# IRS <u>Revenue Rulings</u>, <u>Revenue Procedures</u>, <u>Notices</u>, and <u>Announcements</u> and <u>Fact Sheet FAQs</u> Released for 2025

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

## **Revenue Rulings**

Ruling #	Date released	IRS summary	Code Section(s)
Rev. Rul.	12/16/24	Provides various prescribed rates for federal income	42
2025-01	12/10/24	tax purposes including applicable federal interest	280G
2023 01		rates, the adjusted applicable federal interest rates,	382
		the adjusted federal long-term rate, and the adjusted	467
		federal long-term tax-exempt rate. These rates are	468
		determined as prescribed by § 1274.	482
		, see	483
			1274
			1288
			7520
			7872
Rev. Rul.	12/20/24	Provides tables of covered compensation under	401
<u>2025-02</u>		§401(I)(5)(E) and regs thereunder, for 2025 plan year.	
Rev. Rul.	1/8/25	Addresses the application of Section 530 of the	3509
<u>2025-03</u>		Revenue Act of 1978 (section 530), section 3509	7436
		rates, and the requirements to issue a Notice of	
		Employment Tax Determination Under IRC § 7436 (§	
		7436 Notice) in several distinct factual situations.	
		Section 3509 allows an employer to remit unpaid	
		taxes at reduced rates if an employer fails to deduct	
		and withhold income tax or the employee share of	
		FICA tax with respect to any of its employees because	
		the employer treated that employee as a non-	
		employee.	
Rev. Rul.	1/15/25	Guidance regarding income and employment tax	61
<u>2025-04</u>		treatment of contributions and benefits paid in	162
		certain situations under a state paid family and	104
		medical leave program, as well as the related	105
		reporting requirements. Rev. Rul. 2025-4 provides	106
		guidance to the District of Columbia and states that	3121
		have mandatory paid family and medical leave	3401
		programs and for employees working in and	6041
		employers operating in those states. This guidance	6051
			7805

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		responds to requests to clarify the federal tax treatment of state paid leave programs.	
		<u>IR-2025-16</u> (1/15/25)	
Rev. Rul. 2025-05	1/15/25	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.	42 280G 382 467 468
Rev. Rul. 2025-06	2/19/25	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.	482 483 1274 1288 7520 7872
Rev. Rul. 2025-07	3/6/25	Provides 2 <sup>nd</sup> quarter interest rates for 2025, including rates for underpayments and overpayments.  • 7% for overpayments (payments made in excess of the amount owed), 6% for corporations.  • 4.5% for the portion of a corporate overpayment exceeding \$10,000.  • 7% for underpayments (taxes owed but not fully paid).  • 9% for large corporate underpayments.  IR-2025-29 (3/6/25) – rates same as for 1 <sup>st</sup> quarter.	6621
Rev. Rul. 2025-08	3/17/25	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
Rev. Rul. 2025-9	4/14/25	Fringe benefits aircraft valuation formula. For purposes of section 1.61-21(g) of the Income Tax Regulations, relating to the rule for valuing noncommercial 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 2025 are set forth.	61

Rev. Rul. 2025-10	4/16/25	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
Rev. Rul 2025-11	5/12/25	Provides interest rates for third quarter 2025, including rates for underpayments and overpayments. The rates for interest determined under Section 6621 for calendar quarter beginning July 1, 2025, will be 7 percent for overpayments (6 percent in the case of a corporation), 7 percent for underpayments, and 9 percent for large corporate underpayments. The rate of interest paid on the portion of a corporate overpayment exceeding \$10,000 will be 4.5 percent. Same rates as for 2 <sup>nd</sup> quarter 2025.  IR-2025-59 (5/12/25)	6621
Rev. Rul. 2025-12	5/15/25	Provides various prescribed rates for federal income tax purposes for June 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

## **Revenue Procedures**

Rev. Proc.	Date	IRS summary	Code
#	released		Section(s)

