PUBLIC SUBMISSION

Received: August 12, 2023 Tracking No. 118-91wl-ue4q

Comments Due: October 10, 2023

Submission Type: API

Docket: EBSA-2023-0011

Request for Information—SECURE 2.0 Reporting and Disclosure

Comment On: EBSA-2023-0011-0001

Request for Information: SECURE 2.0 Reporting and Disclosure

Document: EBSA-2023-0011-DRAFT-0001

Comment 00001 Schiller 08122023

Submitter Information

Name: Margery Schiller

General Comment

I continue to be very disappointed in the forced complexity of SECURE 1.0 and 2.0. It would make more sense to simplify this law as follows:

- 1. Continue the RMD rules applied to the original owner of the retirement account for all beneficiaries of that account. Heirs would then continue RMD for those accounts already subject to payout regardless of the age of the heir.
- 2. Consider making the only exception to that rule to allow spouses to merge the inherited retirement account into their own IRA. (Optional)

I suspect if the income taxes to be collected under this revision would likely be similar to those collected under SECURE especially with the longevity of individuals continuing to grow to 100+.