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Don't Touch That Check: The 401(k) Decision That Can't Be Undone

Tax season is over. For a lot of people, so is the job.

Layoffs, early retirement packages, voluntary separations — *spring is when these decisions land*. And when they do, they almost always come with the same question: *What do I do with the money in my 401(k)?*

This may be the largest check you will ever see. And you may only get one chance to get it right.

The mistake often is not picking the wrong path. It is treating the decision like paperwork instead of a plan. You are not just moving money. You are locking in the rules that will govern how it is taxed, accessed, protected, and transferred for the rest of your life, and eventually govern the people you leave behind.

Six Options

When employment ends, you have six choices. Each one determines a different set of rules, protections, and tax consequences:

1. **Leave funds in the current employer plan.** This may preserve ERISA creditor protection and the age-55 penalty exception. The trade-offs are that you can lose flexibility and estate-planning coordination.
2. **Roll funds into a new employer's plan.** This consolidates accounts but resets the rules. The age-55 exception from your old plan disappears, and the new plan's rules now govern the account.
3. **Roll funds into a traditional IRA.** An IRA offers maximum flexibility: broader investments, qualified charitable distribution (QCD) eligibility, easier beneficiary updates. However, ERISA protection no longer applies, and creditor protection depends on state law.
4. **Convert directly to a Roth IRA.** You pay tax now to eliminate tax concerns forever. No lifetime required minimum distributions (RMDs), no future tax uncertainty. However, the tax bill arrives immediately, and you can't undo it.
5. **In-plan Roth conversion.** Some plans allow you to convert pretax dollars to Roth inside the plan. Worth checking before you move anything.
6. **Take a taxable distribution.** The entire balance becomes taxable income. If you are under age 55 (or under age 50 for qualified public safety employees), add a 10% penalty (unless you qualify for one of the penalty exceptions).



Summary of Key Points

Don't Touch That Check: The 401(k) Decision That Can't Be Undone

- Spring is peak season for 401(k) decisions. Layoffs, severance packages, and voluntary separations send retirees to make the largest rollover decision of their lives, often without enough information.
- Where the money lands determines everything. IRAs offer QCD eligibility, investment flexibility, and estate-planning coordination; employer plans may preserve ERISA creditor protection and the age-55 penalty exception.
- Employer stock with NUA must be evaluated before any rollover. Once rolled to an IRA, the long-term capital gains advantage is permanently and irrevocably lost.
- Mandatory 20% withholding on indirect rollovers and the once-per-year rollover rule are among the most common and most avoidable rollover mistakes. Direct rollover eliminates both risks entirely.

The Widow's Tax Trap: Why the Same Income Costs More After a Spouse Dies

- When a spouse dies, the tax bill does not pause for grief. The same income that felt comfortable for two can cost significantly more for one, and most surviving spouses discover this only after they file the first tax return alone.
- When a surviving spouse files as single, tax brackets compress, the standard deduction shrinks, and Medicare IRMAA thresholds drop, even when income is often largely unchanged.
- The year of death is the last year to file jointly. A Roth conversion in that year uses the wider married brackets one final time. Once that return is filed as single, the window is gone.
- Roth conversions done while both spouses are alive can be one of the greatest gifts to leave your spouse, reducing future RMDs, creating tax-free income the survivor draws without IRMAA impact, and helping eliminate the uncertainty of future tax rates.

One Dollar Over the Line: How Medicare Surcharges Work — And When to Ignore Them

- IRMAA is a cliff. Crossing the threshold by one dollar increases Medicare premiums for the entire year — *not just on the extra dollar.*
- The two-year lookback means today's income decisions appear in Medicare bills two years from now. To avoid IRMAA impact at age 65, complete large Roth conversions before age 63.
- Avoiding a Roth conversion to escape a one-year surcharge often creates a permanent, growing problem. Rising RMDs can push income over IRMAA thresholds every year in the future. One bad year is better than every year being bad.

Your Tax Return Answered Last Year's Questions. These Decide the Rest of Retirement.

- Taking only the RMD allows tax-deferred accounts to keep growing, increasing future forced distributions at rates and on a schedule that you do not control.
- Ed Slott's "Always" Rule: A guiding principle: Consider paying taxes at the lowest available rates, even before required, when it aligns with long-term planning goals.
- The sweet spot (the years between age 59½ and the first RMD) is the most valuable tax-planning window in retirement. Once RMDs begin, a floor is set and Roth conversion flexibility narrows significantly.
- Beneficiaries cannot convert an inherited traditional IRA to a Roth IRA. The only tax-free inheritance from a retirement account is built during the owner's lifetime.

