

CHAPTER TWO  
PUBLISHED IN THE MARCH 12, 2015 EDITION OF *THE THURSDAY REPORT*

## ROLLOVER CHART

11/17/2014

		Roll To							
		Roth IRA	Traditional IRA	SIMPLE IRA	SEP-IRA	Governmental 457(b)	Qualified Plan <sup>1</sup> (pre-tax)	403(b) (pre-tax)	Designated Roth Account (401(k), 403(b) or 457(b))
Roll From	<u>Roth IRA</u>	YES <sup>2</sup>	NO	NO	NO	NO	NO	NO	NO
	<u>Traditional IRA</u>	YES <sup>3</sup>	YES <sup>2</sup>	NO	YES <sup>2</sup>	YES <sup>4</sup>	YES	YES	NO
	<u>SIMPLE IRA</u>	YES, <sup>3</sup> after two years	YES, <sup>2</sup> after two years	YES <sup>2</sup>	YES, <sup>2</sup> after two years	YES, <sup>4</sup> after two years	YES, after two years	YES, after two years	NO
	<u>SEP-IRA</u>	YES <sup>3</sup>	YES <sup>2</sup>	NO	YES <sup>2</sup>	YES <sup>4</sup>	YES	YES	NO
	<u>Governmental 457(b)</u>	YES <sup>3</sup>	YES	NO	YES	YES	YES	YES	YES <sup>3,5</sup>
	<u>Qualified Plan<sup>1</sup> (pre-tax)</u>	YES <sup>3</sup>	YES	NO	YES	YES <sup>4</sup>	YES	YES	YES <sup>3,5</sup>
	<u>403(b) (pre-tax)</u>	YES <sup>3</sup>	YES	NO	YES	YES <sup>4</sup>	YES	YES	YES <sup>3,5</sup>
	<u>Designated Roth Account (401(k), 403(b) or 457(b))</u>	YES	NO	NO	NO	NO	NO	NO	YES <sup>6</sup>

<sup>1</sup> Qualified plans include, for example, profit-sharing, 401(k), money purchase and defined benefit plans

<sup>2</sup> Beginning in 2015, only one rollover in any 12-month period. A transitional rule may apply in 2015.

<sup>3</sup> Must include in income

<sup>4</sup> Must have separate accounts

<sup>5</sup> Must be an in-plan rollover

<sup>6</sup> Any amounts distributed must be rolled over via direct (trustee-to-trustee) transfer to be excludable from income  
For more information regarding retirement plans and rollovers, visit Tax Information for Retirement Plans.

<b>Age</b>	<b>Likelihood of Having Died</b>	<b>Participant Married to Spouse More than 10 Years Younger (Using the "Joint and Survivor Table" with a Spouse 15 years Younger than the Participant)</b>	<b>Participant Is Treated as if Married to a Spouse 10 Years Younger (whether married or not) (Using the "Uniform Lifetime Table")</b>	<b>Individual Designated Beneficiary with Recalculation of Life Expectancy (Using the "Single Life Table," Recalculated Annually)</b>	<b>Individual Designated Beneficiary with No Recalculation of Life Expectancy (Using the "Single Life Table," Not Recalculated Annually)</b>
<b>70</b>	<b>0.5%</b>	<b>31.1 / 3.21%</b>	<b>27.4 / 3.65%</b>	<b>17.0 / 5.88%</b>	<b>17.0 / 5.88%</b>
<b>71</b>	<b>1.2%</b>	<b>30.1 / 3.32%</b>	<b>26.5 / 3.77%</b>	<b>16.3 / 6.13%</b>	<b>16.0 / 6.25%</b>
<b>72</b>	<b>2.3%</b>	<b>29.2 / 3.42%</b>	<b>25.6 / 3.91%</b>	<b>15.5 / 6.45%</b>	<b>15.0 / 6.67%</b>
<b>73</b>	<b>3.6%</b>	<b>28.3 / 3.53%</b>	<b>24.7 / 4.05%</b>	<b>14.8 / 6.76%</b>	<b>14.0 / 7.14%</b>
<b>74</b>	<b>5.1%</b>	<b>27.4 / 3.65%</b>	<b>23.8 / 4.20%</b>	<b>14.1 / 7.09%</b>	<b>13.0 / 7.69%</b>
<b>75</b>	<b>7.0%</b>	<b>26.5 / 3.77%</b>	<b>22.9 / 4.37%</b>	<b>13.4 / 7.46%</b>	<b>12.0 / 8.33%</b>
<b>76</b>	<b>9.1%</b>	<b>25.6 / 3.91%</b>	<b>22.0 / 4.55%</b>	<b>12.7 / 7.87%</b>	<b>11.0 / 9.09%</b>
<b>77</b>	<b>11.5%</b>	<b>24.7 / 4.05%</b>	<b>21.2 / 4.72%</b>	<b>12.1 / 8.26%</b>	<b>10.0 / 10.00%</b>
<b>78</b>	<b>14.3%</b>	<b>23.8 / 4.20%</b>	<b>20.3 / 4.93%</b>	<b>11.4 / 8.77%</b>	<b>9.0 / 11.11%</b>
<b>79</b>	<b>17.6%</b>	<b>22.9 / 4.37%</b>	<b>19.5 / 5.13%</b>	<b>10.8 / 9.26%</b>	<b>8.0 / 12.50%</b>
<b>80</b>	<b>21.4%</b>	<b>22.1 / 4.52%</b>	<b>18.7 / 5.35%</b>	<b>10.2 / 9.80%</b>	<b>7.0 / 14.29%</b>
<b>81</b>	<b>25.7%</b>	<b>21.2 / 4.72%</b>	<b>17.9 / 5.59%</b>	<b>9.7 / 10.31%</b>	<b>6.0 / 16.66%</b>
<b>82</b>	<b>30.5%</b>	<b>20.4 / 4.90%</b>	<b>17.1 / 5.85%</b>	<b>9.1 / 10.99%</b>	<b>5.0 / 20.00%</b>
<b>83</b>	<b>35.9%</b>	<b>19.5 / 5.13%</b>	<b>16.3 / 6.13%</b>	<b>8.6 / 11.62%</b>	<b>4.0 / 25.00%</b>
<b>84</b>	<b>41.6%</b>	<b>18.7 / 5.35%</b>	<b>15.5 / 6.45%</b>	<b>8.1 / 12.35%</b>	<b>3.0 / 33.33%</b>
<b>85</b>	<b>47.5%</b>	<b>17.9 / 5.59%</b>	<b>14.8 / 6.76%</b>	<b>7.6 / 13.16%</b>	<b>2.0 / 50.00%</b>

