

Appendix B: Charts Summarizing The RMD Rules

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These charts summarize the minimum distribution requirements for beneficiaries of a retirement-account owner (“participant”) according to final and proposed IRS regulations issued in July 2024. Reg. § 1.401(a)(9)-1(d). Exceptions and limitations:

- These charts do not apply if the participant died before 2020. See PART 8 of this Outline.
- Annuities and collectively bargained retirement plans are not covered in this Outline.
- The rules in these charts are from: final regulations effective 1/1/2025, restating prior editions of RMD regulations and proposed regulations to implement changes made by SECURE 2.0 (2022). For certain transition rules for years 2021–2024 see PART 3 of this Outline, #1(F).

Charts I-A, I-B, and II summarize the requirements applicable to one beneficiary. For multiple beneficiaries, the payout periods would be the same as for a trust with the same “countable beneficiaries”; see Note 1 following Charts III and IV.

The regulations’ required minimum distribution (RMD) “system” for beneficiaries generally has two parts. First, there is an annual distributions track: Annual RMDs would be based on annual distributions over someone’s life expectancy (the “Applicable Denominator”). Second, there is a Required Terminal Distribution: 100% of the account becomes the RMD, regardless of what the “annual distributions track” was. The post-death payout must be completed in the Required Terminal Distribution year if the account was not previously exhausted by distributions (required or otherwise).

To use the charts you need the following information:

1. ***Did decedent die before or after his required beginning date (RBD)?*** See PART 2, #1.

2. ***What category is the beneficiary?***

...an **Eligible Designated Beneficiary** (EDB)? If so which type—participant’s surviving spouse, minor child of the participant, disabled or chronically (D/CI) ill individual, or not-more-than-10-years-younger (NoMoTTY) beneficiary? See PART 3, #4.

...a **plain old designated beneficiary** (PODB)? See PART 3, #3. Or,

...a **non-designated beneficiary** (Non-DB), such as the participant’s estate? See PART 3, #2.

3. ***How to use the Life Expectancy tables (Appendix A):*** The “beneficiary’s life expectancy” and the decedent’s or “ghost” life expectancy are calculated using The Single Life Table. Exception: If the sole designated beneficiary is the surviving spouse the Uniform Lifetime Table may apply; see PART 3, #5. The applicable life expectancy number (“Applicable Denominator”) is divided into the prior year end account balance. For how to calculate the prior year end account balance and other general RMD rules, see ¶ 1.5.05 of *Life and Death Planning for Retirement Benefits*.

Chart I-A: RMDs for one non-spouse beneficiary; Participant died before RBD

“PART” references refer to applicable section of this Outline

You must read preceding page, as well as notes following each chart, to understand the charts

Beneficiary	Annual distributions required beginning year AFTER participant's death (Note 1)	Required Terminal Distribution (100% distribution required)
EDB: Minor child of participant PART 3, #6.	Annual distributions over child's life expectancy (Note 1) unless 10-year rule applies (Note 2).	Year that contains the 10 th anniversary of earlier of the child's death or 21 st birthday. Reg. § 1.401(a)(9)-5(e)(1), (3), (4). Or year that contains 10 th anniversary of participant's death if 10-year rule applies (Note 2).
EDB: Disabled or chronically ill individual; or not more than 10 years younger individual. PART 3, #7, #8	Annual distributions over beneficiary's life expectancy (Note 1) unless 10-year rule applies (Note 2)	Final year of EDB's life expectancy or (if earlier) year that contains the 10 th anniversary of EDB's death. Reg. § 1.401(a)(9)-5(e)(1), (3). Or year that contains 10 th anniversary of participant's death if 10-year rule applies (Note 2)
Plain old designated beneficiary (PODB) PART 3, #3.	None. No distributions required in Years 1-9. Reg. § 1.401(a)(9)-3(c)(3).	Year that contains the 10 th anniversary of participant's death. Reg. § 1.401(a)(9)-3(c)(3).
Non-DB (e.g., participant's estate, or a trust that does not qualify as a designated beneficiary)	None. No distributions required in Years 1-4 (or 1-5, if participant died in 2015-2019). Reg. § 1.401(a)(9)-3(c)(2).	Year that contains the 5 th anniversary of participant's death (or 6 th anniversary, if participant died in 2015–2019). Reg. § 1.401(a)(9)-3(c)(2).

