# INHERITED IRA DISTRIBUTION RULES

| | Pre-RBD / Roth IRAs | Post-RBD |
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| **NDB** | • 5 years to distribute (by end of 5th calendar year after AO's year of death); and<br>• No RMDs | • 5-year payout rule does not apply; and<br>• RMDs (calculate based on AO's single life expectancy in year of death, reduce by one for each year following year of AO's death) |
| **SB** | N/A | N/A |
| **NEDB** | • 10 years to distribute (by end of 10th calendar year after AO's year of death); and<br>• No RMDs | • 10 years to distribute (by end of 10th calendar year after AO's year of death); and<br>• RMDs (calculate based on longer of single life expectancy of **NEDB** in year following year of AO's death or of AO in year of AO's death, reduce by one for each following year) |
| **SB** | • 10 years to distribute (by end of 10th calendar year after AO's year of death); and<br>• No RMDs | • 10 years to distribute (by end of 10th calendar year after AO's year of death); and<br>• RMDs (calculate based on longer of single life expectancy of **original NEDB** in year following year of AO's death or of AO in year of AO's death, reduce by one for each following year) |
| **EDB Categories** | | |
| **SS** | 1. **Roll over to SS's own IRA and follow SS's own lifetime RMD rules, where SS = AO**; or<br>2. Stretch inherited IRA RMDs (calculate based on single life expectancy of SS in year following year of AO's death, recalculate each year); or<br>3. Delay RMDs until the year in which AO would have attained AA then begin stretch inherited IRA RMDs[*] (calculate based on SS's Uniform Lifetime Table in year following year of AO's death, recalculate each year[†]); or<br>4. 10 years to distribute (by end of 10th calendar year after AO's year of death) and no RMDs[‡] | 1. **Roll over to SS's own IRA and follow SS's own lifetime RMD rules, where SS = AO**; or<br>2. *Stretch inherited IRA RMDs (calculate based on longer of single life expectancy of **SS** in year following year of AO's death, recalculate each year, or of AO in year of AO's death, reduce by one for each following year); or*<br>3. Stretch inherited IRA RMDs (calculate based on the longer of **SS's** Uniform Lifetime Table in year following year of AO's death, recalculate each year, or of single life expectancy of AO in year of AO's death, reduce by one for each following year)[§]; or<br>4. *10 years to distribute (by end of 10th calendar year after AO's year of death) and RMDs (calculate as in #2 or #3 as applicable)*<br><br>*Note that electing options #2 and #4 make little sense* |
| **SB** | 1. N/A. Beneficiary would not be a successor beneficiary. Apply this table to class of beneficiary.<br>2. 10 years to distribute (by end of 10th calendar year after SS's year of death) and RMDs (calculate based on single life expectancy of SS using SS's age as of SS's birthday in year of SS's death, reduce by one for each following year)<br>3. Preceding SS's death, if distributions to SS:<br>   a. Had NOT begun[**]: SS = SAO at SS's death and is treated as effective AO. Thus, beneficiary would not be a successor beneficiary. Apply this table to class of beneficiary and substitute SAO for AO whenever calculating RMDs.<br>   b. Had begun: 10 years to distribute (by end of 10th calendar year after SS's year of death) and RMDs (calculate as in #2)[††]<br>4. 10 years to distribute (by end of 10th calendar year after SS's year of death) and no RMDs | 1. N/A. Beneficiary would not be a successor beneficiary. Apply this table to class of beneficiary.<br>2. 10 years to distribute (by end of 10th calendar year after SS's year of death) and RMDs (calculate based on longer of single life expectancy of **SS** using SS's age as of SS's birthday in year of SS's death or of AO in year of AO's death, reduce by one for each following year)<br>3. 10 years to distribute (by end of 10th calendar year after SS's year of death) and RMDs (calculate as in #2)<br>4. 10 years to distribute (by end of 10th calendar year after SS's year of death) and RMDs (calculate as in #2) |
| **SSS** | 1. **Roll over to SSS's own IRA and follow SSS's own lifetime RMD rules, where SSS = AO**; or | 1. **Roll over to SSS's own IRA and follow SSS's own lifetime RMD rules, where SSS = AO**; or |

