For an original Roth IRA owner, there is no lifetime required minimum distribution (RMD). SECURE 1.0 and SECURE 2.0 primarily affect distributions after the owner's death. The summary below assumes an ordinary Roth IRA and an owner who died after December 31, 2019, without relying on special governmental-plan, collectively bargained-plan, or grandfathered-annuity rules. [2]

## Roth IRA RMD summary table

| Situation after the Roth IRA owner's death | Required distribution method | Annual RMDs before the final deadline | Final distribution deadline |
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| Original Roth IRA owner during life | Section 408A(c)(4) overrides the lifetime RMD rule in section 401(a)(9)(A). The owner may leave Roth IRA assets in the account for life. | None. | None during the owner's life. |
| Owner dies; beneficiary is the surviving spouse and sole beneficiary | The spouse may generally remain an inherited-Roth-IRA beneficiary and use either the life-expectancy method or the 10-year method, subject to the governing instrument and applicable election rules. The spouse may also elect to treat the IRA as the spouse's own IRA if the spouse is the sole beneficiary and has an unlimited right to withdraw the assets. [3] | Under the life-expectancy method, distributions generally begin by the end of the year in which the deceased owner would have reached the applicable age. The applicable age is generally 73, or 75 for individuals who attain age 74 after December 31, 2032; the statutory treatment of individuals born in 1959 remains subject to an identified drafting ambiguity. [1] | Under the 10-year method, the entire inherited Roth IRA must generally be distributed by the end of the calendar year containing the 10th anniversary of the owner's death. If the spouse treats the IRA as the spouse's own Roth IRA, no lifetime RMDs apply to the spouse. |
| Beneficiary is an eligible designated beneficiary (EDB), other than a surviving spouse | An EDB may generally receive distributions over the beneficiary's remaining life expectancy. An EDB may instead be subject to the 10-year method if the governing instrument requires or permits that method and the applicable election is made. [3] | If the life-expectancy method applies, the first distribution is generally due by December 31 of the year following the owner's death. The annual amount is generally the preceding December 31 account balance divided by the applicable Single Life Table denominator, reduced by one for each later year. [3] | If the EDB dies before the account is fully distributed, the successor beneficiary generally must receive the remaining account by the end of the 10th calendar year following the EDB's death. |
| EDB because the beneficiary is the owner's minor child | The child is an EDB even if another beneficiary is not an EDB. Under the final regulations, majority generally occurs at age 21. [3] | Life-expectancy distributions generally continue while the child is a minor and may continue afterward under the applicable denominator. | The remaining account must generally be distributed by the end of the 10th calendar year following the earlier of the child's attainment of age 21 or the death of |

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| | | | the relevant minor-child beneficiaries. A child who was disabled or chronically ill as of the owner's death may continue to qualify as an EDB after age 21 if the applicable requirements are met. |
| EDB because the beneficiary is disabled or chronically ill | The disability or chronic illness must exist as of the owner's death. For an IRA, documentation generally need not be furnished to the IRA custodian, although the beneficiary should retain support for the classification. [3] | Life-expectancy distributions may continue during the disabled or chronically ill beneficiary's life. | After the death of the EDB, the remaining account generally must be distributed by the end of the 10th calendar year following that death. |
| EDB because the beneficiary is not more than 10 years younger than the owner | The beneficiary qualifies based on the dates of birth of the owner and beneficiary. [3] | Life-expectancy distributions generally begin by the end of the year following death unless the governing instrument or election instead applies the 10-year method. | If life-expectancy distributions were used and the EDB dies, the successor 10-year rule generally applies. |
| Beneficiary is an ineligible designated beneficiary (IDB)—a designated individual who is not an EDB | Because a Roth IRA owner is treated as dying before the owner's required beginning date, the 10-year rule generally applies without annual RMDs during years 1 through 9. [3] | No annual distribution is generally required before the final year under the regulation's 10-year-rule framework, although the beneficiary may withdraw amounts earlier. | The entire inherited Roth IRA must be distributed by the end of the calendar year containing the 10th anniversary of the owner's death. The beneficiary's subsequent death does not restart the 10-year period. |
| Beneficiary is a nondesignated beneficiary (NDB), such as the owner's estate or an ordinary charity | An entity is not a designated beneficiary. If the owner died before the required beginning date, the five-year rule applies. [3] | No annual RMD is generally required before the final year. | The entire account must be distributed by the end of the calendar year containing the fifth anniversary of the owner's death. |
| Multiple direct beneficiaries | Unless timely separate accounts are established, the oldest designated beneficiary generally controls the applicable life-expectancy denominator. A beneficiary who is an NDB can cause the account to be treated as having no designated beneficiary. [3] | Separate accounts can permit separate RMD methods only if established and separately accounted for by the end of the calendar year following the owner's death. | The applicable 5-year, 10-year, or successor 10-year deadline may apply to the entire account unless the separate-account requirements are satisfied. |

