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# SPECIAL REPORT:
# SAME-SEX MARRIAGE DECISIONS BY THE SUPREME COURT OPEN DOORS FOR TAX PLANNING AND BENEFITS


Finally, practitioners have the clear guidance they need to help with various types of tax and financial planning for same-sex couples. Over the past two years, the U.S. Supreme Court has ruled on two important cases involving same-sex marriage — Windsor[1] and Obergefell[2]. These decisions provide clarity for same-sex couples caught between different state and federal tax rules. After the Windsor ruling, the IRS and DOL also provided guidance on how same-sex marriage will be handled for income tax and employee benefits purposes. This report summarizes that guidance and suggests ways that same-sex couples can benefit from these changes in the areas of federal and state income taxes; qualified retirement plans; social security and estate, trust and gift taxes.

## BACKGROUND

Prior to the Windsor and Obergefell decisions, for federal tax and ERISA as well as most state purposes, "marriage" meant only a union between a man and a woman and "spouse" referred only to a person of the opposite sex who is a husband or wife. For federal purposes, these definitions were codified in Section 3 of the Defense of Marriage Act (DOMA).

### Windsor Decision

On June 26, 2013, the Supreme Court ruled that Section 3 of DOMA was unconstitutional in limiting federal recognition of marriage to be only between a man and a woman. The Court ruled that the federal government's failure to recognize the marriage that was legally valid under state law (i.e., New York) was a violation of an individual's rights to due process and equal protection under the Fifth Amendment of the U.S. Constitution. Section 2 of DOMA (the "Full Faith and Credit Statute"), which provides that no state is required to recognize same-sex marriages from other states, was not impacted by the Windsor decision.

### Agency Guidance

In response to Windsor, on September 16, 2013, the IRS issued Rev. Rul. 2013-17, holding that a same-sex couple married in a jurisdiction that recognizes their marriage (place of celebration rule) would be considered married for federal tax purposes, even if they actually lived in a state that does not recognize the marriage. The IRS does not recognize domestic partnerships or similar unions that are not denominated as marriage. The DOL issued Technical Release 2013-14 to provide guidance on the implications of the Windsor decision on employee benefits plans and ERISA that generally tracked the IRS guidance in Rev. Rul. 2013-17. In February 2015, the DOL finalized regulations to update the regulatory definition of "spouse" under the FMLA. These final regulations also adopted the place of celebration rule for FMLA purposes.

1 U.S. v. Windsor, 111 AFTR 2d 2013-2385, 133 S. Ct. 2675, S. Ct. 2013
2 Obergefell v. Hodges, 135 S. Ct. 2584, 115 AFTR 2d 2015-2309 (S. Ct. 2015).

### Obergefell Decision

On June 26, 2015, the Supreme Court in Obergefell ruled that same-sex marriage must be recognized in all states and that it is unlawful for a state not to recognize a same-sex marriage performed in another state. The Court concluded that the right to marry is a fundamental right under the Due Process and Equal Protection Clauses of the Fourteenth Amendment. The Court noted in its decision that the tax benefits and other state benefits that marriage confers upon spouses, such as health insurance, workers' compensation and child support should not be denied to same-sex couples.

Although Obergefell is not a tax case, it certainly impacts the tax treatment of same-sex married couples. The remainder of this report discusses the employee benefits, estate planning and financial planning implications that these recent Supreme Court decisions and the agency guidance have on same-sex married couples.

## IMPACT ON FEDERAL AND STATE INCOME TAXES

Since the Windsor decision, all same-sex couples legally married under state law must file as married for federal income tax purposes, starting with the 2013 tax year. For state income tax purposes, prior to Obergefell, same-sex couples could file as married only in states that recognized marriage for same-sex individuals. This caused added complexity and higher preparation and filing costs because of the need to prepare "dummy" separate federal income tax returns to reconcile items between the jointly filed federal return and two single filed state returns. The Obergefell decision changed this and now allows consistent filing status between federal and state income tax returns for same-sex couples legally married under state law, regardless of their state of residence.

Married same-sex couples who were previously not allowed to file federal or state income tax returns as married individuals should evaluate whether it is advantageous to file amended returns for open years. However, be aware that filing an amended return from single to joint status may not result in less overall federal and/or state income taxes due to the so-called "marriage penalty" (i.e., because of progressive tax rates and stacking income, a joint return may result in tax that is greater than the sum of the two single returns for a married couple).

## IMPACT ON QUALIFIED RETIREMENT PLANS

Prior to the Windsor decision, marriages between same-sex couples were not recognized for qualified retirement plan purposes. For example, the beneficial alternatives to surviving spouses regarding required minimum distributions were not available to a same-sex surviving spouse.