1. Life-expectancy RMDs to a non-spouse EDB commence the year after the year of participant's death. Reg. § 1.401(a)(9)-3(c)(4), § 1.401(a)(9)-5(a)(2)(iii). Life expectancy of a non-spouse EDB is NOT recalculated annually. Reg. § 1.401(a)(9)-5(d)(3)(iii).

2. If the participant died before his RBD, the 10-year rule MAY apply to an EDB instead of the life expectancy payout; Reg. § 1.401(a)(9)-3(c)(5)(ii), (iii); see PART 3, #4(C), for how this can happen and how to prevent/avoid such treatment.. If the 10-year rule applies, see “PODB” rather than EDB for payout rules.

**Chart I-B: RMDs for participant's surviving spouse as sole beneficiary:
Participant died before RBD**

This chart applies if the participant died before his RBD, and the participant's surviving spouse is the sole designated beneficiary of the decedent's entire account, or of a "separate account" created in accordance with Reg. § 1.401(a)(9)-8 (see PART 6 of this Outline). This Chart also applies to a conduit trust (PART 4, #2) for the surviving spouse's sole life benefit if such trust is the sole beneficiary of the decedent's entire account (or of a separate account thereof). This Chart shows required minimum distributions only; see Note 5 re *spousal rollover/election* option.

This Chart is effective for the surviving spouse-beneficiary of any decedent who reaches, or would have reached, or will reach, his Applicable Age **in 2024 or later**; see Note 6. The Chart covers two possible "payout periods" for such spouse, the "life expectancy payout deemed elected under 401(a)(9)(B)(iv)" and the "10-year rule."

If the life expectancy payout applies (see PART 3, #5):

When distributions to the spouse must begin	Annual distributions required once distributions begin	Required Terminal Distribution (100% distribution required in this year)
Year participant would have reached his Applicable Age, or the year after the year of participant's death, whichever is later. Reg. § 1.401(a)(9)-3(c)(4), (d). Deadline for first RMD (surviving spouse's "required commencement date") is Dec. 31 of that year. There is no RMD for the year of the decedent's death. Notes 1, 2.	Annual distributions are determined under the Uniform Lifetime Table, as if spouse were "the employee." Note 3. Life expectancy is recalculated annually.	Earliest of: final year of payout to spouse while living (would not be reached until age 120+); or, if spouse died before that point, the earlier of [1] the final year of her single life expectancy or [2] the year that contains the 10 th anniversary of spouse's death. Note 7.

If the 10-year rule applies:

See PART 5(A)(vi), (vii), for how the 10-year rule can apply to the surviving spouse if participant dies before his RBD, and for how the spouse can escape the 10-year rule and get a life expectancy payout instead. See PART 5(E) for "catchup" distributions required in some cases if spouse escapes the 10-year rule by rolling over the inherited account into her own IRA or electing to treat the inherited IRA as her own IRA after reaching her own Applicable Age.

If the 10-year rule does apply to the surviving spouse, then 100% distribution of the account is required in the year that contains the 10th anniversary of the decedent's death. No distributions are required for the year of the decedent's death or in the following years 1-9. Reg. § 1.401(a)(9)-3(c)(3). If the 10-year rule applies, the delayed commencement date that applies when the surviving spouse

is taking a life expectancy payout does NOT apply; the 10 years are measured from the year of the deceased spouse's death, NOT the year he would have reached his Applicable Age. Reg. § 1.401(a)(9)-3(d). If the spouse dies before the end of the 10-year period, it appears her successor beneficiary must complete the payout within the 10-year period that applied to the spouse.

Note 1: The Code generally requires that life expectancy payout to a designated beneficiary, based on the beneficiary's life expectancy must begin the year after the year of the participant's death. § 401(a)(9)(b)(iii). However, for the surviving spouse, there can be a deferred commencement date—RMDs to the surviving spouse begin in the year the deceased spouse would have reached his/her Applicable Age, or the year after the year of participant's death, if later. Reg. § 1.401(a)(9)-3(c). Under the Code, this treatment is elective for the spouse; under the proposed regulations, it is automatic (no election required). § 401(a)(9)(B)(iv); Prop. Reg. § 1.401(a)(9)-5(g)(3)(ii)(A). This Chart does not cover the possibility that somehow the spouse elects OUT of this treatment.

