IRS <u>Revenue Rulings</u>, <u>Revenue Procedures</u>, <u>Notices</u>, and <u>Announcements</u> and <u>Fact Sheet FAQs</u> Released for 2024

Generally, the text below is taken verbatim from IRS news releases about the guidance.

Revenue Rulings

Ruling #	Date released	IRS summary	Code Section(s)
<u>Rev. Rul.</u> 2024-01	12/18/23	Provides tables of covered compensation under § 401(I)(5)(E) and regulations thereunder, for the 2024 plan year. The covered compensation tables are	401
<u>Rev. Rul.</u> 2024-02	12/15/23	effective January 1, 2024. Provides various prescribed rates for federal income tax purposes including the applicable federal interest rates, the adjusted applicable federal interest rates, the adjusted federal long-term rate, and the adjusted federal long-term tax-exempt rate. These rates are determined as prescribed by § 1274.	42 280G 382 467 468 482 483 1274 1288 7520 7872
<u>Rev. Rul.</u> 2024-03	1/16/24	Provides various prescribed rates for federal income tax purposes including the applicable federal interest rates, the adjusted applicable federal interest rates, the adjusted federal long-term rate, and the adjusted federal long-term tax-exempt rate. These rates are determined as prescribed by § 1274.	42 280G 382 467 468 482
<u>Rev. Rul.</u> 2024-04	2/15/24	Provides various prescribed rates for federal income tax purposes including the applicable federal interest rates, the adjusted applicable federal interest rates, the adjusted federal long-term rate, and the adjusted federal long-term tax-exempt rate. These rates are determined as prescribed by § 1274.	483 1274 1288 7520 7872
Rev. Rul. 2024-05 Taxpayer Certainty and Disaster	1/30/24	Holds that if one or more of a State's allocations, under section 305 of the Taxpayer Certainty and Disaster Tax Relief Act of 2020, to qualified disaster zones in 2021 or 2022 are returned after 2022, then the returned housing credit dollar amounts are part of the overall Returned Credit Component of a State's housing credit ceiling in the year of return. As such,	42

Tax Relief Act of 2020		reallocations of these returned amounts are not restricted to projects located in qualified disaster zones.	
<u>Rev. Rul.</u> 2024-6	2/21/24	 Interest rates will remain same for calendar quarter beginning April 1, 2024. For individuals, rate for overpayments and underpayments is 8% per year, compounded daily. 8% for overpayments (payments made in excess of the amount owed), 7% for corporations. 5.5% for the portion of a corporate overpayment exceeding \$10,000. 8% for underpayments (taxes owed but not fully paid). 10% for large corporate underpayments. 	6621
<u>Rev. Rul.</u> <u>2024-7</u>	3/15/24	Provides various prescribed rates for federal income tax purposes including applicable federal interest rates, adjusted applicable federal interest rates, adjusted federal long-term rate, and adjusted federal long-term tax-exempt rate. These rates are determined as prescribed by § 1274.	42 280G 382 467 468 482 483 1274 1288 7520 7872
<u>Rev. Rul.</u> <u>2024-8</u>	4/15/24	Fringe benefits aircraft valuation formula. For purposes of section 1.61-21(g), relating to rule for valuing non-commercial flights on employer-provided aircraft, the Standard Industry Fare Level (SIFL) cents- per-mile rates and terminal charge in effect for the first half of 2024 are set forth.	61
<u>Rev. Rul.</u> <u>2024-9</u>	4/16/24	Provides various prescribed rates for federal income tax purposes including the applicable federal interest rates, the adjusted applicable federal interest rates, the adjusted federal long-term rate, and the adjusted federal long-term tax-exempt rate. These rates are determined as prescribed by § 1274.	42 280G 382 467 468 482 483

			1274
			1274
			7520
			7872
Rev. Rul.	5/24/24	Obsoletes Rev. Rul. 75-38 which identified the District	508
<u>2024-10</u>	5/24/24	of Columbia and each State with statutory provisions	508
2024-10		that, in 1975, satisfied the private foundation	
		governing instrument requirements of section 508(e).	
		Due to material changes in the laws of a number of jurisdictions since 1975, the jurisdictional list set forth	
		-	
		in Rev. Rul. 75-38 is no longer accurate.	
		Also see <u>PMTA 2024-03</u> (4/23/24).	
<u>Rev. Rul.</u>	5/9/24	Provides rates for interest determined under Section	6621
<u>2024-11</u>		6621 for the calendar quarter beginning July 1, 2024,	
		will be 8% for overpayments (7% in the case of a	
		corporation), 8% for underpayments, and 10% for	
		large corporate underpayments. The rate of interest	
		paid on the portion of a corporate overpayment	
		exceeding \$10,000 will be 5.5%.	
	- ((<u>IR-2024-138</u> (5/9/24)	
<u>Rev. Rul.</u>	5/15/24	Provides various prescribed rates for federal income	42
<u>2024-12</u>		tax purposes for June 2024, including the applicable	280G
		federal interest rates, the adjusted applicable federal	382
		interest rates, the adjusted federal long-term rate,	467
		and the adjusted federal long-term tax-exempt rate.	468
	C / 1 O / D 1	These rates are determined as prescribed by § 1274.	482
<u>Rev. Rul.</u>	6/18/24	Provides various prescribed rates for federal income	483
<u>2024-13</u>		tax purposes including the applicable federal interest rates, the adjusted applicable federal interest rates,	1274 1288
		the adjusted federal long-term rate, and the adjusted	7520
		federal long-term tax-exempt rate. These rates are	7872
		determined as prescribed by § 1274.	,0/2
Rev. Rul.	6/17/24	Advises taxpayers of IRS position challenging certain	732
<u>2024-14</u>	5, 1, 27	partnership related-party transactions under the	734
		codified economic substance doctrine in	743
		§7701(o). Under the ruling, the IRS applies the	754
		economic substance doctrine in 3 situations involving	755
		related parties where some or all of whom are	7701(o)
		partners in a partnership, and the parties: (1) create	
		basis disparities through various methods; (2)	
		capitalize on these basis disparities either by	
		transferring a partnership interest in a	

		nonrecognition transaction or by making a current or liquidating distribution of partnership property to a partner; and (3) claim a basis adjustment under §§ 732(b), 734(b), or 743(b). The ruling holds that these transaction structures lack economic substance under § 7701(o). In such cases, the Service will disregard the basis adjustments. IR-2024-166 (6/17/24)	
<u>Rev. Rul.</u> 2024-15	7/16/24	Provides various prescribed rates for federal income tax purposes including applicable federal interest rates, adjusted applicable federal interest rates, adjusted federal long-term rate, and adjusted federal long-term tax-exempt rate. These rates are determined as prescribed by § 1274.	42 280G 382 467 468 482 483 1274 1288 7520 7872
<u>Rev. Rul.</u> 2024-16	8/26/24	Special Use Value: Farms: Interest Rates. The 2024 interest rates to be used in computing the special use value of farm real property for which an election is made under section 2032A of the Code are listed for estate of decedents.	2032A
<u>Rev. Rul.</u> 2025-17	8/15/24	Provides various prescribed rates for federal income tax purposes including the applicable federal interest rates, the adjusted applicable federal interest rates, the adjusted federal long-term rate, and the adjusted federal long-term tax-exempt rate. These rates are determined as prescribed by § 1274.	42 280G 382 467 468 482 483 1274 1288 7520 7872
<u>Rev. Rul.</u> 2024-18	8/21/24	Provides fourth quarter interest rates for 2024, including rates for underpayments and overpayments. The rates for interest determined under Section 6621 for the calendar quarter beginning October 1, 2024, will be 8% for overpayments (7% in the case of a corporation), 8% for underpayments, and 10% for large corporate underpayments. The rate of interest paid on the	6621

		portion of a corporate overpayment exceeding	
		\$10,000 will be 5.5%.	
		<u>IR-2024-220</u> (8/21/24)	
Rev. Rul.			
2024-19			
Rev. Rul.	9/30/24	Fringe benefits aircraft valuation formula. For	61
2024-20		purposes of section 1.61-21(g) of the Income Tax	
		Regulations, relating to the rule for valuing non-	
		commercial flights on employer-provided aircraft, the	
		Standard Industry Fare Level (SIFL) cents per-mile	
		rates and terminal charge in effect for the second half	
		of 2024 are set forth.	
Dov. Dul	0/16/24		12
<u>Rev. Rul.</u>	9/16/24	Provides various prescribed rates for federal income	42
<u>2024-21</u>		tax purposes including applicable federal interest	280G
		rates, adjusted applicable federal interest rates, the	382
		adjusted federal long-term rate, and adjusted federal	467
		long-term tax-exempt rate, for October 2024. These	468
		rates are determined as prescribed by § 1274. The	482
		rates are published monthly for purposes of sections	483
		42, 382, 412, 642, 1288, 1274, 7520, 7872, and	1274
		various other sections.	1288
			7520
			7872
Rev. Rul.	9/26/24	Holds that Bourse de Montréal (MX) is a "qualified	446
2024-22		board or exchange" per section 1256(g)(7)(C). MX is a	481
		regulated exchange of Québec, Canada that offers	1256
		electronic trading.	7805
Rev. Rul.	10/2/24	The European Energy Exchange is a "qualified board	446
2024-23	,_,	or exchange" within the meaning of section	481
202725		1256(g)(7)(C). European Energy Exchange is a	1256
		regulated exchange of Germany that offers electronic	7805
		trading.	7005
Rev. Rul.	10/15/24	Provides various prescribed rates for federal income	42
	10/13/24	tax purposes including applicable federal interest	42 280G
<u>2024-24</u>			
		rates, adjusted applicable federal interest rates, the	382
		adjusted federal long-term rate, and adjusted federal	467
		long-term tax-exempt rate. These rates are	468
		determined as prescribed by § 1274.	482
			483
			1274
			1288
			7520
			7872

<u>Rev. Rul.</u> 2024-25	11/18/24	 Sets forth federal short-term rates for calendar quarter beginning Jan. 1, 2025, in accordance with Section 6621, which establishes the interest rates on overpayments and underpayments of tax. <u>IR-2024-290</u> (11/18/24) summary: Rates have decreased from 4th quarter of 2024: 7% for overpayments (payments made in excess of the amount owed), 6% for corporations. 4.5% for portion of a corporate overpayment exceeding \$10,000. 7% for underpayments (taxes owed but not fully paid). 9% for large corporate underpayments. 	6621
<u>Rev. Rul.</u> 2025-26	11/15/24	Provides various prescribed rates for federal income tax purposes including the applicable federal interest rates, the adjusted applicable federal interest rates, the adjusted federal long-term rate, and the adjusted federal long-term tax-exempt rate. These rates are determined as prescribed by § 1274.	42 280G 382 467 468 482 483 1274 1288 7520 7872

