The Pension Digest

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ALSO IN THIS ISSUE –

Collin W. Fritz and Associates, Inc.,
"The Pension Specialists"

SIMPLE-IRA Summary Description — IRA Custodian Must Furnish by October 2014 for 2015

What are a financial institution's duties if it is the custodian or trustee of SIMPLE IRA funds? After a SIMPLE IRA has been established at an institution, it is the institution's duty to provide a Summary Description each year within a reasonable period of time before the employees' 60-day election period. CWF believes that providing the Summary Description 30 days prior to the election period would be considered "reasonable." The actual IRS wording is that the Summary Description must be provided "early enough so that the employer can meet its notice obligation." You will want to furnish the Summary Description to the employer in September or the first week of October. The employer is required to furnish the summary description before the employees' 60-day election period.

IRS Notice 98-4 provides the rules and procedures for SIMPLEs. This notice is reproduced in CWF's 2014 IRA Procedures Manual.

The Summary Description to be furnished by the SIMPLE IRA custodian/trustee to the sponsoring employer depends upon what form the employer used to establish the SIMPLE IRA plan.

As you are probably aware, the employer may complete either Form 5305-SIMPLE (where all employees'

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12/31/14 is RMD Deadline for 5-Year Rule if Death Occurred in 2008 or 2009

This article is a reminder to an IRA custodian to make sure that any nonspouse beneficiary using the 5-year RMD rule must close out an inherited IRA by December 31, 2014, if the IRA accountholder died in 2008 or 2009. If not closed, the beneficiary will owe the 50% tax on the balance as of December 31, 2014.

The IRS acknowledged in 2009 that the 5-year rule needed to be changed on account of the 2009 law waiving when the IRA owner had died during 2004-2008. The IRS ruled that 2009 would not be used to determine (i.e. it would be skipped) the end of the 5-year period for determining when the IRA had to be closed.

Illustration. Jane Doe died in May of 2008 at the age of 67. Her son, Mark, age 43 in 2008, had elected the 5-year rule as the beneficiary. The balance of Jane's IRA as of 12/31/05 had been $28,600. What rules applied to his situation and what options does he have?

2009 Any withdrawal amount permissible, but the year is not considered for purposes of the 5-year rule;
2010 Any withdrawal amount permissible
2011 Any withdrawal amount permissible
2012 Any withdrawal amount permissible
2013 Any withdrawal amount permissible
2014 Account must be closed by 12-31-14

The standard 5-year rule applies to the nonspouse beneficiary of an IRA accountholder who died on or after January 1, 2009. The inherited IRA must be closed by December 31 of the fifth year following the year of his or her passing. This is December 31 2014 if the person died in 2009.

HSA Owner's Duty to File IRS Form 8889

An HSA owner has a duty to file the Form 8889 (HSAs) in certain situations. There are special rules if a person has more than one HSA as discussed below.

A person uses the Form 8889 to determine various tax consequences relating to his or her HSA. The individual reports the contributions made to his or her HSA either by an employer or personally. The individual determines what amount he or she is able to claim as a tax deduction. The individual also reports to what extent, if any, the distributions are taxable and whether or not any amount must be included in income because he or she did not remain an eligible individual during a testing period.

A person must file Form 8889 if any of the following applies:

1. Contributions were made to the person's HSA for the year. These contributions could have been made by the individual, the individual's employer or another person or entity. Note: the Form 8889 must be filed even if it was only the employer who made any contributions.
2. Distributions were made from the person's HSA during the year.
3. The individual failed to remain an eligible individual and so must include certain amounts in income.
4. The individual acquired an interest in the HSA because he or she had been designated as a beneficiary and the HSA owner died.

The duty to prepare and file the Form 8889 applies even if the individual (and spouse, if married) is not required to file Form 1040 or Form 1040-NR. In this situation, the individual must prepare and file both the Form 8889 and the Form 1040/Form 1040-NR. A form 8889 must be filed for each HSA.

Example #1. An individual is the HSA owner of two or more HSAs, then he or she must complete a separate Form 8889 for each HSA.

Example #2. An individual is the beneficiary of two or more HSAs, then he or she must complete a separate Form 8889 for each HSA.

Example #3. An individual is the beneficiary of an HSA and he or she has his or her own HSA, then he or she must complete a separate Form 8889 for each HSA.