Rev. Proc. 2025-1	12/30/24	Revised procedures for letter rulings and information letters issued by the Associate Chief Counsel (Corporate), Associate Chief Counsel (Employee Benefits, Exempt Organizations, and Employment Taxes), Associate Chief Counsel (Energy, Credits, and Excise Tax), Associate Chief Counsel (Financial Institutions and Products), Associate Chief Counsel (Income Tax and Accounting), Associate Chief Counsel (International), Associate Chief Counsel (Passthroughs, Trusts and Estates), and Associate Chief Counsel (Procedure and Administration). This procedure also contains procedures for determination letters issued by the Large Business and International Division, Small Business/ Self Employed Division, Wage and Investment Division, and Tax Exempt and Government Entities Division. Rev. Proc. 2024-1 is superseded.	
Rev. Proc.	12/30/24	Explains when and how an Associate office within the	
2025-2	12/30/24	Office of Chief Counsel provides technical advice,	
2025 2		conveyed in technical advice memoranda (TAMs). It	
		also explains the rights that a taxpayer has when a	
		field office requests a TAM regarding a tax matter.	
		Rev. Proc. 2024-2 is superseded.	
Rev. Proc.	12/30/24	Updates Rev. Proc. 2024-3 to provide a revised list of	
<u>2025-3</u>	12/30/24	areas under the juris diction of the Associate Chief	
2025 5		Counsel (Corporate), Associate Chief Counsel	
		(Financial Institutions and Products), the Associate	
		Chief Counsel (Income Tax and Accounting), Associate	
		Chief Counsel (Passthroughs, Trusts and Estates),	
		Associate Chief Counsel (Energy, Credits, and Excise	
		Tax), Associate Chief Counsel (Procedure and	
		Administration), and Associate Chief Counsel	
		(Employee Benefits, Exempt Organizations, and	
		Employment Taxes) (EEE) relating to issues on which	
		the Internal Revenue Service will not issue letter	
		rulings or determination letters. Areas under the	
		jurisdiction of the Associate Chief Counsel	
		(International) and the Commissioner, Tax Exempt	
		and Government Entities (TEGE) Division are provided	
		in separate revenue procedures.	
Rev. Proc.	12/30/24	Updates Rev. Proc. 2024-4 relating to the types of	
2025-4		advice IRS provides to taxpayers on issues under the	
		jurisdiction of the Commissioner, Tax Exempt and	
		Government Entities Division, Employee Plans Rulings	
	<u> </u>	1	

		and Agreements, and the procedures that apply to	
		requests for determination letters and private letter	
		rulings.	
Rev. Proc.	12/30/24	Sets forth procedures for issuing determination	
<u>2025-5</u>		letters on issues under the jurisdiction of the Director,	
		Exempt Organizations (EO) Rulings and Agreements.	
		Specifically, it explains the procedures for issuing	
		determination letters on tax-exempt status (in	
		response to applications for recognition of exemption	
		from Federal income tax under § 501 or § 521 other	
		than those subject to Rev. Proc. 2025-4 (relating to	
		pension, profit-sharing, stock bonus, annuity, and	
		employee stock ownership plans), private foundation	
		status, and other determinations related to tax-	
		exempt organizations. These procedures also apply to	
		revocation or modification of determination letters.	
		This revenue procedure also provides guidance on the	
		exhaustion of administrative remedies for purposes	
		of declaratory judgment under § 7428. Finally, this	
		revenue procedure provides guidance on applicable	
		user fees for requesting determination letters.	
Rev. Proc.	1/16/25	Exclusive procedures for certain applicable entities, as	442
<u> 2025-6</u>		defined in § 6417(d)(1)(A) and regulations thereunder	6417
		that are not required to file either a federal income	
IRA 2022		tax return under §6011 or an annual information	
		return under §6033(a), but previously filed a Form	
		990-T solely to make an elective payment election	
		under § 6417, to change their annual accounting	
		period.	
Rev. Proc.	12/30/24	Areas in which rulings will not be issued, Associate	
<u>2025-7</u>		Chief Counsel (International).	
Rev. Proc.	12/17/24	Modifies section 7 of Rev. Proc. 2024-23, to modify	174
<u>2025-8</u>		the procedures under section 446 and §1.446-1(e) for	446
		obtaining IRS automatic consent to change methods	
TCJA		of accounting for research or experimental	
		expenditures paid or incurred in tax years beginning	
		after December 31, 2021. The revenue procedure	
		expands the 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 for any tax year	
		beginning in 2022, 2023, or 2024. This revenue	
		procedure also permits a taxpayer to make a change	
		under section 7.01 of Rev. Proc. 2024-23 regardless of	

