



PENSION ANALYST

Important information—Distributions and withdrawals



Prudential
Bring Your Challenges™

Defined benefit plans must make required payments

Who's affected

This information applies to sponsors of qualified defined benefit plans, including governmental plans and non-electing church plans.

Background and summary

All qualified plans must begin making payments, called Required Minimum Distributions (RMDs), by a participant's Required Beginning Date (RBD). Most defined benefit plans begin making pension payments at a participant's RBD, rather than making just an RMD payment. However, RMD rules do apply and may be most notable when an employee earns additional benefits after reaching his RBD.

Action and next steps

Plan sponsors should carefully review the information in this publication to understand RMD rules and deadlines and how they apply to participants in your plan.

Special attention should be given to the "RMD payment deadlines" section, which outlines actions that may be required by plan sponsors to ensure RMDs are paid timely.

If you need additional information regarding these requirements, please contact your Prudential Retirement representative.

In this issue

[Basic RMD rules for defined benefit plans](#)

[Required beginning dates](#)

[Special rules](#)

[RMD payment deadlines](#)

Basic RMD rules for defined benefit plans

An employee must begin receiving his pension benefits once he reaches his Required Beginning Date (RBD). Usually, these benefits are paid in the form of an annuity. To satisfy the Required Minimum Distribution (RMD) rules, the annuity must be paid periodically. Payment intervals cannot be more than one year in length, but may be shorter. Most plans make monthly payments.

Under the RMD rules, payments must be made

- Over the life (or lives) of the participant (and his designated beneficiary); or
- Over a period certain that is not longer than the life expectancy (or joint and last survivor expectancy) of the participant (and his designated beneficiary).

A single life annuity (which pays benefits for the life of the participant) and a joint and survivor annuity with the participant's spouse designated as the beneficiary automatically satisfy these rules.

If an employee (for example, a 5% owner) begins to receive his pension benefits under the RMD rules while he is still employed, he will usually earn additional benefits while he remains employed. Each calendar year's additional accrued benefits must begin to be distributed in the first benefit payment made during the next calendar year.

If a participant who has reached his RBD takes a single sum cash settlement of his benefits, the RMD portion of the payment (which cannot be rolled over to another qualified plan or Individual Retirement Account) is typically determined using the rules that apply to defined contribution plans. Alternatively, defined benefit plans may determine the RMD portion of a single sum cash settlement by applying the rules that apply to annuities. Plan documents must specify which approach will be used. These options were discussed in greater detail in a [November 2005 Pension Analyst](#).

The RMD rules also specify the manner in which death benefits must be paid. When a participant dies after he has reached his RBD and benefit payments have begun, the remaining benefits must be paid out at least as rapidly as they were paid to the participant. Annuity payments generally meet these rules. When a participant dies before reaching his RBD, payments must be made according to either the five-year cash-out rule or the life expectancy rule. The standard Qualified Preretirement Spouse Annuity (QPSA) that is paid by most qualified defined benefit plans automatically meets these death payment requirements.

Required beginning dates

Different groups of participants have different Required Beginning Dates.

- The RBD for a participant who is a 5% owner of his employer is the April 1 following the calendar year in which the participant reaches age 70½, even if he is still employed.

If an employer is a corporation, a "5% owner" is any employee who owns (or is considered to own under family attribution rules) more than 5% of the value of the corporation's outstanding stock or stock having more than 5% of the total combined voting power of all of the corporation's stock. If an employer is not a corporation, a 5% owner is any employee who owns more than 5% of the capital or profits interest in the employer.

- In general, the RBD for a participant who is not a 5% owner is the April 1 following the later of the calendar year in which he reaches age 70½ or the calendar year in which he retires.

However, this rule affects participants differently according to their dates of birth and the way their plan was amended to comply with the Small Business Job Protection Act (SBJPA) rules. For example, a plan sponsor could have chosen to keep the old rules, so that 5% and non-5% owners have the same RBD.

- The RBD for any participant in a governmental plan or a church plan is the April 1 following the later of the calendar year in which he reaches age 70½ or the calendar year in which he retires.

©2019, The Prudential Insurance Company of America, all rights reserved.

Prudential, the Prudential logo, the Rock symbol and Bring Your Challenges are service marks of Prudential Financial, Inc., and its related entities, registered in many jurisdictions worldwide.

Special exceptions to these standard RBDs may apply to certain groups of participants.

It is important to remember that a participant's RBD is determined by his or her date of birth, regardless of date of hire. As a result, an individual who is hired at age 70 may have an RBD before he has accrued any meaningful benefits.

Special rules

Some participants may have signed an election form before January 1, 1984, to remain under the *distribution rules in effect before the enactment of the Tax Equity and Fiscal Responsibility Act of 1982 (TEFRA)*. If such an election was made, the employee must receive payments according to that election. A change in beneficiary does not revoke this election, unless it changes the period over which payments will be made.

RMD payment deadlines

Any participant who received RMD payments in 2019 must receive RMD payments in 2020. If a participant earned additional benefits in 2019, the additional benefit must be reflected by way of an adjustment to the RMD payment in 2020.

If we regularly calculate benefits for your plan, we will automatically calculate the additional payments due, which will be paid no later than December 31, 2019, to employees who took their RMDs as single sum cash settlements. Otherwise, these additional benefits will be reflected in retirement income payments made in 2020. Plan sponsors do not have to submit any paperwork to begin this process.

If we do not calculate your plan's benefits, you must provide us with any increased payment amounts by January 17, 2020. There is no need to complete new distribution paperwork for these employees.

The following participants need to receive their RMD payments for 2019 by December 31, 2019.

- *5% owners* who reached age 70½ before January 1, 2019. In addition, if these participants earned additional benefits in 2019, an appropriate adjusted benefit will need to be paid in 2020.

The following participants must receive RMD payments for 2019 by April 1, 2020:

- *5% owners* who reach age 70½ (i.e., born between July 1, 1948 and June 30, 1949) in 2019, even if still employed.
- *Non-5% owners* who reach age 70½ in 2019 and leave employment in 2019.
- *Non-5% owners* who previously suspended or deferred required payments, as permitted by IRS rules and plan provisions, and leave employment in 2019.
- Participants in governmental plans and church plans who reach age 70½ in 2019 or earlier and leave employment in 2019.

If you have not already requested initial RMD payments for these participants, please complete and return the "Required Minimum Distribution Age 70½ Payment Authorization" form no later than February 14, 2020. If we receive forms after this date, we will make our best efforts, but cannot guarantee, to make distributions in a timely manner.

Specific plan provisions may require other groups of participants to receive additional payments for 2019, or initial payments by April 1, 2020, or may provide other groups of participants with the option to begin taking payments.

RMDs for 2018, payable in 2019, are discussed in an [October 2018 Pension Analyst](#).

Pension Analyst by Prudential Retirement

The Pension Analyst is published by Prudential Retirement, a Prudential Financial business, to provide clients with information on current legislation and regulatory developments affecting retirement plans. This publication is distributed with the understanding that Prudential Retirement is not rendering legal advice. Plan sponsors should consult their attorneys about the application of any law to their retirement plans.

Editor: Julie Koos (563) 585-6811
©2019, The Prudential Insurance Company of America, all rights reserved.

Prudential, the Prudential logo, the Rock symbol and Bring Your Challenges are service marks of Prudential Financial, Inc., and its related entities, registered in many jurisdictions worldwide.