



TAX EXEMPT AND  
GOVERNMENT ENTITIES  
DIVISION

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

DEC 29 2025

Release Number: 202613006

Release Date: 3/27/26

Re: Request for use of plan-specific base substitute mortality tables

Taxpayer =

EIN: -

Plan 1 =

EIN: - (Plan No.: )

Aggregated Group 2:

Plan 2 =

EIN: - (Plan No.: )

Plan 3 =

EIN: - ; PN:

Dear :

This letter is to inform Taxpayer that their request to use base substitute mortality tables for making computations under section 430 of the Internal Revenue Code ("Code") for Aggregated Group 2 has been granted with respect to the populations specified in this ruling. This ruling is effective for a period of up to 5 plan years beginning with the plan year commencing January 1, 2026. Approval has been granted in accordance with section 430(h)(3)(C)(i) of the Code and section 303(h)(3)(C)(i) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA").

This approval applies to the following specific populations of Aggregated Group 2:

- Male combined annuitants and nonannuitants, including disabled male annuitants and nonannuitants ("Male Participants")
- Female combined annuitants and nonannuitants, including disabled female annuitants and nonannuitants ("Female Participants")

This letter ruling was requested by Taxpayer in their submission dated May 29, 2025. Taxpayer submitted a separate request for approval to use base substitute mortality tables for Plan 1 at the same time as this request for Aggregated Group 2. The ruling for Plan 1 will be addressed in a separate letter ruling.

The following facts and representations have been submitted under penalties of perjury in support of the ruling requested.

Taxpayer previously received a letter ruling, dated September 20, 2022 granting the use of base substitute mortality tables for Aggregated Group 2, effective for a period up to 5 plan years beginning with the plan year commencing January 1, 2023. The approved use of the base substitute mortality tables currently being used will expire on December 31, 2027.

Due to a significant change in population of Female Participants since the letter ruling was issued on September 20, 2022, Taxpayer submitted this new request for a ruling to use base substitute mortality tables for Male Participants and Female Participants for a period of up to 5 plan years beginning with the plan year commencing January 1, 2026.

Taxpayer represents that Plan 1, Plan 2, and Plan 3 are the only pension plans within Taxpayer's controlled group. Taxpayer further represents that they do not participate in any multiple-employer plans.

Taxpayer represents that they have no plans for which base substitute mortality tables are not intended to be used.

Taxpayer represents that no plans were spun off from Plan 2 or Plan 3.

Taxpayer represents that there were no special events that occurred during the experience study that required adjustments to the experience study data.

Taxpayer represents that the simplified rule under section 1.430(h)(3)-2(d)(4)(i) of the Treasury Regulations ("Regulations") is not being used for this experience study.

Taxpayer represents that the combined genders rule under section 1.430(h)(3)-2(d)(6) of the Regulations is not being used.

Taxpayer's request is made in accordance with section 430(h)(3)(C)(i) of the Code, section 303(h)(3)(C)(i) of ERISA, section 1.430(h)(3)-2(b)(1) of the Regulations, and Revenue Procedure 2024-32.

Section 430(h)(3) of the Code states, in relevant part, that:

- (A) In general. Except as provided in subparagraph (C) or (D), the Secretary shall by regulation prescribe mortality tables to be used in determining any present value of making any computation under this section. Such tables shall be based on the actual experience of pension plans and projected trends in such experience. In prescribing such tables, the Secretary shall take into account results of available independent studies of mortality of individuals covered by pension plans.

**(C) Substitute mortality table –**

- (i) In general. Upon request by the plan sponsor and approval by the Secretary, a mortality table which meets the requirements of clause (iii) shall be used in determining any present value or making any computation under this section during the period of consecutive plan years (not to exceed 10) specified in the request.
- (ii) Early termination of period. Notwithstanding clause (i), a mortality table described in clause (i) shall cease to be in effect as of the earliest of –
  - (I) the date on which there is a significant change in the participants in the plan by reason of a plan spinoff or merger or otherwise, or
  - (II) the date on which the plan actuary determines that such substitute mortality table does not meet the following requirements of clause (iii).
- (iii) Requirements. A mortality table meets the requirements of this section if –
  - (I) there is a sufficient number of plan participants, and the pension plans have been maintained for a sufficient period of time, to have credible information necessary, and
  - (II) such table reflects the actual experience of the pension plans maintained by the sponsor and projected trends in general mortality experience.