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| | 2. Stretch inherited IRA RMDs (calculate based on single life expectancy of **SSS** in year following year of SAO's death, recalculate each year); or<br>3. 10 years to distribute (by end of 10th calendar year after SAO's year of death) and no RMDs[‡] | 2. Stretch inherited IRA RMDs (calculate based on longer of single life expectancy of **SSS** in year following year of SAO's death, recalculate each year, or of SAO in year of SAO's death, reduce by one for each following year); or<br>*3. 10 years to distribute (by end of 10th calendar year after SAO's year of death) and RMDs (calculate as in #2)*<br><br>*Note that electing option #3 makes little sense* |
| **SB** | 1. N/A. Beneficiary would not be a successor beneficiary. Apply this table to class of beneficiary.<br>2. 10 years to distribute (by end of 10th calendar year after SSS's year of death) and RMDs (calculate based on single life expectancy of SSS using SSS's age as of SSS's birthday in year of SSS's death, reduce by one for each following year)<br>3. 10 years to distribute (by end of 10th calendar year after SSS's year of death) and no RMDs | 1. N/A. Beneficiary would not be a successor beneficiary. Apply this table to class of beneficiary.<br>2. 10 years to distribute (by end of 10th calendar year after SSS's year of death) and RMDs (calculate based on longer of single life expectancy of **SSS** using SSS's age as of SSS's birthday in year of SAO's death or of SAO in year of SAO's death, reduce by one for each following year)<br>3. 10 years to distribute (by end of 10th calendar year after SSS's year of death) and RMDs (calculate as in #2) |
| **MC** | 1. Stretch inherited IRA RMDs (calculate based on single life expectancy of MC in year following year of AO's death, reduce by one for each following year) and upon achieving AOM:<br>a. 10 years to distribute (by end of 10th calendar year after achieving AOM); and<br>b. Continue RMDs (calculate as in #1) during 10-year payout period; or<br>2. 10 years to distribute (by end of 10th calendar year after AO's year of death) and no RMDs | **1. Stretch inherited IRA RMDs (calculate based on longer of single life expectancy of *MC* in year following year of AO's death or of AO in year of AO's death, reduce by one for each following year) and upon achieving AOM:**<br>**a. 10 years to distribute (by end of 10th calendar year after achieving AOM); and**<br>b. **Continue RMDs (calculate as in #1) during 10-year payout period**; or<br>*2. 10 years to distribute (by end of 10th calendar year after AO's year of death) and RMDs (calculate as in #1)*<br><br>*Note that electing option #2 makes little sense* |
| **SB** | 1. 10 years to distribute (by end of 10th calendar year after MC's year of death) and RMDs (calculate based on single life expectancy of SB in year following year of AO's death, reduce by one for each following year)<br>2. 10 years to distribute (by end of 10th calendar year after MC's year of death) and no RMDs | 10 years to distribute (by end of 10th calendar year after MC's year of death) and RMDs (calculate based on longer of single life expectancy of **original MC** in year following year of AO's death or of AO in year of AO's death, reduce by one for each following year) |
| **DCI** | 1. Stretch inherited IRA RMDs (calculate based on single life expectancy of DCI in year following year of AO's death, reduce by one for each following year); or<br>2. 10 years to distribute (by end of 10th calendar year after AO's year of death) and no RMDs | 1. **Stretch inherited IRA RMDs (calculate based on longer of single life expectancy of *DCI* in year following year of AO's death or of AO in year of AO's death, reduce by one for each following year)**; or<br>*2. 10 years to distribute (by end of 10th calendar year after AO's year of death) and RMDs (calculate as in #1)*<br><br>*Note that electing option #2 makes little sense* |
| **SB** | 1. 10 years to distribute (by end of 10th calendar year after DCI's year of death) and RMDs (calculate based on single life expectancy of SB in year following year of AO's death, reduce by one for each following year)<br>2. 10 years to distribute (by end of 10th calendar year after DCI's year of death) and no RMDs | 10 years to distribute (by end of 10th calendar year after DCI's year of death) and RMDs (calculate based on longer of single life expectancy of **original DCI** in year following year of AO's death or of AO in year of AO's death, reduce by one for each following year) |
| **A10** | 1. Stretch inherited IRA RMDs (calculate based on single life expectancy of A10 in year following year of AO's death, reduce by one for each following year); or | 1. **Stretch inherited IRA RMDs (calculate based on longer of single life expectancy of *A10* in year following year of AO's death or of AO in** |

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| | 2. 10 years to distribute (by end of 10th calendar year after AO’s year of death) and no RMDs | **year of AO’s death, reduce by one for each following year)**; or<br>2. *10 years to distribute (by end of 10th calendar year after AO’s year of death) and RMDs (calculate as in #1)*<br><br>*Note that electing option #2 makes little sense* |
| **SB** | 1. 10 years to distribute (by end of 10th calendar year after A10’s year of death) and RMDs (calculate based on single life expectancy of SB in year following year of AO’s death, reduce by one for each following year)<br>2. 10 years to distribute (by end of 10th calendar year after A10’s year of death) and no RMDs | 10 years to distribute (by end of 10th calendar year after A10’s year of death) and RMDs (calculate based on longer of single life expectancy of **original A10** in year following year of AO’s death or of AO in year of AO’s death, reduce by one for each following year) |

