pre-tax amount remaining after assignment and allocation among transfers and rollovers, includible in gross income.
- If transfers and rollovers exceed pretax amounts allocated, any remaining amounts rolled over deemed after-tax.

Spousal Rollovers (Continued)

- Surviving spouse may roll into ROTH IRA.
- No after-death deadline when spouse must complete rollover (but 60 day rollover still applies).
- If participant dies before RBD and 5 year rule would otherwise apply, spouse can rollover entire account balance in 4th year.
- Many PLRs allowing spouse to rollover when she is sole beneficiary of an estate or trust and the sole executor or Trustee. But must get PLR to do.

Non-Spousal Rollovers

- Pension Protection Act of 2006 permits Designated Beneficiary to use Trustee to Trustee transfer to inherited IRA by 12/31 of year after Participant's death. No 60 day rollovers permitted.
- If Designated Beneficiary dies before his or her life expectancy, unless plan doc calls for shorter period, remaining assets must be taken over balance of Designated Beneficiary's life expectancy, non-recalculated (minus 1 each yr).

All Post-Death of Participant Rollovers

- If Participant/Owner attains RBD before death, the Designated Beneficiary(ies) must take balance (if any) of Participant/Owner's MRD for year of death using Universal Table, before rollover(s).