<b>Age</b>	<b>Likelihood of Having Died</b>	<b>Participant Married to Spouse More than 10 Years Younger (Using the "Joint and Survivor Table" with a Spouse 15 years Younger than the Participant)</b>	<b>Participant Is Treated as if Married to a Spouse 10 Years Younger (whether married or not) (Using the "Uniform Lifetime Table")</b>	<b>Individual Designated Beneficiary with Recalculation of Life Expectancy (Using the "Single Life Table," Recalculated Annually)</b>	<b>Individual Designated Beneficiary with No Recalculation of Life Expectancy (Using the "Single Life Table," Not Recalculated Annually)</b>
<b>86</b>	<b>53.3%</b>	<b>17.1 / 5.85%</b>	<b>14.1 / 7.09%</b>	<b>7.1 / 14.08%</b>	<b>1.0 / 100.00%</b>
<b>87</b>	<b>59.0%</b>	<b>16.4 / 6.10%</b>	<b>13.4 / 7.46%</b>	<b>6.7 / 14.93%</b>	<b>N/A</b>
<b>88</b>	<b>64.6%</b>	<b>15.6 / 6.41%</b>	<b>12.7 / 7.87%</b>	<b>6.3 / 15.87%</b>	<b>N/A</b>
<b>89</b>	<b>70.1%</b>	<b>14.9 / 6.71%</b>	<b>12.0 / 8.33%</b>	<b>5.9 / 16.95%</b>	<b>N/A</b>
<b>90</b>	<b>75.1%</b>	<b>14.2 / 7.04%</b>	<b>11.4 / 8.77%</b>	<b>5.5 / 18.18%</b>	<b>N/A</b>
<b>91</b>	<b>79.7%</b>	<b>13.5 / 7.41%</b>	<b>10.8 / 9.26%</b>	<b>5.2 / 19.23%</b>	<b>N/A</b>

Year	Age	Minimum Annual Distribution	Using the 5 Year Alternative
1	93	21.74 %	0 %
2	94	27.78 %	0 %
3	95	38.46 %	0 %
4	96	62.50 %	0 %
5	97	100.00 %	100%

ADP	Applicable Distribution Period
AGI	Adjusted Gross Income
CODA	Cash-or-Deferred Arrangement
COLA	Cost-of-Living Adjustment
CODE	Internal Revenue Code of 1986, as amended through Sept. 27, 2010
DB	Designated Beneficiary
DNI	Distributable Net Income
DOL	Department of Labor
DQP	Disqualified Person
ERISA	Employee Retirement Income Security Act of 1974
IRD	Income in Respect of a Decedent
IRS	Internal Revenue Service
IRT	Individual Retirement Trust (trusteed IRA)
MAGI	Modified Adjusted Gross Income
MRD	Minimum Required Distribution
PLR	IRS Private Letter Ruling
PPA '06	The Pension Protection Act of 2006
Prop. Reg	Proposed Treasury Regulation
PT	Prohibited Transaction
QRP	Qualified Retirement Plan
RBD	Required Beginning Date
REA	Retirement Equity Act of 1984
TSITAH	This Stuff Is Tough As Heck
UBTI	Unrelated Business Taxable Income