Section 1.430(h)(3)-1 of the Regulations states, in relevant part, that:

- (d) Base mortality tables. The following are the base mortality tables. The base year for these tables is 2012.<sup>1</sup>

Section 1.430(h)(3)-2 of the Regulations states, in relevant part, that:

- (b) Procedures for obtaining approval to use substitute mortality tables –
  - (1) Written request for approval to use substitute mortality tables –
    - (i) General requirements. To use substitute mortality tables, a plan sponsor must first submit a written request to the Commissioner demonstrating that those substitute mortality tables meet the requirements of section 430(h)(3)(C) and this section. This request must specify the first plan year and the term of years (not more than 10), for which the tables are to apply.
    - (ii) Time for written request. Substitute mortality tables may not be used for a plan year unless the plan sponsor submits the written request described in paragraph (b)(1)(i) of this section at least 7 months before the first day of the first plan year for which the substitute mortality tables are to apply.
- (c) Development of substitute mortality tables –
  - (2) Mortality experience requirements –
    - (ii) Credible mortality information –
      - (B) Simplified rule. Whether there is credible mortality information for a gender may be determined by only taking into account people who are at least age 50 and less than age 100. If there is a credible mortality information for a gender using this simplified rule, the entire gender (not just those who are at least age 50 and less than age 100) has credible mortality information.
  - (3) Determination of substitute mortality tables –

<sup>1</sup> Due to the length, these base mortality tables have not been included in this letter ruling.

- (i) Requirement to use generational mortality table. A plan's substitute mortality tables must be generational mortality tables. A plan's substitute mortality tables are determined using the plan's base substitute mortality tables developed pursuant to paragraph (d) or (e) of this section and the mortality improvement factors described in paragraph (c)(3)(ii) of this section.
  - (ii) Determination of mortality improvement factors. The mortality improvement factor determined under § 1.430(h)(3)-1(b)(2)(ii) for that age and gender for the applicable period. The applicable period is the period beginning with the base year for the base substitute mortality table determined under paragraph (d) or (e) of this section and ending in the calendar year in which the individual attains the age for which the probability of death is being determined. The base year for the base substitute mortality table is the calendar year that contains the day before the midpoint of the experience study period.
- (6) Duration of use of tables –
- (ii) Early termination of use of tables. A plan's substitute mortality tables must not be used beginning with the earliest of –
    - (A) For a plan using a substitute mortality table for only one gender because of a lack of credible mortality information with respect to the other gender, the first plan year for which there is credible mortality information with respect to the gender that had lacked credible mortality information (unless an approved substitute mortality table is used for that gender);
    - (B) The first plan year in which the plan fails to satisfy the requirements of paragraph (c)(1) of this section (regarding the use of substitute mortality tables for all plans in the controlled group), taking into account the rules of paragraph (f)(3) of this section (regarding the transition period for newly-affiliated plans);
    - (C) The second plan year following the plan year for which there is a significant change in individuals covered by the plan as described in paragraph (c)(6)(iii) of this section;
    - (D) The first plan year following the plan year for which a substitute mortality table used for a plan population is no longer accurately predictive of future mortality of that population, as determined by the Commissioner or as certified by the plan's actuary to the satisfaction of the Commissioner; or
    - (D) The date specified in guidance published in the Internal Revenue Bulletin in conjunction with a replacement of mortality tables specified under section 430(h)(3)(A) and § 1.430(h)(3)-1 (other than changes to the mortality improvement rates under § 1.430(h)(3)-1(b)(1)(iii) or annual updates to the static mortality tables issued as noted in § 1.430(h)(3)-1(c)(1)(iv)).
  - (iii) Significant change in coverage –
    - (A) Change in coverage from time of experience study. For purposes of applying the rules of paragraph (c)(6)(ii)(C) of this section, a significant change in the individuals covered by a substitute