		whether the taxpayer made a change for the same	
		item for any other taxable year beginning in 2022,	
		2023, or 2024. The revenue procedure will be	
		effective for Forms 3115, Application for Change in	
		Accounting Method, filed on or after the date this	
		revenue procedure is released to the public.	
Rev. Proc.	12/31/24	Provides a safe harbor under which a manufacturer,	5000D
<u>2025-9</u>		producer, or importer may identify the applicable	
		sales of a designated drug made during a day	
IRA 2022		described in section 5000D(b) by using a safe harbor	
		percentage. It also provides such safe harbor	
		percentage. A manufacturer, producer, or importer	
		may use the safe harbor and safe harbor percentage	
		provided in this revenue procedure until the	
		proposed regulations are finalized or other guidance	
		is published in the Internal Revenue Bulletin or the	
		Federal Register.	
Rev. Proc.	1/8/25	Modifies and supersedes Revenue Procedure 85-18; it	3102
<u>2025-10</u>		clarifies provisions of Rev. Proc. 85-18 with respect to	3111
		the definition of employee, the section 530	3301
		requirement for the filing of required returns, and the	3403
		reasonable basis safe harbor rules. This revenue	
		procedure also amplifies the guidelines set forth in	
		section 3.03 of Rev. Proc. 85-18 (interpreting the	
		word "treat" for purposes of determining whether a	
		taxpayer did not treat an individual as an employee	
		for purposes of section 530(a)). This revenue	
		procedure also includes new provisions that reflect	
		statutory changes made to section 530 since 1986	
		that added sections 530(d), (e), and (f). Section 530	
		of the Revenue Act of 1978 (as amended) was	
		enacted to provide relief to taxpayers involved in	
		worker classification disputes with the IRS. Section	
Doy Dros	1 /0 /25	530 is not an Internal Revenue Code provision.	405
Rev. Proc.	1/8/25	Provides the process under § 48E(h) to apply for an	48E
<u>2025-11</u>		allocation of Capacity Limitation as part of the Clean Electricity Low-income Communities Bonus Credit	
IRA 2022		Amount Program for 2025 and subsequent years.	
Rev. Proc.	1/20/25	On December 30, 2024, Revenue Procedure 2025-1	
2025-12	1/20/23	was published with an incorrect user fee for requests	
2023 12		for tax treaty limitation of benefits determinations.	
		I.R.B. 2025-1. This revenue procedure contains the	
		correct user fee for requests for tax treaty limitation	
		correct aser rection requests for tax treaty illilitation	

		of benefits determinations. Rev. Proc. 2025-1 is	
		modified.	
Rev. Proc.	1/13/25	Provides a streamlined method by which taxpayers	831
2025-13		who have elected the application of the alternative	
		tax under section 831(b) may obtain automatic	
TAMRA		consent of the Secretary to revoke such election by	
1988		making certain representations.	
Rev. Proc.	1/15/25	Provides the first Annual Table for sections 45Y and	45Y
2025-14		48E. The types and categories of facilities listed in	48E
		this Annual Table are ones that are described as non-	
		combustion and gasification facilities in TD 10024.	
Rev. Proc.	2/13/25	Sets forth the unpaid loss discount factors for the	846
2025-15		2024 accident year for purposes of §846. This	832
		revenue procedure also provides the salvage discount	
		factors for the 2024 accident year, which must be	
		used to compute discounted estimated salvage	
		recoverable under §832.	
Rev. Proc.	2/12/25	Provides: (1) two tables of limitations on depreciation	280F
<u>2025-16</u>		deductions for owners of passenger automobiles	
		placed in service by the taxpayer during calendar year	
		2025; 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 2025. The tables detailing these	
		depreciation limitations and amounts used to	
		determine lessee income inclusions reflect the	
		automobile price inflation adjustments required by	
		section 280F(d)(7). For purposes of this revenue	
		procedure, the term "passenger automobiles"	
		includes trucks and vans.	
Rev. Proc.	3/5/25	Adds Ukraine, Iraq, Haiti, and Bangladesh to the list of	911
<u>2025-17</u>		waiver countries for tax year 2024 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 \$126,500 for 2024). Both the	
		bona fide residence test and the physical presence	
		test contain minimum time requirements. Rev. Proc.	
		2025-17 provides a waiver under section 911(d)(4) for	