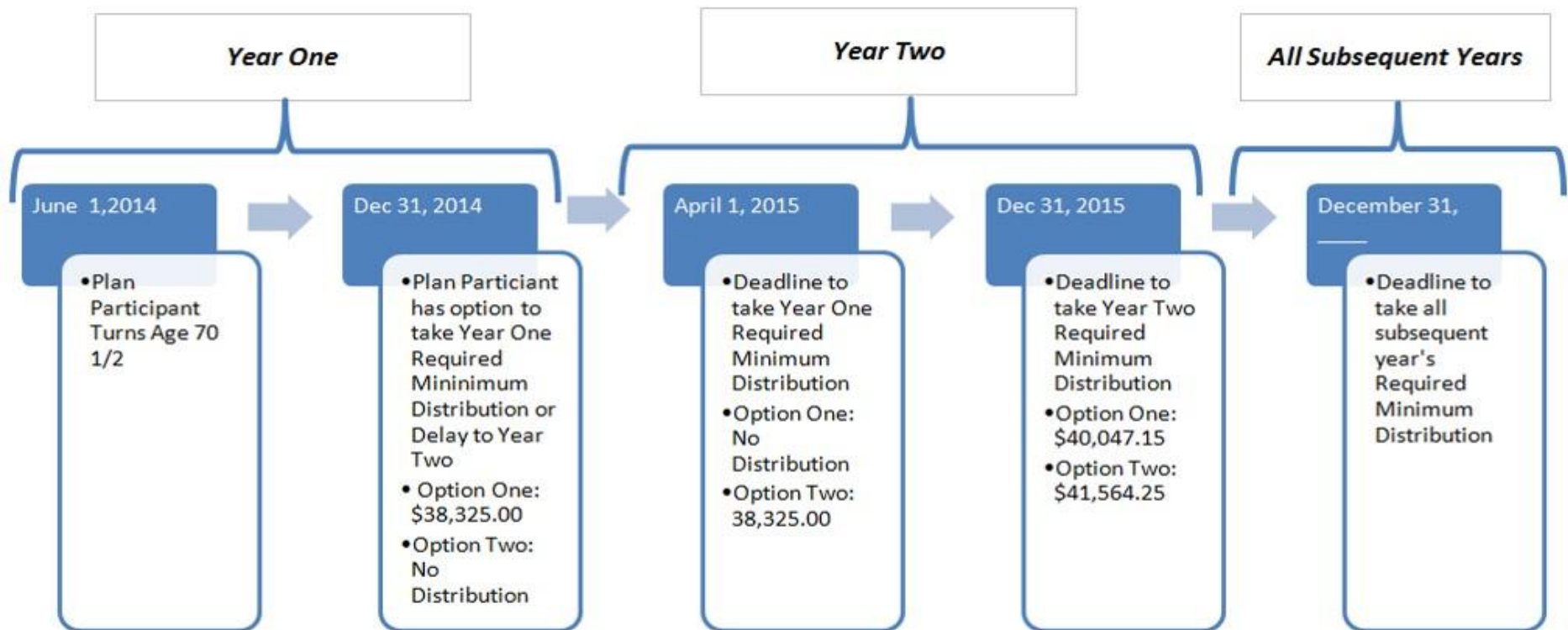


**CHAPTER THREE**  
**PUBLISHED IN THE MARCH 19, 2015 EDITION OF *THE THURSDAY REPORT***

<b>Aggregation Rules for Distributions</b>	
<b>1</b>	Each Qualified Retirement Plan must be withdrawn upon separately to satisfy minimum distribution rules for each separate account.
<b>2</b>	For IRAs and 403(b) accounts, any one or more accounts can be drawn upon to satisfy all accounts. The requirement is calculated in the aggregate. However IRAs can only be aggregated with IRAs, and 403(b)s can only be aggregated with 403(b)s.
<b>3</b>	IRA and 403(b) plans held as an owner/employee may not be aggregated with IRAs held as a beneficiary.
<b>4</b>	Withdrawals from a Roth IRA cannot be aggregate, nor will they satisfy any portion of the Required Minimum Distribution.
<b>5</b>	If any portion of the IRA or 403(b) account has been annuitized, the annuitized and non-annuitized portion are treated as separate plans. Distributions received from the annuitized portion cannot be aggregated with the non-annuitized portion for purposes of satisfying the required minimum distribution. The non-annuitized portion must calculate the required minimum distribution separately excluding the annuity contract from the account value.

<b>Minimum Distribution Rules for Original Participant and/or Rollover Surviving Spouse</b>	
<b>Type</b>	<b>Rule</b>
<b>Roth IRA</b>	<b>No distribution required during lifetime.</b>
<b>Non 5% owner of company sponsoring Qualified Retirement Plan</b>	<b>No distributions required until after age 70 1/2 or retirement.</b>
<b>5% or more owner of Qualified Retirement Plan</b>	<b>No distributions until after age 70 1/2, regardless of retirement status.</b>
<b>All Other Retirement Plans (IRAs)</b>	<b>No distributions until after age 70 1/2, regardless of retirement status.</b>

## ***Deadlines for Required Minimum Distributions***



The Plan Participant should consult with a tax advisor upon reaching the age 70 ½ to determine whether the “first year required payment” should be deferred until the following year, based upon the expected tax bracket or rates of asset growth applicable to the Plan Participant.

***Option One - No Delay of First Year Distribution***

Year	Beginning Balance	Growth 5%	Year End Balance	Required Distribution	Amount Deferred	Ending Balance After Distribution	Difference
1/1/2014 - 12/31/2014	\$ -					\$ 1,000,000.00	\$ -
1/1/2015 - 12/31/2015	\$ 1,000,000.00	\$ 50,000.00	\$ 1,050,000.00	\$ (38,325.00)	\$ -	\$ 1,011,675.00	\$ (38,325.00)
1/1/2016 - 12/31/2016	\$ 1,011,675.00	\$ 50,583.75	\$ 1,062,258.75	\$ (40,047.15)	\$ -	\$ 1,022,211.60	\$ (399.15)

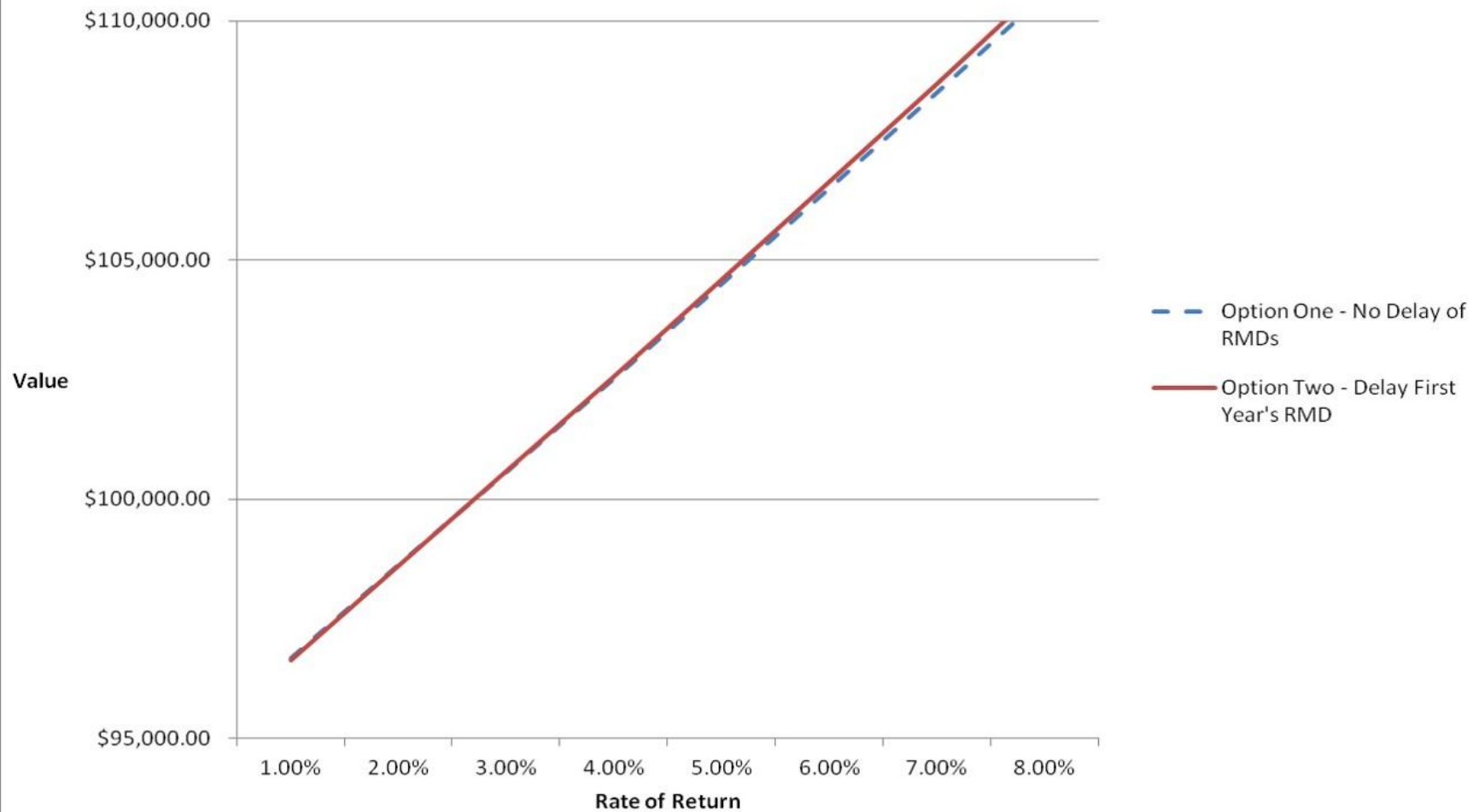
***Option Two - Delay First Year Distribution***