Revenue Procedures

Rev. Proc.	Date	IRS summary	Code
#	released		Section(s)
Rev. Proc.	1/2/24	Revised procedures for letter rulings and information	
<u>2024-1</u>		letters issued by Associate Chief Counsel (Corporate),	
		Associate Chief Counsel (Employee Benefits, Exempt	
		Organizations, and Employment Taxes), Associate	
		Chief Counsel (Financial Institutions and Products),	
		Associate Chief Counsel (Income Tax and Accounting),	
		Associate Chief Counsel (International), Associate	
		Chief Counsel (Passthroughs and Special Industries),	
		and Associate Chief Counsel (Procedure and	
		Administration). This procedure also contains	

procedures for determination letters issued by Large	
Business and International Division, Small Business/	
Self Employed Division, Wage and Investment	
Division, and Tax Exempt and Government Entities	
Division. Rev. Proc. 2023-1 is superseded.	
v. Proc. 1/2/24 Explains when and how an Associate office within	
024-2 Office of Chief Counsel provides technical advice,	
conveyed in technical advice memoranda (TAMs). It	
also explains rights that a taxpayer has when a field	
office requests a TAM regarding a tax matter. Rev.	
Proc. 2023-2 is superseded.	
v. Proc. 1/2/24 No rulings list. Provides a revised list of areas of Code	
024-3 under jurisdiction of Associate Chief Counsel	
(Corporate), Associate Chief Counsel (Financial	
Institutions and Products), Associate Chief Counsel	
(Income Tax and Accounting), Associate Chief Counsel	
(Passthroughs and Special Industries), Associate Chief	
Counsel (Procedure and Administration), and	
Associate Chief Counsel (Employee Benefits, Exempt	
Organizations and Employment Taxes) relating to	
matters on which the Service will not issue letter	
rulings or determination letters. Rev. Proc. 2023-3 is	
superseded.	
v. Proc. 1/2/24 Updates Rev. Proc. 2023-4, relating to types of advice	
IRS provides to taxpayers on issues under the	
jurisdiction of the Commissioner, Tax Exempt and	
Government Entities Division, Employee Plans Rulings	
and Agreements, and procedures that apply to	
requests for determination letters and private letter	
rulings.	
v. Proc. 1/2/24 Per TE/GE email: "provides that EO Determinations	501
will now issue a determination letter to an	001
organization currently recognized as described in	
Section 501(c)(3) that seeks recognition as described	
in a different paragraph of Section 501(c).	
Section 3.01(1) of Rev. Proc. 2024-5 provides that EO	
Determinations will issue a determination letter to an	
organization currently recognized as described in	
Section 501(c)(3) that seeks recognition as described	
in a different paragraph of Section 501(c) if the	
organization establishes that as of the submission	
date of its application, it:	

r		
	 Has distributed its assets to another Section 501(c)(3) organization or government entity, and 	
	2. Otherwise meets the requirements for the Section 501(c) status requested.	
	It further provides that the new determination letter will only be effective from the submission date of the new application.	
	Accordingly, an organization currently recognized as described in Section 501(c)(3) that seeks recognition as described in a different paragraph of Section 501(c) must:	
	 Represent that its assets have been distributed as of the submission date of its application and provide a description of the assets distributed, the date of distribution and the name, EIN, and address of the recipient and 	
	 Agree to submission (postmark) date for recognition under the new paragraph of Section 501(c) 	
	The required representation may be included with the organization's supplemental responses in the single PDF file submitted with its Form 1024, Application for Recognition of Exemption Under Section 501(a) or Section 521 of the Internal Revenue Code, or Form 1024-A, Application for Recognition of Exemption Under Section 501(c)(4) of the Internal Revenue Code.	
	This procedure also applies to an organization automatically revoked under Section 6033(j) that was described in Section 501(c)(3) that seeks retroactive reinstatement as described in a different paragraph of Section 501(c).	
	Section 501(c)(3) organizations seeking to be recognized as described in Section 501(c)(4) are subject to the same requirement to file Form 8976 within 60 days of formation as new Section 501(c)(4) organizations.	
	An organization previously described in Section 501(c)(3) that submits Form 8976 within 60 days of seeking to be described in Section 501(c)(4) may have reasonable cause for not filing Form 8976 within 60	

		days of formation. Such an organization may seek	
		reasonable cause relief from any penalty for late filing	
		Form 8976 by following the instructions in the	
		correspondence from the IRS regarding the penalty.	
Rev. Proc.		Not issued as of 5/31/24	
2024-6			
Rev. Proc.	1/2/24	Areas in which rulings will not be issued, Associate	
2024-7		Chief Counsel (International).	
Rev. Proc.	12/8/23	Provides issuers of qualified mortgage bonds under	143
<u>2024-8</u>		§143(a), and issuers of mortgage credit certificates	
		under § 25(c), with a list of qualified census tracts.	
		Qualified census tracts consist of households in which	
		70 percent or more of the families have income that	
		is 80 percent or less of the statewide median family	
		income. This revenue procedure modifies and	
		supersedes Rev. Proc. 2014-14.	
Rev. Proc.	12/22/23	Modifies sections 7 and 19 of Rev. Proc. 2023-24 to	174
2024-9	12, 22, 20	provide procedures under § 446 and § 1.446-1(e) to	446
20215		obtain automatic consent of IRS to change methods	460
TCJA		of accounting for expenditures paid or incurred in tax	100
105/1		years beginning after December 31, 2021, to rely on	
		interim guidance under §§174 and 460 provided in	
		Notice 2023-63. This revenue procedure also clarifies	
		section 9 of Rev. Proc. 2023-24 to provide that	
		section 5 of Rev. Proc. 2000-50 is obsoleted for costs	
		of developing computer software paid or incurred in	
		any taxable year beginning after December 31, 2021,	
		and continues to apply to costs of developing	
		computer software paid or incurred in any taxable	
	F /29 /24	year beginning on or before December 31, 2021. Obsoletes Rev. Rul. 75-38 which identified District of	
<u>Rev. Proc.</u>	5/28/24		
<u>2024-10</u>		Columbia and each State with statutory provisions	
		that, in 1975, satisfied the private foundation	
		governing instrument requirements of section 508(e).	
		Due to material changes in the laws of a number of	
		jurisdictions since 1975, the jurisdictional list set forth	
	2/25/25	in Rev. Rul. 75-38 is no longer accurate.	
Rev. Proc.	3/25/24	General Rules and Specifications for Substitute Form	
<u>2024-11</u>		941, Schedule B (Form 941), Schedule D (Form 941),	
		Schedule R (Form 941), and Form 8974.	
		This revenue procedure provides general rules and	
		specifications from the IRS for paper and computer-	
		generated substitutes for Form 941; Schedule B (Form	

		941); Schedule D (Form 941); Schedule R (Form 941); and Form 8974. This revenue procedure supersedes Rev Proc 2023-13.	
Rev. Proc. 2024-12 IRA 2022	2/7/24	Sets forth a temporary extension of time to perform procedures under §§ 30D(d)(1)(H) and 25E(c)(1)(D)(i) for provision of seller reports to the IRS. This revenue procedure modifies sections 5.01 and 6.03 of Rev. Proc. 2022-42 and section 7.03(1) of Rev. Proc. 2023- 33, providing new information for the timing and manner of submission of seller reports for sales of vehicles qualifying for the clean vehicle credit or the previously-owned clean vehicle credit under §§ 30D and 25E, respectively. Extension for 2023 reports made in interest of "sounds tax administration."	25E 30D
<u>Rev. Proc.</u> 2024-13	2/6/24	Provides: (1) two tables of limitations on depreciation deductions for owners of passenger automobiles placed in service by the taxpayer during calendar year 2024; and (2) a table of dollar amounts that must be used to determine income inclusions by lessees of passenger automobiles with a lease term beginning in calendar year 2024. The tables detailing these depreciation limitations and amounts used to determine lessee income inclusions reflect the automobile price inflation adjustments required by §280F(d)(7). For purposes of this revenue procedure, the term "passenger automobiles" includes trucks and vans.	280F
Rev. Proc. 2024-14 ACA	2/12/24	Provides indexing adjustments for applicable dollar amounts under section 4980H(c)(1) and (b)(1). These indexed amounts are used to calculate the employer shared responsibility payments (ESRP) under section 4980H(a) and (b)(1), respectively. For 2024, (a) penalty is \$2,900 and (b) is \$4,350.	4980H
<u>Rev. Proc.</u> 2024-15	2/29/24	Sets forth Federal income tax treatment that may apply to certain legislatively authorized transactions entered into by a public utility to recover specified costs through a surcharge to customers within the utility's service area. The transactions in question involve a securitization in which the issuance of debt instruments is by a qualifying State financing entity. The revenue procedure also modifies Rev. Proc. 2005- 62.	61 451 1001

Rev. Proc.		Not issued as of 5/31/24	
2024-16			
<u>Rev. Proc.</u> 2024-17	3/19/24	Adds Ukraine, Belarus, Sudan, Haiti, Niger, and Iraq to the list of waiver countries for tax year 2023 for which the minimum time requirements are waived. Generally, U.S. citizens or resident aliens living and working abroad are taxed on their worldwide income. However, if their tax home is in a foreign country and they meet either the bona fide residence test or the physical presence test, they can choose to exclude from their income a limited amount of their foreign earned income (up to \$120,000 for 2023). Both the bona fide residence test and the physical presence test contain minimum time requirements. Revenue Procedure 2024-17 provides a waiver under section 911(d)(4) for the time requirements for individuals electing to exclude their foreign earned income who must leave a foreign country because of war, civil	911
		unrest, or similar adverse conditions in that country.	
<u>Rev. Proc.</u>	4/8/24	Supplements Rev. Proc. 2023-32 by publishing	42
<u>2024-18</u>		amounts of unused housing credit carryovers allocated to qualified states under § 42(h)(3)(D) for calendar year 2023 in addition to those amounts	
		published in Rev. Proc. 2023-32.	
Rev. Proc.	3/29/24	Provides clarifying and procedural guidance	48
2024-19	-,, - ,	applicable to low-income communities bonus credit	.0
		program (Program) for 2024 Program year. Program	
IRA 2022		was established pursuant to Inflation Reduction Act of 2022. Under this Program, applicants investing in	
		certain solar and wind-powered electricity generation	
		facilities may apply for an allocation of environmental	
		justice solar and wind capacity limitation to increase	
		the amount of an energy investment credit under	
		section 48 for the taxable year in which the facility is	
		placed in service.	
		<u>IR-2024-86</u> (3/29/24)	
		<u>IR-2024-149</u> (5/28/24) – Treasury, IRS and Dept of Energy open application <u>portal</u> for 2024 Program Year	
		of the Low-Income Communities Bonus Credit	
		Program. Also see regs at $TD 9979$ (8/15/23).	
Rev. Proc.	4/18/24	Provides domestic asset/liability percentages and	842
2024-20	1/ 10/ 27	domestic investment yields needed by foreign life	012
		insurance companies and foreign property and	
		liability insurance companies to compute their	

		minimum effectively connected net investment	
		income under section 842(b) for tax years beginning	
		after December 31, 2022. This revenue procedure	
		applies to foreign insurance companies.	
Rev. Proc.	4/16/24	Provides issuers of qualified mortgage bonds and	25
2024-21		mortgage credit certificates with (1) nationwide	143
		average purchase price for residences located in the	
		United States, and (2) average area purchase price	
		safe harbors for residences located in statistical areas	
		in each state, the District of Columbia, Puerto Rico,	
		the Northern Mariana Islands, American Samoa, the	
		Virgin Islands, and Guam.	
Rev. Proc.	5/24/24	obsoletes Rev. Proc. 82-2 which identified the	501
<u>2024-22</u>		circumstances in which an organization could satisfy	
		§1.501(c)(3)-1(b)(4) (requiring that the assets of a	
		section 501(c)(3) organization be dedicated to an	
		exempt purpose) by operation of the law of certain	
		States or the District of Columbia. Due to material	
		changes in the law of many jurisdictions since 1982,	
		the jurisdictional list set forth in Rev. Proc. 82-2 is no	
		longer accurate.	
		Also see <u>PMTA 2024-02</u> (4/23/24)	
Rev. Proc.	4/30/24	Annual procedure that provides the List of Automatic	446
<u>2024-23</u>		Changes to which the automatic method of	481
		accounting change procedures apply under the	
		method of accounting change guidance.	
		Changes of method of accounting are covered in in	
		Rev. Proc. 2015-13, as clarified and modified by Rev.	
		Proc. 2015-33, and as modified by Rev. Proc. 2021-34,	
		by Rev. Proc. 2021-26, by Rev. Proc. 2017-59, and by	
		section 17.02(b) and (c) of Rev. Proc. 2016-1,	
		apply. The definitions in section 3 of Rev. Proc. 2015-	
		13 apply to this revenue procedure.	
		Modified by <u>Rev. Proc. 2024-30</u> (7/2/24)	
Rev. Proc.	5/1/24	Provides updated procedures for taxpayers	355
2024-24		requesting private letter rulings from the IRS	
		regarding certain matters pertaining to section 355	
		transactions, including representations, information,	
		and analysis to be submitted with those requests.	
		This revenue procedure modifies Rev. Proc. 2017-52	
		and supersedes Rev. Proc. 2018-53.	