Rev. Proc. 2025-18	4/16/25	the time requirements for individuals electing to exclude their foreign earned income who must leave a foreign country because of war, civil unrest, or similar adverse conditions in that country.  Provides issuers of qualified mortgage bonds and mortgage credit certificates with (1) the nationwide average purchase price for residences located in the United States, and (2) the average area purchase price safe harbors for residences located in statistical areas in each state, the District of Columbia, Puerto	25 103A 143
		Rico, the Northern Mariana Islands, American Samoa, the Virgin Islands, and Guam.	
Rev. Proc. 2025-19	5/1/25	2026 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. 2025-20	5/2/25	Provides domestic asset/liability percentages and domestic investment yields needed by foreign life insurance companies and foreign property and liability insurance companies to compute their minimum effectively connected net investment income under section 842(b) of the Internal Revenue Code for taxable years beginning after December 31, 2023. This document only applies to foreign insurance companies.	842
Rev. Proc. 2025-21	5/6/25	Modifies section 12.02 of Rev. Proc. 2024-32 to provide immediate relief for certain plan sponsors by narrowing the category of plan sponsors required to request approval of new plan-specific substitute mortality tables. Section 12.02 of Rev. 2024-32 specifies that, in conjunction with the replacement of the generally applicable mortality tables, certain plan sponsors that wish to continue using plan-specific mortality tables must develop and request approval for the use of new plan-specific substitute mortality tables for plan years beginning on or after January 1, 2026.	430
Rev. Proc.			
2025-22	6 10 10 5	Hadana Hadistari Adamati B	446
Rev. Proc. 2025-23	6/9/25	Updates the List of Automatic Procedures as established in Treasury and IRS guidance for taxpayer-	446 448

	initiated requests for changes in methods of	
	accounting. An "automatic change" is a change in	
	method of accounting for which the taxpayer is	
	eligible under section 5.01(1) of Revenue Procedure	
	2015-13 for requesting the Commissioner's consent	
	for the requested year of change	

## Notices

Notice #	Date	IRS summary	Code
	released		Section(s)
Notice 2025-	12/16/24	Sets forth updates on corporate bond monthly	417
<u>01</u>		yield curve, the corresponding spot segment	430
		rates for November 2024 used under	
		§417(e)(3)(D), 24-month average segment rates	
		applicable for December 2024, and 30-year	
		Treasury rates, as reflected by the application of	
		§ 430(h)(2)(C)(iv).	
Notice 2025-	12/14/24	Provides relief from certain penalties imposed	751
<u>02</u>		solely for failure of a partnership with unrealized	6050K
		receivables or inventory items to furnish Part IV	6721
		of Form 8308, Report of a Sale or Exchange of	6722
		Certain Partnership Interests, by January 31,	
		2025, to the transferor and transferee in certain	
		transfers of partnership interests occurring in	
		calendar year 2024.	
Notice 2025-	12/27/24	Provides transitional relief under provisions of	3403
<u>03</u>		the IRC with respect to reporting of information	3406
		and backup withholding on digital assets for	6045
		digital asset brokers providing trading front-end	6721
		services.	6722
		N. 1	6651
		Notice refers to TD 10021 (12/3024) final regs	6656
		under §6045. Also see Treasury <u>press release of</u>	
Notice 2025	12/10/24	12/27/24.	402
Notice 2025-	12/18/24	Treasury and IRS intend to issue proposed regs	482
<u>04</u>		that, for purposes of applying section 482,	
		provide a new simplified and streamlined	
		approach ("SSA") for pricing certain controlled	
		transactions involving baseline marketing and	
		distribution activities. It also provides guidance	
		concerning application of the SSA to in-scope	
		transactions undertaken by parties subject to	