Taking a taxable distribution may be a strong option to consider if you have highly appreciated company stock that qualifies for a net unrealized appreciation (NUA) distribution.

Why Many Retirees Choose an IRA

Rolling a company plan into an IRA is common and often appropriate, but it should not be automatic.

IRAs typically offer a broader investment universe, easier estate-

plan coordination, and the ability to name multiple beneficiaries with tailored percentages that can be updated as life changes. Qualified charitable distributions (QCDs), the most tax-efficient way to give to a charity, are available only from IRAs, not from any employer plans.

A QCD allows anyone age 70½ or older to donate directly from an IRA, satisfying an RMD without the amount appearing in adjusted gross income.

Traditional IRAs can also be aggregated for RMD purposes, meaning you can take the total amount from whichever single account makes the most sense. And if the employer plan holds after-tax contributions, special allocation rules allow those dollars to roll directly to a Roth IRA tax-free, while the pretax portion moves to a traditional IRA. That opportunity is easily missed without a careful review.

When Staying in the Plan Is Intentional

ERISA-governed employer plans offer strong federal creditor protection, widely considered the gold standard. IRA protection varies significantly by state law outside of federal bankruptcy proceedings.

If you separate from service during or after the year you turn age 55 (or the earlier of age 50 or 25 years of service for certain public safety employees), distributions from that employer plan may qualify for an exception to the 10% early-distribution penalty. That exception does not survive a rollover to an IRA. If you continue working past your required beginning date (RBD) and do not own more than 5% of the company, some plans allow you to delay RMDs under the still-working exception, an option IRAs do not offer.

Example 1: Kelly and Ryan leave the same job at age 55 with identical account balances. Kelly rolls immediately to an IRA without reviewing early-access rules. Ryan keeps funds in the employer plan to preserve the age-55 withdrawal exception. Two years later, Kelly pays a 10% penalty on withdrawals. Ryan does not.

Employer Stock: Evaluate Before You Move

If your 401(k) holds highly appreciated company stock, the NUA strategy requires analysis before any rollover. The cost basis of the stock is taxed as ordinary income in the year of a qualifying lump-sum distribution. The appreciation above that basis may later be taxed at long-term capital gains rates when sold — *a difference that can produce savings of tens or hundreds of thousands of dollars.*

Once employer stock is rolled into an IRA, the NUA opportunity is permanently lost. All future distributions will be taxed as ordinary income regardless of appreciation. The evaluation must happen before the rollover, not after.

Once employer stock is rolled into an IRA, the NUA opportunity is permanently lost.

The 20% Withholding Trap

When an eligible rollover is paid directly to you rather than directly transferred to a new custodian, the plan must withhold 20% for federal income taxes, by law. To complete a full rollover, you must deposit the entire original amount within 60 days, which means replacing the missing 20% with personal funds. If you do not, the withheld amount becomes taxable income.

A federal court case illustrates exactly how this plays out:

In *Carol Mulhern v. Federal Retirement Thrift Investment Board et al.*, a federal employee completed the required form to roll over her Thrift Savings Plan (TSP) to an IRA, but elected to have the check paid directly to her rather than it be transferred to the IRA.

The plan withheld 20% as required by law. She sued the plan, claiming it had wrongfully withheld her funds. She lost. Had she elected a direct rollover to the IRA custodian, the mandatory withholding would have been avoided entirely.

Many rollover mistakes are not planning errors. They are process errors. Once the 60-day window closes, there is often no clean fix.

The Once-Per-Year Rollover Rule

Another common mistake often overlooked inside the rollover rules that catches even experienced investors off guard is the once-per-year rollover rule. This prohibits more than one 60-day IRA-to-IRA (or Roth IRA-to-Roth IRA) rollover within any 12-month period, and the clock runs from the date you receive the distribution — *not the calendar year.* Violate it, and the second distribution becomes taxable income, a potential 10% penalty applies if you are under age 59½, and the deposit into the second IRA becomes an excess contribution requiring correction.

This rule was confirmed to apply across all of an individual's IRAs combined, not per-account, by the Tax Court in *Alvan L. Bobrow and Elisa S. Bobrow, Petitioners v. Commissioner of Internal Revenue, Respondent.* If you receive a distribution from any IRA and roll it over within 60 days, that uses your one allowance for the next 12 months.