Example #4. An individual is married and has his or her own HSA and so does the spouse. A separate Form 8889 must be prepared for each spouse and each HSA.

The IRS instructions then require an individual to consolidate the multiple 8889 forms as follows. Enter "statement" at the top of each Form 8889 and complete the form as instructed. Next, complete a controlling Form 8889 combining the amounts shown on each of the statement Forms 8889. The individual is then to attach the statements to his or her tax return after completing the controlling Form 8889.

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Form **8889**

Department of the Treasury
Internal Revenue Service

Health Savings Accounts (HSAs)

► Information about Form 8889 and its separate instructions is available at *www.irs.gov/form8889*.
► Attach to Form 1040 or Form 1040NR.

OMB No. 1545-0074
2014
Attachment Sequence No. 53

Name(s) shown on Form 1040 or Form 1040NR | Social security number of HSA beneficiary. If both spouses have HSAs, see instructions ►

Before you begin: Complete Form 8853, Archer MSAs and Long-Term Care Insurance Contracts, if required.

Part I **HSA Contributions and Deduction.** See the instructions before completing this part. If you are filing jointly and both you and your spouse each have separate HSAs, complete a separate Part I for each spouse.

1	Check the box to indicate your coverage under a high-deductible health plan (HDHP) during 2014 (see instructions) ► ☐ Self-only ☐ Family		
2	HSA contributions you made for 2014 (or those made on your behalf), including those made from January 1, 2015, through April 15, 2015, that were for 2014. **Do not** include employer contributions, contributions through a cafeteria plan, or rollovers (see instructions)	**2**	
3	If you were under age 55 at the end of 2014, and on the first day of **every** month during 2014, you were, or were considered, an eligible individual with the **same** coverage, enter $3,300 ($6,550 for family coverage). **All others,** see the instructions for the amount to enter	**3**	
4	Enter the amount you and your employer contributed to your Archer MSAs for 2014 from Form 8853, lines 1 and 2. If you or your spouse had family coverage under an HDHP at any time during 2014, also include any amount contributed to your spouse's Archer MSAs	**4**	
5	Subtract line 4 from line 3. If zero or less, enter -0-	**5**	
6	Enter the amount from line 5. But if you and your spouse each have separate HSAs and had family coverage under an HDHP at any time during 2014, see the instructions for the amount to enter	**6**	
7	If you were age 55 or older at the end of 2014, married, and you or your spouse had family coverage under an HDHP at any time during 2014, enter your additional contribution amount (see instructions)	**7**	
8	Add lines 6 and 7	**8**	
9	Employer contributions made to your HSAs for 2014	**9**		
10	Qualified HSA funding distributions	**10**		
11	Add lines 9 and 10	**11**	
12	Subtract line 11 from line 8. If zero or less, enter -0-	**12**	
13	**HSA deduction.** Enter the **smaller** of line 2 or line 12 here and on Form 1040, line 25, or Form 1040NR, line 25	**13**	

Caution: *If line 2 is more than line 13, you may have to pay an additional tax (see instructions).*

Part II **HSA Distributions.** If you are filing jointly and both you and your spouse each have separate HSAs, complete a separate Part II for each spouse.

14a	Total distributions you received in 2014 from all HSAs (see instructions)	**14a**	
b	Distributions included on line 14a that you rolled over to another HSA. Also include any excess contributions (and the earnings on those excess contributions) included on line 14a that were withdrawn by the due date of your return (see instructions)	**14b**	
c	Subtract line 14b from line 14a	**14c**	
15	Qualified medical expenses paid using HSA distributions (see instructions)	**15**	
16	**Taxable HSA distributions.** Subtract line 15 from line 14c. If zero or less, enter -0-. Also, include this amount in the total on Form 1040, line 21, or Form 1040NR, line 21. On the dotted line next to line 21, enter "HSA" and the amount	**16**	
17a	If any of the distributions included on line 16 meet any of the **Exceptions to the Additional 20% Tax** (see instructions), check here ► ☐		
b	**Additional 20% tax** (see instructions). Enter 20% (.20) of the distributions included on line 16 that are subject to the additional 20% tax. Also include this amount in the total on Form 1040, line 62, or Form 1040NR, line 60. On the dotted line next to Form 1040, line 62, or Form 1040NR, line 60, enter "HSA" and the amount	**17b**	

Part III **Income and Additional Tax for Failure To Maintain HDHP Coverage.** See the instructions before completing this part. If you are filing jointly and both you and your spouse each have separate HSAs, complete a separate Part III for each spouse.

