



TAX EXEMPT AND  
GOVERNMENT ENTITIES  
DIVISION

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

JAN 09 2026

Release Number: 202614034

Release Date: 4/3/26

Re: Substitute Mortality Table Ruling

Taxpayer =

EIN: -

Plan 1 =

EIN: - ; PN:

Other Plans in Controlled Group:

Plan 2 =

EIN: - ; PN:

Plan 3 =

EIN: - ; PN:

Plan 4 =

EIN: - ; PN:

Plan 5 =

EIN: - ; PN:

Plan 6 =

EIN: - ; PN:

Dear :

This letter is to inform you that your request to use substitute mortality tables for making computations under section 430 of the Internal Revenue Code ("Code") for the male and female non-annuitant populations specified in this letter for Plan 1 has been granted. This ruling is effective for a period of up to 1 plan year beginning with the plan year commencing January 1, 2026, for these specific populations for Plan 1. In granting this approval, we have only considered whether these substitute mortality rates were developed in accordance with section 1.430(h)(3)-2 of the Regulations and Revenue Procedure 2024-32. We are expressly not ruling on the appropriateness of the substitute mortality tables that have been used for

making computations under section 430 of the Code for the male and female annuitant populations for Plan 1.

Your request has been granted in accordance with section 430(h)(3) of the Code and section 303(h)(3) of the Employee Retirement Income Security Act of 1974 ("ERISA").

This approval applies to the following specific populations of Plan 1:

- Male non-annuitants
- Female non-annuitants

This request is made in accordance with section 430(h)(3)(C) of the Code, section 303(h)(3) of ERISA, section 1.430(h)(3)-2 of the Treasury Regulations ("Regulations"), and Revenue Procedure 2024-32.

This is the second request for use of substitute mortality tables for plans in Taxpayer's controlled group. Taxpayer previously requested to use substitute mortality tables for the following populations under section 430(h)(3)(C) of the Code for up to 10 plan years, effective with the plan year commencing January 1, 2019. The tables that were approved on March 7, 2019, are listed below. Plan 1 did not exist at this time.

- Males & females, annuitants & non-annuitants for Plan 2<sup>1</sup>
- Males & females, annuitants for Plan 3<sup>2</sup>
- Males & females, annuitants for Plan 4

Taxpayer is making this request for the non-annuitant populations of Plan 1 because the tables Taxpayer had been using were required to be terminated due to a significant change in coverage for the non-annuitant population of Plan 1, in accordance with section 1.430(h)(3)-2(c)(6)(ii) of the Regulations and section 12 of Revenue Procedure 2024-32. Taxpayer represents that the annuitant populations of Plan 1 did not experience such a significant change in coverage and therefore Taxpayer plans to continue using the substitute mortality tables that have been used for the annuitant populations of Plan 1, for the plan year commencing January 1, 2026<sup>3</sup>.

Taxpayer submitted the current request for substitute mortality tables to be approved for a 10-year period effective with the plan year commencing January 1, 2026, for the non-annuitant populations of Plan 1. This request was tentatively denied on August 27, 2025, in part due to stability concerns for both the annuitant and non-annuitant populations of Plan 1, in

<sup>1</sup> At the time the plan specific mortality tables were approved in 2019, Plan 1 did not exist. What would ultimately become a portion of Plan 1's population existed in Plan 2. This population changed in \_\_\_\_\_ when Plan 2 engaged in a spinoff and subsequent merger. In \_\_\_\_\_, a group of annuitants and non-annuitants were then spun out of Plan 2 to form Plan 1 on \_\_\_\_\_. The population that remained with Plan 2 was then merged into Plan 1 on \_\_\_\_\_. Based on the exhibits supplied with the Taxpayer's submission, these plans remained largely open to new participants from certain collectively bargained units during this period.

<sup>2</sup> Plan 3 was merged into Plan 2 on \_\_\_\_\_.

<sup>3</sup> Plan specific mortality tables were never approved for Plan 1. Instead, the substitute mortality tables approved for the annuitant and non-annuitant populations in Plan 2 have been used by Taxpayer for the annuitant and non-annuitant populations of Plan 1. Taxpayer represents that many of the annuitants currently in Plan 1 were in Plan 2 at the time these plan specific mortality tables were approved for Plan 2. Taxpayer further represents that the substitute mortality tables granted for the annuitants in Plan 2 are reasonably predictive of the mortality experienced by the annuitant population in Plan 1.

accordance with section 1.430(h)(3)-2(d)(4)(v) of the Regulations. Additional information was provided by the authorized representatives on October 3, 2025, and October 16, 2025. In the October 16, 2025 correspondence, Taxpayer amended their request for substitute mortality tables to request approval of the non-annuitant populations of Plan 1, for a 1-year period commencing with the plan year beginning January 1, 2026. Taxpayer also committed to submitting a ruling request, before June 2026, to use plan specific substitute mortality tables for the annuitant and non-annuitant populations of Plan 1, for the plan year commencing January 1, 2027.