As mentioned earlier, one consequence of Windsor is that the IRS now recognizes same-sex marriages for qualified retirement plan purposes as long as the spouses were married in a jurisdiction that recognizes the marriage of two individuals of the same sex, even if they actually lived in a state that does not recognize the marriage (place of celebration rule). In IRS Notice 2014-19, the IRS stated that a qualified retirement plan's operation must reflect the outcome of Windsor as of June 26, 2013 and provide same-sex spouses with the same rights as opposite-sex spouses under the Internal Revenue Code's special rules affecting married participants in qualified retirement plans. These rules include the following:

- **a.** Qualified joint and survivor annuity (QJSA) and qualified preretirement survivor annuity (QPSA) options
- **b.** Spousal consent for alternate beneficiaries for those defined contribution plans that are exempt from the QJSA/QPSA requirements
- **c.** Additional alternatives for providing required minimum distributions and rollover distributions to surviving and divorced spouses — a surviving same-sex spouse may make rollovers to another employer's eligible retirement plan or to a personal or inherited IRA rather than only to an inherited IRA
- **d.** Ownership rules based on spousal status that impact controlled group membership and key employee and highly compensated employee (HCE) status
- **e.** Distributee rules under a qualified domestic relations order (QDRO) for property allocations in a divorce
- **f.** Consideration of same-sex spouses in determining the availability of certain hardship withdrawals
- **g.** Spousal consent for loans in retirement plans that are subject to spousal annuity requirements

One important planning implication provided through Windsor and the IRS guidance relates to required minimum distributions. Favorable tax treatment that allows for greater tax deferral opportunities exists for surviving spouse beneficiaries (including same-sex spouses). The rule allows for a surviving spouse named as the sole beneficiary of the participant's entire interest at all times during the distribution calendar year to defer required minimum distributions based on the joint life expectancy of the participant and the spouse.

### Deadline for Amending Plans for the Windsor Decision

Qualified retirement plans were not required to give retroactive effect (i.e., recognize same-sex marriages) of the Windsor decision before June 26, 2013. However, a plan sponsor could voluntarily amend its plan to reflect the decision, for some or all purposes, prior to that date. A plan sponsor that elected to amend the plan as of an earlier date must specify the date on which, and the purposes for which, same-sex marriages would be recognized.

Whether the plan must be amended for Windsor depends on the definitions found in the plan document and whether the plan's terms are consistent with the Windsor decision and the subsequent guidance by the IRS. Generally, the deadline to adopt a plan amendment reflecting the outcome of the Windsor decision is the later of (a) the due date of the employer's tax return for the tax year that includes the date the change is first effective or (b) December 31, 2014.

### Implications of Obergefell

Even though the decision in Obergefell does not significantly impact qualified retirement plans since they were already required to recognize same-sex marriages, there are other important implications for qualified retirement plans.

- Employers with multistate operations will no longer be concerned with administering their retirement plans to cover states with varying marriage laws, nor will they need to verify if the state where the participant was married is one that recognizes the marriage of two individuals of the same sex.
- States that previously did not recognize marriage of same-sex couples will probably be required to permit same-sex spouses to file domestic relations proceedings. These couples will now be able to obtain QDROs from their respective retirement plans.

After the decision in Obergefell, the time is right for plan sponsors to review their definition of spouse and their procedures related to spousal rights, such as the delivery of spousal QJSA and QPSA notices, QDRO procedures and beneficiary designations to ensure that they are consistent with the recognition of all spouses based on the recent Supreme Court decisions.


## IMPACT ON SOCIAL SECURITY BENEFITS

Perhaps the biggest opportunity created by Obergefell is that the decision requires a same-sex couple's state of residence to recognize a legal marriage from another state.

Prior to the Obergefell decision, a same-sex couple that was married in one state and resided in another state that did not recognize same-sex marriage would not be able to receive social security spousal and survivor benefits because the law did not apply the place of celebration rule described earlier. Rather, the place of residence of the same-sex spouses was controlling for social security benefits. Consequently, same-sex couples that were legally married in one location but moved to another where the marriage would not be recognized were not eligible for spousal and survivor social security benefits as a couple.

Because of the decision in Obergefell, same-sex couples are eligible for spousal and survivor social security benefits, regardless of the state in which they reside. Whether the change in the law related to social security benefits will be retroactive is still uncertain. Practitioners should be alert to further guidance from the Social Security Administration about the possibility to claim benefits retroactively for a same-sex couple who was already married but couldn't claim social security spousal or survivor benefits because their state of residence didn't recognize the marriage until after the Obergefell decision.