[*] Treatment applies automatically if AO died before RBD and SS is the sole beneficiary of AO (a separate election is not required). Although an election under section 401(a)(9)(B)(iv) of the Internal Revenue Code results in SS being treated as effective AO for purposes of the regulations referred to in section 401(a)(9)(B)(iii)(II) (that is, § 1.401(a)(9)–5), that treatment does not extend to other purposes. For example, SS would not be subject to the 10 percent additional tax under section 72(t)(2)(A)(ii) even if SS takes distributions before attaining age 59.5. Similarly, the date by which SS must commence distributions is determined by reference to AO’s attainment of AA (rather than by reference to SS’s attainment of AA). In addition, for purposes of determining the account balance under a plan while SS is taking distributions, § 1.401(a)(9)–5(b)(3) of the 2024 final Income Tax Regulations (which excludes amounts held in a designated Roth account from AO’s account balance during AO’s lifetime) does not apply. Thus, all amounts held in a designated Roth account and any other account under the plan are included for purposes of determining the RMD due under the plan for the calendar year.
[†] Proposed Income Tax Regulations REG–103529–23 (published 7/19/24).
[‡] Hypothetical RMDs would apply to subsequent rollovers. § 1.402(c)–2(j)(4) of the Income Tax Regulations sets forth a special rule under which a portion of a distribution to surviving spouses (that is, the portion of the distribution that represents a catch-up of missed hypothetical RMDs) is treated as an RMD that is not eligible for rollover. § 1.402(c)– 2(j)(4)(iii) provides that the hypothetical RMD is calculated assuming that the election described in § 1.401(a)(9)–5(g)(3)(i) is in effect for that spouse.
[§] Proposed Income Tax Regulations REG–103529–23 (published 7/19/24). Applicable if the election under section 401(a)(9)(B)(iv) of the Internal Revenue Code results in SS being treated as effective AO for purposes of the regulations referred to in section 401(a)(9)(B)(iii)(II) (that is, § 1.401(a)(9)–5).
[**] SS dies before December 31 of the year in which they must begin receiving RMDs.
[††] Proposed Income Tax Regulations REG–103529–23 (published 7/19/24).
[‡‡] Hypothetical RMDs would apply to subsequent rollovers as described above. While § 1.402(c)– 2(j)(4)(iii) provides that the hypothetical RMD is calculated assuming that the election described in § 1.401(a)(9)–5(g)(3)(i) is in effect, presumably this does not apply to SSS as the election described in § 1.401(a)(9)–5(g)(3)(i) only applies to SS.

**GLOSSARY:**

RBD = required beginning date (Roth IRA AOs are always deemed to have died prior to RBD)
RMD = required minimum distribution
AO = deceased original account owner / plan participant / employee
SAO = deceased statutory account owner (defined above)
NDB = no designated beneficiary
NEDB = non-eligible designated beneficiary
EDB = eligible designated beneficiary
SB = successor beneficiary
SS = surviving spouse of AO
SSS = surviving spouse of SAO
MC = minor child of AO
AOM = MC reaching age of majority (age 21)
DCI = disabled or chronically ill individual
A10 = individual not more than 10 years younger than AO
AA = applicable age (age 73)

**NOTES:**

- If a Roth IRA AO dies, the minimum distribution rules that apply to traditional IRAs apply to Roth IRAs as though the Roth IRA AO died before RBD. Because Roth IRAs are not subject to **lifetime** RMDs, Roth IRA AOs are always deemed to have died prior to RBD. Consequently, RMDs do not apply to inherited Roth IRAs held by NEDBs or EDBs for whom the 10-year payout rule applies. Whereas EDBs who elect to perform a full lifetime stretch on an inherited IRA are **always** subject to RMDs, including for stretch inherited Roth IRAs (though qualified distributions from Roth IRAs are non-taxable).
- A beneficiary can combine or aggregate an inherited IRA with another IRA maintained by the beneficiary only if the beneficiary either:
  - Inherited the other IRA from the same decedent; or
  - Is the surviving spouse of the decedent and the sole beneficiary of the IRA and elects to treat it as their own IRA.
- Please reference IRS Notice 2024-35 Certain Required Minimum Distributions for 2024, amended Income Tax Regulations in 26 CFR 1.401(a)(9)-5 and 89 FR 58886 (published 7/19/24), proposed amendments to Income Tax Regulations in REG–103529–23 (published 7/19/24), I.R.C. § 401(a)(9), and IRS Publication 590-B for additional guidance.