		IRS seeks specific comments by 7/30/24; see Notice	
		<u>2024-38</u> (5/1/24).	
<u>Rev. Proc.</u> 2024-25	5/9/24	Provides 2025 inflation adjusted amounts for Health Savings Accounts (HSAs) as determined under § 223 and the maximum amount that may be made newly available for excepted benefit health reimbursement arrangements (HRAs) provided under § 54.9831- 1(c)(3)(viii) of the Pension Excise Tax Regulations.	223
Rev. Proc. 2024-26 IRA 2022	6/7/24	Updates existing procedures and provides additional procedures for qualified manufacturers to submit information regarding new clean vehicles to ensure the vehicles satisfy the requirements of § 30D(d) and (e) for the applicable calendar year and therefore are eligible for the clean vehicle credit under § 30D. This revenue procedure also updates existing procedures regarding seller report updates and rescissions. Modifies section 7.03(4) of Rev. Proc. 2023-33, and modifies section 5.04 of Rev. Proc. 2023-38. <u>IR-2024-158</u> (6/7/24)	25E 30D
<u>Rev. Proc.</u> 2024-27	7/29/24	Provides specifications for the private printing of red- ink substitutes for the 2024 Forms W-2 and W-3. This revenue procedure will be produced as the next revision of Publication 1141. Rev. Proc. 2023-25 is superseded.	
<u>Rev. Proc.</u> 2024-28	6/28/24	Subject to certain requirements, generally permits taxpayers to rely on any reasonable allocation of units unattached basis to a wallet or account that holds the same number of remaining digital asset units based on the taxpayer's records of such unattached basis and remaining units. The allocation must be a reasonable allocation as defined in section 5.02 of this Revenue Procedure and must be made as of January 1, 2025. However, the taxpayer may identify the method of allocation and may comply with the requirements set forth in section 4.02 of this Revenue Procedure at a later date to the extent permitted by section 5.02(4) or 5.02(5) of this Revenue Procedure. IR-2024-178 (6/28/24)	1012 6045
<u>Rev. Proc.</u> 2024-29	7/22/24	Provides specifications for the private printing of red- ink substitutes for the 2024 revisions of certain information returns. This procedure will be	various

Rev. Proc. 2024-30 Rev. Proc. 2024-31 IRA 2022	7/2/24	reproduced as the next revision of Publication 1179. Revenue Procedure 2023-30 is superseded. Modifies Rev. Proc. 2024-23 to provide procedures under § 446 and § 1.446-1(e) for obtaining automatic consent of the Commissioner to change methods of accounting to the Allowance Charge-off Method described in proposed regulations under section 166. See REG-121010-17 (<u>88 FR 89636</u>). Provides procedures and requirements that a manufacturer of specified property must follow to be treated as a "qualified manufacturer" (QM) under §25C(h). Section25C(h)(1) provides that no credit will	166 446 25C
<u>2024-30</u> <u>Rev. Proc.</u> <u>2024-31</u>		Modifies Rev. Proc. 2024-23 to provide procedures under § 446 and § 1.446-1(e) for obtaining automatic consent of the Commissioner to change methods of accounting to the Allowance Charge-off Method described in proposed regulations under section 166. See REG-121010-17 (<u>88 FR 89636</u>). Provides procedures and requirements that a manufacturer of specified property must follow to be treated as a "qualified manufacturer" (QM) under	446
<u>2024-30</u> <u>Rev. Proc.</u> <u>2024-31</u>		under § 446 and § 1.446-1(e) for obtaining automatic consent of the Commissioner to change methods of accounting to the Allowance Charge-off Method described in proposed regulations under section 166. See REG-121010-17 (<u>88 FR 89636</u>). Provides procedures and requirements that a manufacturer of specified property must follow to be treated as a "qualified manufacturer" (QM) under	446
<u>Rev. Proc.</u> 2024-31	10/24/24	consent of the Commissioner to change methods of accounting to the Allowance Charge-off Method described in proposed regulations under section 166. See REG-121010-17 (<u>88 FR 89636</u>). Provides procedures and requirements that a manufacturer of specified property must follow to be treated as a "qualified manufacturer" (QM) under	
<u>2024-31</u>	10/24/24	accounting to the Allowance Charge-off Method described in proposed regulations under section 166. See REG-121010-17 (<u>88 FR 89636</u>). Provides procedures and requirements that a manufacturer of specified property must follow to be treated as a "qualified manufacturer" (QM) under	25C
<u>2024-31</u>	10/24/24	described in proposed regulations under section 166. See REG-121010-17 (<u>88 FR 89636</u>). Provides procedures and requirements that a manufacturer of specified property must follow to be treated as a "qualified manufacturer" (QM) under	25C
<u>2024-31</u>	10/24/24	 166. See REG-121010-17 (<u>88 FR 89636</u>). Provides procedures and requirements that a manufacturer of specified property must follow to be treated as a "qualified manufacturer" (QM) under 	25C
<u>2024-31</u>	10/24/24	Provides procedures and requirements that a manufacturer of specified property must follow to be treated as a "qualified manufacturer" (QM) under	25C
<u>2024-31</u>	10/24/24	manufacturer of specified property must follow to be treated as a "qualified manufacturer" (QM) under	25C
		treated as a "qualified manufacturer" (QM) under	
IRA 2022			
IRA 2022		§25C(h). Section25C(h)(1) provides that no credit will	
		be allowed under § 25C(a) with respect to any item of	
		specified property placed in service after December	
		31, 2024, unless such item is produced by a QM and	
		the taxpayer includes the qualified product	
		identification number (PIN) of such item on the	
		taxpayer's tax return for the tax year. Provides that a	
		manufacturer that wishes to become a QM must	
		register and enter into an agreement with the IRS,	
		assign a PIN unique to each item of specified	
		property, label such items, and make periodic written	
		reports to the IRS of the PINs so assigned.	
		Prop. Regs. (<u>REG-118264-23</u> ; 10/25/24)	
	7/20/24	<u>IR-2024-280</u> (10/24/24)	
Rev. Proc.	7/30/24	Updates Rev. Proc. 2017-55 to set forth the	430
<u>2024-32</u>		procedure by which the sponsor of a defined benefit	
		plan that is subject to funding requirements of § 430	
		may request approval from IRS for the use of plan-	
		specific substitute mortality tables in accordance with	
		§430(h)(3)(C) and § 1.430(h)(3)-2. It also specifies the	
		date by which the use of a previously approved	
		substitute mortality table must be terminated in	
		conjunction with the replacement of the generally	
		applicable mortality tables specified in § 430(h)(3)(A)	
		and § 1.430(h)(3)-1.	
Rev. Proc.	10/28/24	General Rules and Specifications for Substitute Forms	
2024-33	-	and Schedules - Provides guidelines and general	
		procedure will be reproduced as the next revision of	
		T DLOCEDATE MILLOE LEDLODACED AS THE NEXT LEVISION OF T	
	10/28/24	General Rules and Specifications for Substitute Forms and Schedules - Provides guidelines and general requirements for the development, printing, and approval of the 2024 substitute tax forms. This	

Rev. Proc.	8/29/24	Modifies section 7 of Rev. Proc. 2024-23, to modify	174
<u>2024-34</u>		the procedures under section 446 and §1.446-1(e) for obtaining automatic consent of Commissioner to	446
TCJA		change methods of accounting for research or	
		experimental expenditures paid or incurred in tax	
		years beginning after December 31, 2021. Expands	
		waiver of the eligibility rules in section 5.01(1)(d) and (f) of Rev. Proc. 2015-13 to accounting method	
		changes described in section 7.01 of Rev. Proc. 2024-	
		23 that are made in any tax year beginning in 2022 or	
		2023. Also permits taxpayer to make changes under	
		section 7.01 of Rev. Proc. 2024-23 regardless of	
		whether a change under that section has been filed	
		for any other tax year beginning in 2022 or 2023.	
		Finally, for any change under section 7.01 of Rev. Proc. 2024-23 made in a tax year beginning in 2022 or	
		2023 (other than the first tax year beginning after	
		December 31, 2021), this revenue procedure limits	
		audit protection for research or experimental	
		expenditures paid or incurred in taxpayer's first tax	
		year beginning after December 31, 2021 if taxpayer	
		failed to make a change for such expenditures for such tax year.	
Rev. Proc.	9/6/24	Provides applicable percentage table in § 36B(b)(3)(A)	36B
2024-35		for tax years beginning in calendar year 2025. Table	
		used to calculate an individual's premium tax credit	
Affordable		under § 36B. Also provides indexing adjustment	
Care Act		for required contribution percentage in	
		§ 36B(c)(2)(C)(i)(II) for plan years beginning in calendar year 2025. This percentage is used to	
		determine whether an individual is eligible for	
		affordable employer-sponsored minimum essential	
		coverage under § 36B. Required Contribution	
	10/7/04	Percentage = 9.02%.	60.44
<u>Rev. Proc.</u>	10/7/24	Provides specifications for private printing of red-ink and black-and-white substitutes for the June 2024	6041 6051
<u>2024-36</u>		revisions of Forms W-2c and W-3c. This revenue	6071
		procedure will be produced as the next revision of	6081
		Publication 1223. Rev. Proc. 2023-39, 2023-52 IRB	6091
		dated December 26, 2023, is superseded.	
Rev. Proc.	9/18/24	Provides guidance to issuers of tax-exempt and other	148
<u>2024-37</u>		tax-advantaged bonds regarding procedures for filing claims for recovery of overpayments of rebate,	
		claims for recovery of overpayments of repate,	

		penalty in lieu of rebate, and yield reduction	
Davis Direct	0/01/01	payments under section 148.	42
<u>Rev. Proc.</u>	9/24/24	Provides guidance on effect on income requirements	42
<u>2024-38</u>		under §§ 142(d) and 42 of the alternative income	142
		eligibility requirements for the Department of	
		Housing and Urban Development–Veterans Affairs	
		Supportive Housing (HUD–VASH) program.	
<u>Rev. Proc.</u>	10/11/24	Grants certain applicable entities under	6081
<u>2024-39</u>		<pre>§6417(d)(1)(A) an automatic six-month extension of</pre>	6417
		time to file an original or superseding Form 990-T,	7803
		Exempt Organization Business Income Tax Return	
		(and proxy tax under section 6033(e)), with any other	
		relevant schedules and forms (such as Form 3800,	
		General Business Credit, and any relevant source	
		credit forms), to make an elective payment election	
		as provided under section 6417(d)(3) and §1.6417-	
		2(b).	
		In addition to the automatic six-month extension of	
		time to file for certain applicable entities, this	
		revenue procedure allows certain applicable entities	
		to make the elective payment election on a paper-	
		filed Form 990 if they follow certain procedural requirements. The document also provides a	
		procedure allowing for assistance on processing an	
		elective payment election for applicable entities	
<u>Rev. Proc.</u>	10/22/24		Numerous
<u>2024-40</u>			
<u>Rev. Proc.</u>	11/18/24	Publishes the amounts of unused housing credit	42
<u>2024-41</u>		carryovers allocated to qualified states under	
		§42(h)(3)(D) for calendar year 2024.	
<u>Rev. Proc.</u>	12/23/24	Updates and supersedes the lists of countries in Rev.	6049
<u>2024-42</u>		Proc. 2023-36. Armenia and Uruguay are added to the	
		list of jurisdictions with which the United States has in	
		effect a relevant information exchange agreement.	
		Costa Rica and Thailand are added to the list of	
		countries with which Treasury and the IRS have	
		determined it is appropriate to have an automatic	
2024-40 <u>Rev. Proc.</u> 2024-41 <u>Rev. Proc.</u>		otherwise eligible for relief that previously filed a return and received a notice that their election was ineffective because the return on which it was made was filed after the due date of the return. <u>IR-2024-267</u> (10/11/24) Provides detailed information on adjustments and changes to more than 60 tax provisions that will impact taxpayers when they file their returns in 2026. Publishes the amounts of unused housing credit carryovers allocated to qualified states under §42(h)(3)(D) for calendar year 2024. Updates and supersedes the lists of countries in Rev. Proc. 2023-36. Armenia and Uruguay are added to the list of jurisdictions with which the United States has in effect a relevant information exchange agreement. Costa Rica and Thailand are added to the list of countries with which Treasury and the IRS have	42

Rev. Proc. 2024-43		exchange relationship with respect to the information collected under Treas. Reg. §§ 1.6049-4(b)(5) and 1.6049-8(a).	
<u>Rev. Proc.</u> 2024-44	12/23/24	This proposed revenue procedure specifies when information shown on a return in accordance with the applicable forms and instructions will be an adequate disclosure for purposes of reducing an understatement of income tax under section 6662(d) and for purposes of avoiding the section 6694(a) preparer penalty. This revenue procedure updates Rev. Proc. 2023-40, and applies to any income tax return filed on 2024 tax forms for a tax year beginning in 2024, and to any income tax return filed in 2025 on	6662 6694
		2024 tax forms for short taxable years beginning in 2025.	