Two important clarifications: First, the rule applies only to 60-day rollovers between IRAs. It does not apply to direct trustee-to-trustee transfers, which have no limit. It does not apply to rollovers from an employer plan to an IRA. And it does not apply to Roth conversions. Second, a "reverse rollover," moving IRA funds back into a qualifying employer plan, is also exempt from the rule.

Example 2: Retiree Donna receives a 60-day distribution from IRA #1 in January and rolls it over in February. In March, she receives a distribution from IRA #2 intending to do the same. Because fewer than 12 months have passed since the first distribution was received, the second distribution is taxable, regardless of intent.

If Donna puts the money back into IRA #2, the deposit into IRA #2 is an excess contribution subject to a 6% annual excise tax until corrected. The fix is simple: Use direct transfers. The once-per-year rule never applies.

What Employer Plans Offer That IRAs Cannot

The IRA v. employer plan decision is not simply about access or flexibility. Certain benefits are structurally available inside an employer plan that disappear the moment assets leave:

- **The still-working exception** allows certain employees past their required beginning date to delay RMDs while still employed.
- **ERISA creditor protection** provides federal-level shielding that many states cannot match in an IRA.

- **And the age-55 exception** for penalty-free early access exists only inside the employer plan where the separation occurred, not in a rollover IRA.

These decisions move quickly and rarely come with a second chance. Before signing any paperwork, it is worth a conversation with a financial advisor who specializes in retirement tax planning about your unique situation. The right guidance at this stage can mean the difference between a decision that works for decades and one you cannot undo. ■

Widow's Tax Trap: Why the Same Income Costs More After a Spouse Dies

Many surviving spouses describe a similar financial experience: The first tax return filed alone looks almost identical to the year before. The income is roughly the same. The portfolio has not changed. The house is still there. But the tax bill is thousands of dollars higher, and no one warned them the rules had changed.

An estimated \$54 trillion will pass to surviving spouses, mostly women, before it ever reaches the next generation. Widows outlive their husbands by an average of four to twelve years. Financial decisions made during a marriage, and the conversations that did *not* happen, follow the surviving spouse for decades.

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Most retirement plans are constructed around two people, the couple. Two Social Security checks. Two standard deductions.

Two sets of tax brackets absorbing the household's income. What few couples model is what happens when one of those names disappears from the return.

How the Tax Framework Narrows

In the year of a spouse's death, the surviving spouse can still file a joint return. After that, unless remarried, the filing status changes to single. That one administrative change alters the entire tax framework simultaneously.

Income tax brackets compress. Income that was comfortably in the 22% or 24% bracket under joint filing can be pushed into the 32% or 35% bracket. The standard deduction decreases, roughly cut in half, exposing more income to taxation. The 3.8% net investment income tax threshold drops from \$250,000 for married filers to \$200,000 for single filers. Medicare's income-related monthly adjustment amount (IRMAA) surcharges apply at lower income levels. Higher health care costs arrive even if total income has not materially changed.

The law has not changed. Only the filing status has.

Spending Needs Rarely Fall as Much as Expected

Many couples assume that when a spouse dies, income needs drop significantly, and therefore the tax picture improves. The reality is more complicated. Some costs do decline, but many do not. The mortgage or rent does not change. Property taxes, utilities, insurance, and home maintenance remain largely the same. Health care costs often increase.

Required minimum distributions (RMDs) from traditional retirement accounts still apply and may increase if the surviving spouse inherits additional IRA balances from the deceased. Life insurance proceeds, while income-tax-free, are typically reinvested and begin generating new taxable income almost immediately: interest, dividends, capital gains. The higher of the two Social Security checks remains, and if there is a pension, survivor benefits will vary. The difference needed to sustain income levels is then often drawn from taxable investment accounts.

The surviving spouse frequently ends up with a similar level of taxable income needs, now measured against a narrower tax framework. The result is higher effective tax rates on roughly the same dollars, for potentially a decade or more.

The Final Joint Return: A Window That Closes

One of the most overlooked planning windows is the year of a spouse's death as the last opportunity to file jointly and take advantage of wider brackets while they are available. The larger standard deduction still applies, and income thresholds are more generous.