Year	Beginning Balance	Growth 5%	Year End Balance	Required Distribution	Amount Deferred	Ending Balance After Distribution	Difference
1/1/2014 - 12/31/2014	\$ 1,000,000.00					\$ 1,000,000.00	\$ -
1/1/2015 - 12/31/2015	\$ 1,000,000.00	\$ 50,000.00	\$ 1,050,000.00	\$ (38,325.00)	\$ 38,325.00	\$ 1,050,000.00	\$ 38,325.00
1/1/2016 - 12/31/2016	\$ 1,050,000.00	\$ 52,500.00	\$ 1,102,500.00	\$ (79,889.25)	\$ -	\$ 1,022,610.75	\$ 399.15

<b><i>Age 70 1/2 First Year Delay Crossover Analysis</i></b>			
<b>IRA Rate of Return</b>	<b>Option One - No Delay of RMD</b>	<b>Option Two - Delay First Year's RMD</b>	<b>Difference (Two - One)</b>
<b>1.00%</b>	<b>\$96,677.33</b>	<b>\$96,639.87</b>	<b>\$(37.46)</b>
<b>2.00%</b>	<b>\$98,601.21</b>	<b>\$98,590.34</b>	<b>\$(10.87)</b>
<b>3.00%</b>	<b>\$100,544.04</b>	<b>\$100,564.16</b>	<b>\$20.12</b>
<b>4.00%</b>	<b>\$102,505.83</b>	<b>\$102,561.43</b>	<b>\$55.60</b>
<b>5.00%</b>	<b>\$104,486.57</b>	<b>\$104,582.28</b>	<b>\$95.71</b>
<b>6.00%</b>	<b>\$106,486.27</b>	<b>\$106,626.81</b>	<b>\$140.54</b>
<b>7.00%</b>	<b>\$108,504.92</b>	<b>\$108,695.13</b>	<b>\$190.21</b>
<b>8.00%</b>	<b>\$110,542.53</b>	<b>\$110,787.37</b>	<b>\$244.84</b>



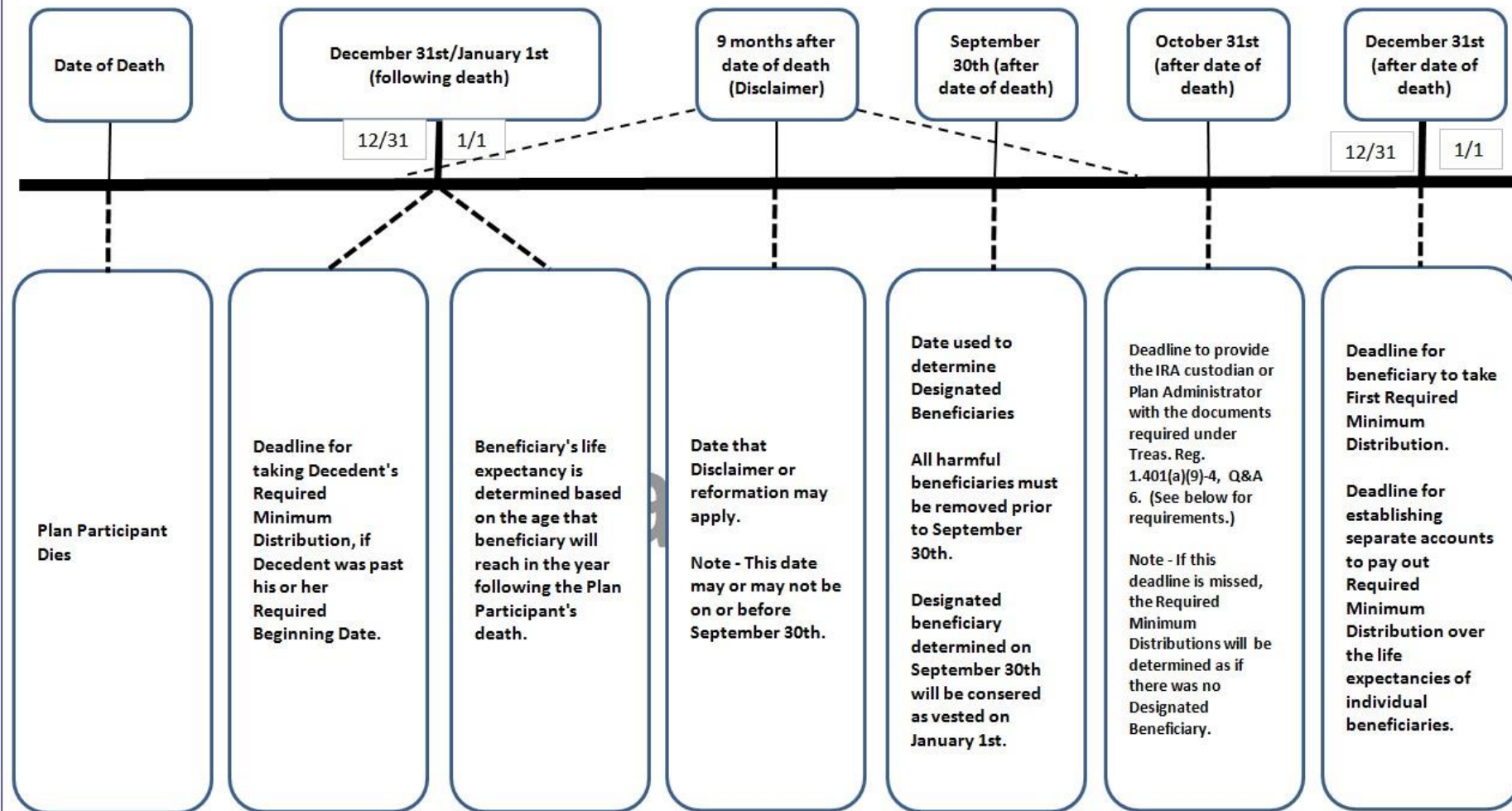
## Age 70 1/2 First Year Delay Crossover Analysis