Notices

Notice #	Date released	IRS summary	Code Section(c)
			Section(s)
<u>Notice 2024-</u>	12/19/23	Provides indexing factors to be used by group	9816
<u>01</u>		health plans and health insurance issuers to	
		calculate qualifying payment amount (QPA) for	
		items or services provided on or after January 1,	
		2024, and before January 1, 2025. The No	
		Surprises Act (NSA) added parallel provisions at	
		Code sections 9816 and 9817, ERISA sections 716	
		and 717, and PHS Act sections 2799A-1 and	
		2799A-2. These provisions provide protections	
		against balance-billing for certain out-of-network	
		items or services provided to patients. The QPA is	
		the basis for determining individual cost sharing	
		for items and services covered by the balance-	
		billing protections in the NSA, under certain	
		circumstances. The QPA for a given calendar year	
		is based on information regarding median rates	
		for certain items and services from prior years	
		and is indexed based on changes in the consumer	
		price index. In addition to providing the indexing	
		factor for adjusting 2023 amounts for 2024, the	
		notice also provides cumulative adjustments for	

		prior years and examples of how to apply the percentage increases.	
Notice 2024- 02 SECURE Act 2.0	12/20/23	Provides guidance in the form of questions and answers with respect to certain provisions of the SECURE 2.0 Act of 2022.	
Notice 2024- 03 SECURE Act 2.0 and other provisions	12/20/23	Sets forth 2023 Cumulative List of Changes in Plan Qualification Requirements for Defined Contribution Qualified Pre-approved Plans (2023 Cumulative List). The 2023 Cumulative List will assist pre approved plan providers applying to IRS for opinion letters for the fourth remedial amendment cycle for defined contribution qualified pre approved plans (Cycle 4) under the IRS's pre-approved plan program. The 2023 Cumulative List identifies recent changes in qualification requirements of the Internal Revenue Code that were not taken into account during the first three remedial amendment cycles for defined contribution qualified pre-approved plans and that will be taken into account by the IRS with respect to the form of a plan submitted to the IRS for Cycle 4. The Cycle 4 submission period begins on February 1, 2024, and ends on January 31, 2025.	401 402 402A 411 413 414 415 416
<u>Notice 2024-</u> <u>04</u>	12/14/23	Sets forth updates on corporate bond monthly yield curve, corresponding spot segment rates for December 2023 used under § 417(e)(3)(D), 24- month average segment rates applicable for December 2023, and 30-year Treasury rates, as reflected by the application of §430(h)(2)(C)(iv).	417 430 431
<u>Notice 2024-</u> <u>05</u> IRA 2022	12/20/23	Provides safe harbor regarding incremental cost of certain qualified commercial clean vehicles placed in service in calendar year 2024 for purposes of the credit for qualified commercial clean vehicles under § 45W. This notice also requests comments regarding additional types or classes of vehicles that should be included in the safe harbor in the future. <u>IR-2023-245</u> (12/20/23)	45W

Notice 2024- 06 IRA 2022	12/15/23	Provides safe harbors for a method that can be used to qualify for and calculate the SAF sustainable aviation fuel (SAF) credit, the Renewable Fuel Standard program method. It also discusses other methods, informing the public that the current Greenhouse Gases, Regulated Emissions, and Energy Use in Technologies (GREET) model of the Argonne National Laboratory and existing GREET-based models do not currently meet the applicable requirements to be used for the SAF credit, but federal agencies are working to modify the GREET model so that it does. IR-2023-240 (12/15/23) Appendix A of this notice supersedes Appendix B of Notice 2023-6 (12/19/22).	40B 6426(k)
<u>Notice 2024-</u> <u>07</u>	12/19/23	Provides automatic relief to eligible taxpayers from additions to tax for failure to pay with respect to certain income tax returns for 2020 and 2021. For eligible taxpayers, these additions to tax will be waived or, to the extent previously assessed or paid, will be abated, refunded, or credited to other outstanding tax liabilities, as appropriate, for the relief period, which begins on the date the IRS issued an initial balance due notice or February 5, 2022, whichever is later, and ends on March 31, 2024. IR-2023-244 (12/19/23) FS-2023-28 (Dec. 2023)	6651
<u>Notice 2024-</u> <u>08</u>	12/14/23	Provides optional 2024 standard mileage rates for taxpayers to use in computing deductible costs of operating an automobile for business, charitable, medical, or moving expense purposes. This notice also provides the amount taxpayers must use in calculating reductions to basis for depreciation taken under the business standard mileage rate, and the maximum standard automobile cost that may be used in computing the allowance under a fixed and variable rate	61 162 213 274

		plan. Additionally, this notice provides the maximum fair market value of employer- provided automobiles first made available to employees for personal use in calendar year 2024 for which employers may use the fleet-average valuation rule in § 1.61-21(d)(5)(v) or the vehicle cents-per-mile valuation rule in § 1.61-21(e). Business: 67 cents/mile 30 cents/mile represents depreciation Medical/moving: 21 cents/mile	
Notice 2024-	12/28/23	Charitable set at 14 cents per §170(i). Provides procedures for applicable entities to	45
<u>09</u>		claim the statutory exception to the application of the phaseouts for elective payment projects	45Y
		that begin construction during calendar year	48
IRA 2022		2024 that fail to satisfy the domestic content requirement.	48E
		The phaseouts for elective payment and the statutory exception apply to the following credits:	6417
		 Renewable Electricity Production Credit (IRC § 45) 	
		Clean Electricity Production Credit (IRC § 45Y)	
		• Energy Credit (IRC § 48)	
		 Clean Electricity Investment Credit (IRC § 48E) 	
		Applicable entities are generally tax-exempt organizations, state and local governments, Indian tribal governments, Alaska Native Corporations, the Tennessee Valley Authority or rural electric cooperatives.	
		Domestic content is generally defined as steel, iron or manufactured products that are manufactured or produced in the United States.	
		Generally, unless a statutory exception applies, the phaseouts for elective payment apply to projects that produce 1 or more megawatts of	

		electricity and that fail to satisfy the domestic content requirement.	
		<u>IR-2023-252</u> (12/28/23)	
Notice 2024- <u>10</u> IRA 2022	12/15/23	Provides additional interim guidance regarding application of new corporate alternative minimum tax (CAMT), as added to the Code by IRA 2022. Provides additional rules for determining adjusted financial statement income (AFSI) of a U.S. Shareholder when a controlled foreign corporation (CFC) pays a dividend to the U.S. Shareholder or another CFC and modifies and clarifies the interim guidance provided in <u>Notice 2023-64</u> regarding the applicable financial statement (AFS) of members of a tax consolidated group.	55 56A 59
		<u>IR-2023-241</u> (12/15/23)	
<u>Notice 2024-</u> <u>11</u>	12/28/23	Updates the list of treaties that meet the requirements of section 1(h)(11) (qualified dividends). Under section 1(h)(11), a dividend paid to an individual shareholder from either a domestic corporation or a "qualified foreign corporation" generally is subject to tax at the reduced rates applicable to certain capital gains. A qualified foreign corporation includes certain foreign corporations that are eligible for benefits of a comprehensive income tax treaty with the United States that the Secretary determines is satisfactory for purposes of this provision and that includes an exchange of information program.	1
Notice 2024- 12 TCJA	12/22/23	Clarifies and modifies Notice 2023-63 which announced that Treasury and IRS intend to issue proposed regulations providing rules addressing capitalization and amortization of specified research or experimental expenditures under §174. This notice clarifies rules in Notice 2023-63 relating to research performed under a contract. This notice also modifies the reliance rules Notice 2023-63 by removing the requirement that taxpayers must rely on all of the rules in sections	174

Notice 2024- 13 IRA 2022	12/29/23	3 through 9 of Notice 2023-63. Finally, this notice clarifies that section 5 of Rev. Proc. 2000-50 (costs of developing computer software) is obsoleted for amounts paid or incurred in taxable years beginning after December 31, 2021. Beginning January 1, 2023, energy efficient home improvement credit allows for a credit, subject to certain limitations and caps, equal to 30% of a taxpayer's expenses for certain energy efficiency improvements and related costs. Beginning January 1, 2025, taxpayers claiming the credit must also satisfy a product identification number (PIN) requirement for certain categories of products. Notice 2024-13 requests comments on several general and specific questions relating to this PIN requirement and outlines a PIN assignment system that the IRS is considering. Applies to "qualified energy property" (§25C(d)(2)) and exterior windows and doors listed at §25C(c)(3)(B)&(C). Comments sought by 2/27/24.	<u>25C(h)</u>
		<u>IR-2023-253</u> (12/29/23)	
Notice 2024- 14		Not issued as of 5/31/24	
Notice 2024- 15		Not issued as of 5/31/24	
<u>Notice 2024-</u> <u>16</u>	12/28/23	Announces that Treasury and IRS intend to issue proposed regs that will address certain basis consequences of internal restructuring transactions in which a U.S. corporation acquires stock of a controlled foreign corporation ("CFC") from another CFC. In particular, the notice announces rules under which basis provided under section 961(c) in stock of a second-tier CFC held by a first-tier CFC will be transferred to a U.S. corporation that acquires the second-tier CFC from the first-tier CFC in a liquidation described in section 332 or an asset reorganization described in section 368(a)(1).	332 368 961
Notice 2024- 17		Not issued as of 5/31/24	

Notice 2024-	1/12/24	Addresses availability of administrative	6011
18	_,,	exemptions from requirement to file certain	6037
_		returns and other documents in electronic form.	
TFA 2019		This notice also addresses availability of	
		information about procedure to request a waiver	
		of the requirement to file electronically Forms	
		1120, 1120-S, 1120-F, and 1065. In addition,	
		provides information about publications	
		pertaining to failed attempts to electronically file	
		Forms 1120, 1120-S, and 1120-F using IRS filing	
		systems. Lastly, this notice obsoletes Notice	
		2010-13, Form 1120, Form 1120-F, Form 1120S,	
		Form 990, and Form 990-PF Electronic Filing	
		Waiver Request Procedures, and modifies Notice 2023-60, as released on August 11, 2023, but not	
		published in IRB.	
Notice 2024-	1/11/24	Provides relief from certain penalties imposed	751
<u>19</u>	, ,	solely for failure of a partnership with unrealized	_
_		receivables or inventory items to furnish Part IV	
		of Form 8308, Report of a Sale or Exchange of	
		Certain Partnership Interests, by January 31,	
		2024, to the transferor and transferee in certain	
		transfers of partnership interests that occurred in	
		calendar year 2023.	
<u>Notice 2024-</u>	1/19/24	Provides taxpayers with a list of eligible census	30C
<u>20</u>		tracts in advance of 2023 filing season and to	
IRA 2022		explain how taxpayers can identify the 11-digit census tract identifier for the location where the	
IKA 2022		property is placed in service. IRS intends to	
Modified by		propose regulations including this information in	
Notice 2024-		the future, but taxpayers may rely on the notice	
<u>64</u> (9/18/24)		until proposed regulations are published.	
_ 、 、 、 、			
		<u>IR-2024-16</u> (1/19/24)	
		FAQs	
		Appendices A & B corrected by <u>IR-2024-107</u>	
		(4/12/124)	
Notice 2024-	1/12/24	Sets forth updates on corporate bond monthly	417
21	, ,	yield curve, corresponding spot segment rates for	430
		January 2024 used under § 417(e)(3)(D), 24-	
		month average segment rates applicable for	

