

Enhancements

Narratives revised to handle QCD to CGA, CRAT, and CRUT

Provisions included in the Consolidated Appropriations Act, 2023 that passed in late December 2022 allow a donor to make a qualified charitable distribution (QCD) to fund a gift annuity, charitable remainder annuity trust, or charitable remainder unitrust. All narratives have been updated with a QCD option that affects the text of the narrative as needed. The narratives that include a QCD option are listed below along with their QCD-related narrative follow-up questions:

Narrative	QCD follow-up question #1	QCD follow-up question #2
Proposal Letter	Show example of QCD from an IRA?	Not applicable.
Acknowledgement Letter	Is the letter acknowledging a QCD from an IRA?	Not applicable.
Gift Information Summary	Was the gift funded with a QCD from an IRA?	Not applicable.
Gift Annuity Agreement*	Create agreement for a QCD from an IRA?	If NJ/WA agreement: Month/year QCD agreement was submitted to [NJ/WA] for approval
Gift Annuity Disclosure Statement	Not applicable. QCD info always included.	Not applicable.
Description and/or Example	Include QCD info in CGA and CRT descriptions?	Show example of QCD from an IRA?
Long Description and/or Example	Include QCD info in CGA and CRT descriptions?	Show example of QCD from an IRA?
Comparative Description	Include QCD info in CGA and CRT descriptions?	Show example of QCD from an IRA?

To choose the QCD option for any of these narratives, choose the narrative, then choose “Yes” to the follow-up question regarding a QCD from an IRA. Error messages will appear when you choose a gift term, gift option, or property type incompatible with choosing a QCD. For deduction and annuity taxation calculations to be correct for a QCD, set *Property type* = *Ordinary income property* and *Cost basis* = 0 in the gift option follow-up window.

The above is an interim solution. A more comprehensive solution for illustrating QCDs will be included in the *PGM Anywhere* release planned for this spring.

- Before issuing a gift annuity agreement to a QCD donor in a state that requires your agreements to be on file, you should submit and receive approval of the QCD forms of agreement you intend to use. Also, we have revised the Gift Annuity Agreement for a QCD in the ways we think are sensible. It is possible future guidance from the IRS or state regulators* will cause us to revise the agreement text for a QCD. For example, the QCD legislation states that the annuity must be non-assignable, so we have written the QCD agreement that way. It is possible that guidance from the IRS or state regulators will clarify that the annuity must be non-assignable, except that it can be assigned to the issuing charity.

Annuity agreement forms must be submitted for review and approval in these states: Alabama, Arkansas, California, Maryland, North Dakota, New Jersey, New York, Tennessee, and Washington.

* On 3/29/2023, we updated the gift annuity agreement narrative to reflect guidance from New York regulators regarding the agreement language they require for gift annuities funded by QCD.

Online Help updated to reflect all changes

We have updated *PGM Anywhere's* Online Help to reflect all changes in this release. These changes include a topic that explains the new Legacy IRA Act provisions: see [Table of Contents > Reference Information > Tax Rulings > Tax Act Overviews > Legacy IRA Act provisions effective 1/1/2023](#).

Bug Fixes

Password security setting no longer enforced when *PGM Anywhere* configured to use SSO

When a user's *PGM Anywhere* account was configured to use Single Sign-On (SSO), the application was still enforcing the security setting for "Enforce password change after how many days?" Since SSO enables logging into *PGM Anywhere* without entering a *PGM Anywhere* password, enforcing this setting caused SSO users to be locked out of the application and not be able to reset their password to get back in. This setting is no longer enforced for *PGM Anywhere* users configured to use SSO. Other security settings, such as "Number of inactive days since login before locking an Account," are still enforced when SSO is active.