mortality table for a plan year occurs if the number of individuals covered by the substitute mortality table for the plan year is less than 80 percent or more than 120 percent of the average number of individuals in that population over the years covered by the experience study on which the substitute mortality tables are based. However, a change in coverage is not treated as significant if the plan's actuary certifies in writing to the satisfaction of the Commissioner that the substitute mortality tables used for the population continue to be accurately predictive of future mortality of that population (taking into account the effect of the change in the population).

- (B) Change in coverage from time of certification. For purposes of applying the rules of paragraph (c)(6)(ii)(C) of this section, a significant change in the individuals covered by a substitute mortality table for a plan year occurs if the number of individuals covered by the substitute mortality table for the plan year is less than 80 percent or more than 120 percent of the number of individuals covered by the substitute mortality table in a plan year for which a certification described in paragraph (c)(6)(iii)(A) of this section was made on account of a prior change in coverage. However, a change in coverage is not treated as significant if the plan's actuary certifies in writing to the satisfaction of the Commissioner that the substitute mortality tables used by the plan with respect to the covered population continue to be accurately predictive of future mortality of that population (taking into account the effect of the change in the population).

(d) Full credibility –

(2) Experience study requirements –

- (i) General rule. The base substitute mortality table for a gender or other population must be developed from an experience study of the mortality experience of that population that is collected over an experience study period. The experience study period must consist of 2, 3, 4, or 5 consecutive 12-month periods, and must be the same period for all populations except as provided in paragraph (c)(5)(iii) of this section.

(ii) Requirements to use recent experience data –

- (A) General rule. Except as provided in paragraph (d)(2)(ii)(B) of this section, the last day of the experience study period must be less than 3 years before the first day of the first plan year for which the substitute mortality tables are to apply. For example, if January 1, 2019, is the first day of the first plan year for which the substitute mortality tables will be used, then an experience study using calendar year data generally must include data collected for a period that ends no earlier than December 31, 2016.

(3) Full credibility threshold –

- (i) Threshold number of deaths. The full credibility threshold for a gender or other population is the product of 1,082 and the population's benefit dispersion factor. In calculating the population's benefit dispersion factor,

for purposes of (d)(3)(iii), (iv), and (v) of this section, the population is adjusted, as appropriate, for individuals who leave the population on account of a reason other than death.

(ii) Population's dispersion factor. The population's benefit dispersion factor is equal to –

(A) The number of expected deaths for the population during the experience study period (as defined in paragraph (d)(3)(iii) of this section); multiplied by

(B) The sum of the mortality-weighted squares of the benefits (as defined in paragraph (d)(3)(iv) of this section); divided by

(C) The square of the sum of the mortality-weighted benefits (as defined in paragraph (d)(3)(v) of this section).

(4) Development of mortality rates –

(i) In general. The mortality rates under the base substitute mortality tables must be amounts-weighted mortality rates that are derived from the experience study. Except as provided in paragraph (d)(4)(iv) of this section, the mortality rate for an age and gender is determined by multiplying the mortality rate for that age and gender from the standard mortality table determined under paragraph (d)(4)(iii) of this section by the mortality ratio determined under paragraph (d)(4)(ii) of this section. If the simplified rule of paragraph (c)(2)(ii)(B) of this section is used for the population, then the mortality ratio is determined only taking into account people who are at least 50 years old and less than 100 years old, but the mortality ratio is applied to all ages.

(ii) Mortality ratio –

(A) In general. Except as provided in paragraph (d)(6) of this section, a mortality ratio is determined for a gender or other population within a gender, and is equal to the quotient determined by dividing—

(1) The sum, for all years in the experience study period, of the benefit amount for all individuals in the population at the beginning of the year who died during the year, by

(2) The sum, for all years in the experience study period, for all individuals in the population at the beginning of the year (adjusted, as appropriate, for individuals who leave on account of reason other than death), of the product of –

(i) The probability of death of the individual using the mortality rate for the individual's age and gender from the standard mortality table determined under paragraph (d)(4)(iii) of this section; and

(ii) The benefit amount for the individual.