		January 2024, and 30-year Treasury rates, as	
		reflected by application of § 430(h)(2)(C)(iv).	
Notice 2024-	1/12/24	Initial guidance on pension-linked emergency	
	1/12/24	savings accounts (PLESAs), which are individual	
<u>22</u>		accounts, in defined contribution plans, that are	
SECURE Act		designed to encourage employees to save for	
2.0		financial emergencies. The notice provides initial	
		guidance regarding anti-abuse rules under IRC	
		§402A(e)(12) to assist in implementation of	
	1/25/24	SECURE 2.0 Act section 127 provisions.	F 20
<u>Notice 2024-</u>	1/25/24	Provides relief from 12-month limitation for	529
<u>23</u>		taxpayers making rollovers to certain 529 plans.	
		Maryland Prepaid College Trust, which is a	
		qualified tuition plan under section 529 has	
		experienced numerous system issues in recent	
		years. Many taxpayers moved their money out of	
		MPCT because of the issues. In July, MPCT	
		determined it owed taxpayers additional money,	
		and section 529 only allows one tax-free rollover	
		per 12-month period (generally).	
Nation 2024	2/15/24	IR-2024-20 (1/25/24)	117
Notice 2024-	2/15/24	Sets forth updates on corporate bond monthly yield curve, corresponding spot segment rates for	417 430
<u>24</u>		January 2024 used under § 417(e)(3)(D), 24-	430
		month average segment rates applicable for	
		February 2024, and 30-year Treasury rates, as	
Notice 2024-	3/18/24	reflected by application of § 430(h)(2)(C)(iv). Resident populations of the 50 states, the District	42
<u>10011Ce 2024-</u> <u>25</u>	3/ 10/ 24	of Columbia, Puerto Rico, and the insular areas	42
<u>25</u>		for purposes of determining the 2024 calendar	142
		year (1) state housing credit ceiling under section	140
		42(h) of the Code, (2) private activity bond	
		volume cap under section 146, and (3) private	
		activity bond volume limit under section 142(k)	
		are reproduced.	
Notice 2025-	2/27/24	IRS is granting an administrative exemption from	1461
<u>10011CE 2023-</u> <u>26</u>	~, ~, ~, ~+	electronic filing requirements for Form 1042,	1401
20		Annual Withholding Tax Return for U.S. Source	6011
		Income of Foreign Persons, set forth in final regs	0011
		issued under sections 6011(e), 1461, and 1474	
		(TD 9972, 88 FR 11754). Notice 2024-26	
		announces that withholding agents (both U.S.	
		and foreign persons) are administratively exempt	
		and foreign persons) are auministratively exempt	

		from the requirement to electronically file Forms 1042 required to be filed in calendar year 2024 (applicable to Forms 1042 filed in 2024 for taxable year 2023). Additionally, this notice announces that withholding agents that are foreign persons are administratively exempt from the requirements to electronically file Forms 1042 required to be filed in calendar year 2025 (applicable to Forms 1042 filed in 2025 for taxable year 2024). The administrative exemption from the electronic filing requirements for Form 1042 is automatic, and withholding agents are not required to file a waiver request to utilize this exemption.	
<u>Notice 2024-</u> <u>27</u>	3/5/24	Requests additional comments on any situations in which an election under §6417(a) could be made for a credit that was purchased in a	6417 6418
IRA 2022		transfer for which an election under § 6418(a) is made. Such sequence of events is referred to as "chaining" in this notice.	
<u>Notice 2024-</u> <u>28</u>	3/7/24	Invites the public to submit recommendations for items to be included on the 2024-2025 Priority Guidance Plan. Comments due by 5/31/24.	
<u>Notice 2024-</u> <u>29</u>	3/19/24	Sets forth updates on the corporate bond monthly yield curve, the corresponding spot segment rates for February 2024 used under § 417(e)(3)(D), the 24-month average segment rates applicable for March 2024, and the 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).	417 430
<u>Notice 2024-</u> <u>30</u> IRA 2022	3/22/24	Modifies Notice 2023-29 by expanding the Nameplate Capacity Attribution Rule under section 4.02(1)(b) to include additional attribution property and by adding two 2017 North American Industry Classification System (NAICS) industry codes to the table in section 3.03(2) for purposes of determining the Fossil Fuel Employment rate. IR-2024-77 (3/22/24).	45 45Y 48E
<u>Notice 2024-</u> <u>31</u>	3/20/24	Provides for adjustments to the limitation on housing expenses for purposes of §911 for the	911

		2024 tax year. These adjustments are made on basis of geographic differences in housing costs relative to housing costs in the United States. If the limitation on housing expenses is higher for 2024 tax year than the adjusted limitations on housing expenses provided in Notice 2023-26, qualified taxpayers may apply the adjusted limitations in this notice for the 2024 tax year to their 2023 tax year.	
<u>Notice 2024-</u> <u>32</u>	3/25/24	Provides guidance for qualified student loan bonds to clarify certain requirements for tax- exempt bond financing for loan programs of general application approved by a State under § 144(b)(1)(B) (State Supplemental Loan programs). Specifically, this notice addresses eligibility of borrowers of loans through State Supplemental Loan programs and the loan size limitation for State Supplemental Loans. This notice also provides guidance on whether an issue of State or local bonds the proceeds of which are used to finance or refinance qualified student loans or to finance qualified mortgage loans is a refunding issue.	144
Notice 2024- 33 IRA 2022 Obsoleted by Notice 2024- 66 (9/12/24)	4/15/24	Provides limited relief to CAMT taxpayers from addition to tax under § 6655 for failure to pay estimated income tax with respect to its CAMT liability under § 55 for the 2024 first quarterly installment of estimated income tax due on or before April 15, 2024 (or on or before May 15, 2024, for taxpayers with taxable years beginning in February 2024).	55 6655
<u>Notice 2024-</u> <u>34</u>	4/10/24	Sets forth updates on corporate bond monthly yield curve, corresponding spot segment rates for March 2024 used under §417(e)(3)(D), 24-month average segment rates applicable for April 2024, and 30-year Treasury rates, as reflected by application of § 430(h)(2)(C)(iv).	417 430
Notice 2024- <u>35</u> Secure Act 1.0 Secure Act 2.0	4/16/24	Provides relief with respect to certain RMDs that are not made in 2024. This relief was provided with respect to certain RMDs in 2021, 2022, and 2023, and is being extended in this notice to certain RMDs in 2024. Provides that if certain requirements are met, a plan will not fail to be	401
2000.07.00 2.0	1		

			I
		qualified for failing to make a specified RMD in 2024, and a taxpayer will not be assessed an excise tax for failing to take the RMD. This notice also announces that the final regs intended to be published relating to RMDs are anticipated to apply for purposes of determining RMDs for calendar years beginning on or after January 1, 2025.	
<u>Notice 2024-</u> <u>36</u> IRA 2022	4/29/24	Announces 2024 allocation round of the section 48C qualifying advanced energy project credit to allocate approximately \$6 billion of section 48C credits, with approximately \$2.4 billion in section 48C credits to be allocated to projects located in section 48C(e) energy communities census tracts. Also updates and modifies <u>Appendices A,</u> <u>B</u> and <u>C</u> , as published in Notice 2023-18 and Notice 2023-44.	48C
		Appendix A provides definitions and examples of qualifying advanced energy projects. Appendix B provides the application process that the Department of Energy will use to evaluate concept papers and § 48C applications to decide whether recommend a project for a section 48C allocation. Appendix C contains a list of census tracts that are section 48C(e) energy community census tracts.	
Notice 2024- <u>37</u> IRA 2022	4/30/24	Provides safe harbors for new 40BSAF-GREET 2024 model as a qualifying method to qualify for and calculate the sustainable aviation fuel (SAF) credit. This notice also provides a safe harbor for the use of the United States Department of Agriculture Climate Smart Agriculture Pilot Program to further reduce the lifecycle greenhouse gas emissions reduction percentage calculated using 40BSAF-GREET 2024 for domestic soybean and domestic corn feedstocks. IR-2024-127 (4/30/24) – "SAF credit applies to a	40B 6426
		qualified fuel mixture containing sustainable aviation fuel for certain sales or uses after Dec. 31, 2022, and before Jan. 1, 2025."	

<u>Notice 2024-</u> <u>38</u>	5/1/24	Accompanies <u>Rev. Proc. 2024-24</u> , which provides procedures for requesting private letter rulings from the IRS regarding certain matters pertaining to section 355 transactions. Specifically, this notice requests public feedback on the provisions set forth in the Rev. Proc. 2024-24 and describes the Treasury Department's and IRS's views and concerns relating to certain matters addressed in the revenue procedure. Comments due by 7/30/24.	355
<u>Notice 2024-</u> <u>39</u> IRA 2022	6/10/24	Publishes inflation adjustment factor for the carbon oxide sequestration credit under § 45Q for calendar year 2024. The inflation adjustment factor is used to determine the amount of credit allowable under § 45Q for taxpayers that make an election under § 45Q(b)(3) to have the dollar amounts applicable under § 45Q(a)(1) or (2) apply. This notice also obsoletes Notice 2009-83 and Notice 2011-25.	45Q
<u>Notice 2024-</u> <u>40</u>	5/15/24	Provides guidance on corporate bond monthly yield curve, corresponding spot segment rates used under § 417(e)(3), and the 24-month average segment rates under §430(h)(2) of the Internal Revenue Code. In addition, this notice provides guidance as to the interest rate on 30- year Treasury securities under § 417(e)(3)(A)(ii)(II) as in effect for plan years beginning before 2008 and the 30-year Treasury weighted average rate under § 431(c)(6)(E)(ii)(I).	417 430
<u>Notice 2024-</u> <u>41</u>	5/16/24	Modifies existing domestic content safe harbor in Notice 2023-38, provides a new elective safe	45 45Y
IRA 2022	Corrected version released by IRS on 5/24/24	harbor for determining the domestic content bonus credit amounts under §§ 45, 45Y, 48, and 48E, and requests comments regarding the new elective safe harbor to inform the development of any future updates. IR-2024-140 (5/16/24)	48 48E
<u>Notice 2024-</u> <u>42</u>	5/15/24	Specifies updated static mortality tables to be used for defined benefit pension plans under § 430(h)(3)(A) and section 303(h)(3)(A) of the Employee Retirement Income Security Act of 1974, Pub. L. No. 93-406, as amended (ERISA). These updated static mortality tables, issued	430

		pursuant to regulations under § 430(h)(3)(A), apply for purposes of calculating the funding target and other items for valuation dates occurring during the 2025 calendar year.	
Notice 2024-	5/22/24	Amends regs under sections 59A and 6038A to	59A
<u>43</u>		defer the applicability date of certain provisions	6038A
		of the regulations relating to the reporting of	
TCJA		qualified derivative payments ("QDPs").	
<u>Notice 2024-</u>	5/22/24	Provides guidance for complying with the final	871
<u>44</u>		regulations with respect to dividend equivalents	1441
		under IRC sections 871(m), 1441, 1461, and 1473	1461
		(collectively referred to as the section 871(m)	1473
		regulations) in 2025, 2026, and 2027, extending	
		the transition relief provided in Notice 2022-37	
		for two years.	
<u>Notice 2024-</u>	6/24/24	Publishes inflation adjustment factors for the	45V
<u>45</u>		credit for production of clean hydrogen under	
		§ 45V and the corresponding applicable amounts	
IRA 2022		for calendar years 2023 and 2024. The inflation	
		adjustment factor and applicable amount are	
		used to determine the amount of the credit	
	c /= /o /	allowable under § 45V.	100
Notice 2024-	6/5/24	Announces that the IRS Commissioner has	<u>139</u>
<u>46</u>		determined that the February 3, 2023,	
		derailment of a freight train operated by a	
		common carrier in East Palestine, Ohio, is "an	
		event of a catastrophic nature under § 139(c)(3)" and thus a qualified disaster for purposes of	
		§139. As a result, certain payments made by the	
		common carrier to individuals affected by the	
		Derailment are excludable from gross income as	
		qualified disaster relief payments under §139(a).	
		The common carrier issued 1099-MISC to	
		affected individuals for 2023 payments.	
		. ,	
		See the notice for how to report this if the	
		individual already filed their 2023 return and if	
		they have not yet done so. The notice and <u>IR-</u>	
		2024-156 (6/5/24) also explain that some	
		payments, such as for lost wages or those made	
		to businesses, are taxable.	

