



OFFICE OF THE CHIEF COUNSEL

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

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Dear _____ :

This is to respond to your letter of February 15, 2016, and to confirm the telephone call of April 1, 2016, with _____ during which you asked how to calculate the beginning date of your required minimum distributions ("RMDs"), whether full time separation from service is required in order to begin to receive your RMDs, and, lastly, whether the total amount of your RMD may be withdrawn from one of your multiple retirement accounts or whether the RMDs must be withdrawn on a pro rata basis from all accounts. During that discussion, we explained that:

- For IRAs, the required minimum distributions begin on April 1 of the year following the calendar year in which you reach age 70½. For employer sponsored retirement plans, such as 401(k), profit-sharing, 403(b), or other defined contribution and pension plans, the RMD generally begins on April 1 following the later of the calendar year in which you reach age 70½, or retire.
- The term "separation from service" is not defined in the Internal Revenue Code or the Treasury Regulations. The terms of your retirement plan will govern whether an employee who has reached aged 70½ and is still employed on a part-time basis is required to begin to receive his RMDs.
- An IRA owner must calculate the RMD separately for each IRA that he owns, but can withdraw the total amount from one or more of the IRAs. Similarly, a 403(b) contract owner must calculate the RMD separately for each 403(b) contract that he owns, but can take the total amount from one or more of the 403(b) contracts. RMDs required from other types of retirement plans have to be taken separately from each of those plan accounts.

I hope this general information is helpful. I have enclosed additional information on frequently asked questions concerning RMDs. If you have any other questions about this letter, please contact _____ at _____.

Sincerely,

By: _____
Jason E. Levine
Senior Technician Reviewer
Qualified Plans Group 4
Office of Associate Chief Counsel
(Tax Exempt and Governmental Entities)

Enclosures (3)