## IMPACT ON ESTATE, TRUST AND GIFT TAX PLANNING

Now that same-sex marriages are considered legal for both federal and state purposes, estate, trust and gift tax benefits are available for all married same-sex spouses. Terms that previously applied only to married persons of the opposite sex or same-sex spouses legally married in jurisdictions that recognized such marriages now apply to all married persons, regardless of their domicile or gender.

**Expanded Eligibility.** The estate, trust and gift tax benefits available to all married couples, including those of the same-sex, comprise the following:

- **Marital Deduction.** If all requirements are met, spouses are entitled to claim the unlimited marital deduction for lifetime gifts or transfers at death. For states that impose a state estate or inheritance tax, most allow an exemption for bequests to spouses, which now includes a same-sex spouse. Although a marital deduction has been available to same-sex couples who were married in states that recognized the marriage for federal estate tax since 2013 (after the Supreme Court's ruling in Windsor), the deduction is now available at the state level, too — even for the states who previously did not recognize the marriage as legal.
- **Portability Election.** All same-sex spouses are eligible to make the portability election to transfer the deceased spouse's unused estate tax exclusion to the surviving spouse. The surviving spouse can use this amount to reduce gift tax during life or estate tax for transfers at death. This election permits both spouses to maximize their estate exclusion amounts, regardless of who dies first.
- **QTIP Election.** All same-sex spouses can use a qualified terminable interest property (QTIP) trust election to qualify for the marital deduction. A QTIP election ensures that the deceased spouse's assets are available after his or her death to care for the surviving spouse, yet allows the decedent to determine who receives the property when the surviving spouse dies.
- **Elective Share Right.** All same-sex surviving spouses can claim his or her elective share of the deceased spouse's estate, regardless of the provisions of the deceased spouse's will.
- **Gift-splitting.** All same-sex spouses, if both consent, can elect to treat gifts made by one spouse as if they were made one-half by each spouse. With gift-splitting, the amount of the annual exclusion gifts (i.e., those not subject to gift tax) can be doubled. In 2015, if both spouses consent to the gift-splitting election, annual exclusion gifts of up to $28,000 per donee can be made.
- **Qualified Domestic Trusts (QDOTs).** All same-sex spouses are eligible to create a QDOT, which is a trust that can qualify for the marital deduction when the surviving spouse is not a U.S. citizen.

**Potential Drawbacks.** Although most of the expanded estate, trust, and gift tax implications for same-sex marriages are positive, a few drawbacks apply in these situations, including the following:

- **Transfers to Grantor Retained Income Trusts (GRITs).** A GRIT is created by a grantor by placing property in trust for the benefit of a remainder beneficiary, while retaining the income from the trust assets for the grantor's life or a term of years. This has the potential to save transfer taxes on property that is likely to appreciate. Unfortunately, GRITs can't be used in family transfers. Because same-sex spouses are now considered family members in all jurisdictions, this planning opportunity is no longer available to them.
- **Transfers or Sales by Qualified Personal Residence Trusts (QPRTs).** A QPRT is an irrevocable trust created by the grantor to hold his or her residence for a specified period, after which the residence is transferred to the remainder beneficiaries (usually his or her children). If the grantor is likely to be subject to estate tax, transferring a home to a QPRT, rather than an outright gift during his or her life or a transfer at death, can save significant transfer taxes. To qualify as a QPRT, the trust must meet certain requirements, one of which is that the trust cannot sell or transfer the residence, directly or indirectly, to the grantor or the grantor's spouse during the retained term of the trust or at any time after the retained term interest that the trust is a grantor trust. Here again, because a same-sex spouse is now considered the grantor's spouse in all jurisdictions, a sale of the residence by the trust to a same-sex spouse is no longer allowed.

The opportunity to take advantage of these benefits should be incorporated into the couple's planning by updating their estate documents.

**Taking Advantage of Benefits Not Previously Allowed.** Now that the estate, trust and gift tax benefits are available to all married same-sex couples, those who were not considered legally married before the Supreme Court's ruling in Obergefell should be able to claim them. For example, the executor of a deceased same-sex spouse's estate should consider making the portability election by filing an estate tax return (even if not otherwise required to file because the filing threshold is not met). The opportunity to take advantage of these benefits should be incorporated into the couple's planning by updating their estate documents. Certain trusts created for the same-sex couple may no longer be necessary, including irrevocable life insurance trusts (ILITs) set up to cover federal and/or state death taxes that may no longer apply due to the marital deduction or the portability election.