For families navigating loss, tax planning may not feel urgent. But structurally, that year operates under rules that will not return. A Roth conversion completed during the final joint-filing year can use the wider married brackets at a lower effective rate than will be possible under single filing in subsequent years. Once that return is filed, the window is closed.

A Roth conversion completed during the final joint-filing year can use the wider married brackets at a lower effective rate than will be possible under single filing in subsequent years.

The Planning That Matters Most Happens Before

The most effective response to the widow's tax trap happens years before widowhood. Converting portions of traditional IRAs to Roth IRAs while both spouses are alive accomplishes several things at once, including locking in today's known tax rates, reducing the size of future RMDs, and creating

a pool of tax-free assets the surviving spouse can draw from without increasing taxable income.

Think of a Roth conversion as one of the most meaningful financial gifts one spouse can give the other. You pay a tax now that your surviving spouse would otherwise face later, possibly at higher rates, under a more compressed filing status, and without the flexibility to do anything about it.

A Roth IRA also carries no lifetime RMDs for a surviving spouse who rolls the inherited account into their own, giving the survivor flexibility a traditional IRA cannot match.

Why converting while both spouses are alive matters:

- ✓ Locks in today's known tax rates before filing status changes.
- ✓ Reduces future RMDs from the traditional IRA.
- ✓ Creates tax-free income the surviving spouse can draw without triggering IRMAA surcharges.
- ✓ No lifetime RMDs for a surviving spouse who rolls the inherited Roth into their own account.
- ✓ Removes the uncertainty of future tax rates.

What a Surviving Spouse Can Do

Grief and financial decisions rarely mix well, but the options available to a surviving spouse are time-sensitive. A surviving spouse has choices no other beneficiary has.

Surviving spouses can complete a spousal rollover — *moving inherited IRA funds into their own IRA, where the account is treated as their own*. They can treat the inherited IRA as their own immediately by electing ownership.

Or they can remain a beneficiary — *taking annual RMDs over their lifetime*. For a surviving spouse who is under age 59½ and may need immediate access to funds, remaining as the beneficiary is often the better choice as inherited IRAs are not subject to the 10% early-distribution penalty. Once that need is resolved, the spousal rollover can be completed.

Roth IRAs have a five-year rule: Earnings are only tax-free if at least five years have passed since the first contribution or conversion to any Roth IRA. When a surviving spouse rolls an inherited Roth IRA into the surviving spouse's own account, then the deceased spouse's five-year clock may be used, meaning if the deceased spouse had a Roth IRA open for five or more years, that requirement is already satisfied.

However, the surviving spouse cannot use the deceased spouse's age. If the surviving spouse is under age 59½ at the time of the rollover, earnings withdrawn could still be taxable and subject to penalty. Timing the rollover to coincide with reaching age 59½ resolves the issue entirely.

The Conversation That Changes Everything

Research from UBS and Thrivent finds that 56% of married women defer long-term financial decisions to their husbands, and 98% later say they wish they had been more involved. The financial consequences of that deferred engagement don't show up while both spouses are alive. They arrive later, quietly, in the form of a tax bill that did not have to be as large.

The planning that prevents the widow's tax trap is also the planning that makes the hardest year of a person's life a little less complicated. That conversation is worth having now, while there are still choices to make. ■

One Dollar Over the Line: How Medicare Surcharges Work — And When to Ignore Them

Most retirees understand tax brackets. What they are less prepared for is a different mechanism in the Tax Code where crossing a threshold by a single dollar does not just tax that dollar at a higher rate. It changes the treatment of an entire category of income for the full year.

These are income cliffs. And the most consequential one in retirement has nothing to do with income tax rates.

How IRMAA Works

The income-related monthly adjustment amount (IRMAA) is how Medicare charges higher premiums to higher-income enrollees. For 2026, the standard Part B premium applies to single filers with modified adjusted gross income (MAGI) of \$109,000 or less and married couples at \$218,000 or less. Earn one dollar more, and premiums for the entire year increase across the board, not just on the extra dollar.

At the highest income tier in 2026, the additional Part B cost is roughly \$487 per month per person, and the additional Part D cost is approximately \$91 per month. For a married couple, that can exceed \$13,872 in annual surcharges. The majority of Medicare enrollees have income below these thresholds and are never affected. For those who are, the surcharge needs to be measured against the full financial picture, not feared in isolation.

