



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

OFFICE OF THE CHIEF COUNSEL

September 30, 2020

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Dear _____ :

I am responding to your inquiry we received on August 18, 2020. You requested information about extended repayment deadlines for certain IRA distributions you received in March 2020. You explained you may need relief from possible tax events related to these IRA distributions you had to make due to the pandemic.

Generally, an IRA owner has 60 days from the IRA distribution to roll over that amount to an IRA or other eligible retirement plan. If the distribution is in the form of stock, the rollover must be the stock that was originally distributed. However, on April 9, 2020, we issued Notice 2020-23 to extend the deadline to roll over any distribution between February 1, 2020, and May 15, 2020, to July 15, 2020.

Section 2203 of the CARES Act waived required minimum distributions (RMDs) from IRAs for the 2020 calendar year. Therefore, individuals can roll over amounts equal to an individual's RMD paid from an IRA in 2020. On June 23, 2020, we issued Notice 2020-51 which permitted individuals to repay amounts equal to the 2020 RMD into the IRA that distributed the RMD if the repayment was made no later than August 31, 2020. The rules do not treat that repayment as a rollover for purposes of the "one rollover per year" rule.

In addition, Section 2202 of the CARES Act permits certain individuals affected by the coronavirus pandemic to include the taxable portion of a distribution from an IRA in income ratably over a 3-year period (2020, 2021, and 2022). The CARES Act also permits individuals to repay such distribution to an IRA or other eligible retirement plan during the 3-year period beginning on the day after the date on which the distribution was received. A coronavirus-related distribution generally means a distribution made between January 1, 2020, and December 30, 2020, to a qualified individual. Section 1.B. of Notice 2020-50 explains who a qualified individual is and provides other

guidance on coronavirus-related distributions. An individual cannot treat more than \$100,000 in distributions from all plans as coronavirus-related distributions.

For your convenience, I have enclosed copies of Notice 2020-23, Notice 2020-50, 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 (3)