Note 2: Because in cases of participant's death prior to the Required Beginning Date the first distribution year is no earlier than the year after the participant's death, and because a decedent could die IN the year he reaches his Applicable Age and still die before his RBD, the required commencement date for the surviving spouse (though generally it is the year decedent would have reached his Applicable Age) is the "later of" that year and the year after the year of the participant's death. If the surviving spouse then dies BEFORE that required commencement date, see Note 4!

Note 3: Life expectancy payments to the surviving spouse are determined using the Uniform Lifetime Table (ULT) (Reg. § 1.401(a)(9)-9(c)) "as if" the surviving spouse were "the employee." The ULT is based on the joint and survivor life expectancy of the "employee" [surviving spouse] and a hypothetical 10-years younger individual. Under the Code, this treatment is elective for the spouse; under the regulations, it is automatic (no election required). § 401(a)(9)(B)(iv); Prop. Reg. § 1.401(a)(9)-5(g)(3)(ii)(A)

Note 4: The generous payout rules for the surviving spouse have a potential trap: If the surviving spouse dies BEFORE her extended required commencement date, she suddenly is treated as the "participant" and the payout period for her successor beneficiary(ies) is determined using the "death before the RBD" rules. § 401(a)(9)(B)(iv)(III). Thus, for example, if she failed to name a successor beneficiary, and the account defaulted to her estate as beneficiary, the 5-year rule would apply to the spouse's estate. § 401(a)(9)(B)(iv)(II); Reg. § 1.401(a)(9)-4(d).

Note 5: This Chart deals only with required minimum distributions (RMDs). The surviving spouse named as outright beneficiary of a retirement account also has the option to "roll over" distributions from the decedent's account into the S/S's own retirement account or into an "inherited IRA." Reg. § 1.402(c)-2(j)(1)(i); § 1.408-8(d)(1)(ii), (iii). In the case of an inherited IRA, the spouse has the option to elect to treat the inherited IRA as the spouse's own IRA. Reg. § 1.408-8(c). Following such rollover or election, the S/S's RMDs will be calculated using the Uniform Lifetime Table with the spouse as "participant." The rollover option does not apply to any distribution to the S/S that is an RMD. Reg. § 1.402(c)-2(c)(2)(ii). (RMDs are not eligible rollover distributions). The

rollover/election options are NOT part of the minimum distribution rules; they are separate spousal rights. The right to elect to treat an IRA as the spouse's own IRA applies only if the spouse has the unlimited right to withdraw from the IRA, and cannot apply to a trust (even a conduit trust). Reg. § 1.408-8(c)(1)(ii).

Note 6: The effective date of this payout system will be surprising in some situations because it applies to surviving spouses of participants who died before SECURE 2.0 [or even SECURE itself] was enacted: It applies to the surviving spouse of any decedent who reaches *or would have reached* his Applicable Age in 2024 or later. Thus, if the participant died in 2018, in the year he attained or would have attained age 64, that means he was born in 1954. His Applicable Age (under laws passed after his death) was 73. He would have attained his Applicable Age in 2027 if he had lived. If the surviving spouse, as sole beneficiary of the decedent's IRA, is still holding the IRA as beneficiary, she will be required to start taking RMDs as beneficiary (using the Uniform Lifetime Table) in 2027.

Note 7: Recalculation of S/S's life expectancy, and use of the Uniform Lifetime Table, both end with year of S/S's death, and thereafter RMDs to the successor beneficiary continue based on the surviving spouse's remaining SINGLE life expectancy minus one each year. Prop. Reg. § 1.401(a)(9)-5(g)(3)(ii)(D). Thus if her death occurs in her age 81 year or later, the payout period for her successor beneficiary(ies) will be less than 10 years (single life expectancy less than 10 years after that age). The spouse's single life expectancy is not recalculated annually for this purpose.