		Observations If a neurosent use for democrate	
		Observation: If a payment was for damages to	
		property, it likely is not "income" so not taxable.	
<u>Notice 2024-</u>	6/13/24	Extends the relief provided in Notice 2024-33,	55
<u>47</u>		which waived the estimated tax penalty imposed	6655
		under § 6655 (for a corporation's failure to pay	
IRA 2022		estimated income tax) to the extent attributable	
		to the revised corporate alternative minimum tax	
Obsoleted by		(CAMT) under § 55, but only with respect to an	
<u>Notice 2024-</u>		installment of estimated tax due on April 15,	
<u>66</u> (9/12/24)		2024, or May 15, 2024, with respect to a tax year	
		that began in 2024. The relief from the addition	
		to tax under § 6655 provided by Notice 2024-33	
		is extended to any installment of estimated tax	
		by a corporate taxpayer with respect to a taxable	
		year that began in 2024 that is due on or before	
		August 15, 2024, to the extent attributable to the	
		CAMT.	
Notice 2024-	6/7/24	Publishes lists of information that taxpayers may	45
48		use to determine whether they meet certain	45Y
		requirements under the Statistical Area Category	48
IRA 2022		or the Coal Closure Category as described in	48E
		sections 3.03 and 3.04 of Notice 2023-29 for	
		purposes of qualifying for energy community	
		bonus credit amounts or rates under sections 45,	
		45Y, 48, and 48E. These lists are provided	
		in <u>Appendix 1</u> and <u>Appendix 2</u> to this notice.	
		Appendix 1 to this notice pertains to the	
		Statistical Area Category, and Appendix 2 to this	
		notice pertains to the Coal Closure Category.	
		<u>IR-2024-157</u> (6/7/24)	
Notice 2024-	5/31/24	Provides guidance on registration requirements	45Z
49		for clean fuel production credit. Taxpayer must	_
		be registered as a producer of clean fuel at the	
IRA 2022		time of production to be eligible to claim the	
		clean fuel production credit. It provides guidance	
		regarding the registration requirement, including	
		information about the time, form, and manner of	
		such registration with the IRS. A taxpayer must	
		have a signed registration letter dated on or	
		before January 1, 2025, for the taxpayer to be	
		eligible to claim the clean fuel production credit	
		for production starting January 1, 2025.	

IR-:	2024-153 (5/31/24)	
	2024-25 (7/10/24) released in <u>IR-2024-184</u>	
(//	10/24)	
50 any det add sho Pro Pro an req sub req the	der section 4672(a)(2), importer or exporter of y substance may request that Secretary termine whether such substance should be ded to the list of taxable substances (List) or puld be removed from the List. Revenue ocedure 2022-26, as modified by Revenue ocedure 2023-20, provides the procedures for importer, exporter, or interested person to uest a modification of the list of taxable ostances. An importer of polyoxymethylene uested that polyoxymethylene be added to List. This Notice of Determination provides Secretary's determination that	4672
	yoxymethylene be added to the List. Dishes reference price for the	43
	nconventional source production credit under	43 451
	5K for calendar year 2023. Section	45K
451	<(d)(2)(A) provides, in general, that the	613A
	retary shall determine and publish in the	
	leral Register the inflation adjustment factor	
	the reference price for the preceding	
	endar year for purposes of the	
	nconventional source production credit under	
	5K. The credit period for nonconventional	
	rce production credit ended on December 31,	
	13, for facilities producing coke or coke gas	
	her than from petroleum-based products).	
	erefore, this notice does not publish the	
	ation adjustment factor for that credit for endar year 2023. However, the reference price	
	itinues to apply in determining the amount of	
	enhanced oil recovery credit under § 43, the	
	rginal well production credit for qualified	
	de oil production under § 451, and the	
	centage depletion in case of oil and natural	
	produced from marginal properties under	
-	13A. Accordingly, this notice publishes the	
	erence price for calendar year 2023.	

<u>Notice 2024-</u> <u>52</u>	7/1/24	Provides applicable reference price for qualified natural gas production from qualified marginal wells during tax years beginning in calendar year 2024 for purpose of determining marginal well production credit under § 45I. The applicable reference price for tax years beginning in calendar year 2024 is \$2.04 per 1,000 cubic feet. The notice also provides credit amount used for the purpose of determining the marginal well production credit. The credit amount for tax years beginning in calendar year 2024 is \$0.77 per 1,000 cubic feet.	451
<u>Notice 2024-</u> <u>53</u>	6/18/24	Sets forth updates on the corporate bond monthly yield curve, the corresponding spot segment rates for May 2024 used under §417(e)(3)(D), the 24-month average segment rates applicable for June 2024, and the 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).	417 430
<u>Notice 2024-</u> <u>54</u> Withdrawn by <u>Notice 2025-23</u> (4/17/25) per <u>Exec Order</u> <u>14219</u> (2/19/25)	6/17/24	Announces that Treasury and IRS intend to issue 2 sets of proposed regs that would provide special rules for certain transactions under §§ 732, 734, 743, 755, and 1502. First, proposed regs under §§ 732, 734, 743, and 755 would provide special rules for cost recovery of positive basis adjustments or the ability to take positive basis adjustments into account in computing gain or loss on the disposition of basis adjusted property following certain transactions. Second, proposed regs under § 1502 would provide rules to clearly reflect the taxable income and tax liability of a consolidated group whose members own interests in a partnership. <u>FS-2024-21</u> (6/17/24) on New guidance focused on "basis shifting" transactions using partnerships. Basis shifting transactions generally fall into 3 groups: 1) Transfer of p/s interest to related party. 2) Distribution of property to a related party. 3) Liquidation of related p/s or partner. <u>IR-2024-166</u> (6/17/24)	732 734 743 754 755 1502

Notice 2024- 55 SECURE Act 2.0	6/20/24	Provides guidance on the application of the exceptions to the 10 percent additional tax under section 72(t)(1) for emergency personal expense distributions and domestic abuse victim distributions. [SECURE Act 2.0, SEC. 115]	72(t)
Notice 2024- 56 IIJA 2021	6/28/24	IR-2024-170 (6/20/24) Provides transition relief with respect to the reporting of information and backup withholding on digital assets by brokers under section 6045. IR-2024-178 (6/28/24)	3403 3406 6045 6721 6722 6651 6656
Notice 2024- <u>57</u> IIJA 2021	6/28/24	Provides that brokers are not required to report certain identified digital asset transactions under section 6045 until further notice. IR-2024-178 (6/28/24)	6045
<u>Notice 2024-</u> <u>58</u>	7/22/24	Announces the applicable percentage under § 613A of the Code to be used in determining percentage depletion for marginal properties for the 2024 calendar year	613A
<u>Notice 2024-</u> <u>59</u>	7/18/24	Sets forth updates on corporate bond monthly yield curve, corresponding spot segment rates for July 2024 used under § 417(e)(3)(D), 24-month average segment rates applicable for July 2024, and 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).	417 430
Notice 2024- <u>60</u> IRA 2022 and prior public laws	7/24/24	Describes information that must be included in a written report described in § 1.45Q-4(c)(2) (LCA Report) and provides procedures a taxpayer must follow to submit the LCA Report and required supporting information to IRS and Department of Energy for review under § 1.45Q-4(c)(5) before any credit for carbon oxide sequestration allowed under § 45Q(a)(2)(B)(ii) or (a)(4)(B)(ii) is determined for qualified carbon oxide utilized by any taxpayer in the manner described in §45Q(f)(5) as implemented by § 1.45Q-4 (§ 45Q utilization credit). As required by § 1.45Q-4(c)(6), the IRS must approve the lifecycle analysis (LCA) of greenhouse gas emissions (as defined in §1.45Q-4(c)(1)) documented in the LCA Report	45Q

		with respect to carbon capture property placed in service on or after February 18, 2018, before any § 45Q utilization credit otherwise satisfying the applicable requirements of § 45Q and §§1.45Q-1, 1.45Q-2, and 1.45Q-4 is determined. Accordingly, IRS must approve the taxpayer's LCA before the taxpayer may claim any § 45Q utilization credit determined with respect to a taxpayer on any federal income tax return for a tax year beginning on or after January 13, 2021 (that is, the tax years to which §1.45Q-4 applies). IR-2024-194 (7/24/24)	
<u>Notice 2024-</u> <u>61</u>	4/19/24	Announces inflation adjustment factor and phase-out amount for the enhanced oil recovery credit for taxable years beginning in the 2024 calendar year. The notice concludes that because the reference price for the 2023 calendar year (\$76.10) exceeds \$28 multiplied by the inflation adjustment factor for the 2024 calendar year (\$28 multiplied by 2.0615 = \$57.72) by \$18.38, the enhanced oil recovery credit for qualified costs paid or incurred in 2024 is phased-out completely.	43
<u>Notice 2024-</u> <u>62</u>	8/16/24	Sets forth updates on corporate bond monthly yield curve, the corresponding spot segment rates for July 2024 used under § 417(e)(3)(D), the 24-month average segment rates applicable for August 2024, and the 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).	417 430
Notice 2024- <u>63</u> SECURE 2.0 Act	8/19/24	Guidance in form of questions and answers with respect to section 110 of Division T of Consolidated Appropriations Act, 2023, P. L. 117 328 (2022), known as SECURE 2.0 Act of 2022. Section 110 of SECURE 2.0 Act allows employers to make matching contributions on account of employees' qualified student loan payments (QSLPs) under section 401(k) plans, section 403(b) plans, SIMPLE IRA plans, and governmental section 457(b) plans (QSLP matches). IR-2024-217 (8/19/24)	221 401 402 457

Notice 2024- 64 IRA 2022	9/18/24	Feb 12, 2024, Treasury and IRS published Notice 2024-20, to provide guidance on eligible census tracts for the § 30C credit in advance of 2023 filing season and to announce the intent to propose regulations for the credit. Section 5.01 of Notice 2024-20 refers taxpayers to appendices with lists of eligible census tracts based on either the 2015 census tract boundaries or the 2020 census tract boundaries, as relevant, using a unique identifier called an 11-digit census tract GEOID. Section 5.02 of Notice 2024-20 provides website addresses for mapping tools that taxpayers can use to identify the 11-digit census tract GEOID for a location where a property is placed in service. Section 5.03 of Notice 2024-20 provides that until the issuance of the forthcoming proposed regulations, taxpayers may rely on Notice 2024- 20 and its appendices for purposes of determining whether qualified alternative fuel vehicle refueling property has been placed in service in an eligible census tract. In addition, until the issuance of the forthcoming proposed regulations, the IRS will administer § 30C in a manner consistent with the appendices and related rules described in this notice. This notice modifies sections 5.02 and 5.03 of <u>Notice 2024-</u> 20 by updating the mapping tools referenced in Notice 2024-20. Also see <u>IR-2024-240</u> (9/18/24) which also notes release of proposed regs (REG-118269-23) on 9/19/24 in the Federal Register (advance release	30C
		9/19/24 in the Federal Register (advance release <u>here</u>).	
Notice 2024- 65 SECURE 2.0 Act	9/5/24	Requests comments from public by 11/4/24 regarding all aspects of sections 103 and 104 of the SECURE 2.0 Act of 2022. Section 103, in part, added section 6433, which provides for matching contributions (Saver's Match contributions) paid by Treasury to applicable retirement savings	6433
		vehicles on behalf of eligible individuals who make qualified retirement savings contributions.	

