

Coming Minimum Distribution Regs Will Have Delayed Start

Posted on Dec. 19, 2024

By Caitlin Mullaney

The IRS's planned applicability date delay for upcoming regulations finalizing new required minimum distribution (RMD) rules has earned swift approval from the benefits community.

"A big thank you to the IRS is in order for this holiday treat," Elizabeth Thomas Dold of Groom Law Group told *Tax Notes*, regarding guidance (<u>Announcement 2025-2</u>, 2025-2 IRB 1) that expressed the IRS's intention to apply a 2026 start date to most of the provisions of the future finalized RMD regs, originally proposed to take effect in 2025.

The December 18 announcement said that the anticipated delay will apply to provisions in the proposed rules addressing RMDs for stock bonus, pension, and profit-sharing plans. The proposed regs (REG-103529-23), issued in 2024, address additional questions that weren't covered in the related final regs (T.D. 10001), issued concurrently, regarding the RMD provisions enacted in the SECURE 2.0 Act.

"Although the relief is not a blanket one-year extension for all the proposed 2024 RMD regulations, this extension is welcomed relief for plan sponsors, recordkeepers, and IRA providers that are tasked with implementing these new rules," Dold said.

Since the issuance of the proposed regs, benefits community professionals <u>have asked</u> the IRS for a delayed start, warning of the difficulty of implementing the final regs under the current timeline.

The IRS announcement instructs taxpayers to apply a reasonable, good-faith interpretation of the current provisions for the period before the amended rules are finalized.

That instruction means that despite the relief provided by the announcement, practitioners and other affected parties still must decide how to proceed as of January 1, 2025, Ronald G. Cluett of Caplin & Drysdale said.

Dold, however, said she thinks "there will be no complaints" with applying this standard before the rules are finalized.