Study Two scoring rubric

How SimpleRMD scored 185 RMD pages from 30 financial institutions. Pages captured September 26 – October 28, 2026; re-checked November 13, 2026.

The four rules

Each page was scored against the law in effect on its capture date.

Rule	Current answer	Source
Start age	73 if born 1951–1959; 75 if born 1960 or later	IRC §401(a)(9)(C)(v); SECURE 2.0 §107
Missed-RMD penalty	25%, or 10% if corrected within the correction window	IRC §4974(a), (e); SECURE 2.0 §302
Inherited IRA, owner died on or after the required beginning date	Annual RMDs in years 1–9; account empty by the end of year 10	Treas. Reg. §1.401(a)(9)-5(d) (July 2024)
Qualified charitable distribution (QCD) limit, 2026	$111,000 per IRA owner	IRC §408(d)(8) as amended by SECURE 2.0 §307

Status (one per page)

Status	Meaning	Counted in rates?
Current	States at least one rule correctly and nothing wrong.	Yes
Incomplete	Says 73 with no mention of 75 for people born 1960 or later. Not wrong today.	Yes, not in the headline
Wrong	States a superseded rule as current: start age 72 or 70½, a 50% penalty, or a $100,000 or $108,000 QCD limit in the present tense.	Yes
Stale document	A dated PDF or notice from 2016–2021 that is still posted and states an old rule. Its date is visible.	Yes, reported separately from wrong
Outdated figure	Gives an earlier year's QCD limit, labeled with that year, and no 2026 figure.	Yes

No rule stated / removed / blocked / off-topic	The page states none of the four rules, was gone, would not load, or was not about RMDs.	No

Sample and checking

- **Sample:** 30 institutions chosen before any page was read: the 20 that host the calculators tested in Study One, plus 10 large recordkeepers and broker-dealers. 124 of their 185 pages stated at least one rule; all rates use those 124.
- **Pages found by DFX Intelligence** (10 pages, 10 organizations) were found because they were out of date, so they are listed in the data file but never included in any rate.
- **Capture:** each page saved as a dated screenshot plus full text. Pages behind a bot wall were captured again by hand.
- **Second check:** every page scored wrong, stale or outdated was checked again by a person against the saved copy and the live page, with the exact sentence recorded. Where the same page also stated the correct rule elsewhere, that is noted.
- **Notice:** every institution with a flagged page was told on October 30, 2026 and given until November 12 to respond. Pages were re-checked November 13; the result is in the data file's "Recheck" columns.
- **Corrections before publication:** three pages were rescored on November 13 after a full re-read (see the "Scoring note" column).

Disclosure: SimpleRMD makes an RMD calculation and tracking tool and has a commercial interest in this subject. Data file: simplermd_study-two_all-pages_2026-11-17.csv. Questions: trigg@simplermd.com