The Two-Year Echo

IRMAA is calculated using a two-year lookback. Your 2026 Medicare premiums are based on your 2024 income. A one-time event such as a large Roth conversion or the sale of an appreciated asset can

produce an echo that appears in Medicare bills two years later, long after the income that caused it is gone.

Form SSA-44 allows you to appeal IRMAA surcharges for qualifying life-changing events: retirement, marriage, divorce, or death of a spouse. A Roth conversion is not a qualifying event. The surcharge will stand.

Planning Opportunity: To avoid an IRMAA impact at age 65, consider completing large Roth conversions before age 63, so the income spike falls outside the two-year lookback period used to set initial Medicare premiums.

**"I'd rather have you be angry for one year than be angry for the rest of your life."
— Ed Slott, CPA
*The Great Retirement Debate, Season 4, Episode 4***

The Most Common Planning Error

Because cliffs feel abrupt, some retirees abandon otherwise sound strategies to avoid them. The most costly version involves Roth conversions when a retiree calculates that converting a portion of a traditional IRA would cross an IRMAA threshold, and the conversion is abandoned to avoid the visible surcharge.

Consider what happens instead: The traditional IRA keeps growing, RMDs increase over time, and those rising RMDs push income across IRMAA thresholds repeatedly, year after year rather than in a single controlled event. Avoiding a one-time surcharge can create a permanent one.

Precision Over Paralysis

If income is near a threshold, the most effective move is often deliberate: either reduce the conversion to stay clearly below the line, or move decisively above it as part of a longer-term plan. What tends to cause the most damage is unintentional drift, a distribution here, capital gains there, layered on top of required withdrawals, without recognizing how the pieces interact until the Medicare bill arrives two years later.

The most costly version involves Roth conversions when a retiree calculates that converting a portion of a traditional IRA would cross an IRMAA threshold, and the conversion is abandoned to avoid the visible surcharge.

IRMAA surcharges are part of the retirement income landscape. The goal is not necessarily to eliminate them, but rather to encounter them on your terms, not the IRS's. ■

*For a full conversation on navigating Medicare surcharges, Ed Slott and Jeffrey Levine discuss this topic in depth on their podcast, *The Great Retirement Debate, Season 4, Episode 4: "How Big of a Deal Are IRMAA Charges?"* Available for listening at greatretirementdebate.com and most major streaming platforms.*



Your Tax Return Answered Last Year's Questions. These Decide the Rest of Retirement.

You just filed your tax return. That return told you what happened last year — *how much you earned, how much you paid, whether you followed the rules*. What it did not determine is what will happen next.

Retirement tax problems rarely begin with a mistake on a tax return. They develop gradually, through account structure and income timing, over years of decisions that felt routine at the time. Filing season looks backward. Retirement planning must look forward.

Minimum Is Not a Strategy

The Tax Code is built around minimums: minimum required distributions, minimum withholding rules, minimum compliance standards. Most retirees follow those minimums taking the required amount, reporting the income, paying the tax, and moving on.

But minimum does not mean optimal. Taking only the required distribution each year allows traditional retirement accounts to keep growing, which increases future required distributions. Larger balances produce larger forced income. The IRS is effectively setting your income level — *not you*. And the income level the IRS sets tends to arrive after brackets have narrowed, after filing status has changed, and after the flexibility to do anything about it has passed.

Unused lower tax brackets are gone forever. They do not carry forward. They simply expire.

Ed Slott's "Always" Rule

Ed Slott's "Always" rule is a guiding principle: Consider paying taxes at the lowest available rates, even

before required, when it aligns with long-term planning goals. A 12% or 22% bracket not used today may become a 32% or 35% obligation on that same income later, when required distributions force it out on a schedule not of your choosing.

The years between age 59½ and your first RMD — *what Ed Slott calls the "sweet spot"* — are the most valuable planning window in retirement. Income often dips. Brackets are wide. The opportunity to convert at lower rates is greatest. Once required minimum distributions (RMDs) begin, a floor is established. Income must be taken whether needed or not, and that required amount cannot be converted to a Roth IRA. The flexibility that exists at age 62 does not exist at age 74.

The years between age 59½ and your first RMD — what Ed Slott calls the "sweet spot" — are the most valuable planning window in retirement.

The IRA Imbalance

For many retirement savers, the largest asset on the balance sheet is a traditional IRA or 401(k). That balance represents deferred income that will eventually be taxed. If the account continues to grow untouched, RMDs increase accordingly. As those distributions grow, they intersect with narrower filing brackets, IRMAA thresholds, and the life transitions discussed throughout this issue.