18	Last-month rule	**18**	
19	Qualified HSA funding distribution	**19**	
20	**Total income.** Add lines 18 and 19. Include this amount on Form 1040, line 21, or Form 1040NR, line 21. On the dotted line next to Form 1040, line 21, or Form 1040NR, line 21, enter "HSA" and the amount	**20**	
21	**Additional tax.** Multiply line 20 by 10% (.10). Include this amount in the total on Form 1040, line 62, or Form 1040NR, line 60. On the dotted line next to Form 1040, line 62, or Form 1040NR, line 60, enter "HDHP" and the amount	**21**	

SIMPLE-IRA,
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SIMPLE IRAs are established at the same employer-designated financial institution) or Form 5304-SIMPLE (where the employer allows the employees to establish the SIMPLE IRA at the financial institution of his or her choice).

There will be one Summary Description if the employer has used the 5305-SIMPLE form. There will be another Summary Description if the employer has used the 5304-SIMPLE form. If you are a user of CWF forms, these forms will be Form 918-A and 918-B.

The general rule is that the SIMPLE IRA custodian/trustee is required to furnish the summary description to the employer. This Summary Description will only be partially completed. The employer will be required to complete it and then furnish it to his employees. The employer needs to indicate for the upcoming 2015 year the rate of its matching contribution or that it will be making the non-elective contribution equal to 2% of compensation.

However, in the situation where the employer has completed the Form 5304-SIMPLE, the IRS understands that many times the SIMPLE IRA custodian/trustee will have a minimal relationship with the employer. It may well be that only one employee of the employer establishes a SIMPLE IRA with a financial institution. In this situation, the IRS allows the financial institution to comply with the Summary Description rules by using an alternative method.

To comply with the alternative method, the SIMPLE IRA custodian/trustee is to furnish the individual SIMPLE IRA accountholder the following:

✓ A current 5304-SIMPLE — this could be filled out by the employer, or it could be the blank form
✓ Instructions for the 5304-SIMPLE
✓ Information for completing Article VI (Procedures for withdrawal) (You will need to provide a memo explaining these procedures.)
✓ The financial institution's name and address.

Obviously, if an institution provides the employee with a blank form, he/she will need to have the employer complete it, and, the employee may well need to remind the employer that it needs to provide the form to all eligible employees.

CWF has created a form which covers the "alternative" approach of the Summary Description being provided directly to an employee.

The penalty for not furnishing the Summary Description is $50 per day.

Special Rule for a "transfer" SIMPLE IRA.

There is also what is termed a "transfer" SIMPLE IRA. If your institution has accepted a transfer SIMPLE IRA, and there have been no current employer contributions, then there is no duty to furnish the Summary Description.

However, if there is the expectation that future contributions will be made to this transfer SIMPLE IRA, then the institution will have the duty to furnish the Summary Description.

Reminder of Additional Reporting Requirements

The custodian/trustee must provide each SIMPLE IRA account holder with a statement by January 31, 2015, showing the account balance as of December 31, 2014, (this is the same as for the traditional IRA), and include the activity in the account during the calendar year (this is not required for a traditional IRA). There is a $50 per day fine for failure to furnish this statement (with a traditional IRA, it would be a flat $50 fee). ◆

Is it Still Possible to Establish a SIMPLE-IRA Plan for 2014?

Yes, if the sponsoring business has never sponsored a SIMPLE-IRA Plan before and if the business has not made any contributions for 2014 to another type of retirement plan (e.g. profit sharing plan or SEP).

A person or business can set up a SIMPLE-IRA plan effective on any date between January 1 and October 1 of a year, provided it did not previously maintain a SIMPLE-IRA plan. This requirement does not apply if there is a new employer that comes into existence after October 1 of the year the SIMPLE-IRA plan is set up and you set up a SIMPLE-IRA plan as soon as administratively feasible after you come into existence. If it previously maintained a SIMPLE-IRA Plan, it can set up a SIMPLE-IRA plan effective only on January 1 of a year. A SIMPLE-IRA plan cannot have an effective date that is before the date you actually adopt the plan.