**Illustration 2.9**

<i>Annuitized IRA Payouts on \$100,000 Investment by an Individual Age 70</i>			
	Monthly	Yearly	% of Premium
Male	\$639.00	\$7,668.00	7.67%
Female	\$593.00	\$7,116.00	7.12%

## Deadlines After Death of Plan Participant



**Documents required to be provided to Plan Administrator according to Treas. reg 1.401(a)(9)-4, Q&A 6** -In order to satisfy the documentation requirement for RMDs after the death of the employee, by October 31 of the calendar year immediately following the calendar year of the employee's death, the trustee of the trust must either (1) Provide the plan administrator with a final list of all beneficiaries of the trust (including contingent and remaindermen beneficiaries with a description of the conditions on their entitlement) as of September 30 of the year following the year of the employee's death and certify that, to the best of the trustee's knowledge, this list is correct and complete and that the requirements of Treas. Reg. §1.401(a)(9)-4, Q&A5(b)(1), (2), and (3) are satisfied; and agree to provide a copy of the trust instrument to the plan administrator upon demand; or (2) Provide the plan administrator with a copy of the actual trust document for the trust that is named as a beneficiary of the employee under the plan as of the employee's date of death.

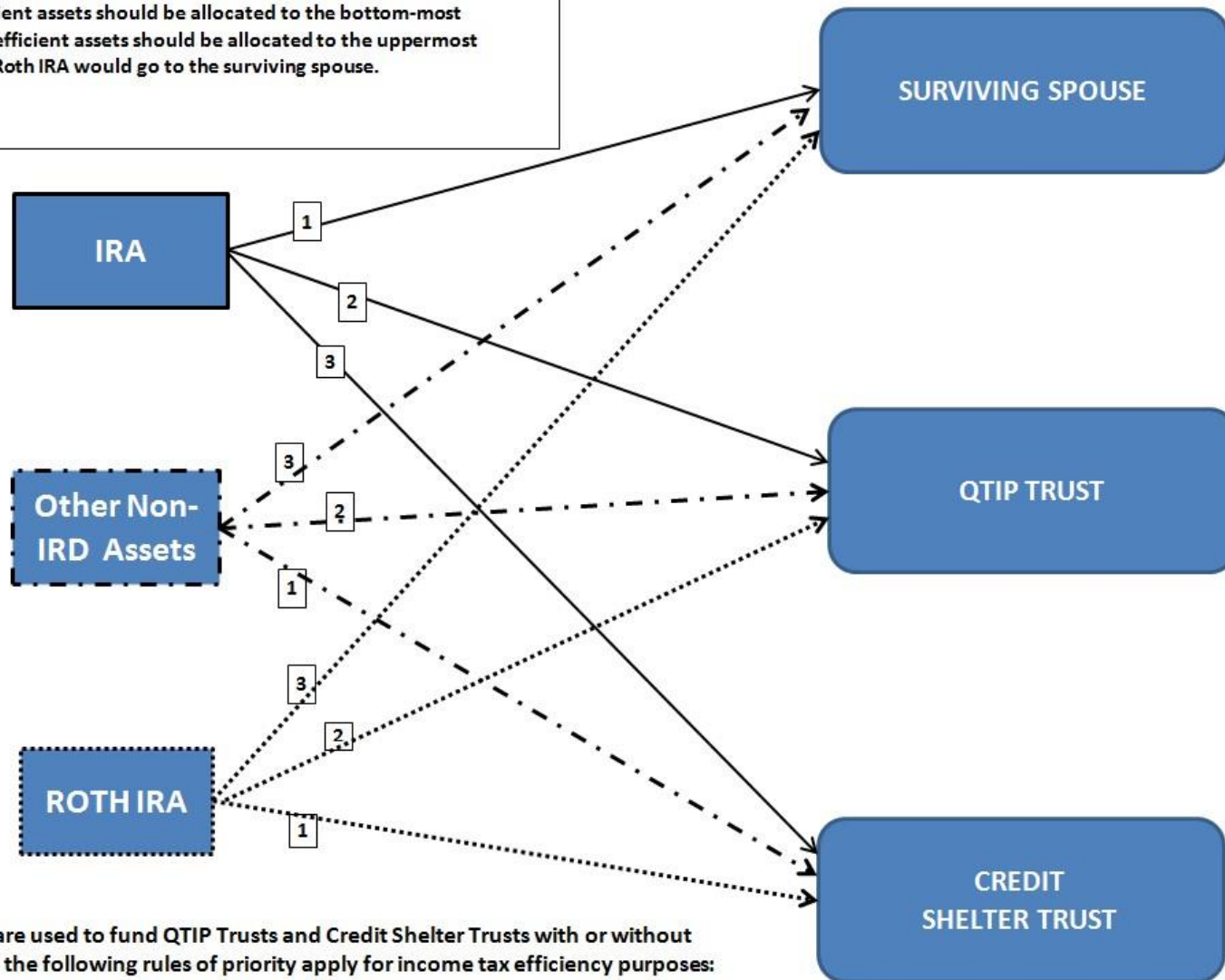
CHAPTER FIVE  
PUBLISHED IN THE APRIL 2, 2015 EDITION OF *THE THURSDAY REPORT*

THE RULES THAT APPLY TO SEE-THROUGH TRUSTS:		
APPLY TO BOTH ACCUMULATION AND CONDUIT TRUSTS	APPLY ONLY TO ACCUMULATION TRUSTS	APPLY ONLY TO CONDUIT TRUSTS
<p>Any Accumulation or Conduit Trust must meet the following requirements in order for the Stretch Rules to apply:</p> <p><b>A.</b> The trust must be valid under state law.</p> <p><b>B.</b> The trust must be irrevocable, at least immediately after the death of the Plan Participant.</p> <p><b>C.</b> The beneficiaries of the trust must be identifiable by being named, or by being members of a class of beneficiaries that makes each person identifiable.</p> <p><b>D.</b> Only Beneficiaries on the Designation Date count.</p> <p><b>E.</b> Information must be provided to the Plan Administrator by October 31 of the year after the year of the Plan Participant's death.</p> <p><b>F.</b> Deceased beneficiary exemption.</p> <p><b>G.</b> Special QTIP Marital Deduction Rules</p>	<p><b>A.</b> Powers of Appointment Must Be Limited Only to Certain Appointees.</p> <p><b>B.</b> Permit Powers of Appointment Only in Favor of Individuals Who Are Younger Than the Designated Beneficiary of any Accumulation Trust.</p> <p><b>C.</b> Programming for Tax Efficiency as Between GST and Non-GST Trusts.</p> <p><b>D.</b> Contingent Beneficiaries Count for Required Minimum Distribution Purposes.</p> <p><b>E.</b> Prevent the Adoption or Addition of an Older Beneficiary.</p>	<p><b>A.</b> Income Must Be Paid to the Trust Beneficiary upon Receipt by the Trustee.</p> <p><b>B.</b> Remainder Beneficiaries Do Not Count For Required Minimum Distribution Purposes.</p> <p><b>C.</b> Conduit Trust Can Pay Trust Expenses.</p>



***Presumption of order of funding between Surviving Spouse, QTIP Trust, and Credit Shelter Trusts.***

Typically, the most tax efficient assets should be allocated to the bottom-most category, and the least tax efficient assets should be allocated to the uppermost category, except that Non-Roth IRA would go to the surviving spouse.