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| Trust beneficiary | A qualifying "see-through" trust may be analyzed by reference to its individual beneficiaries if it is valid under state law, irrevocable or becomes irrevocable at death, has identifiable beneficiaries, and satisfies the documentation requirements. A trust generally cannot be treated as separate accounts for each beneficiary unless its terms require immediate division into separate trusts at death and leave no discretion over allocation of post-death distributions. [3] | A conduit trust generally looks to beneficiaries who must receive plan distributions currently. An accumulation trust may also include residual beneficiaries who could receive accumulated Roth IRA distributions. | The deadline depends on the beneficiaries treated as designated beneficiaries. An applicable multi-beneficiary trust may receive life-expectancy distributions for disabled or chronically ill EDBs despite other IDB beneficiaries, but the successor 10-year rule generally applies after the death of the last qualifying disabled or chronically ill EDB. |

## Tax treatment of inherited Roth IRA distributions

- A distribution is a qualified Roth IRA distribution if it is made after age 59½, after the owner's death to a beneficiary or estate, because of disability, or for a qualified special purpose. However, the distribution generally must also occur after the five-taxable-year period beginning with the first year for which the owner or qualifying contributor made a Roth IRA contribution. [2]
- Qualified distributions are excluded from gross income. Nonqualified distributions generally follow Roth ordering rules: regular contributions are treated as distributed first, followed by qualified rollover or conversion contributions, and then earnings. [2]
- The 10-year rule is a distribution deadline, not necessarily a taxable-event rule. A final-year distribution from an inherited Roth IRA may be entirely tax-free if the applicable five-year qualified-distribution requirement has been satisfied. [2]

## Penalty and transition rules

- Section 4974 generally imposes a 25% excise tax on the shortfall—the amount by which the required distribution exceeds the amount actually distributed. The tax may be reduced to 10% if the shortfall is corrected and the required return is filed by the end of the statutory correction window, generally ending on the earliest of the notice-of-deficiency date, assessment date, or the last day of the second taxable year beginning after the taxable year of the shortfall. The IRS may waive the tax for reasonable error when reasonable corrective steps are being taken. [3]
- The final RMD regulations apply generally to distribution calendar years beginning on or after January 1, 2025. For earlier years, taxpayers generally apply the prior regulations together with a reasonable, good-faith interpretation of SECURE 1.0 and SECURE 2.0. [3]
- IRS transition relief eliminated the excise tax for certain missed annual distributions during 2021–2024 under the SECURE 10-year rules, but it did not extend the ultimate 10-year distribution deadline or require taxpayers to make up those waived annual distributions. [3]

## Important distinction

A Roth IRA is not the same as a designated Roth account in a 401(k), 403(b), or governmental 457(b) plan. SECURE 2.0 eliminated lifetime RMDs for designated Roth accounts beginning with taxable years after December 31, 2023, but beneficiaries of those accounts remain subject to post-death RMD rules. Roth IRAs already had the lifetime exemption under section 408A(c)(4). [3]

## Conclusion

For an original Roth IRA owner, no lifetime RMD is required. After death, an IDB generally has a 10-year payout period, an NDB generally has a five-year payout period, and an EDB may generally use life-expectancy distributions subject to a successor 10-year limitation. The beneficiary's classification, timely beneficiary cleanup or account separation, trust terms, and satisfaction of the Roth five-year rule determine the actual result.

## Cited Sources

1. Sec. 401 Qualified pension, profit-sharing, and stock bonus plans
2. Sec. 408A Roth IRAs
3. T.D. 10001