(iii) Standard mortality table –

(A) Projection of base table. Except as otherwise provided in this paragraph (d)(4)(iii), the standard mortality table for a year is the mortality table determined by applying cumulative mortality improvement factors determined under § 1.430(h)(3)-1(b)(2)(ii) to the base mortality table under § 1.430(h)(3)-1(d) for the period beginning with the base year for the mortality table and ending in

the base year for the base substitute mortality table determined under paragraph (c)(3)(ii) of this section. For purposes of the preceding sentence, the cumulative mortality improvement factors are determined using the mortality improvement rates described in § 1.430(h)(3)-1(b)(1)(iii) that apply for the calendar year during which the plan sponsor submits the request for approval to use substitute mortality tables.

(iv) Modification for ages 96 and older. Mortality rates for ages 96 and older under the base substitute mortality table are determined using the rules of paragraph (d)(4)(i) of this section but substituting a modified mortality ratio for the mortality ratio determined under paragraph (d)(4)(ii) of this section.

The modified mortality ratio is determined as follows—

(A) For ages 96 through 109, if the mortality ratio is greater than 1.0, the modified mortality ratio is equal to the mortality ratio for the population reduced by 1/15th of the excess of the mortality ratio over 1.0 for each year that the age exceeds 95.

(B) For ages 96 through 109, if the mortality ratio is less than 1.0, the modified mortality ratio is equal to the mortality ratio for the population increased by 1/15th of the excess of 1.0 over the mortality ratio for each year that the age exceeds 95.

(C) For ages 110 and older, the modified mortality ratio is equal to 1.0.

(e) Partial credibility –

(1) In general. The mortality experience with respect to a population has partial credibility if the actual number of deaths for that population during the experience study period described in paragraph (d)(2) of this section is at least equal to 100 and is less than the full credibility threshold described for the population in paragraph (d)(3) of this section. If the mortality experience for the population has partial credibility, then in lieu of creating a base substitute mortality table as described in paragraph (d) of this section, the base substitute mortality table is created as the sum of—

(i) The product of—

(A) The partial credibility weighting factor determined under paragraph (e)(2) of this section; and

(B) The mortality rates that are derived from the experience study determined under paragraph (d)(4)(i) of this section; and

(ii) The product of—

(A) One minus the partial credibility weighting factor described in paragraph (e)(2) of this section; and

(B) The mortality rate from the standard mortality tables described in paragraph (d)(4)(iii) of this section.

(2) Partial credibility weighting factor. The partial credibility weighting factor is equal to the square root of the fraction—

(i) The numerator of which is the actual number of deaths for the population during the experience study period; and

(ii) The denominator of which is the full credibility threshold for the population described in paragraph (d)(3) of this section.

Section 303(h)(3) of ERISA states, in relevant part, that:

(C) Substitute mortality table.—

- (i) In general.—Upon request by the plan sponsor and approval by the Secretary of the Treasury, a mortality table which meets the requirements of clause (iii) shall be used in determining any present value or making any computation under this section during the period of consecutive plan years (not to exceed 10) specified in the request:
- (iii) Requirements.—A mortality table meets the requirements of this clause if—
  - (I) there is a sufficient number of participants , and the pension plans have been maintained for a sufficient period of time, to have credible mortality information necessary for purposes of subclause (II), and
  - (ii) such table reflects the actual experience of the pension plans maintained by the sponsor and projected trends in general mortality experience.

Revenue Procedure 2024-32 sets forth the procedure by which the sponsor of a defined benefit plan that is subject to the funding requirements of § 430 of the Code may request approval from the Internal Revenue Service ("IRS") for the use of plan-specific substitute mortality tables in accordance with § 430(h)(3)(C) and § 1.430(h)(3)-2 of the Regulations.

