Is the IRA owner living?

- Yes
  - Is the spouse the “sole beneficiary”? Yes
    - Yes
    - Calculate using Joint and Last Survivor Table
    - No
    - Calculate using Uniform Lifetime Table
  - No
    - Calculate using Uniform Lifetime Table

- No
  - Spouse
  - Trust
  - Trust by disclaimer
  - Charity
  - Estate
  - Children or grandchildren by disclaimer
  - Children or grandchildren

Spouse

- Rollover or inherited IRA?
  - Yes
    - Rollover (take RMD, if applicable, then go to step one treating survivor as new owner)
  - No
    - Inherited IRA

Trust

- Is the trust a designated beneficiary? See PLRs 200228025 and 200235039.
  - Yes
    - Inherited IRA
  - No
    - Were separate shares created by Dec. 31st of year following the year of death?
      - Yes
        - Five-Year Rule
      - No
        - Life expectancy of oldest beneficiary

Trust by disclaimer

- Did owner die before RBD?
  - Yes
    - Remaining life expectancy of decedent as of death based on Single Life Table
  - No
    - OR the owner’s life expectancy if the owner is younger than the oldest trust beneficiary

Charity

- Did you create separate accounts by Dec. 31st of year following the year of death?
  - Yes
    - Life expectancy of each beneficiary
  - No
    - Life expectancy of oldest beneficiary

Estate

- Children or grandchildren

SPECIAL NOTE
Pursuant to §829 of the Pension Protection Act of 2006, beginning in tax years after December 31, 2006, non-spousal qualified retirement plan beneficiaries (e.g. children, siblings, friends, etc.) will be permitted to make trustee-to-trustee transfers from qualified retirement plans to inherited IRAs.

Robert S. Keebler, CPA/PFS, MST, AEP
TRADITIONAL IRA DISTRIBUTION FLOWCHART

Personal Financial Planning Section
Spouse may defer required distributions until the year the owner would have reached age 70½. Thereafter, RMDs are calculated based upon spouse’s life expectancy by referencing her attained age for the year of distribution on the Single Life Table in A-1 of Treas. Reg § 1.401(a)(9)-9. For each succeeding year, this process is repeated. *(RECALC'D)*

RMD for year of death must be taken based upon decedent’s life expectancy factor under the Uniform Lifetime Table. Thereafter, the applicable distribution period is the longer of:

1. the surviving spouse’s life expectancy based on the Single Life Table using the surviving spouse’s birthday for each distribution calendar year after the calendar year of the employee’s death through the calendar year of the spouse’s death.

2. the life expectancy of the deceased spouse under the Single Life Table using the age of the deceased spouse as of his or her birthday in the year of death, whereby in subsequent years, this factor is reduced by one.

*(RECALC'D); or (2)* the life expectancy of the deceased spouse under the Single Life Table using the age of the deceased spouse as of his or her birthday in the year of death, whereby in subsequent years, this factor is reduced by one.

Entire balance must be distributed no later than December 31st of the fifth anniversary year of the decedent’s death. However, consider (if possible) the potential to cash out non-individual beneficiaries, or segregate interests. PLR required.

RMD must be taken for year of decedent’s death based upon decedent’s age in year of death based on the Uniform Lifetime Table in A-2 of Treas. Reg § 1.401(a)(9)-9. For the first distribution year, determine factor by referencing the owner’s age in year of death and reduce by one. This factor is then reduced by one for each succeeding year.

### Uniform Lifetime Table for Determining Factor Lifetime Distributions

<table>
<thead>
<tr>
<th>Attained Age in year of distribution</th>
<th>Applicable Divisor under Final Regulations</th>
<th>Attained Age in year of distribution</th>
<th>Applicable Divisor under Final Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>70</td>
<td>27.4</td>
<td>93</td>
<td>9.6</td>
</tr>
<tr>
<td>71</td>
<td>26.5</td>
<td>94</td>
<td>9.1</td>
</tr>
<tr>
<td>72</td>
<td>25.6</td>
<td>95</td>
<td>8.6</td>
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<tr>
<td>73</td>
<td>24.7</td>
<td>96</td>
<td>8.1</td>
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<tr>
<td>74</td>
<td>23.8</td>
<td>97</td>
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<tr>
<td>75</td>
<td>22.9</td>
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<tr>
<td>76</td>
<td>22.0</td>
<td>99</td>
<td>6.7</td>
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<td>21.2</td>
<td>100</td>
<td>6.3</td>
</tr>
<tr>
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<td>20.3</td>
<td>101</td>
<td>5.9</td>
</tr>
<tr>
<td>79</td>
<td>19.5</td>
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</tr>
<tr>
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<td>17.9</td>
<td>104</td>
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<tr>
<td>82</td>
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<td>105</td>
<td>4.5</td>
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<tr>
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<td>106</td>
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<td>113</td>
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<tr>
<td>92</td>
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<td>115 and older</td>
<td>1.9</td>
</tr>
</tbody>
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