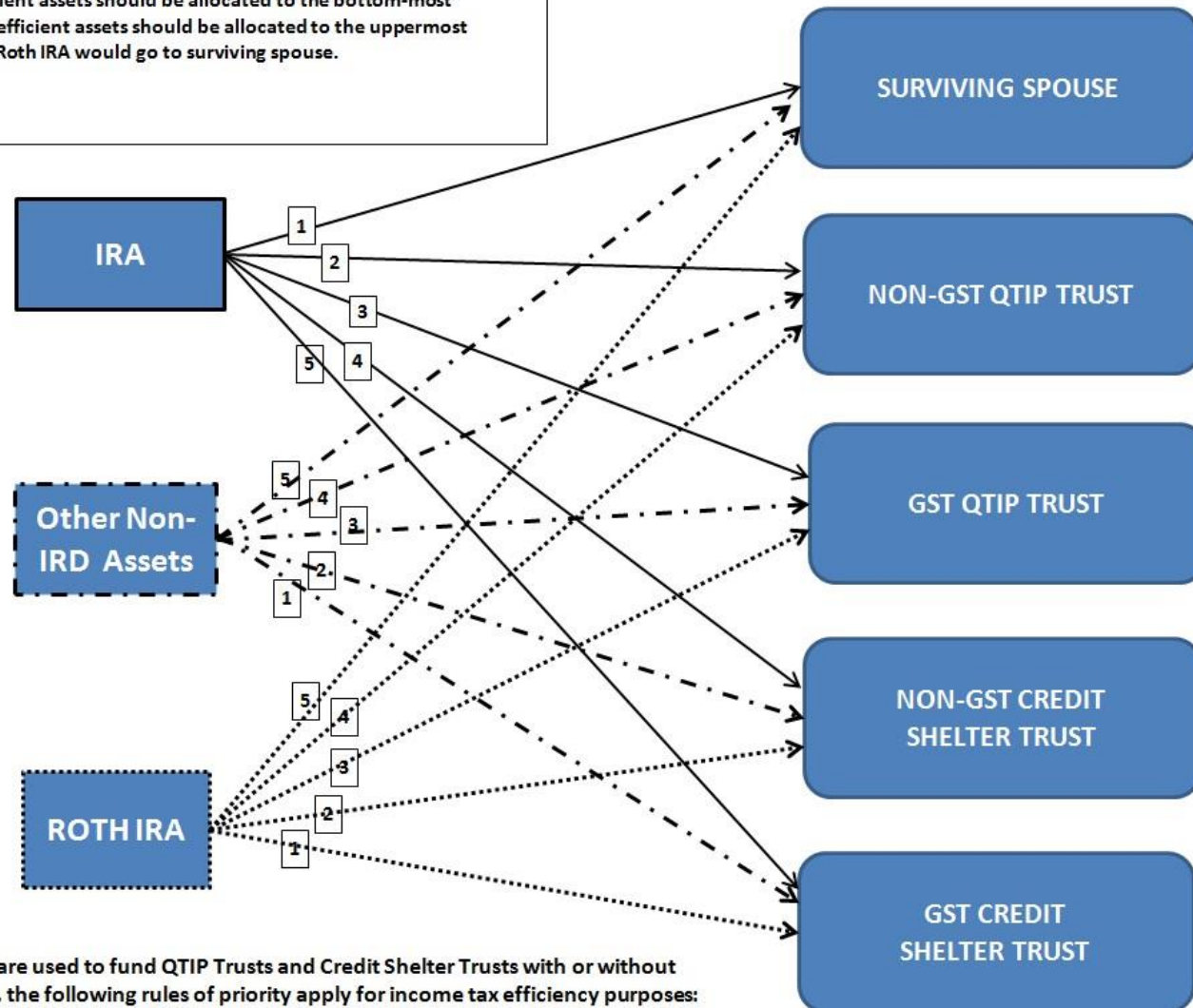


Where IRAs are used to fund QTIP Trusts and Credit Shelter Trusts with or without other assets, the following rules of priority apply for income tax efficiency purposes:

- 1 Roth IRAs allocated first to Credit Shelter Trust shares, and secondarily to any QTIP Trust share.
- 2 Non-IRA (other than Roth IRA) assets that are not "In Respect of Decedent" assets to pass first to QTIP share, then to Credit Shelter Trust share.

**PRESUMPTION OF ORDER OF FUNDING BETWEEN SURVIVING SPOUSE QTIP TRUST AND CREDIT SHELTER TRUST - BUT ASSUME NON-GST AND GST QTIP AND CREDIT SHELTER TRUSTS**

