



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

OFFICE OF THE CHIEF COUNSEL

July 23, 2020

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UIL: 401.06-00

The Honorable Dianne Feinstein
United States Senator
1 Post Street, Suite 2450
San Francisco, CA 94104

Attention:

Dear Senator Feinstein:

I am responding to your inquiry dated June 9, 2020, on behalf of your constituent, . explained he received his required minimum distribution (RMD) in January 2020 and asked if he can roll over the RMD back to his IRA.

Generally, an IRA owner has 60 days from the IRA distribution to roll over that amount to an IRA or other eligible retirement plan. However, Section 2203 of the CARES Act of March 27, 2020 waived all RMDs for the 2020 calendar year. Therefore, individuals can roll over any RMD paid from an IRA in 2020.

On June 23, 2020, we issued Notice 2020-51 to extend the deadline to roll over any 2020 RMD paid in January 2020 to August 31, 2020. In addition, individuals may repay amounts equal to the 2020 RMD into the IRA that distributed the RMD. That repayment will not be treated as a rollover for purposes of the "one rollover per year" rule.

In addition, on April 9, 2020, we issued Notice 2020-23, 2020-18 IRB 742, to extend the 60-day rollover distribution deadline to July 15, 2020 for distributions made between February 1, 2020, and May 16, 2020, that would have been required to be rolled over between April 1, 2020, and July 15, 2020.

For your convenience, I have enclosed copies of Notice 2020-23 and Notice 2020-51.

I hope this information is helpful. If you have any additional questions, please contact me at _____ or _____ at _____.

Sincerely,

Laura B. Warshawsky
Branch Chief, Qualified Plans Branch 1
(Employee Benefits, Exempt Organizations,
and Employment Taxes)

Enclosures (2)