		U.S. tax with respect to those transactions before	
		issuance of those proposed regulations.	
Notice 2025-	12/19/24	Provides the optional 2025 standard mileage	61
<u>05</u>		rates for taxpayers to use in computing	162
		deductible costs of operating an automobile for	213
		business, charitable, medical, or moving expense	217
		purposes. This notice also provides 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 plan. Provides the maximum fair market value of employer-provided automobiles first made available to employees for personal use in calendar year 2025 for which employers	274
		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).  IR-2024-312 (12/19/24)	
		Business rate = 70 cents per mile which includes 33 cents per mile for depreciation (up from 67 cents per mile in 2024 and 30 cents for depreciation).	
		Medical and moving = 21 cents per mile (same as 2024)	
		Charitable = 14 cents per mile as fixed per §170(i).	
		For more in use of standard mileage rate, see Rev. Proc. 2019-46.	
Notice 2025- 06	1/10/25	Requests comments on any potential implications if characterization rules currently contained in §§1.861-18 and 1.861-19, as amended and added, respectively, by TD 10022, were to apply to all provisions of the IRC, including the need for additional guidance, and seeks specific comments on the possible impacts and guidance that may be necessary with respect	861
		to certain identified provisions. Treasury and IRS	

		have published TD 10022 containing final regs that provide rules for characterizing digital content and cloud transactions. TD 10022 applies solely to certain enumerated international provisions of the IRC.	
Notice 2025- 07 IIJA 2021	12/31/24	Provides temporary relief allowing eligible taxpayers to rely on alternative methods for making an adequate identification, within the meaning of § 1.1012-1(j)(3)(ii), with respect to units of a digital asset held in the custody of a	1012
Notice 2025- 08 IRA 2022	1/16/25	broker.  Modifies New Elective Safe Harbor for domestic content bonus credit contained in Notice 2024-41, by updating tables in sections 4.04(1)-(3), clarifying rules and defined terms, reclassifying the Manufactured Products and Manufactured Product Components, and by providing new associated cost percentages for those components. Notice 2025-08 further preserves the modifications completed in section 3 of Notice 2024-41 of Table 2 in Notice 2023-38	6417
Notice 2025- 09 IRA 2022	1/15/25	Provides safe harbors regarding the incremental cost and retail price equivalent of certain qualified commercial clean vehicles for purposes of the credit for qualified commercial clean vehicles under section 45W.	45W
Notice 2025- 10 IRA 2022	1/10/25	Describes forthcoming proposed regs on the §45Z clean fuel production credit (§ 45Z credit) enacted under Inflation Reduction Act of 2022. In addition to providing background on the § 45Z credit, the notice explains forthcoming proposed regs and requests public comments. The draft text includes intended rules on how to calculate the credit, allowed methodologies for determining emissions rates, unrelated party certification of emissions rates, how to claim the credit, and requirements for registration.  Treasury press release of 1/10/25.	45Z
Notice 2025- 11 IRA 2022	1/10/25	Provides taxpayers with guidance about emissions rates, including the initial emissions rate table, for the clean fuel production credit. For a transportation fuel established on the emissions rate table that is not a sustainable	45Z

		aviation fuel, this notice directs a taxpayer producing such fuel to calculate emissions rates using the most recent determinations under the new 45ZCF-GREET model. For a transportation fuel established on the emissions rate table that is a sustainable aviation fuel, this notice directs a taxpayer producing such fuel to calculate emissions rates using either determinations from fuel pathways approved under the most recent version of the CORSIA Program or the most recent determinations under the 45ZCF-GREET model. This notice also requests public comments.	
		Treasury press release of 1/10/25.	
Notice 2025- 12	1/14/25	Provides percentage increase for calculating the qualifying payment amounts for items and services furnished during 2025 for purposes of IRC sections 9816 and 9817, sections 716 and 717 of the Employee Retirement Income Security Act of 1974, and sections 2799A–1 and 2799A–2 of the Public Health Service Act.	9816 9817
Notice 2025-	1/15/25	Sets forth updates on corporate bond monthly	417
13	1,13,23	yield curve, corresponding spot segment rates for December 2024 used under §417(e)(3)(D), 24-month average segment rates applicable for January 2025, and 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).	430
Notice 2025-	2/12/25	Sets forth updates on the corporate bond	417
14	,, <del></del>	monthly yield curve, the corresponding spot segment rates for January 2025 used under §417(e)(3)(D), the 24-month average segment rates applicable for February 2025, and the 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).	430
Notice 2025- 15	2/21/25	Provides guidance regarding the alternative manner of furnishing certain health insurance	6055 6056
13		_	0030
Danamicant		coverage statements to individuals pursuant to	
Paperwork		§6055(c)(3) and §6056(c)(3), added by section 2	
Burden		of the Paperwork Burden Reduction Act (P.L. 118-	
Reduction Act		167 (12/23/24).	
P.L. 118-167			
(12/23/24)			