Section 8.1. of Revenue Procedure 2024-32 states, in relevant part, that the following information must be provided in tabular form for each population within the plan (or aggregated group) for which approval to use substitute mortality tables is requested, aggregating all plans that have the same plan year:

- (1) The average number of individuals within the population during the experience study period; and
- (2) The number of individuals within the population as of the last day of the plan year immediately preceding the plan year during which approval to use substitute mortality tables is requested.

Taxpayer's proposed base substitute mortality tables are developed based on an experience study period from January 1, 2023 through December 31, 2024, with a base year of 2023. This satisfies the requirements under section 1.430(h)(3)-2(d)(2) of the Regulations.

Section 12.2. of Revenue Procedure 2024-32 states, in relevant part, that if a substitute mortality table was first approved for use for a plan year that began before January 1, 2025, and the number of individuals covered by the substitute mortality table is less than 80 percent or more than 120 percent of the average number of individuals in that population over the 12-month period covered by the experience study, then the substitute mortality table may not be used for a plan year beginning on or after January 1, 2026. This termination, which is pursuant to § 1.430(h)(3)-2(c)(6)(ii)(E), applies without regard to whether the actuary makes the certification described in § 1.430(h)(3)-2(c)(6)(iii)(A).

Taxpayer's proposed base substitute mortality tables are developed by adjusting the applicable standard mortality tables in section 1.430(h)(3)-1(d) of the Regulations by the mortality ratios, in accordance with section 1.430(h)(3)-2(d)(4)(i) of the Regulations, and credibility weighting factors, in accordance with section 1.430(h)(3)-2(e)(1) of the Regulations, shown below.

**Mortality Ratio and Credibility Weighting Factor Table**

<b>Population</b>	<b>Mortality Ratio</b>	<b>Credibility Weighting Factor</b>
Male Participants		
Female Participants		

The mortality ratios above are determined in accordance with section 1.430(h)(3)-2(d)(4)(ii) of the Regulations, and the credibility weighting factors shown above are determined in accordance with section 1.430(h)(3)-2(e)(2) of the Regulations.

Permission is hereby granted to use the base substitute mortality tables, shown below, for Male Participants and Female Participants.

**Base Substitute Mortality Tables  
Approved for Use Beginning with the Plan  
Year Commencing January 1, 2026 for Aggregated Group 2**

**Base year 2023**

<b>Age</b>	<b>Male Participants</b>	<b>Female Participants</b>
1		
2		
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<b>Age</b>	<b>Male Participants</b>	<b>Female Participants</b>
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<b>Age</b>	<b>Male Participants</b>	<b>Female Participants</b>
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<b>Age</b>	<b>Male Participants</b>	<b>Female Participants</b>
118		
119		
120		

In granting this approval, we have only considered whether the base substitute mortality tables are developed in accordance with section 1.430(h)(3)-2 of the Regulations and Revenue Procedure 2024-32. Accordingly, we are not expressing any opinion as to the accuracy or acceptability of any calculations or other material submitted with Taxpayer's request.

These approved base substitute mortality tables must be applied on a generational basis, as provided in section 1.430(h)(3)-2(c)(3)(i) of the Regulations.

Taxpayer's attention is called to section 430(h)(3)(C)(ii) of the Code and section 1.430(h)(3)-2(c)(6)(ii) of the Regulations, which describe the circumstances in which the use of these base substitute mortality tables will terminate before the end of the 5-year period described above.

Taxpayer's attention is also called to the fact that a certification must be provided each plan year that it is required under section 1.430(h)(3)-2(c)(6)(iii) of the Regulations, signed by the enrolled actuary for Plan 2 and Plan 3, stating that these base substitute mortality tables continue to be accurately predictive of the expected future mortality for Male Participants and Female Participants. The certification must also contain a statement that:

- (1) The enrolled actuary is current with educational requirements set forth by the Joint Board for the Enrollment of Actuaries as well as any other actuarial designations asserted;
- (2) The enrolled actuary was personally involved in the determination that the substitute mortality table is still accurately predictive and provides the actuary's best estimate for the Plan;
- (3) In determining that the substitute mortality table is still accurately predictive, the enrolled actuary took into consideration the effect of business combinations, plan mergers or spinoffs and settlements/other risk transfers, and other events that would have similar effects on the relevant populations; and,
- (4) The enrolled actuary has the specific knowledge and experience to make the judgements set forth above and attests to these representations.