Taxpayer represents that there were several mergers and spinoffs that occurred within the five-year period preceding the date of this request, including the following:

- On \_\_\_\_\_, a group of active and terminated vested participants from Plan 2 were spun off to a plan outside of Taxpayer's controlled group.
- On \_\_\_\_\_, Plan 3 was merged into what remained of Plan 2.
- On January 1, 2023, the majority of Plan 2 (with the exception of certain annuitants) were spun off to create Plan 1.
- On \_\_\_\_\_, the annuitants remaining in Plan 2 were merged into Plan 1.

Section 430(h)(3)(A) of the Code states, in relevant part, that the Secretary shall by regulation prescribe mortality tables to be used in determining any present value of making any computation under section 430 of the Code.

Section 430(h)(3)(C) of the Code states, that upon request by the plan sponsor and approval by the Secretary, a mortality table shall be used in determining any present value or making any computation under section 430 of the Code during the period of consecutive plan years (not to exceed 10) specified in the request.

Section 430(h)(3)(C)(ii) of the Code states, in relevant part, a substitute mortality table shall cease to be in effect as of the earliest of:

- (1) 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
- (2) the date on which the plan actuary determines that such substitute mortality table does not meet the following requirements of Section 430(h)(3)(C)(iii) of the Code.

Section 430(h)(3)(C)(iii) of the Code states, in relevant part, that 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 substitute mortality 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)-2(c)(1) of the Regulations states, in relevant part, that substitute mortality tables are permitted to be used for a plan for a plan year only if, for that plan year (or any portion of that plan year), substitute mortality tables are also approved and used for each other pension plan subject to the requirements of section 430 that is maintained by the plan sponsor and by each member of the plan sponsor's controlled group.

Section 1.430(h)(3)-2(c)(3) of the Regulations states, in relevant part, that 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. Additionally, a plan's substitute mortality tables must be generational mortality tables.

Section 1.430(h)(3)-2(c)(6)(ii) of the Regulations states, in relevant part, that 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 requirement that other plans and populations in the controlled group must also use substitute mortality tables unless it can be demonstrated that they do not have credible mortality information (taking into account 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 Section 1.430(h)(3)-2(c)(6)(iii) of the Regulations,
- (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
- (E) 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) of the Code and section 1.430(h)(3)-1 of the Regulations, other than annual updates to the static mortality tables issued as noted in section 1.430(h)(3)-1(c)(1)(iv) of the Regulations or changes to the mortality improvement rates under section 1.430(h)(3)-1(b)(1)(iii) of the Regulations.

Section 1.430(h)(3)-2(c)(6)(iii) of the Regulations states, in relevant part, 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% or more than 120% of either the average number of individuals in that population over the years covered by the experience study on which the substitute mortality tables are based, or the number of individuals covered by the substitute mortality table in a plan year for which a certification (described below) 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 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).

Section 1.430(h)(3)-2(d)(2) of the Regulations states, in relevant part, that 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.<sup>4</sup> The last day of the experience study period must be less than 3

<sup>4</sup> If two or more plans are aggregated and not all of the plans have the same plan year, then the experience study period may be a period that is not a multiple of 12 months provided that four criteria under section 1.430(h)(3)-2(c)(5)(iii) are met.

years before the first day of the first plan year for which the substitute mortality tables are to apply. However, if the plan sponsor submits a request for approval to use of substitute mortality tables more than 1 year (and less than 2 years) before the first day of the first plan year for which the substitute mortality tables are to apply, then the experience study is not treated as failing to satisfy the rule in section 1.430(h)(3)-2(d)(2)(ii)(A) of the Regulations if the last day of the final year reflected in the experience data is less than 2 years before the date of submission.

Section 1.430(h)(3)-2(d)(4) of the Regulations states, in relevant part, that the base mortality rates are determined by multiplying the mortality rate from the standard mortality table by the mortality ratio. If the simplified rule under section 1.430(h)(3)-2(c)(2)(ii)(B) of the Regulations 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.

Section 1.430(h)(3)-2(d)(4)(iii)(B) of the Regulations require that adjustments be made to the standard mortality table for any 12-month period in the experience study that begins after December 31, 2019 and before January 1, 2023. Such adjustment factors are 15% increases for calendar years 2020 and 2021 and a 7.5% increase for calendar year 2022.