Notice 2025-	3/5/25	Provides for adjustments to the limitation on	911
<u>16</u>	, ,	housing expenses for purposes of §911 for the	
		2025 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	
		the 2025 tax year than the adjusted limitations	
		on housing expenses provided in Notice 2024-31,	
		qualified taxpayers may apply the adjusted	
		limitations in this notice for the 2025 tax year to	
		their 2024 tax year.	
Notice 2025-	3/11/25	Sets forth updates on the corporate bond	417
<u>17</u>	, ,	monthly yield curve, the corresponding spot	430
		segment rates for February 2025 used under	
		§417(e)(3)(D), 24-month average segment rates	
		applicable for March 2025, and 30-year Treasury	
		rates, as reflected by application of	
		§430(h)(2)(C)(iv).	
Notice 2025-	4/14/25	Resident populations of the 50 states, the District	42
<u>18</u>		of Columbia, Puerto Rico, and the insular areas	142
		for purposes of determining the 2025 calendar	146
		year (1) state housing credit ceiling under section	
		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-	4/4/25	Invites the public to submit recommendations for	
<u>19</u>		items to be included on the 2025-2026 Priority	
		Guidance Plan.	
Notice 2025-	5/5/25	Announces applicable percentage under section	613A
<u>20</u>		613A(c)(6)(C) for marginal oil and gas properties	
		in the 2025 calendar year. The applicable	
		percentage is used to determine the amount of	
		the percentage depletion deduction allowable	
		under section 613A(c)(6) with respect to oil and	
	- / -	natural gas produced from marginal properties.	
Notice 2025-	4/15/25	Sets forth updates on the corporate bond	417
<u>21</u>		monthly yield curve, the corresponding spot	430
		segment rates for March 2025 used under	
		§417(e)(3)(D), the 24-month average segment	
		rates applicable for April 2025, and the 30-year	
		Treasury rates, as reflected by the application of	
		§ 430(h)(2)(C)(iv).	

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Notice 2025- 22	4/14/25	Starts the process of eliminating extraneous and unnecessary Internal Revenue Bulletin guidance by identifying and obsoleting nine IRB guidance documents.  See list at end of this document.	409A 965 4191 4980I others
Notice 2025- 23	4/17/25	Treasury and IRS intend to publish a notice of proposed rulemaking (forthcoming NPRM) proposing to remove § 1.6011-18 (Basis Shifting TOI Regulations). This notice provides immediate relief from (i) penalties under § 6707A(a) to participants in transactions identified as transactions of interest in the Basis Shifting TOI Regulations that are required to file disclosure statements under § 6011, and (ii) penalties under §§ 6707(a) and 6708 for material advisors to transactions identified as transactions of interest in the Basis Shifting TOI Regulations that are required to file disclosure statements under §6111 and maintain lists under § 6112. Lastly, this notice withdraws Notice 2024-54 (Basis Shifting Notice), which describes certain proposed regs that Treasury and IRS intended to issue addressing partnership related-party basis shifting transactions.  Per Exec Order 14219 (2/19/25).	6011 6707 6707A 6708
Notice 2025- 24	4/11/25	Provides relief from penalties under section 6707A(a) and 6707(a) for participants in and material advisors to micro-captive reportable transactions for disclosure statements required to be filed with the Office of Tax Shelter Analysis (OTSA) under sections 6011 and 6111, as set forth in §§ 1.6011-10(h)(2) and (3) and 1.6011-11(h)(2) and (3), respectively. This relief applies only if the required disclosure statements are filed with OTSA by July 31, 2025.	6011 6111 6707 6707A
Notice 2025- 25	5/12/25	Provides inflation adjustment factor for the carbon oxide sequestration credit under §45Q for calendar year 2025. The inflation adjustment factor is used to determine the amount of the credit allowable under § 45Q for taxpayers that make an election under § 45Q(b)(3) to have the	45Q