		Section 104 requires Treasury to take steps to increase public awareness of availability of Saver's Match contributions and to provide a report to Congress on anticipated promotion	
		efforts by Treasury.	
		<u>IR-2024-232 (</u> 9/5/24)	
<u>Notice 2024-</u>	9/12/24	Provides relief from the addition to tax under	55
<u>66</u>		§6655 for the underpayment of estimated tax by	6655
		a corporation to the extent the amount of any	
IRA 2022		underpayment is attributable to revised corporate alternative minimum tax (CAMT)	
		liability under § 55 for any Covered CAMT	
		Year. A Covered CAMT Year is any tax year that	
		begins after December 31, 2023, and before	
		January 1, 2025. The notice also incorporates	
		relief provided in Notice 2024-33, and Notice	
		2024-47, and obsoletes those notices.	
		<u>IR-2024-235</u> (9/12/24) – also includes link to	
	0/10/24	proposed CAMT regulations.	417
<u>Notice 2024-</u> <u>67</u>	9/18/24	Sets forth updates on corporate bond monthly yield curve, corresponding spot segment rates for	417 430
07		August 2024 used under § 417(e)(3)(D), 24-	430
		month average segment rates applicable for	
		September 2024, and 30-year Treasury rates, as	
		reflected by the application of § 430(h)(2)(C)(iv).	
Notice 2024-	9/20/24	Announces special per diem rates effective	274
<u>68</u>		October 1, 2024, which taxpayers may use to	
		substantiate amount of expenses for lodging,	
		meals, and incidental expenses when traveling	
		away from home. Provides special	
		transportation industry rate, rate for incidental	
		expenses only deduction, and the rates and list of	
		high-cost localities for purposes of high-low substantiation method.	
		Substantiation method.	
		[Rev. Proc. 2019-48 provides the rules for using	
		per diem rates, rather than actual expenses, to	
		substantiate the amount of expenses for lodging,	
		meals, and incidental expenses for travel away	
		from home. Taxpayers who use per diem rates	
		to substantiate the amount of travel expenses	
		under Rev. Proc. 2019-48 may use the federal per	

		diem rates published annually by the General Services Administration. Rev. Proc. 2019-48 allows certain taxpayers to use a special transportation industry rate or to use rates under a high-low substantiation method for certain high-cost localities. The IRS announces these rates and the rate for the incidental expenses only deduction in an annual notice.] Use of a per diem substantiation method is not mandatory. A taxpayer may substantiate actual allowable expenses if the taxpayer maintains	
		adequate records or other sufficient evidence for	
		proper substantiation.	
<u>Notice 2024-</u> <u>69</u> <u>Notice 2024-</u> <u>70</u>	10/7/24 9/30/24	Publishes the inflation adjustment factor and reference price for calendar year 2024 for the renewable electricity production credit under section 45. The 2024 inflation adjustment factor and reference price are used in determining the availability of the credit and apply to calendar year 2024 sales of kilowatt hours of electricity produced in the United States or a possession thereof from qualified energy resources. This notice also provides the credit amounts for calendar year 2024 under section 45. Explains circumstances under which four-year replacement period under section 1033(e)(2) is extended for livestock sold on account of	45 1033
		drought. Appendix contains list of counties that experienced exceptional, extreme, or severe drought conditions during the 12-month period ending August 31, 2024. Taxpayers may use this list to determine if an extension is available.	
		<u>IR-2024-248</u> (9/30/24)	
<u>Notice 2024-</u>	10/17/24	Provides a safe harbor under section 213 for	213
<u>71</u>		amounts paid for condoms.	
<u>Notice 2024-</u> <u>72</u>	10/1/24	Postpones various time-sensitive deadlines for taxpayers affected by terrorist attacks in Israel throughout 2023 and 2024. Defines the covered area, identifies categories of "affected taxpayers," and provides a list of the acts postponed. Postponement period is September	7508A`
		30, 2024, to September 30, 2025. The separate	

Notice 2024- 73 SECURE Act 2.0	10/3/24	determination of terroristic action and grant of relief in this notice will also postpone acts that were postponed by Notice 2023-71 until September 30, 2025 for taxpayers eligible for relief under both notices. <u>IR-2024-252 (10/1/24)</u> Provides guidance regarding discrete issues related to application of nondiscrimination rules of section 403(b)(12) with respect to the ERISA long-term, part-time (LTPT) employee rules for a section 403(b) plan. ERISA LTPT rules were added under section 125 of the SECURE 2.0 Act of 2022 effective for plan years beginning after December 31, 2024. This notice also (1) provides that Department of the Treasury and the IRS anticipate issuing proposed regulations with respect to section 403(b)(12)(D) and guidance with respect to sections 202(c) and 203(b)(4) of ERISA, (2) announces that the final regulation that the Treasury Department and the IRS intend to issue related to long term, part time employees under section 401(k) plans will apply no earlier than to plan years that begin on or after January 1, 2026, and (3) asks for comments on the content of this notice.	403
Notice 2024-	10/18/24	<u>IR-2024-257</u> (10/3/24) Additional guidance for taxpayers using safe	40B
74		harbors in Notice 2024-37 with respect to the sustainable aviation fuel (SAF) credit. Notice 2024-74 provides that a taxpayer using a 40BSAF- GREET 2024 safe harbor to calculate its emissions reduction percentage with respect to claims that relate to the sale or use of a SAF qualified mixture after the effective date of the notice must use the newly released October 2024 version of the 40BSAF-GREET 2024 model. <u>IR-2024-272</u> (10/18/24)	6426
<u>Notice 2024-</u>	10/17/24	Expands list of preventive care benefits	223
<u>75</u>		permitted to be provided by a high deductible	

		health plan (HDHP) under section 223(c)(2)(C)	
		without a deductible, or with a deductible below	
		the applicable minimum deductible for the	
		HDHP. Provides Q&As on oral contraceptives,	
		male condoms, breast cancer screening, and	
		continuous glucose monitors and insulin.	
		Generally, health plan won't fail to qualify as	
		HDHP if, for example, provides benefits for	
		continuous glucose monitors before individual	
		meets minimum annual deductible for an HDHP	
		under §223(c)(2)(A).	
Notice 2024-	10/21/24	Provides guidance on corporate bond monthly	417
76	_,,	yield curve for September 2024, the	430
<u> </u>		corresponding spot segment rates used under	431
		§417(e)(3), and the 24-month average segment	
		rates under § 430(h)(2). In addition, this notice	
		provides guidance as to interest rate on 30-year	
		Treasury securities under §417(e)(3)(A)(ii)(II) as in	
		effect for plan years beginning before 2008 and	
		the 30-year Treasury weighted average rate	
	10/15/24	under §431(c)(6)(E)(ii)(I).	402
Notice 2024-	10/15/24	Guidance in form of questions and answers on	402
77		sections 414(aa) and 402(c)(12) as added by	403
		section 301(b) of Division T of the SECURE 2.0 Act	414
SECURE 2.0		of 2022. Section 414(aa) addresses the	
Act		requirements of sections 401(a) and 403 with	
		respect to inadvertent benefit overpayments.	
		Section 402(c)(12) addresses the treatment of	
		certain inadvertent benefit overpayments as	
		eligible rollover distributions.	
<u>Notice 2024-</u>	10/28/24	Extends the temporary relief provided in Notice	1471
<u>78</u>		2023-11, subject to the procedures and	
		requirements of this notice, for certain foreign	
FATCA		financial institutions (FFIs) required to report U.S.	
		taxpayer identification numbers (U.S. TINs) for	
		certain preexisting accounts. The extension of	
		the temporary relief granted by Notice 2023-11 is	
		intended to enable IRS to continue to collect and	
		analyze additional information for accounts	
		without U.S. TINs.	
Notice 2024-			
79			
L	1	1	

Notice 2024-	11/1/24	Provides listing of dollar limitations applicable to	401
<u>80</u>	11/1/24	qualified retirement plans as adjusted for cost-of-	401
<u></u>		living adjustments for 2025.	402
			403
		<u>IR-2024-285</u> (11/1/24)	414
			415
		401(k) contribution limit for 2025 is \$23,500 up	457
		from \$23,000 for 2024. See notice and IR for	-57
		more details.	
Notice 2024-	11/13/24	Provides updates on corporate bond monthly	417
<u>81</u>		yield curve, corresponding spot segment rates for	430
<u>01</u>		October 2024 used under §417(e)(3)(D), the 24-	431
		month average segment rates applicable for	101
		November 2024, and the 30-year Treasury rates,	
		as reflected by the application of §	
		430(h)(2)(C)(iv).	
Notice 2024-	12/5/24	Sets forth 2024 Required Amendments List (2024	401
<u>82</u>	12/3/24	RA List). 2024 RA List applies to individually	401
<u>52</u>		designed plans qualified under section 401(a)	100
		and individually designed plans that satisfy the	
		requirements of section 403(b). 2024 RA List also	
		applies to pre-approved plans with respect to	
		interim amendments.	
Notice 2024-	12/2/24	Sections 4375 and 4376 impose a fee on issuers	4375
83	, _,	of specified health insurance policies and plan	4376
<u></u>		sponsors of applicable self-insured health plans	1070
ACA		to help fund the Patient-Centered Outcomes	
		Research Trust Fund (PCORTF). PCORTF fee is	
		determined by multiplying applicable dollar	
		amount for that year by average number of lives	
		covered during the year. The applicable dollar	
		amount is based on increases in projected per	
		capita amount of National Health Expenditures,	
		as most recently released by HHS. Notice 2023-	
		70 provided that adjusted applicable dollar	
		amount for policy years and plan years ending on	
		or after October 1, 2023, and before October 1,	
		2024, is \$3.22.This notice provides that adjusted	
		applicable dollar amount that applies for	
		determining the PCORTF fee for policy years and	
		plan years ending on or after October 1, 2024,	
		and before October 1, 2025, is \$3.47. This	
		amount has been determined by Treasury	
		economists using the percentage increase in the	
		coontentions asing the percentage increase in the	

Г			
		projected per capita amount of National Health	
		Expenditures published by HHS last year in June	
		2024 (Table 3) and adjustment, as determined by	
		Treasury economists, for year to year variations.	
Notice 2024-	11/22/24	Extends transition process for claiming a	45
84		statutory exception to elective payment	45Y
		phaseouts contained in section 5 of Notice 2024-	48
IRA 2022		9. Thus, if an Applicable Entity provides an	48E
		attestation described in section 5.02 of Notice	
		2024-9 with respect to an Applicable Credit	
		Property the construction of which begins before	
		the later of January 1, 2027, or the issuance of	
		further guidance, Treasury and IRS will treat the	
		attestation as establishing that a Domestic	
		-	
		Content Exception is met with respect to such	
	44/20/20	Applicable Credit Property.	2400
<u>Notice 2024-</u>	11/26/24	Provides that calendar years 2024 and 2025 will	3406
<u>85</u>		be regarded as final transition period for	6050W
		purposes of IRS enforcement and administration	
		of minimum reporting threshold for Form 1099-	
ARPA 2021		K, Payment Card and Third Party Network	
		Transactions. Under Notice 2024-85, a third	
		party settlement organization (TPSO) will be	
		required to report payments in settlement of	
		third party network transactions with respect to	
		a participating payee when the amount of total	
		payments for those transactions is more than	
		\$5,000 during calendar year 2024; more than	
		\$2,500 during calendar year 2025; and more than	
		\$600 during calendar year 2026 and after. Notice	
		2024-85 also provides that for calendar year	
		2024, IRS will not assert penalties under section	
		6651 or 6656 for a TPSO's failure to withhold and	
		pay backup withholding tax during the calendar	
		year.	
		<u>IR-2024-299</u> (11/26/24)	
Notice 2024-	12/23/24	In order to ensure that plans, participants,	7805A
86		beneficiaries, qualified beneficiaries, and	
		claimants in disaster areas are not further	
		adversely affected by Hurricane Helene, Tropical	
		Storm Helene, and Hurricane Milton with respect	
		to their employee benefit plans, certain	
		timeframes are extended during the Relief Period	
		timenames are extended during the Neller Fellou	

established by this document. This document is jointly issued by Departments of Labor and Treasury, through Employee Benefits Security Administration and IRS, respectively, under	
section 518 of ERISA and section 7508A(b).	