When that happens, the surprise is rarely the rule itself. The surprise is the size of the account and the damning recognition that the

years of *inaction* compounded the liability. Ignoring income timing in earlier years concentrates that liability later, when flexibility is limited and rates may be less favorable.

What This Means for the Next Generation

Retirement accounts do not disappear at death. They transfer. Under current law, most non-spouse beneficiaries must distribute inherited retirement accounts within ten years, often during their own peak earning years. A large pretax balance left untouched for decades does not eliminate the tax. It concentrates it into a compressed window for heirs who had no say in how it accumulated.

Beneficiaries cannot convert an inherited traditional IRA to a Roth. That option closes at the original owner's death. The only way to give heirs a tax-free inheritance from a retirement account is to do the work now, during your lifetime, while the choice is still yours to make.

After Tax Filing Season Has Ended

The tax return that you just completed answered last year's questions. The questions that shape the rest of your retirement are different:

- *How large will your RMDs become?*
- *How exposed will that income be if your filing status changes?*
- *How concentrated will taxes be for your heirs?*

The structure you build now determines how much of retirement runs on your terms and how much runs on the IRS's. ■

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Hypothetical examples are for illustration only. Assumes constant tax rates and a 6% annual return; actual results will vary. No guarantee of future outcomes.

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Minimum Thinking vs. Maximizing Retirement: How All These Decisions Connect

Every decision covered in this issue exists on a spectrum. *Minimum thinking* follows each rule as it appears. *Maximizing retirement* coordinates the rules across time. The table below reinforces how these two approaches play out across the topics in this issue.

	Minimum Thinking	Maximizing Retirement
401(k) Rollover	<ul style="list-style-type: none"> - Takes the check, does a 60-day rollover, or rolls everything to an IRA by default. - Misses employer stock NUA analysis. - Loses age-55 penalty exception 	<ul style="list-style-type: none"> + Evaluates all six options. + Reviews NUA on employer stock before moving. + Uses direct rollover to avoid 20% withholding. + Decides based on access, protection, and estate goals.
Surviving Spouse	<ul style="list-style-type: none"> - No Roth conversions during marriage. - Surviving spouse faces compressed brackets, higher IRMAA, and a large traditional IRA with rising RMDs. - Final joint return goes unused. - Discovers the tax increase on the first solo return, no plan in place to cushion it. 	<ul style="list-style-type: none"> + Converts while both spouses are alive. + Uses final joint return for one last conversion at married filing joint rates. + Surviving spouse draws from Roth IRA tax-free without IRMAA impact. + Filing status change was already accounted for proactively.
Surcharges	<ul style="list-style-type: none"> - Avoids Roth conversions to prevent a one-year IRMAA surcharge. - Traditional IRA keeps growing. - Rising RMDs push income over thresholds every year for the rest of retirement. 	<ul style="list-style-type: none"> + Accepts a controlled one-year surcharge to reduce the IRA balance permanently. + Completes large conversions before age 63 to avoid IRMAA at age 65 entirely.
Distributions	<ul style="list-style-type: none"> - Takes only what is required, - RMDs increase over time. - Lower brackets in the sweet spot go unused. - Heirs receive a large taxable IRA with a 10-year distribution window. 	<ul style="list-style-type: none"> + Fills lower brackets in the sweet spot. + Converts proactively before RMDs begin. + Heirs receive tax-free Roth assets. + The "Always Rule" governs: Pay at the lowest rate available.

Sources: IRS.gov, SSA.gov, CMS.gov, Setting Every Community Up for Retirement Enhancement (SECURE) Act (2019), SECURE 2.0 (2022), One Big Beautiful Bill Act (OBBA) (2025), Cerulli Associates 2024 Wealth Transfer Report; UBS "Own Your Worth" Study; Thrivent 2024 Widows Survey; CDC life expectancy data; CMS 2026 Medicare Part B and Part D premium schedules; IRS Revenue Procedure 2025-28 (2026 inflation adjustments); Bobrow v. Commissioner, T.C. Memo. 2014-21 (once-per-year IRA rollover rule); Mulhern v. Thrift Savings Plan Board, No. 2:17-cv-00094 (E.D. Pa. 2019) (20% mandatory withholding); ERISA; IRS Publication 590-A.

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