Т		1.11	
		dollar amounts applicable under § 45Q(a)(1) or (2) apply.	
Notice 2025- 26	5/12/25	Publishes the reference price under § 45K(d)(2) (C) for calendar year 2024. The reference price applies in determining the amount of the enhanced oil recovery credit under § 43, the marginal well production credit under § 45I, and the percentage depletion in case of oil and natural gas produced from marginal properties under § 613A.	43 45I 45K 613A
Notice 2025- 27 IRA 2022	6/2/25	Provides interim guidance regarding the application of the corporate alternative minimum tax, as added to Code by Inflation Reduction Act of 2022. Specifically, this notice provides an optional simplified method for determining applicable corporation status under § 59(k). This notice also waives certain additions to tax under § 6655 with respect to a corporation's CAMT liability under § 55.  SEC. 3 – "Purpose of the interim guidance. To reduce compliance burdens and costs for certain corporations, this section 3 provides an interim simplified method to determine applicable corporation status using thresholds of \$800 million and \$80 million and calculating AFSI by using the AFSI adjustments described in proposed § 1.56A-12 as well as other AFSI adjustments."	55 56A 6655
Notice 2025- 28			
Notice 2025- 29	5/15/25	Sets forth updates on corporate bond monthly yield curve, corresponding spot segment rates for April 2025 used under § 417(e)(3)(D), 24-month average segment rates applicable for May 2025, and the 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).	417 430
Notice 2025-			
30			
Notice 2025- 31			
Notice 2025-			
32			

Notice 2025-	6/12/25	Extends certain transition relief provided by	3403
<u>33</u>		Notice 2024-56 with respect to backup	3406
		withholding on digital assets by brokers under	6045
		section 6045. This notice also provides transition	6721
		relief with respect to the reporting of	6722
		information and backup withholding on digital	6651
		asset sales effected for certain customers that	6656
		have not been previously classified by the broker	
		as U.S. persons.	
Notice 2025-			
34			
Notice 2025-	6/13/25	Sets forth updates on the corporate bond	417
<u>35</u>		monthly yield curve, the corresponding spot	430
		segment rates for May 2025 used under	
		§417(e)(3)(D), the 24-month average segment	
		rates applicable for June 2025, and the 30-year	
		Treasury rates, as reflected by the application of	
		§ 430(h)(2)(C)(iv).	

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

Ann #	Date	IRS summary	Code
	released		Section(s)
<u>Ann.</u>	12/18/24	On July 19, 2024, Treasury and IRS published proposed	401
<u>2025-02</u>		regulations regarding required minimum distributions	403
		(RMDs) under section 401(a)(9) and related provisions	408
		in the Federal Register (89 FR 58644). The proposed	457
		regs were generally proposed to apply for purposes of	
		determining RMDs for calendar years beginning on or	
		after January 1, 2025. This announcement provides that	
		Treasury and IRS anticipate that certain portions of	
		future regs finalizing the proposed regs will apply	
		beginning in the 2026 distribution calendar year.	
<u>Ann.</u>	12/31/24	Confirms suspension of the operation of paragraph 1,	
<u>2025-05</u>		subparagraph (g), of Article III of Convention between	
		the US and Union of Soviet Socialist Republics on	
		Matters of Taxation, with related letters, signed at	
		Washington June 20, 1973, as it relates to Belarus, by	
		mutual agreement.	
Ann. 2025-	1/15/25	Implements a pilot program testing changes to Fast	
<u>06</u>		Track Settlement programs currently available to	
		taxpayers under examination in the Large Business and	
		International, Small Business/Self-Employed, and Tax	