Chart II: Post-death RMDs to One Beneficiary
Participant Died ON OR AFTER his/her RBD

Beneficiary	RMD for year of Participant's death	Annual distributions required in succeeding years	Required Terminal Distribution (100% distribution required in this year)
EDB: Participant's surviving spouse (S/S)	Balance of participant's RMD if not taken by participant (Note 1)	Annual distributions over greater of spouse's "Uniform Table" life expectancy or decedent's ("ghost") life expectancy (Notes 2, 3).	Earlier of year that contains 10 th anniversary of S/S's death or the final year of a payout based on spouse's <i>single</i> life expectancy starting the year after spouse's death (Note 4)
EDB: Minor child of participant	Same—see above	Annual distributions over the greater of the "ghost" life expectancy or the beneficiary's life expectancy (Note 5)	10 th year after the year of the child's 21 st birthday (or of child's death if he died before age 21). Reg. § 1.401(a)(9)-5(f)(2)(ii).
EDB: Disabled, Chronically ill, or not more than 10 years younger individual	Same—see above	Annual distributions over the greater of the "ghost" life expectancy or the beneficiary's life expectancy (Note 5)	Earlier of: Year that contains 10 th anniversary of EDB's death or final year of the EDB's life expectancy. Reg. § 1.401(a)(9)-5(e)(1), (3)
PODB	Same—see above	Annual distributions over the greater of the "ghost" life expectancy or the beneficiary's life expectancy (Notes 5, 6)	Earlier of: (1) year that contains the 10 th anniversary of the participant's death or (2) final year of the beneficiary's life expectancy. (Notes 2, 8)
Non-DB (such as participant's estate)	Same—see above	Annual distributions over ghost life expectancy. Reg. § 1.401(a)(9)-5(d)(1)(iii), (3)(ii).	Final year of ghost life expectancy. Reg. § 1.401(a)(9)-5(d)(1)(iii).

Notes to Chart II:

1. If participant had not taken the full RMD for the calendar year of his death, the beneficiary must withdraw whatever portion the decedent failed to take by December 31 of the year of death. Reg. § 1.401(a)(9)-5(c)(1). If the beneficiary misses that deadline, then, "Unless the Commissioner determines otherwise," there is an automatic waiver of the excise tax (currently 25%) normally assessed on a missed RMD (§ 4974(a)) if the beneficiary satisfies the year-of-death distribution requirement by taking the distribution "no later than the tax filing deadline (including extensions thereof) for the taxable year of that beneficiary that begins with or within that calendar year (or, if later, the last day of the calendar year following that calendar year)." Reg. § 54.4974-1(g)(3).
2. RMDs to the S/S are a "life expectancy payout" using either the Uniform Lifetime Table (annual RMD is based on the joint life expectancy of spouse and a hypothetical beneficiary 10 years younger than spouse) OR the Single Life Table (based on spouse's life expectancy only)—spouse elects which applies, though the plan may have a default choice if spouse fails to elect one or the other; OR, if longer, the participant's life expectancy ("ghost life expectancy"). Reg. § 1.401(a)(9)-5(d)(1)(ii), (g)(3)(i); Prop. Reg. § 1.401(a)(9)-5(g)(3)(ii)(B), (C). The S/S's life expectancy is recalculated annually, the ghost life expectancy is not, so they might eventually "cross." Reg. § 1.401(a)(9)-5(d)(3)(ii), (iv). Recalculation of S/S's life expectancy ends with year of S/S's death, and thereafter RMDs to the successor beneficiary continue, based on the surviving spouse's remaining SINGLE life expectancy minus one each year for up to 10 years (final payout in earlier of 10th year after spouse's death or final year of spouse's single life expectancy). Prop. Reg. § 1.401(a)(9)-5(g)(3)(ii)(D).
3. This Chart deals only with required minimum distributions (RMDs). The surviving spouse named as outright beneficiary of a retirement account also has the option to "roll over" distributions from the decedent's account into the S/S's own retirement account or into an "inherited IRA." Spousal rollover is not covered in this Outline.
4. Reg. § 1.401(a)(9)-5(e)(1), (3).
5. Reg. § 1.401(a)(9)-5(d)(1)(ii). Life-expectancy RMDs to a non-spouse designated beneficiary are required to commence the year after the year of the participant's death. Reg. § 1.401(a)(9)-5(d)(1)(i) (2d sentence); § 1.401(a)(9)-5(a)(3) (2d sentence). Life expectancy of a nonspouse EDB is not recalculated annually. Reg. § 1.401(a)(9)-5(d)(3)(iii).
6. The rule for PODBs in case of participant's death after the RBD is the 10-year rule limit, unless the payout ends earlier under the "greater of" (PODB's or participant's life expectancy) rule. The "greater of" rule might come into play for a PODB if the beneficiary is a see-through accumulation trust with multiple designated beneficiaries; this Chart II does not cover trusts or multiple beneficiary situations, see Chart IV instead.