Married same-sex couples may wish to amend their previously filed federal and state estate, gift and income tax returns (assuming the statute of limitations has not expired) to claim benefits for which they were previously not eligible. For example, if the deceased spouse made gifts during his or her lifetime or at death to a same-sex surviving spouse, there may be an opportunity to file an amended gift or estate tax return to claim the unlimited marital deduction. This could potentially reduce the amount of applicable exclusion that was used and may result in a refund of any gift or estate tax paid. Or, if one spouse made a large gift (one that exceeded the annual exclusion amount, which for 2015 is $14,000) to someone other than his or her spouse, the married same-sex couple may choose to amend prior gift tax returns to take advantage of the gift-splitting election.

## IMPACT ON HEALTH PLANS AND EMPLOYEE BENEFITS

Because states may no longer refuse to recognize same-sex marriages, employers are likely to see an increase in the number of employees married to a same-sex spouse. The implications of Obergefell for employer-provided benefits differ somewhat depending on whether the employer is public or private, insured or self-insured. Employers located in states that previously recognized same-sex marriage may already offer same-sex spousal benefits and will require relatively few, if any, changes.

Employers are not required by law to offer health insurance coverage to employees' spouses, even after Obergefell. However, employers that do offer health coverage to opposite-sex spouses must consider whether they are now required to offer equal coverage to same-sex spouses. For public sector employers, like state and local governments, same-sex spouses are now required to be treated in the same manner as opposite-sex spouses for health insurance and other employee benefits. Many of these employers already had this practice in place as a result of the Windsor decision and will simply continue their current practices.

Employers are not required by law to offer health insurance coverage to employees' spouses, even after Obergefell. However, employers that do offer health coverage to opposite-sex spouses must consider whether they are now required to offer equal coverage to same-sex spouses.

Private employers are not expressly required to recognize same-sex spouses or to provide equal benefits, but maintaining separate treatment could subject the employer to legal challenges based on workplace discrimination. Additionally, if an employer has a fully insured plan that provides coverage for spouses, state insurance law will likely require equal coverage to be provided to opposite-sex and same-sex spouses. Even if equal coverage is not required, employers may want to offer it to minimize liability exposure to sexual orientation discrimination or sex discrimination laws under Title VII of the Civil Rights Act.

**Note:** If states interpret or amend insurance laws to include same-sex spouses in the definition of "spouse," employers will not be able to purchase plans that exclude same-sex spouses.

Private employers with self-funded insurance plans are not required to follow state and local laws on plan administration because these plans are subject to ERISA only. Thus, sponsors of these plans have more flexibility in deciding to offer coverage to same-sex spouses. Self-funded plans could arguably continue to exclude same-sex spouses from coverage, although this may leave them with increased risk of discrimination challenges.

Not only are changes required for health insurance plans and employment tax practices, but all other employee benefits may be impacted, including cafeteria plan elections, health savings accounts, health reimbursement arrangements and FMLA or other family leave policies. For the most part, an employee with a same-sex spouse is eligible for all benefits under the same circumstances as an employee with an opposite-sex spouse. The same tax rules that apply to opposite-sex spouses, such as contribution limits, also apply to same-sex spouses. Group health plans must make COBRA coverage available to same-sex spouses when a qualifying event occurs. If an employer's leave of absence policy allows employees leave to care for a spouse, it's interpreted that same-sex spouses are also eligible.

Insurance policies and benefit plans should be reviewed to determine how married couples are treated and whether there is a need to amend the definition of marriage or spouse. If coverage is offered to spouses, it is advisable that both same-sex and opposite-sex spouses are treated equally. This is true regarding leave policies, nondiscrimination provisions and benefit plans. Other policies impacted by the definition of spouse include bereavement leaves and equal employment opportunity policies since marital status is a protected classification under many state and local laws.

## IMPACT ON EMPLOYMENT TAX AND WITHHOLDING

When employers do offer spousal coverage, whether through employer contribution or employee pre-tax contribution, the value of the benefits is tax free to the employee. In other words, the value is not included in the employee's W-2 income and is not subject to FICA or FUTA withholding.

Before Obergefell, in states where same-sex marriage was not recognized, employers were required to impute income and withhold state income tax on benefits extended to same-sex spouses. Tax withholding on imputed income is no longer required to the extent that coverage for opposite-sex spouses would also be excluded from income. Further, the place of celebration rule no longer needs to be considered, so employers will not need to verify whether a same-sex marriage is valid in a particular jurisdiction.