Announcements (not a complete list as most are not guidance or of longstanding relevance)

Ann #	Date released	IRS summary	Code Section(s)
<u>Ann.</u> 2024-03 CARES Act	12/21/23	Announces a Voluntary Disclosure Program for taxpayers to resolve refunds or credits for erroneous Employee Retention Credit (ERC) claims. The announcement explains taxpayer eligibility criteria, terms, and procedures for taxpayers electing to participate in the Voluntary Disclosure Program. <u>IR-2023-247</u> (12/21/23)	
Ann. 2024-04 IIJA	1/16/24	Informs filers that digital assets should not be included in section 6050I reporting until after final regulations under section 6050I are issued. <i>Observation</i> : The above text is from the email sent by the IRS to subscribers announcing the announcement. The announcement itself as well as the news release – IR-2024-12 (1/16/24) do not say "final regulations" but just "regulations." Arguably, the IRS is referring to final regulations since proposed regulations are not binding. Also, while not mentioned by the IRS, since §6050I uses "digital assets" as defined under §6045(g), final §6045 are likely needed before the §6050I regulations are finalized. At 1/16/24, no regulations have been released on the IIJA changes to §6050I. When the IRS postponed the effective date of the §6045 broker reporting rule for digital assets (Ann. 2023-02 (12/23/23)), they specifically said the rule would not be effective until final regulations were issued.	60501
<u>Ann.</u> 2024-05	12/29/23	The United States provided a diplomatic notification, dated July 8, 2022, to the Government of the Republic of Hungary of its termination of the United States- Hungary Tax Treaty. In respect of tax withheld at source, the United States-Hungary Tax Treaty ceases to have effect with respect to amounts paid or credited on or	

			1
		after January 1, 2024. In respect of other taxes, the United States-Hungary Tax Treaty ceases to have effect with respect to taxable periods beginning on or after January 1, 2024.	
<u>Ann.</u> <u>2024-10</u> IIJA 2021	2/23/24	Addresses income tax treatment of certain lead service line replacement programs for residential property owners. The replacement of lead service lines under these programs does not result in income to residential property owners. Water systems and state governments are not required to file information returns or furnish payee statements with respect to the replacement of lead service lines under these programs.	61
<u>Ann.</u> <u>2024-16</u>	3/29/24	Advance Pricing and Mutual Agreement report covering calendar year 2023. This Announcement is issued pursuant to § 521(b) of Pub. L. 106-170, the Ticket to Work and Work Incentives Improvement Act of 1999, which requires Treasury to report annually to the public concerning advance pricing agreements (APAs) and the Advance Pricing and Mutual Agreement Program (APMA Program), formerly known as the Advance Pricing Agreement Program (APA Program). This twenty-fifth report describes the experience, structure, and activities of the APMA Program during calendar year 2023.	482
<u>Ann.</u> 2024-19	4/5/24	Addresses the Federal income tax treatment of amounts paid for purchase of energy efficient property and improvements as part of the Department of Energy's "Home Energy Rebate Programs" under §§ 50121 and 50122 of the Inflation Reduction Act of 2022. The announcement also provides coordination rules for taxpayers who receive such amounts and wish to claim a Federal tax credit under § 25C.	25C 61
		Generally, the rebates are not taxable but reduce the basis of property acquired with the rebate and will not count as expenditures for the §25C credit. IR-2024-97 (4/5/24)	
	- / - /		4=05
<u>Ann.</u> 2024-24 IRA 2022	5/17/24	Notifies taxpayers of the applicable Reference Standard 90.1 required under § 179D(c)(2) as part of the definition of energy efficient commercial building property (EECBP). This announcement supplements and	179D
		supersedes Announcement 2023-1 by affirming ASHRAE/IES Reference Standard 90.1-2022 as the	

<u>Ann.</u> 2024-25 IRA 2022	5/17/24	 applicable Reference Standard 90.1 for EECBP placed in service after December 31, 2028, and the construction of which did not begin by December 31, 2022. Provides total amount of unallocated environmental justice solar and wind capacity limitation (Capacity Limitation) that has been carried over from the 2023 Low-Income Communities Bonus Credit Program (Program) year to the 2024 Program year. Additionally, 	48
		this announcement states the distribution of the carried over Capacity Limitation among the facility categories, category 1 sub-reservations, and application options for the 2024 Program year.	
<u>Ann.</u> 2024-26	6/21/24	IR-2024-142 (5/17/24) Provides notice of the partial suspension of the U.S Russia tax treaty.	
<u>Ann.</u> 2024-30	8/15/24	Announces a second Voluntary Disclosure Program for taxpayers to resolve refunds or credits for erroneous ERC claims. It explains taxpayer eligibility criteria, terms, and procedures for taxpayers electing to participate in the second Voluntary Disclosure Program. It is intended to provide taxpayers an opportunity to efficiently resolve their civil tax liabilities under this second Voluntary Disclosure Program and avoid potential litigation.	
<u>Ann. 2024-</u> <u>38</u>	11/22/24	IR-2024-213 & 2024-212 (8/15/24) Notifies public that IRS intends to issue opinion letters on November 29, 2024, or, as soon as possible thereafter, for § 403(b) pre-approved plans that were updated for changes with respect to the requirements of § 403(b), including 2022 Cumulative List, and that were filed during the second remedial amendment cycle for § 403(b) pre-approved plans. This announcement also notifies the public of the date by which an adopting employer intending to maintain a § 403(b) pre-approved plan for the second cycle must adopt that plan, and announces the beginning and ending dates of the period during which an adopting employer may file for an individual determination letter under the second remedial amendment cycle. This announcement also discusses a procedural restatement rule that applies to all pre-approved plans and provides a reminder for	403

		adopting employers of § 403(b)(9) retirement income account plans of a requirement provided by § 403(b)(9).	
<u>Ann. 2024-</u> <u>40</u>	11/26/24	Addresses the Federal income tax treatment of certain amounts paid or incurred pursuant to agreements with the Department of Commerce required under the CHIPS Act of 2022.	48D
<u>Ann. 2024-</u> <u>42</u>	12/9/24	Competent authorities of U.S. and the Kingdom of Norway have entered a Competent Authority Arrangement under paragraph 2 of Article 27 (Mutual Agreement Procedure) of Convention between the United States of America and the Kingdom of Norway for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and Property in which the competent authorities confirm that Article 20 (Investment or Holding Companies) is not applicable to a U.S. investment company that qualifies as a Regulated Investment Company pursuant to sections 851 (Definition of regulated investment company) and 852 (Taxation of regulated investment companies and their shareholders) of the Internal Revenue Code.	

Fact Sheet FAQs



<u>IR-2021-202</u> (10/15/21) provided a new process for issuance of FAQs. For those related to newly enacted legislation or emerging issues (as labeled by IRS), the FAQs will be announced in a news release and posted at the IRS website in a separate Fact Sheet. These FAQs will be "authority" under Reg. 1.6662-4 due to the <u>news release</u>. This does not mean they are a high level of authority and it is a good idea to always look for the Code, regs and/or court rulings where the FAQs came from. For other FAQs, reasonable reliance might justify reasonable cause to have negligence or other accuracy-related penalty waived.

Be sure to see the disclaimer required to be added to IR and Fact Sheet FAQs (at <u>IR-2021-202</u> or any of the Fact Sheets below).

IRS Website of Fact Sheets for Frequently Asked Questions -

https://www.irs.gov/newsroom/fact-sheets-for-frequently-asked-questions

Note: Not all IRS Fact Sheets are for FAQs. That is why some numbers are missing in the 2024 list below.

FS-2024-03 (2/6/24) released in IR-2024-33 (2/6/24)

- 1099-K clarifications
- Replaces FS-2023-06 (3/22/23)
- March 2024 the IRS also released <u>FS-2024-07</u> but it is not a reliance set of FAQs (it also not a set of FAQs).

<u>FS-2024-04</u> (2/9/24) released in <u>IR-2024-37</u> (2/9/24)

- Premium Tax Credit
- Replaces FS-2023-13 (2/24/22)
- Replaced by <u>FS-2024-30 (9/19/24</u>) released in <u>IR-2024-244</u> (9/19/24)

FS-2024-05 (2/23/24) released in IR-2024-49 (2/23/24)

- Treatment of USDA's Discrimination Financial Assistance Program created by IRA 2022 to address discrimination in lending that occurred before 2021.
- Amounts are taxable, legal fees deductible for AGI (§62) and if connected to a business, likely subject to SE tax.

FS-2024-13 (4/16/24) released in IR-2024-110 (4/16/24)

- Work-life referral services offered as fringe benefit to employees and if is a de minimis fringe benefit.
- Observation: Reliance FAQs are issued if relate to newly enacted tax legislation or emerging issues. It is not clear why these FAQs were issued and why as reliance FAQs. See <u>IR-2021-202</u> (10/15/21).

FS-2024-14 (4/16/24) released in IR-2024-111 (4/16/24)

- Clean vehicle credits under sections 25E, 30D and 45W.
- Replaces FS-2023-29 (12/26/24)

FS-2024-15 (4/17/24) released in IR-2024-113 (4/17/24)

- Residential energy credits under section 25C and 25D
- Replaces FS-2022-42 (Dec. 2022)
- Replaced by <u>FS-2025-01</u> (<u>IR-2025-17</u> (1/17/25))

FS-2024-19 (5/3/24) released in IR-2024-132 (5/3/24)

- "The FAQs relate to the SECURE 2.0 Act of 2022 (SECURE 2.0) provision that provides for ongoing disaster relief for certain distributions and loans in the case of federally declared major disasters. Prior to the changes made by SECURE 2.0, there was no disaster relief allowing these distributions and loans that applied generally for all major disasters."
- It is not entirely clear if these are reliance FAQs despite being released in an IR and relating to the SECURE Act 2.0 enacted December 2022 (that might not be considered recently enacted legislation at May 2024); the Fact Sheet is not a pdf like others.

FS-2024-25 (7/10/24) released in IR-2024-184 (7/10/24)

 Address entity registration under <u>Notice 2024-49</u> for Clean Fuel Production Credit of §45Z.

FS-2024-26 (7/26/24) released in IR-2024-197 (7/26/24)

- FAQs on clean vehicle credits under §§25E, 30D and 45W.
- Replaces earlier FAQ Fact Sheets where most recent one was FS-2024-14 (4/15/24)

FS-2024-30 (9/19/24) released in IR-2024-244 (9/19/24)

- FAQs on PTC under §36B
- Replaces earlier FAQ FS 2024-04 (2/9/24)