**Chart III: RMDs to a Trust Named as Beneficiary of a Retirement Account
If Participant Died BEFORE RBD**

NOTES FOLLOW CHART IV; SEE NOTE 1 BEFORE USING THIS CHART

Type of trust that inherited the account	Annual distributions required beginning year after Participant's death	Required Terminal Distribution (100% distribution required in this year)
Trust that does not qualify as a DBT; a Non-DB.	None. Reg. § 1.401(a)(9)-3(c)(2).	Year that contains 5 th anniversary of participant's death (6 th year if death occurred in 2015-2019). Reg. § 1.401(a)(9)-3(c)(2).
Conduit trust for one beneficiary who is a PODB or EDB	Same RMD "deal" as would apply to that PODB or EDB if named directly as beneficiary; see Charts I-A and I-B. Reg. § 1.401(a)(9)-4(f)(3), (6)(i) (Example 1). Note 2.	Same as would apply if that PODB or EDB were named directly as beneficiary (see Chart I). Reg. § 1.401(a)(9)-4(f)(1)(ii), (3)(i)(B), (6)(i) (Example 1). Note 2.
Applicable Multi-Beneficiary Trust (AMBT)	Annual distributions over life expectancy of oldest countable D/CI beneficiary. Reg. § 1.401(a)(9)-5(f)(1)(i), (ii). Note 2.	Earlier of: Final year of the life expectancy payout or year that contains the 10 th anniversary of the death of the last-to-die D/CI beneficiary of the trust. Reg. § 1.401(a)(9)-5(f)(2)(iii). Note 2.
DBT which has at least one countable minor-child-EDB	Annual distributions over life expectancy of the oldest countable beneficiary of the trust (NOT just the oldest minor-child EDB). Reg. § 1.401(a)(9)-5(f)(1)(i).	10 th year after the earliest point at which there is no living minor child-EDB who is under age 21. Reg. § 1.401(a)(9)-5(f)(2)(ii).
DBT which is none of the above, but all countable beneficiaries of which are EDBs	Annual distributions over the life expectancy of the oldest countable beneficiary of the trust. Reg. § 1.401(a)(9)-5(f)(1)(i). Note 2.	Year of 10 th anniversary of death of oldest countable beneficiary. Reg. § 1.401(a)(9)-5(e)(1), (3), (f)(2)(i). Note 2.
DBT trust which is none of the above	10-year rule applies; no annual distributions. Reg. § 1.401(a)(9)-3(c)(1), (3), (5)(i)(B).	Year containing 10 th anniversary of the participant's death. Reg. § 1.401(a)(9)-5(e)(2).