Affected employees may need to revise their Form W-4 to adjust state and local income tax withholding rates for a change from single to married status. Withholding may also need to be adjusted for income that was previously imputed to the employee for benefits provided to a same-sex spouse. Employers should be prepared to make adjustments to 2015 Forms W-2 to reflect reductions in taxable wages or withholding related to spousal benefits. It's possible that employers in states issuing guidance late this year or in early 2016 could be required to file Forms W-2c to reflect adjustments to changes in the calculation of imputed benefits.

Employers should review their wage reporting, tax withholding and benefit enrollment procedures to ensure that all spouses are treated equally. Plan amendments and procedure changes may be necessary to fully comply with the law. States with bans on same-sex marriage are expected to release guidance later this year on the imputed income issue and to address other open questions, such as retroactive tax consequences. It does not seem likely that Obergefell would result in retroactive requirements for employers, but guidance from all applicable jurisdictions should be carefully monitored.

## IMPACT ON DOMESTIC PARTNER BENEFITS

Obergefell has no direct impact on benefits provided to unmarried domestic partners. Employers may choose to continue any current benefits offered to domestic partners of employees. However, many employers may now look at whether it makes sense to continue to provide domestic partner benefits, which were originally offered as a way to treat same-sex couples similarly when legal protection did not exist. It's possible that some employers may drop domestic partner benefits because of the additional administrative burden. For example, defining a domestic partnership is more difficult than proving a legal marriage, and it is also simpler to identify the beginning and end dates for a marriage than for a domestic partnership. For federal tax purposes, employers are still required to impute income and withhold payroll taxes on the benefits received by domestic partners. State tax treatment varies, and those that do currently exclude domestic partner benefits from state taxable income may change that practice. Employers should consider the impact to employees enrolled in such plans before changes to benefit offerings are made. If the decision is made to drop benefits, it will be important to clearly communicate any changes and offer a grace period of several months or a year before a partner is dropped from benefits. Employers should also consider whether domestic partner benefits are necessary to meet other legal requirements, such as state or local contractor rules that require them.

Several questions remain after Obergefell. One question is how common law marriage will be treated in the few states that still recognize it. Typically, employers require employees to sign an affidavit certifying their common law status in their state of residence. If this practice continues, the affidavit may need to be modified in light of Obergefell. Another unanswered question is whether an employer may exclude same-sex spouses based on religious beliefs. Future litigation on this issue is probable.

## FINALLY ...

The long-anticipated rulings from the Supreme Court have not only guaranteed same-sex couples the right to marry, but also to have that marriage recognized in every state. These decisions change the legal landscape for millions of Americans, dramatically simplifying their financial lives. The guidance in this report is a good start. Practitioners must remain alert as employers, as well as state and federal agencies, continue to shake out the implications of these landmark decisions.

## RELATED RESOURCES

### PPC'S GUIDE TO SMALL EMPLOYER RETIREMENT PLANS

PPC's Guide to Small Employer Retirement Plans provides practical guidance for plan advisors, administrators and fiduciaries for all qualified retirement plan needs — from plan design and administration to termination. It covers plans typically sponsored by small businesses, including profit-sharing plans, 401(k) plans, SEPs, SARSEPs, SIMPLE IRA plans, payroll deduction IRAs and defined benefit plans.

### PPC'S GUIDE TO PRACTICAL ESTATE PLANNING

PPC's Guide to Practical Estate Planning can help you develop practical solutions to wealth transfer challenges. The recent changes will significantly impact the focus of estate planning. It's more important than ever to revisit your clients' existing estate plans to help them plan for their financial and personal needs after retirement, as well as evaluate and help them implement their goals for transferring their wealth. Estate planning involves both tax saving and nontax planning services.

### PPC'S GUIDE TO COMPENSATION AND BENEFITS

PPC's Guide to Compensation and Benefits provides the tools needed to structure optimal compensation and fringe benefit plans. It will help you understand the different types of compensation and benefits that companies are currently offering and their tax implications. The Guide provides clear explanation, analysis and advice that can be used to quickly evaluate fringe benefit alternatives, design compensation plans that motivate key executives, ensure compliance with IRS rules and avoid costly mistakes.

### EBIA'S EMPLOYEE BENEFITS FOR DOMESTIC PARTNERS

For employers providing domestic partner and same-sex spousal benefits as well as those seeking to introduce them, EBIA's Employee Benefits for Domestic Partners provides comprehensive guidance on related design, tax and administrative issues. Topics include state and federal rules regarding same-sex marriage, civil unions, and other relationship recognition, tips for drafting effective plan eligibility provisions, tax treatment of domestic partner benefits, and special compliance challenges related to COBRA, HIPAA, other health plan mandates, and the rules governing retirement plans. Also included are helpful charts, checklists and sample documents.

For more information, visit tax.thomsonreuters.com or call 800.431.9025.

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