Why Does an IRA Accountholder Want to do a Qualified HSA Funding Distribution?

IRA → HSA

The tax benefit is great. A person is able to convert taxable money into non-taxable money. Who would not want to do this?

The federal income tax laws authorize an IRA accountholder to move IRA funds to an HSA on a tax-free basis. IRA funds are generally taxable when distributed. In 2014 it is permissible for an IRA accountholder, age 58, who also has family HDHP coverage and is otherwise eligible to make an annual HSA contribution, to move $7,550 from his or her IRA to an HSA. There is no taxation when this is done. If the individual then withdraws funds from the HSA to pay qualified medical expenses, that distribution too is tax-free.

What guidance has the IRS issued on Qualified HSA Funding Distributions? The IRS issued Notice 2008-51 in June of 2008. The following rules apply to HSA funding distributions.

1. This tax-free transfer counts against the individual's maximum annual HSA contribution for the tax year of the transfer/distribution. Thus, if the IRA distribution takes place in 2014, then the 2014 HSA contribution limit applies. The fact that this tax-free transfer counts against the contribution limit does not mean that the individual is able to claim a tax deduction for the transfer amount. He or she cannot. To allow a tax deduction, would be to allow a second tax benefit in addition to the tax-free treatment. This Notice makes clear that the maximum contribution amount includes any catch-up amount, if applicable. For example, in 2014, an IRA owner who is an eligible individual with family HDHP coverage at the time of the distribution and who is age 55 or over by the end of the year is allowed a qualified HSA funding distribution of $7,550 for 2014 ($6,550 plus $1,000). An IRA owner who is an eligible individual with self-only HDHP coverage, and who is age 55 or over December 31, 2014 is allowed a qualified HSA funding distribution of $4,300 for 2014 ($3,300 + $1,000).

   The maximum amount which can be transferred tax-free is determined at the time of the transfer and not later in the year. A person who is covered under a HDHP in March of 2014 may transfer from an IRA to an HSA in March the "family" amount even though later in 2014 he switches to a "single" HDHP. The IRS has concluded that there will be no penalty for switching to the "single" coverage. The person is still allowed the benefit of transferring the family amount.

2. This tax-free transfer (qualified HSA funding distribution) is a type of contribution. However, it is more like a rollover contribution than an annual contribution even though it counts against the annual contribution limit. Therefore, the IRS has concluded that the contribution relates to the tax year in which the transfer is actually made and that a person cannot use the special rule that a contribution is timely if made before the deadline for filing the individual's federal income tax return because the contribution is deemed made on the last day of the preceding tax year. That is, an individual cannot during the carryback period (January 1 to April 15) designate this special transfer as being for the prior tax year.

3. The transaction will be tax-free only if it is done by a direct transfer (i.e. HSA custodian to HSA custodian). As with the tax-free charitable distribution which can be accomplished only by a direct transfer, the IRS has determined that as long as the check is made payable to the HSA custodian or

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trustee, then the check may be given to the individual who then delivers the check to the HSA custodian or trustee.

4. A person is allowed only one tax-free transfer HSA funding distribution during his or her lifetime. One means one. Therefore, if a person has two or more IRAs and wants to use amounts in multiple IRAs to make the tax-free transfer, if eligible, the individual must first make an IRA to IRA or Roth IRA to Roth IRA transfer of the amounts to be distributed into a single IRA, and then make the one tax-free transfer. The IRS points out that a person who has both a traditional IRA and a Roth IRA will only be able to do the transfer from one or the other IRA.
5. There is the one special situation where the law expressly authorizes two tax-free transfers. An individual who makes a tax-free transfer from his traditional IRA or Roth IRA to his HSA while he is covered under a self-only HDHP is permitted a second tax-free transfer if later in the same tax year he acquires family HDHP coverage. Both such transfers will count against the contribution limit for the year. Each such transfer will have its own testing period for recapture tax purposes. Set forth below is IRS Example #4. Example 4. Individual C, age 38, enrolls in self only HDHP coverage on January 1, 2014, is otherwise an eligible individual on January 1, and remains an eligible individual through December 31, 2015. C owns an IRA with a balance of $12,550. A qualified HSA funding distribution of $3,300 is made from C's IRA trustee directly to C's HSA trustee on June 4, 2014. On August 1, C enrolls in family HDHP coverage. A transfer of $3,250 is made from C's IRA trustee directly to C's HSA trustee on August 15, 2014. The $3,300 and $3,250 distributions are qualified HSA funding distributions. The distributions from the IRA are not included in C's gross income and are not subject to the additional tax under §72(t). The qualified HSA funding distributions of $6,550 ($3,300 + $3,250) equal C's 2014 maximum annual HSA contribution. C's testing period for the first qualified HSA funding distribution begins in June 2014 and ends on June 30, 2015 and the testing period for the second qualified HSA funding distribution begins in August 2014 and ends on August 31, 2015.
6. An inheriting IRA beneficiary has the right to make a tax-free transfer of his or her inherited IRA interest to his or her own HSA. It is certainly not clear that Congress intended to allow a beneficiary to make a tax-free transfer from a decedent's IRA to his or her own HSA, but the IRS has authorized such a transfer in this Notice. And it gets better. When a beneficiary transfers funds from his or her inherited IRA to an HSA, such a transfer will count to satisfy his or her IRA required distribution from the inherited IRA.
7. The IRS has adopted an approach allowing any traditional IRA and/or Roth IRA funds to be transferred to an HSA, including non-taxable basis. However, if a person chooses to transfer his or her basis from either a traditional IRA and/or Roth IRA, the individual will not be able to carry over this basis to his or her HSA. The IRS has adopted the position that the general HSA distribution rule will be applied even if a person has transferred IRA basis into his or her HSA. Example – an individual transfers $3,000 of nontaxable Roth IRA contributions and then later withdraws the $3,000 from the HSA and uses it for non-medical reasons. The individual will owe income tax on the $3,000 and also owe the 20% tax, if applicable.
8. Under current IRS reporting rules, the IRA custodian will report the IRA distribution as it reports any other IRA distribution. It will be reported as being taxable; it will be up to the individual to complete his or her tax return to show it as being nontaxable. The contribution made to the HSA is reported as an annual contribution.
9. A person who has established a substantially equal periodic payment schedule with respect to his or her IRA is eligible to make a tax-free transfer to his or her HSA. The amount transferred will not be taxed and will not be subject to the 20% additional tax. However, a determination will need to be made whether or not the

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qualified HSA funding distribution results in an impermissible modification. If there is an impermissible modification, then the recapture tax of Code section 72 applies.

10. A literal reading of the law is that this type of tax-free transfer may not be made from a SEP-IRA or SIMPLE-IRA to an HSA. As with the tax-free charitable distributions, the IRS played word games and changed the rule to be – a person will be able to take funds from their SEP-IRA or SIMPLE-IRA and transfer them to their HSA as long as such SEP or SIMPLE is not an "on-going" plan. That is, the transfer is permissible as long as the employer has not made an employer contribution for the plan year ending with or within the SEP-IRA or SIMPLE IRA owner's tax year.
11. The traditional or Roth IRA custodian or trustee is allowed to rely upon the instructions of the IRA owner that he or she qualifies to do this tax-free transfer as long as such representations are reasonable. CWF Form #66-HSA obtains this reasonable representation. Being a tax-free transfer, the IRS has ruled that the withholding rules do not apply because the IRA accountholder is deemed to have elected out of withholding.
12. The IRS has expressly stated that an employer has no responsibility to report whether an employee remains an eligible individual during a testing period. The IRS is silent as to whether or not the HSA custodian or trustee has any duty to do any special reporting regarding testing periods.

Employers and Payroll Deduction Plans or Services

A financial institution may wish to to inform its business clients it is willing to assist with IRA contributions arising from payroll deductions.

Everyone should be saving more and IRAs are an excellent savings tool. Too many think that because he or she is participating in a 401(k) that there is no benefit to make an IRA contribution. But there is and more individuals should make periodic IRA contributions.

An employer may agree to assist one or more of its employees in making traditional IRA and/or Roth IRA contributions. That is, an employer agrees to send to an IRA custodian an individual's IRA contribution. For example, ABC corporation withholds $100 from Roberta's wages each payroll and transmits a check to First National Bank, to be deposited into Roberta's Roth IRA.

An employer most likely will make this service available to all employees who would wish to take advantage of the employer's offer to assist, but the employer could choose to perform this special service for only certain employees. An employer might require that the IRA contributions must be made with one selected financial institution.

Set forth below is the IRS summary on payroll deduction IRA services. The myRA is essentially a payroll deduction service.

Operating a Payroll Deduction IRA

What are the employer's administrative responsibilities?

- There is no annual filing or reporting requirement for a Payroll Deduction IRA.
- The employee's Form W-2 will not reflect the contributions and will indicate that the employee is not a participant in a retirement plan.
- No separate statements need to be provided to the employees.

Who is eligible for participation?

Any employee who performs services for your company is eligible to be included in a Payroll Deduction IRA. If you offer it to one employee, then you should offer it to everyone.

What are the contribution rules?

- Employees fund their own Payroll Deduction IRA through payroll withholding.
- Contributions to each employee's account are limited.
- After employers send Payroll Deduction IRA contributions to each financial institution, they have no further responsibility for the amounts contributed.

Investments:

- Each employee has the freedom to move their IRA assets from one IRA to another.
- The financial institutions selected will manage the funds.
- Payroll Deduction IRA contributions can be invested in stocks, mutual funds, money market funds, savings accounts and other similar types of investments.

What are the vesting rules?

Each employee is always 100% vested in (or has total ownership of) the contributions to their Payroll Deduction IRA.

Certification for One Lifetime Transfer of IRA Funds to an HSA

Custodian/Trustee Information

Custodian's Name ____________________
Address ____________________
City ____________________ State ___ Zip ________
Attn: ____________________ Phone ________

Purpose of Form

This form provides certification that a distribution from a traditional or Roth IRA is exempt from income tax, because the distribution meets the one lifetime transfer rules under the Health Opportunity Patient Empowerment Act of 2006. See the reverse side of this form for additional information. This one lifetime transfer is called a "qualified HSA funding distribution."

Note: This special contribution will be reported on IRS Form 8889 on line 10. This special transfer counts against the annual HSA contribution limit.

Accountholder Information

Name ____________________
Address ____________________
____
City ____________________ State ___ Zip ________
County ____________________ Date of Birth ________
Home Phone ____________________
SSN: ____________________ Plan # ________

Type of IRA: ❍ Traditional ❍ Roth ❍ Inherited Traditional ❍ Inherited Roth

Certification of Accountholder

I certify that I am an eligible individual for HSA contribution purposes;
I hereby instruct the above-named custodian of my IRA to send $____________ (not to exceed the applicable contribution amount for the applicable year) via a direct payment to the HSA custodian listed below. I understand that the check or electronic payment must be made out to the HSA custodian, and that such payment is only authorized to be made in tax years beginning after December 31, 2006. I accept the tax consequences for my instruction. I intend this transfer distribution will not be taxable to me. Because of the complexity of this transaction, and the tax issues associated with it, I acknowledge that it is recommended that I discuss this transaction with my tax advisor prior to requesting this distribution. I hereby instruct you that I do not want any withholding withheld from this distribution. I understand that the amount transferred under this special rule counts toward my allowed HSA contribution amount for the year in which the distribution occurs. The carryback contribution rule of Code section 223(d)(4)(B) does not apply to a qualified HSA funding distribution.

I understand that this IRA-to-HSA direct transfer may be made only once in my lifetime, and I certify that I have not previously made such a transfer. I understand this IRA-ta-HSA direct transfer is irrevocable.

Caveat: This form addresses the rules which apply for federal income tax purposes. This form does not address how such withdrawal will be treated for state income tax purposes.

Signature of
Accountholder ____________________ Date ________

Acknowledgment and Reliance by IRA Custodian/Trustee

Per your instruction, we will distribute funds from your IRA, via direct payment, to the HSA custodian listed below.

Signature of Remitting
Custodian/Trustee ____________________ Date ________

Certification of HSA Custodian

Name ____________________ Tax ID Number ________
Address ____________________
City ____________________ State ___ Zip ________
Phone ____________________ Fax ________
Contact Person ____________________

On behalf of the individual listed above, I accept this one lifetime HSA contribution (qualified HSA funding distribution).

Authorized Signature
of HSA Custodian ____________________ Date ________