Chart IV: RMDs to a Trust: if Participant Died AFTER RBD

See Note 3 for all beneficiaries; all notes for this Chart are on next page

Type of trust that inherited the account	Annual distributions required beginning year after Participant's death	Required Terminal Distribution (100% distribution required in this year)
Trust that does not qualify as a DBT; a Non-DB.	Annual distributions over ghost life expectancy. Reg. § 1.401(a)(9)-5(d)(1)(iii).	Final year of ghost life expectancy. Reg. § 1.401(a)(9)-5(d)(1)(iii).
Conduit trust for one beneficiary who is a PODB	Same RMD "deal" as would apply to that PODB if named directly as beneficiary: see Chart II. Reg. § 1.401(a)(9)-5(f)(1)(ii). Note 4.	Same as would apply if PODB were named directly as beneficiary. See Chart II. Reg. § 1.401(a)(9)-5(f)(1)(ii).
Conduit trust for one beneficiary who is an EDB	Same RMD "deal" as would apply to that EDB if named directly as beneficiary: see Chart II. Reg. § 1.401(a)(9)-5(f)(1)(ii).	Same as would apply if that EDB were named directly as beneficiary. See Chart II. Reg. § 1.401(a)(9)-5(f)(1)(ii).
Type II AMBT	Annual distributions over life expectancy of oldest countable D/CI beneficiary (or, if longer, ghost life expectancy). Reg. § 1.401(a)(9)-5(f)(1)(i), (ii).	Year that contains the 10 th anniversary of the death of the last D/CI beneficiary of the trust to die. Reg. § 1.401(a)(9)-5(f)(2)(iii).
DBT which has at least one countable minor-child-EDB	Annual distributions over life expectancy of oldest countable trust beneficiary or ghost life expectancy if longer. Reg. § 1.401(a)(9)-5(d)(1)(ii), (f)(1)(i).	10 th year after the point at which there is no living minor child-EDB who is under age 21. Reg. § 1.401(a)(9)-5(f)(2)(ii).
DBT which is none of the above, but all countable beneficiaries of which are EDBs	Annual distributions over life expectancy of oldest countable beneficiary of the trust or over ghost life expectancy if longer. Reg. § 1.401(a)(9)-5(d)(1)(ii), (f)(1)(i).	Final year of oldest EDB's life expectancy, or if earlier year that contains 10 th anniversary of death of the oldest EDB. Reg. § 1.401(a)(9)-5(e)(1), (3); (f)(2)(i). Note 3.
DBT trust which is none of the above	Annual distributions over life expectancy of oldest countable trust beneficiary or ghost life expectancy if longer. Reg. § 1.401(a)(9)-5(d)(1)(ii), (f)(1)(i). Note 4.	Year that contains the 10 th anniversary of the participant's death. Reg. § 1.401(a)(9)-4(e)(2)(i), § 1.401(a)(9)-5(e)(2).

NOTES TO CHARTS III and IV

NOTE 1: Though these charts apply specifically to trusts, the same RMD rules apply to any retirement account that had multiple designated beneficiaries, even if there is no trust involved. To apply in that situation, just apply the charts as though your multiple DBs were countable beneficiaries of a designated beneficiary trust. Reg. § 1.401(a)(9)-5(f)(1)(i).

Charts III and IV summarize the information provided in PART 5 of this Outline, “DETERMINING THE APPLICABLE DENOMINATOR FOR A TRUST.” To use Charts III and IV, you must FIRST determine who are the “countable beneficiaries” of the trust you are testing; see PART 4. You cannot use Charts III and IV for a trust unless you have first read and understood PART 4, “RMD RULES FOR TRUSTS; HOW TO TEST A TRUST.” To determine the countable beneficiaries, you will also need to learn along the way the difference between a designated beneficiary trust (DBT) and a trust that does not qualify as a designated beneficiary and the difference between a conduit trust and an accumulation trust. *See PART 4!!!!*

NOTE 2: If the participant died before his RBD, the retirement plan may require that the 10-year rule “will apply” to some or all EDBs in place of the life expectancy payout; OR allow an EDB to elect the 10-year rule instead of life expectancy payout; OR allow the participant to elect that the 10-year rule shall apply to the EDB instead of life expectancy payout. Reg. § 1.401(a)(9)-3(c)(5)(ii), (iii). For details on this election, see PART 3, #4(C).

NOTE 3: If the decedent had not taken the full RMD for the calendar year of his death, the beneficiary must withdraw whatever portion the decedent failed to take by December 31 of the year of the participant’s death. Reg. § 1.401(a)(9)-5(c)(1), last two sentences. If the beneficiary misses that deadline, then, “Unless the Commissioner determines otherwise” (???), there is an automatic waiver of the excise tax (currently 25%) normally assessed on a missed RMD (§ 4974(a)) if the beneficiary satisfies the year-of-death distribution requirement by taking the distribution “no later than the tax filing deadline (including extensions thereof) for the taxable year of that beneficiary that begins with or within that calendar year (or, if later, the last day of the calendar year following that calendar year).” Reg. § 54.4974-1(g)(3).

NOTE 4: For a PODB and for the successor beneficiary to an EDB [but NOT for the EDB him/herself!], RMDs for the years 2021–2024 may be “skipped” without consequence; see discussion of Notices 2022-53, 2023-54, and 2024-35 at PART 3, #1(F).