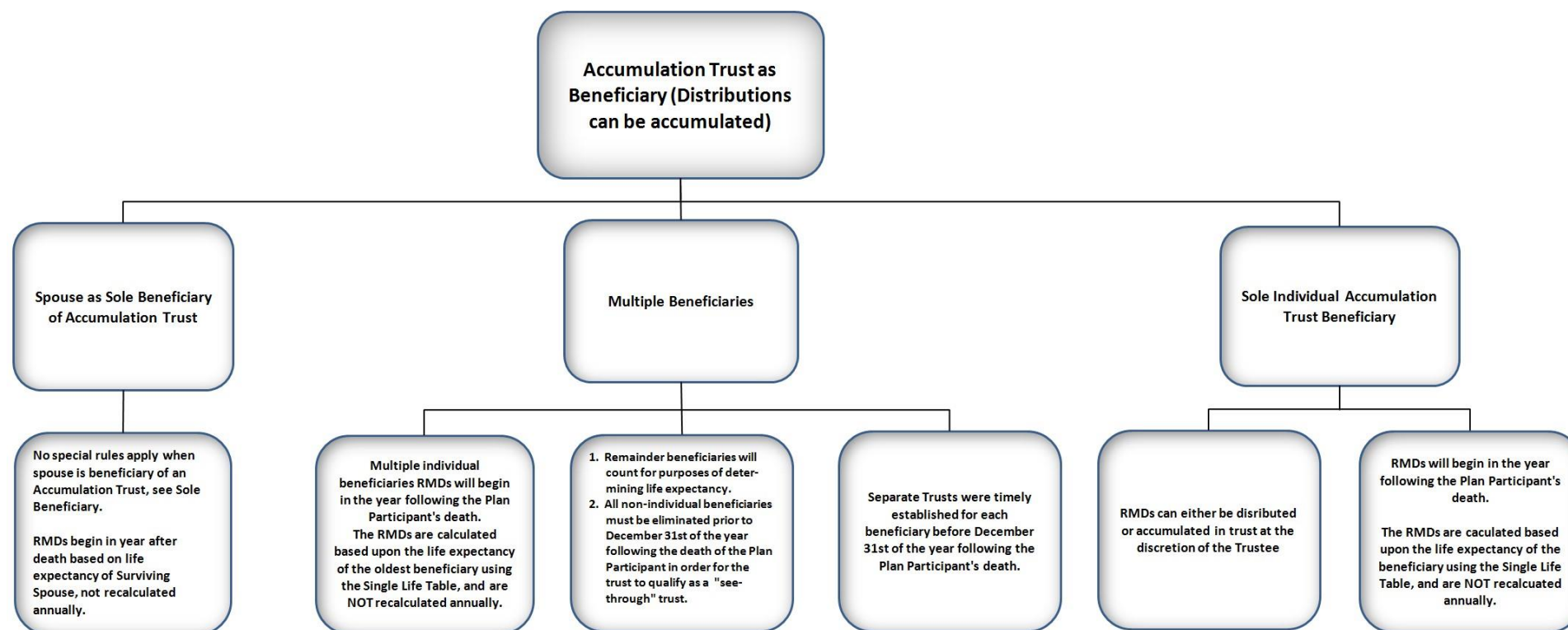
Typically, the most tax efficient assets should be allocated to the bottom-most category, and the least tax efficient assets should be allocated to the uppermost category, except that Non-Roth IRA would go to surviving spouse.



Where IRAs are used to fund QTIP Trusts and Credit Shelter Trusts with or without other assets, the following rules of priority apply for income tax efficiency purposes:

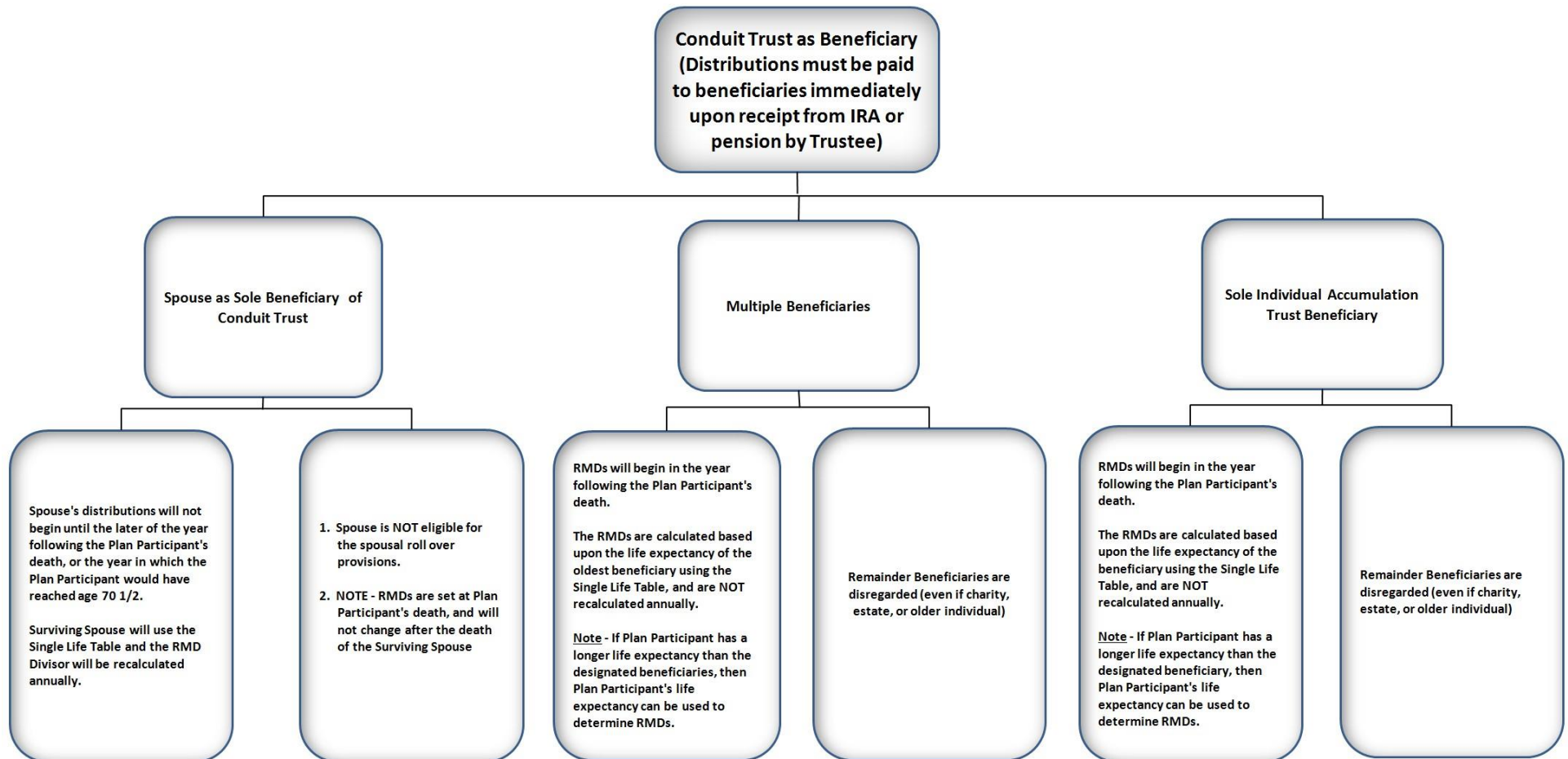
- 1 Roth IRAs allocated first to GST Credit Shelter Trust shares, secondarily to NON-GST Credit Shelter Trust Shares, third to any GST QTIP Trust share, and fourth to any Non-GST QTIP Trust share.
- 2 Non-IRA (other than Roth IRA) assets that are not "In Respect of Decedent" assets to pass first to Non-GST QTIP share, then to GST QTIP share, then to Non-GST Credit Shelter Trust share, and finally to GST Credit Shelter Trust share.