Section 1.430(h)(3)-2(e)(1) of the Regulations states, in relevant part, that if the actual number of deaths is at least equal to 100 and is less than the full credibility threshold, then the base mortality rates are determined using a partial credibility weighting factor as calculated under section 1.430(h)(3)-2(e)(2).

The non-annuitant substitute mortality tables for Plan 1 were developed based on an experience study period from January 1, 2019 through December 31, 2023, with a base year of 2021. This satisfies the requirements under sections 1.430(h)(3)-2(c)(3) and (d)(2) of the Regulations.

The substitute mortality tables were developed by adjusting the applicable standard mortality tables in section 1.430(h)(3)-1(d) of the Regulations with the mortality ratio and credibility weighting factors shown below.

**Mortality Ratio and Credibility Weighting Factor Table**

	<b>Combined male and female annuitants, excluding disabled annuitants</b>
Mortality Ratio	
Credibility Weighting Factor	

These were determined by combining male and female non-annuitant experience.

This approval applies to the following specific populations of Plan 1:

- Male non-annuitants
- Female non-annuitants

Based on the information provided by Taxpayer, the following populations lack credible mortality experience:

- Males and females, non-annuitant populations of Plan 4
- Males and females, annuitant and non-annuitant populations of Plan 5
- Males and females, annuitant and non-annuitant populations of Plan 6

Therefore, the standard mortality tables will be used for calculations under section 430 of the Code for the above populations.

Permission is hereby granted to use the substitute mortality rates shown in the table below for the non-annuitants of Plan 1.

**Substitute Mortality Tables**  
**Approved for use in Plan 1, Commencing with the**  
**January 1, 2026 Plan Year**  
**(Base year 2021)**

Age	Male Non-Annuitants	Female Non-Annuitants
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

<b>Age</b>	<b>Male Non-Annuitants</b>	<b>Female Non-Annuitants</b>
26		
27		
28		
29		
30		
31		
32		
33		
34		
35		
36		
37		
38		
39		
40		
41		
42		
43		
44		
45		
46		
47		
48		
49		
50		
51		
52		
53		
54		
55		
56		
57		
58		
59		
60		
61		
62		
63		
64		
65		
66		
67		
68		
69		
70		
71		

<b>Age</b>	<b>Male Non-Annuitants</b>	<b>Female Non-Annuitants</b>
72		
73		
74		
75		
76		
77		
78		
79		
80		
81		
82		
83		
84		
85		
86		
87		
88		
89		
90		
91		
92		
93		
94		
95		
96		
97		
98		
99		
100		
101		
102		
103		
104		
105		
106		
107		
108		
109		
110		
111		
112		
113		
114		
115		
116		
117		

Age	Male Non-Annuitants	Female Non-Annuitants
118		
119		
120		

The above mortality rates were developed based on an experience study period from January 1, 2019, through December 31, 2023, with a base year of 2021. The base substitute mortality tables listed above were verified by the Taxpayer's authorized representatives on December 16, 2025.

The Internal Revenue Service ("Service") has reviewed the substitute mortality rates and supporting information, and has determined that based on the information submitted, the rates for the non-annuitant population of Plan 1 were developed in accordance with section 1.430(h)(3)-2 of the Regulations and Revenue Procedure 2024-32.

The above rates must be applied on a generational basis, as provided in section 1.430(h)(3)-2(c)(3)(i) of the Regulations.

Your 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 the substitute mortality tables will terminate. In general, the substitute mortality tables can no longer be used as of the earliest of:

- (1) 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),
- (2) The first plan year in which the plan fails to satisfy the requirements of section 1.430(h)(3)-2(c)(1) of the Regulations, regarding the requirement that other plans and populations in the controlled group must also use substitute mortality tables unless it can be demonstrated that they do not have credible mortality information (taking into account the transition period for newly-affiliated plans in section 1.430(h)(3)-2(f)(3) of the Regulations),
- (3) The second plan year following the plan year for which there is a significant change in individuals covered by the plan as described in section 1.430(h)(3)-2(c)(6)(iii) of the Regulations,
- (4) 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
- (5) 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) of the Code and section 1.430(h)(3)-1 of the Regulations, other than annual updates to the static mortality tables issued as noted in section 1.430(h)(3)-1(c)(1)(iv) of the Regulations or changes to the mortality improvement rates under section 1.430(h)(3)-1(b)(1)(iii) of the Regulations.