	1		
		Exempt/Government Entities Divisions. This	
		announcement also describes pilot program changes to	
		Post Appeals Mediation (PAM) procedures and	
		introduces a "Last Chance FTS" pilot program for SB/SE	
		taxpayers.	
		<u>IR-2025-14</u> (1/15/25)	
<u>Ann.</u>	3/21/25	The competent authorities of the United States and the	
<u>2025-08</u>		Swiss Confederation have entered a Competent	
		Authority Arrangement under paragraph 3 of Article 25	
		(Mutual Agreement Procedure) of the Convention	
		Between the United States of America and the Swiss	
		Confederation for the Avoidance of Double Taxation	
		with Respect to Taxes on Income signed at Washington	
		on October 2, 1996, as amended by the Protocol, signed	
		on September 23, 2009, regarding certain U.S. and Swiss	
		pension or other retirement arrangements, including	
		individual retirement savings plans, that may be eligible	
		for benefits under paragraph 3 of Article 10 (Dividends).	
Ann.	3/27/25	issued pursuant to § 521(b) of P. L. 106-170, the Ticket	
2025-13	, , =	to Work and Work Incentives Improvement Act of 1999,	
		which requires Treasury Secretary to report annually to	
		public concerning advance pricing agreements (APAs)	
		and Advance Pricing and Mutual Agreement Program	
		(APMA Program), formerly known as Advance Pricing	
		Agreement Program (APA Program). This 26 <sup>th</sup> report	
		describes the experience, structure, and activities of the	
		APMA Program during calendar year 2024.	
Ann.	6/16/25	The Competent Authorities of the US and Denmark	
<u>2025-16</u>	, _5, _5	entered into a Competent Authority Arrangement under	
		paragraph 3 of Article 25 (Mutual Agreement	
		Procedure) listing the types of pension entities or	
		arrangements established in either Contracting State	
		that will be treated as a "pension fund" for purposes of	
		paragraph 3(c) of Article 10 (Dividends), as well as the	
		application of Article 22 (Limitation on Benefits).	
		application of Article 22 (Limitation on Delicitis).	

#### **Fact Sheet FAQs**



IR-2021-202 (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 <a href="news release">news release</a>. 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 IR-2021-202 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.

### <u>FS 2025-01</u> (1/17/25) released in <u>IR-2025-17</u> (1/17/25)

- Energy Efficient Home Improvement Credit (§ 25C) and the Residential Clean Energy Property Credit (§ 25D)
- Replaces FS-2024-15 (4/17/24)

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Notice 2025-22 (4/14/25) – details on 9 IRB items obsoleted as part of compliance with Executive Order 14219, Ensuring Lawful Governance and Implementing the President's 'Department of Government Efficiency' Deregulatory Initiative (2/19/25).

- Eliminates:
  - 1. Notice 2015-73, Listing Notice Basket Option Contracts (11/16/15)
    - IRS no longer using notices for listed transactions.
    - Also see AOD 2024-1 (12/24/24)

- 2. Notice 2009-49, Guidance Under § 409A(a)(2)(A)(v) on Certain Transactions Pursuant to the Emergency Economic Stabilization Act of 2008 (6/22/09)
  - Relates to Troubled Asset Relief Program no longer in operation.
- 3. Notice 2018-10, Medical Device Excise Tax Deposit Penalty Relief (2/20/18)
  - §4191 repealed
- 4. Ann. 2013-23, Taxable Medical Devices (4/15/13)
  - Correction already in regulation
- 5. Ann. 2013-19, Taxable Medical Devices (4/15/13)
  - Correction already in regulation
- 6. Notice 2015-16, Excise Tax on High Cost Employer-Sponsored Health Coverage (3/9/15)
  - Deals with § 4980I which was repealed
- 7. Notice 2015-52, § 4980l Excise Tax on High Cost Employer Sponsored Health Coverage (8/31/15)
  - Provision repealed
- 8. Notice 2005-64, Foreign Tax Credit and Other Guidance Under Section 965 (9/6/05)
  - Outdated
- 9. Rev. Rul. 91-32, Partnership Effectively Connected Income Lookthrough (5/20/1991)
  - Now addressed by TCJA change