RMD = Required Minimum Distributions



**CHAPTER SIX**  
**PUBLISHED IN THE APRIL 9, 2015 EDITION OF *THE THURSDAY REPORT***

**RMD = Required Minimum Distributions**





**CHAPTER SEVEN**  
**PUBLISHED IN THE APRIL 16, 2015 EDITION OF *THE THURSDAY REPORT***

METHOD 1- "UNIFORM LIFE EXPECTANCY METHOD"	METHOD 2- "MUCH YOUNGER SPOUSE METHOD"	METHOD 3- "RECALCULATED ONE LIFE METHOD"
<p><b>WHEN USED:</b></p> <p>A. During the lifetime of the Participant, after the Participant attains the age of 70 1/2, unless the Participant's spouse is named as the sole beneficiary of the Plan and said spouse is more than 10 years younger than the Participant.</p> <p>B. If a surviving spouse (i) inherits the Participant's Plan as the sole beneficiary, and (ii) rolls over the Plan into his or her IRA.</p> <p><b>WHICH TABLE TO USE:</b></p> <p>Uniform Lifetime Table, based on the age of the Participant or surviving spouse, as applicable.</p>	<p><b>WHEN USED:</b></p> <p>A. During the lifetime of the Participant, once the Participant attains the age of 70 1/2, but only if the Participant's spouse is named as the sole beneficiary of the Plan and said spouse is more than 10 years younger than the Participant.</p> <p>B. If a surviving spouse (i) inherits the Participant's Plan as the sole beneficiary, (ii) rolls over the Plan into his or her IRA, (iii) subsequently marries a spouse who is more than 10 years younger than the surviving spouse, and (iv) the new spouse named as the sole beneficiary of surviving spouse's IRA.</p> <p><b>WHICH TABLE TO USE:</b></p> <p>Joint Life and Last Survivor Expectancy Table, based on the ages of the Participant and his or her spouse, or on the ages of the Participant's surviving spouse and his or her new spouse.</p>	<p><b>WHEN USED:</b></p> <p>A. After the death of the Participant, where the Participant's spouse is named as the sole beneficiary of the Plan (or is the Designated Beneficiary of a Conduit Trust to which the Plan is payable).</p> <p><b>WHICH TABLE TO USE:</b></p> <p>Single Life Table, recalculated annually based on the surviving spouse's age.</p>

**METHOD 4- "NON-RECALCULATED ONE  
LIFE METHOD"**

**WHEN USED:**

A. After the death of the Participant, where (i) the Participant's spouse is not named as the sole beneficiary of the Plan (or is the Designated Beneficiary of an Accumulation Trust to which the Plan is payable), (ii) a non-spouse individual is named as the beneficiary of the Plan, or (iii) the Participant's spouse has not rolled over the Participant's Plan into his or her own IRA, names a beneficiary of the Plan, and later dies.

**WHICH TABLE TO USE:**

Single Life Table; the applicable divisor based on the beneficiary's age in the calendar year after the year of the Participant's death is used, and is subtracted for one for each subsequent year thereafter.

**METHOD 5- "AT LEAST AS RAPIDLY  
METHOD"**

**WHEN USED:**

A. After the death of a Participant who has attained the age of 70 1/2, where (i) no Designated Beneficiary is named with respect to the Plan, or (ii) the Participant's life expectancy is longer than the Designated Beneficiary's life expectancy. However, if the Participant named a Designated Beneficiary (i.e., an individual or a Trust that qualifies as a Conduit Trust or an Accumulation Trust), and the Designated Beneficiaries' life expectancy is longer than the Participant's, then this Method is not required to apply and the applicable Method to the left can apply.

**WHICH TABLE TO USE:**

Single Life Table, based upon the life expectancy of the deceased Participant as if he or she were still living, with the applicable divisor reduced by one in each calendar year after the first calendar year following the Participant's death.

**METHOD 6- "FIVE YEAR RULE  
METHOD"**

**WHEN USED:**

A. After the death of a Participant who has not yet attained the age of 70 1/2, where a non-individual (i.e., the Participant's estate, a corporation or other business entity, or a trust that does not qualify as a Conduit Trust or an Accumulation Trust) is named as a beneficiary of the Plan.

**WHICH TABLE TO USE:**

None; all benefits must be distributed from the Plan by the end of the fifth calendar year after the Participant's death.

Tricky Situation	Rule
<p>Plan Participant turns 70 ½ on June 1, 2014. Is the Plan Participant required to take his Required Minimum Distribution in 2014?</p>	<p><b>NO.</b></p> <p>Plan Participant has the option to take the Required Minimum Distribution prior to the end of 2014 or delay the first year's distribution to April 1<sup>st</sup> of the following year.</p>
<p>Plan Participant turns 70 ½ on June 1, 2014 but elects to delay his first distribution until April 1, 2015. If Plan Participant dies before taking the first distribution, did he die before his Required Beginning Date?</p>	<p><b>YES.</b></p> <p>Even if part of the distribution is taken, a Plan Participant is determined to have died before his or her Required Beginning Date if he or she dies before April 1 of the year following the death of the Plan Participant.</p>
<p>Beneficiary is 30 when Plan Participant dies on December 31, 2014. Beneficiary turns 31 in June 2015. Is the beneficiary's life expectancy calculated using age 30 or age 31?</p>	<p><b>AGE 31.</b></p> <p>The beneficiary's life expectancy is calculated based upon the age the beneficiary will attain in the calendar year following the Plan Participant's death.</p>
<p>IRA benefits are payable to multiple beneficiaries ages 20, 30, and 50. What age is used to calculate life expectancy?</p>	<p><b>IT DEPENDS.</b></p> <p>If separate accounts are timely established, life expectancy can be calculated using the age of each individual beneficiary. If separate accounts are not timely established, life expectancy is calculated using the age of the oldest beneficiary.</p>