Note that populations will have credible mortality experience if they experience at least 100 deaths during a 5-year period (corresponding to the length of the experience study used to construct the substitute mortality tables for the other populations). It is important to monitor the mortality experience of each plan population to ensure that appropriate action is taken should this occur, to avoid violating paragraph (2) above. The following information was submitted by Taxpayer to demonstrate that the plan populations in the controlled group that are using the standard mortality tables have not exceed 100 deaths:

<b>Population</b>	<b>Number of deaths during experience study period</b>
Non-annuitants – Plan 4	
Annuitants and non-annuitants – Plan 5	
Annuitants and non-annuitants – Plan 6	

Should any of the populations listed above exceed 100 deaths during a 5-year period, plan specific mortality tables will be required for that population in accordance with section 1.430(h)(3)-2(c)(1) of the Regulations.

Section 1.430(h)(3)-2(c)(6)(iii) of the Regulations provides that the use of substitute mortality tables must be discontinued after a significant change in coverage unless 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 the population (taking into account the effect of the change in the population). As noted earlier in this letter, a significant change in coverage occurs if the number of individuals covered by the substitute mortality table for a plan year is less than 80 percent or more than 120 percent of either (1) the average number of individuals in that population over the years covered by the experience study on which the substitute mortality table is based, or (2) the number of individuals covered by the substitute mortality table in a plan year for which a certification described in section 1.430(h)(3)-2(c)(6)(iii)(A) of the Regulations was made.

The following information was submitted by Taxpayer to demonstrate stability:

<b>Population</b>	<b>Average Number During Experience Study Period</b>	<b>Number as of 12/31/2024</b>	<b>Percentage Difference</b>
Plan 1, combined male and female non-annuitants			

A certification must be provided each year that it is required under the Regulations, as described above, signed by the enrolled actuary for the plan and stating that the substitute mortality tables continue to be accurately predictive of the expected future mortality for the plan. The certification must also contain a statement that:

- a. 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;

- b. 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;
- c. 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,
- d. 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.
- (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 Service) 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, commencing 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 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.

When filing Form 5500 for the plan years for which the 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.

In granting this approval to use these substitute mortality tables for the non-annuitant population for Plan 1, we have considered only the acceptability of the non-annuitant mortality tables for Plan 1. Specifically, we have only considered whether the substitute mortality rates were 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 your request. We are expressly not ruling on the appropriateness of the substitute mortality tables that have been used for making computations under section 430 of the Code for the male and female annuitant populations for Plan 1, and not expressing any opinion with regard to whether each plan or plan population in the controlled group satisfies the requirements under section 1.430(h)(3)-2(c)(6)(ii) of the Regulations.

To reiterate, Taxpayer represents that the annuitant population of Plan 1 is not significantly different than the annuitant population of Plan 2 for which the use of plan specific substitute mortality tables was approved on March 7, 2019. In the tentative denial letter issued by the Service on August 27, 2025, the Service expressed concerns that the annuitant population of Plan 1 is significantly different from the January 1, 2012 to December 31, 2016 experience study<sup>5</sup> used to justify the 2019 plan specific substitute mortality tables for Plan 2, in part due to the transactions noted on page 2 of this letter. Furthermore, the Service noted that Taxpayer never requested approval to use plan specific tables for Plan 1, Plan 1 itself never received approval to use plan specific mortality tables, and Plan 1 did not exist at the time the 2019 plan specific approvals were granted to Plan 2, Plan 3, and Plan 4.

On October 3, 2025, the authorized representatives provided additional information to support their December 3, 2024 certification that the substitute mortality table being used for the annuitants of Plan 1 is accurately predictive of their future mortality experience. Furthermore, in their October 16, 2025 correspondence to the Service, Taxpayer committed to submitting a ruling request before June 2026, to use plan specific substitute mortality tables for the annuitant and non-annuitant populations of Plan 1, for the plan year commencing January 1, 2027.

The Service also wants to make the Taxpayer aware that each of the plan mergers and spinoffs discussed earlier may require approval for a change in funding method, unless the

---

<sup>5</sup> Plan 1 did not exist until the plan year commencing January 1, 2023. No opinion is being expressed on whether this experience study period satisfies section 1.430(h)(3)-2((d)(2) of the Regulations.

change in methods related to those transactions meet the requirements for automatic approval under Revenue Procedure 2017-56. Please refer to Revenue Procedure 2017-57 for the procedure for obtaining approval from the Service for a change in the funding method.

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.

Pursuant to a Power of Attorney and Declaration of Representative (Form 2848) on file with this office, a copy of this letter ruling is being sent to your authorized representatives. Additionally, a copy of this letter ruling is being sent to the Manager, Classification Group 4 in Houston, Texas.

If you require further assistance in this matter, please contact \_\_\_\_\_ (ID# \_\_\_\_\_)  
\_\_\_\_\_ ) at ( \_\_\_\_\_ ) - \_\_\_\_\_ .

Sincerely,

David M. Ziegler, Manager  
Employee Plans Actuarial Group 2

Enclosures

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

cc: