

Update from ASC Actuaries

A Publication of ASC | July 2025

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2026 Mortality Tables Update

IRS Notice 2025-40

On July 15th, 2025, the IRS published Notice 2025-40, issuing the mortality table for §IRC 417(e)(3) used to determine the minimum present value of certain accelerated retirement plan distributions. The §417(e)(3) table is referred to as the Applicable Mortality Table.

The notice also includes the 2026 Small Plan Static Combined Mortality Tables for plans with valuation dates in 2026. Under 1.430(h)(3)-1(C), plans with 500 or fewer total participants as of the plan's valuation date have the option to use Static Combined Mortality tables in the calculation of the PPA minimum contribution and maximum deduction under IRC 430(h)(3)(A).

IRS Final Regulations published on October 20, 2023, contain the generational mortality tables to be used in the calculation of the PPA minimum contribution and maximum deduction for valuations on or after January 1, 2024, for all plans, unless the plan is eligible and opts to use the Small Plan Static Combined Mortality tables.

Generational mortality tables combine the use of Base Mortality Tables and Mortality Improvement Rates (sometimes referred to as projection scales). The 2023 IRS Final Regulations published the Pri-2012 Base Mortality Tables and the 2024 Adjusted MP-2021 Rates for use with valuation dates on or after January 1, 2024.

ASC Resources

The 2026 Applicable Mortality Table and the 2026 Small Plan Static Combined Mortality Table published in Notice 2025-40 are available for download on the ASC website by logging into the <u>Client Support Center</u> and accessing the Updates & Downloads tab.

The IRS Pri-2012 Base Mortality Tables published in the October 20, 2023, Final Regulations were included in the 2024-2025 tables download packages and are expected to have been loaded to your ASC system already but are included in the 2026 tables download package as well.

The 2024 Adjusted MP-2021 Rates are available to users who are current on patches and does not require a manual download to apply to your system.

We recommend users also select to download and review the step-by-step instructions, the <u>Mortality Tables in ASC - A Comprehensive Guide.pdf</u>, which provides an overview of the tables available for download and how to load them to your ASC system.

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