All required certifications must be provided on or before the date the Form 5500 is filed for each plan year for which the certification is required and must be accompanied by the supporting information relied upon by the enrolled actuary to make that certification. To the extent possible, please also provide the following supporting information:

- (1) The number of actual deaths during the experience study period used to develop the substitute mortality tables and the beginning and ending dates of the experience study period;
- (2) A table showing the number of expected deaths and actual deaths, reported separately as of December 31, 2024 and for each plan year beginning with deaths during the plan year ending December 31, 2024 through the plan year immediately preceding the most recent actuarial valuation, and in total;

- (3) A table similar to the stability demonstration required under section 8.1 of Revenue Procedure 2024-32, showing the average number of participants in the population covered by the substitute mortality table during the experience study period and the number of participants in that population as of the end of each plan year, beginning with December 31, 2024 through the plan year immediately preceding the most recent actuarial valuation, expressed both as a headcount and as a percentage of the average number of participants in the experience study;
- (4) A table showing a comparison of (i) the average ages and (ii) percentage of the population, by the following monthly single life annuity brackets: under \$100, between \$100 and \$250, between \$250 to \$500, between \$500 to \$1,000, between \$1,000 and \$1,500, and \$1,500 and over, along with the average age and average benefit amount for the population in total. This information should also be provided for the population in the experience study and at the end of each plan year, beginning with the valuation date for the first plan year that the certification is required, through the date immediately preceding the most recent actuarial valuation at the time the information is reported; and
- (5) An explanation of any material changes in the population.

This information must be provided to David M. Ziegler (or to another individual designated by the IRS) to the following address:

Internal Revenue Service  
Attn: Mr. David M. Ziegler  
TE/GE: SE:T:EP:RA:T:A2  
IR-6213  
1111 Constitution Ave. NW  
Washington, DC 20224-0002

Failure to provide this information by the due date may result in a requirement that the standard mortality tables must be used for purposes of section 430 of the Code, beginning with the earlier of:

- (1) the plan year for which the deadline for providing this information is missed; or
- (2) the date required for early termination of the use of the substitute mortality tables pursuant to section 1.430(h)(3)-2(c)(6)(ii) of the Regulations.

This letter ruling may be revoked or modified retroactively if there was a misstatement or omission of controlling facts, the facts at the time of the transaction are materially different from the controlling facts on which the letter ruling was based, or the transaction involves a continuing action or series of actions and the controlling facts change during the course of the transaction.

No opinion is expressed as to the tax treatment of the transaction described herein under the provisions of any other section of either the Code or Regulations which may be applicable thereto, as appropriate.

When filing Form 5500 for Plan 2 and Plan 3 for the plan years for which these base substitute mortality tables are used, please note the information that is required to be attached to Schedule SB (Actuarial Information) in accordance with the instructions to that form.

This ruling is directed only to the taxpayer that requested it. Section 6110(k)(3) of the Code provides that it may not be used or cited by others as precedent.

We have sent a copy of this letter ruling to Taxpayer's authorized representatives pursuant to the Power of Attorney and Declaration of Representative (Form 2848) on file with the IRS. In addition, a copy of this letter ruling is being sent to the Manager, EP Classification Group 4 in Houston, Texas.

If Taxpayer wishes to inquire about this letter ruling, please contact Mr. \_\_\_\_\_ (ID Badge Number \_\_\_\_\_) at (\_\_\_\_\_) - \_\_\_\_\_.

Sincerely yours,

David M. Ziegler, Manager  
Employee Plans Actuarial Group 2

Enclosures

Notice 437, Notice of Intention to Disclose (Rulings)  
A deleted copy of the letter ruling

cc: