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 + List of IRB Guidance Items Obsoleted by the IRS

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

Revenue Rulings

Ruling #	Date	IRS summary	Code
	released		Section(s)
Rev. Rul.	12/16/24	Provides various prescribed rates for federal income	42
<u>2025-01</u>		tax purposes including applicable federal interest	280G
		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
			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
2025-04	, ,	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

		responds to requests to clarify the federal tax treatment of state paid leave programs. IR-2025-16 (1/15/25)	7805
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 2nd 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 1st 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 nd 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 including the applicable federal interest	42 280G
Rev. Rul. 2025-13	6/17/25	rates, the adjusted applicable federal interest rates, the adjusted federal long-term rate, and the adjusted	382 467
Rev. Rul. 2025-14	7/15/25	federal long-term tax-exempt rate. These rates are determined as prescribed by § 1274.	468 482 483 1274 1288 7520 7872
Rev. Rul. 2025-15	7/16/25	Provides guidance on withholding and reporting issues relating to uncashed qualified retirement plan distribution checks and replacement checks.	401 3405 6047 6413 6414
Rev. Rul. 2025-16	8/25/25	2025 interest rates to be used in computing special use value of farm real property for which an election	2032A

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		is made under section 2032A are listed for estate of decedents.	
Rev. Rul.	8/18/25	Provides various prescribed rates for federal income	42
<u>2025-17</u>		tax purposes including the applicable federal interest	280G
		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
			483
			1274
			1288
			7520
			7872
Rev. Rul. 2025-18	8/25/25	Interest rates: underpayments and overpayments. The rates for interest determined under §6621 for the calendar quarter beginning October 1, 2025, will be 7% for overpayments (6% in the case of a corporation), 7% for underpayments, and 9% for large corporate underpayments. The rate of interest paid on the portion of a corporate overpayment exceeding \$10,000 will be 4.5%. IR-2025-87 (8/25/25) – interest rates remain the same for the 4 th quarter of 2025.	6621
Rev. Rul.	9/15/25	Provides various prescribed rates for federal income	42
<u>2025-19</u>		tax purposes including the applicable federal interest	280G
		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
			483
			1274
			1288
			7520
			7872

Revenue Procedures

Rev. Proc.	Date	IRS summary	Code
#	released		Section(s)
Rev. Proc.	12/30/24	Revised procedures for letter rulings and information	
<u>2025-1</u>		letters issued by the Associate Chief Counsel	
		(Corporate), Associate Chief Counsel (Employee	

Rev. Proc. 2025-5	12/30/24	Sets forth procedures for issuing determination 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.	
D. D.	4 /4 6 /2 5	·	4.42
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	
		530 is not an Internal Revenue Code provision.	
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	
<u>2025-12</u>		was published with an incorrect user fee for requests	
		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	
		of benefits determinations. Rev. Proc. 2025-1 is	
		modified.	
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Rev. Proc.	1/13/25	Provides a streamlined method by which taxpayers	831
<u>2025-13</u>		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
<u>2025-14</u>		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
<u>2025-15</u>		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	
		the time requirements for individuals electing to	
		exclude their foreign earned income who must leave	

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		a foreign country because of war, civil unrest, or	
		similar adverse conditions in that country.	
Rev. Proc.	4/16/25	Provides issuers of qualified mortgage bonds and	25
<u>2025-18</u>		mortgage credit certificates with (1) the nationwide	103A
		average purchase price for residences located in the	143
		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	
		Rico, the Northern Mariana Islands, American Samoa,	
		the Virgin Islands, and Guam.	
Rev. Proc.	5/1/25	2026 inflation adjusted amounts for Health Savings	223
2025-19		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.	
Rev. Proc.	5/2/25	Provides domestic asset/liability percentages and	842
2025-20	3, 2, 23	domestic investment yields needed by foreign life	0.2
2023 20		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.	
Rev. Proc.	5/6/25	Modifies section 12.02 of Rev. Proc. 2024-32 to	430
2025-21	3/0/23	provide immediate relief for certain plan sponsors by	430
2023 21		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,	
	7/06/07	2026.	
Rev. Proc.	7/21/25	Provides specifications for the private printing of red-	numerous
<u>2025-22</u>		ink substitutes for the 2025 revisions of certain	
		information returns. This procedure will be	
		reproduced as the next revision of Publication 1179.	
		Revenue Procedure 2024-29 is superseded.	

Rev. Proc.	6/9/25	Updates the List of Automatic Procedures as	446
2025-23		established in Treasury and IRS guidance for taxpayer-	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	
Rev. Proc.	7/28/25	Provides specifications for private printing of red-ink	6041
2025-24	1, = 0, = 0	substitutes for 2025 Forms W-2 and W-3. This	6051
		revenue procedure will be produced as the next	6071
		revision of Publication 1141. Rev. Proc. 2024-27 is	6081
		superseded.	6091
Rev. Proc.	7/18/25	Provides indexing adjustments to applicable	36B
2025-25	, -,	percentage table in §36B(b)(3)(A)(i) for tax years	
		beginning in calendar year 2026. Table used to	
ACA		calculate an individual's premium tax credit under	
		§36B. This revenue procedure also provides indexing	
		adjustment for the required contribution percentage	
		in § 36B(c)(2)(C)(i)(II) for plan years beginning in	
		calendar year 2026. This percentage is used to	
		determine whether an individual is eligible for	
		affordable employer-sponsored minimum essential	
		coverage under §36B.	
		Note: Taxpayer favorable changes to PTC by ARPA	
		2021 (extended by IRA 2022) end after 2025 unless	
		extended. These include lower percentage for	
		contributions and allowing otherwise eligible	
		individuals to claim PTC even if household income	
Day Design	7/22/25	exceeds 400% FPL.	400011
Rev. Proc.	7/22/25	Provides indexing adjustments for the applicable	4980H
<u>2025-26</u>		dollar amounts under section 4980H(c)(1) and (b)(1)	
ACA		of the Internal Revenue Code. These indexed	
ACA		amounts are used to calculate the employer shared	
		responsibility payments (ESRP) under section	
		4980H(a) and (b)(1), respectively.	
		Penalty amounts for 2026:	
		• §4980H(a) \$3,340 (\$2,900 for 2025)	
		• §4980H(b)(1) \$5,010 (\$4,350 for 2025)	
Rev. Proc.			
2025-27			

Rev. Proc.	8/28/25	Instructs taxpayers on how to make various elections,	174
<u>2025-28</u>		file amended returns, or change accounting methods	174A
		for research or experimental expenditures as	280C
OBBBA		provided under SEC. 70302 of P.L. 119-21 (July 4,	446
		2025). Also provides transitional rules, modifies Rev.	
61 pages		Proc. 2025-23, List of Automatic Changes, and grants	
		an extension of time for partnerships, S corps, C	
		corps, individuals, estates and trusts, and exempt	
		organizations to file superseding 2024 Federal income	
		tax returns.	
		Note: Printed in 9/15/25 IRB although requires some	
		taxpayers to take action by 9/15 if want to take what	
		might be a favorable option for many small	
		businesses with R&D expenditures pre-2025.	
Rev. Proc.			
2025-29			
Rev. Proc.	9/29/25	Provides procedures for taxpayers requesting private	355
<u>2025-30</u>		letter rulings regarding certain issues pertaining to	
		transactions intended to qualify under §355, including	
		representations, information, and analysis that	
		taxpayers requesting these rulings should submit to	
		the IRS. This revenue procedure revokes Notice 2024-	
		38, supersedes Rev. Proc. 2024-24, and modifies Rev.	
		Proc. 2025-1 and Rev. Proc. 2017-52.	

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 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
		§ 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
	12/2//24	•	
<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
			6651
		Notice refers to TD 10021 (12/3024) final regs	6656
		under §6045. Also see Treasury press release of	
		<u>12/27/24</u> .	
Notice 2025-	12/18/24	Treasury and IRS intend to issue proposed regs	482
04		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
Notice 2025-	12/19/24		
<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	274
		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	
		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).	
		<u>IR-2024-312</u> (12/19/24)	

		Rusinoss rato = 70 conts nor mile which includes	
		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 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.	861
Notice 2025- 07	12/31/24	Provides temporary relief allowing eligible taxpayers to rely on alternative methods for making an adequate identification, within the	1012
IIJA 2021		meaning of § 1.1012-1(j)(3)(ii), with respect to units of a digital asset held in the custody of a broker.	
Notice 2025- 08	1/16/25	Modifies New Elective Safe Harbor for domestic content bonus credit contained in Notice 2024-41, by updating tables in sections 4.04(1)-(3),	6417
IRA 2022		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	

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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	45W
		vehicles under section 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	45Z
		credit, and requirements for registration. Treasury press release of 1/10/25.	
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 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.	45Z
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	9816 9817

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		of 1974, and sections 2799A–1 and 2799A–2 of	
		the Public Health Service Act.	_
Notice 2025-	1/15/25	Sets forth updates on corporate bond monthly	417
<u>13</u>		yield curve, corresponding spot segment rates for	430
		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).	
Notice 2025-	2/12/25	Sets forth updates on the corporate bond	417
<u>14</u>		monthly yield curve, the corresponding spot	430
		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).	
Notice 2025-	2/21/25	Provides guidance regarding the alternative	6055
<u>15</u>		manner of furnishing certain health insurance	6056
		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
17	-,, 	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
18	.,,	of Columbia, Puerto Rico, and the insular areas	142
<u> 10</u>		or constitution, racito filco, and the insular areas	⊥ -⊤∠

Notice 2025- 19	4/4/25	for purposes of determining the 2025 calendar 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. Invites the public to submit recommendations for items to be included on the 2025-2026 Priority	146
Notice 2025- 20	5/5/25	Guidance Plan. Announces applicable percentage under section 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.	613A
Notice 2025- 21	4/15/25	Sets forth updates on the corporate bond monthly yield curve, the corresponding spot 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).	417 430
Notice 2025- 22 Executive Order 14192, Unleashing Prosperity Through Deregulation	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. Notice 2025-36 (7/4/25) obsoleted 83 guidance documents.	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	6011 6707 6707A 6708

		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).	
Notice 2025-	4/11/25	Provides relief from penalties under section	6011
<u>24</u>		6707A(a) and 6707(a) for participants in and	6111
		material advisors to micro-captive reportable transactions for disclosure statements required	6707 6707A
		to be filed with the Office of Tax Shelter Analysis	0707A
		(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.	
Notice 2025-	5/12/25	Provides inflation adjustment factor for the	45Q
<u>25</u>		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	
		dollar amounts applicable under § 45Q(a)(1) or	
Notice 2025-	5/12/25	(2) apply. Publishes the reference price under § 45K(d)(2)	43
<u>26</u>		(C) for calendar year 2024. The reference price	451
		applies in determining the amount of the	45K
		enhanced oil recovery credit under § 43, the marginal well production credit under § 45I, and	613A
		the percentage depletion in case of oil and	
		natural gas produced from marginal properties	
		under § 613A.	
Notice 2025-	6/2/25	Provides interim guidance regarding the application of the corporate alternative minimum	55 56A
<u>27</u>		tax, as added to Code by Inflation Reduction Act	56A 6655
IRA 2022		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	

	1		
		§ 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."	
Notice 2025- 28	7/29/25	Informs taxpayers of the intention of Treasury and IRS to partially withdraw proposed regs	56A
IRA 2022		[REG-112129-23 (9/13/24)] and issue revised proposed regs regarding the application of the Corporate Alternative Minimum Tax (CAMT) to	
		applicable corporations with financial statement income (FSI) attributable to investments in	
		partnerships. In addition, the notice provides interim guidance primarily on simplified methods	
		to determine an applicable corporation's adjusted financial statement income (AFSI) with	
		respect to an investment in a partnership,	
		reporting by partnerships of information needed to compute ASFI, and rules for partnership contributions and distributions.	
Notice 2025-	5/15/25	Sets forth updates on corporate bond monthly	417
<u>29</u>		yield curve, corresponding spot segment rates for April 2025 used under § 417(e)(3)(D), 24-month	430
		average segment rates applicable for May 2025,	
		and the 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).	
Notice 2025-	6/23/25	Publishes the inflation adjustment factor and	45
<u>30</u>		reference price for calendar year 2025 for the	
		renewable electricity production credit under section 45 of the Internal Revenue Code. The	
		2025 inflation adjustment factor and reference	
		price are used in determining the availability of the credit and apply to calendar year 2025 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	
		2025 under section 45.	
Nation 2025	C /22 /25		4.5
Notice 2025-	6/23/25	Publishes information taxpayers may use to	45 45V
<u>31</u>		determine whether they meet certain	45Y
		requirements under Statistical Area Category or	48
		the Coal Closure Category as described in	48C
		sections 3.03 and 3.04 of Notice 2023-29 for	48E
		purposes of qualifying for energy community	
		bonus credit amounts or rates under §§ 45, 45Y,	
		48, and 48E of the Internal Revenue Code. This	
		information is provided in Appendices 1, 2, 3, 4,	
		and 5 of this notice. Appendices 1, 2, and 3 of	
		this notice address the Statistical Area Category,	
		and Appendices 4 and 5 of this notice address the	
		Coal Closure Category. This notice does not	
		provide information addressing the Brownfield	
		Category as described in section 3.02 of Notice	
		2023-29. None of the appendices provided for	
		purposes of energy community bonus credit	
		amounts or rates are applicable for purposes of	
		the qualifying advanced energy project credit	
	- 1 1	determined under § 48C.	
Notice 2025-	6/30/25	Announces inflation adjustment factor and	43
<u>32</u>		phase-out amount for enhanced oil recovery	45K
		credit for tax years beginning in 2025 calendar	
		year. The notice concludes that because the	
		reference price for 2024 calendar year (\$74.48)	
		exceeds \$28 multiplied by the inflation	
		adjustment factor for the 2025 calendar year	
		(\$28 multiplied by 2.1115 = \$59.12) by \$15.36,	
		the enhanced oil recovery credit for qualified	
		costs paid or incurred in 2025 is phased-out	
Notice 2025	6/12/25	completely. Extends certain transition relief provided by	3403
Notice 2025-	0/12/23	Notice 2024-56 with respect to backup	3403 3406
<u>33</u>		withholding on digital assets by brokers under	6045
IIJA 2021		section 6045. This notice also provides transition	6721
11JA 2021		relief with respect to the reporting of	6721
		information and backup withholding on digital	6651
		asset sales effected for certain customers that	6656
		have not been previously classified by the broker	0000
		as U.S. persons.	
Notice 2025-	6/30/25	Provides applicable reference price for qualified	451
INULICE ZUZJ			
34	0/30/23	natural gas production from qualified marginal	431

		wells during tax years beginning in calendar year 2025 for purpose of determining marginal well production credit under §45I. The applicable reference price for tax years beginning in calendar year 2025 is \$1.64 per 1,000 cubic feet. The notice also provides credit amount used for the purpose of determining marginal well production credit. The credit amount for tax years beginning in calendar year 2025 is \$0.79 per 1,000 cubic feet.	
Notice 2025- 35	6/13/25	Sets forth updates on the corporate bond monthly yield curve, the corresponding spot 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).	417 430
Notice 2025- 36 Executive Order 14192, Unleashing Prosperity Through Deregulation	7/3/25	Obsoletes 83 pieces of guidance, which were identified for obsolescence by the Associate Offices. Today's notice is a continuation of guidance following Notice 2025-22, in which nine IRB guidance documents were obsoleted. See the end of this document for the list of what was obsoleted	Various
Notice 2025- 37 IRA 2022	7/21/25	Publishes 2025 calendar-year inflation adjustment factor for section 45U zero-emission nuclear power production credit, as well as inflation adjustment factors and corresponding applicable amounts for section 45V clean hydrogen production credit and section 45Z clean fuel production credit. The inflation adjustment factors (applicable to sections 45U, 45V, and 45Z) and the applicable amounts (in the case of sections 45V and 45Z) are used to determine the amount of the credit allowable under sections 45U, 45V, and 45Z.	45U 45V 45Z
Notice 2025- 38 IRA 2022	9/15/25	Republishes inflation adjustment factor and applicable amounts for calendar year 2025 for clean electricity production credit allowable under section 45Y, which were published in the Federal Register at 90 FR 41477 on August 25, 2025. The 2025 inflation adjustment factor and	45Y

		applicable amounts are used to determine amount of section 45Y credit and apply to calendar year 2025 sales, consumption, or storage of electricity produced in the United States or a possession thereof at a qualified facility.	
Notice 2025- 39	7/15/25	Sets forth updates on corporate bond monthly yield curve, corresponding spot segment rates for June 2025 used under § 417(e)(3)(D), 24-month average segment rates applicable for July 2025, and the 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).	417 430
Notice 2025- 40	7/15/25	Specifies updated static mortality tables to be used for defined benefit pension plans under IRC §430(h)(3)(A) and section 303(h)(3)(A) of ERISA. This notice also specifies a mortality table for use in determining minimum present value under IRC §417(e)(3) and section 205(g)(3) of ERISA for distributions with annuity starting dates that occur during stability periods beginning in the 2026 calendar year.	417 430
Notice 2025- 41	8/18/25	This Notice of Determinations adds 21 chemical substances to list of taxable substances under § 4672 subject to the tax imposed by § 4671. Also modifies Notice 2021-66 by correcting the spelling of sodium nitrilotriacetate monohydrate and by prescribing a tax rate for sodium nitrilotriacetate monohydrate.	4671 4672
Notice 2025- 42 IRA 2022 OBBBA	8/15/25	Provides guidance, consistent with Executive Order 14315, 90 FR 30821 (July 7, 2025), regarding when construction of an applicable wind facility or applicable solar facility (each as defined in section 2.02 of this notice) has begun for purposes of determining whether such facility is subject to credit termination provisions added to §§ 45Y and 48E by §§ 70512 and 70513 of P.L. 119-21 (July 4, 2025) (OBBBA). Section 70512(a) and (I)(4) of OBBBA terminates the clean electricity production credit determined under §45Y (§ 45Y credit), and § 70513(a) and (g)(5) of OBBBA a terminates the clean electricity investment credit determined under § 48E (§ 48E credit), in the case of an applicable wind facility or applicable solar facility that is placed in service	45Y 48E

Notice 2025- 43	8/18/25	after December 31, 2027 (credit termination date). The credit termination date applies to applicable wind and solar facilities the construction of which begins after July 4, 2026 (beginning of construction deadline), the date that is 12 months after the date of enactment of the OBBBA. Updates the corporate bond monthly yield curve, corresponding spot segment rates for July 2025 used under § 417(e)(3)(D), 24-month average segment rates applicable for August 2025, and 30-year Treasury rates, as reflected by application of § 430(h)(2)(C)(iv).	417 430
Notice 2025- 44	8/20/25	Announces that Treasury and IRS intend to issue proposed regs withdrawing the disregarded payment loss ("DPL") rules under § 1.1503(d)-1(d). The DPL rules were finalized on January 14, 2025 and are applicable with respect to losses incurred in tax years beginning on or after January 1, 2026. In addition, this notice announces an extension of the transition relief initially announced in Notice 2023-80 with respect to the interaction of the dual consolidated loss ("DCL") rules and the model rules published by the OECD/G20 Inclusive Framework on BEPS (the "GloBE Model Rules"). The notice extends the transition relief such that the DCL rules would generally be applied without respect to the GloBE Model Rules for losses incurred in taxable years beginning before January 1, 2028.	1503
Notice 2025- 45	8/19/25	Announces that Treasury and the IRS intend to issue proposed regs under sections 897(d) and (e) to modify the rules under §§1.897-5T and 1.897-6T, Notice 89-85 and Notice 2006-46 regarding certain transactions involving the transfer of United States real property interests. When issued, the regs will propose to revise the rules that apply to certain inbound asset reorganizations under section 368(a)(1)(F) that constitute a "covered inbound F reorganization" as defined in section 3.02 of this notice. This notice also announces that Treasury and the IRS intend to issue proposed regs to revise §1.368-	368 897

		2(m) to clarify that qualification of a potential F reorganization (as defined in §1.368-2(m)(1)) as a reorganization under section 368(a)(1)(F) would not be affected by a disposition of stock in either the transferor corporation or the resulting corporation if that disposition is not included in the plan of reorganization.	
Notice 2025- 46			
Notice 2025- 47	9/15/25	Sets forth updates on corporate bond monthly yield curve, corresponding spot segment rates for August 2025 used under § 417(e)(3)(D), the 24-month average segment rates applicable for September 2025, and the 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).	417 430
Notice 2025- 48			
Notice 2025- 49			
Notice 2025- 50			
Notice 2025- 51			
Notice 2025- 52	9/22/25	Explains circumstances under which 4-year replacement period under §1033(e)(2) is extended for livestock sold on account of drought. Appendix to notice contains a list of counties that experienced exceptional, extreme, or severe drought conditions during the 12-month period ending August 31, 2025. Taxpayers may use this list to determine if an extension is available. IR-2025-93 (9/22/52)	1033
Notice 2025- 53			
Notice 2025- 54	9/23/25	Announces special per diem rates effective October 1, 2025, which taxpayers may use to substantiate amount of expenses for lodging, meals, and incidental expenses when traveling away from home. This notice provides special transportation industry rate, rate for the	274

incidental expenses only deduction, and rates and list of high-cost localities for purposes of the high-low substantiation method. Rev. Proc. 2019-48 provides 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. Notice 2024-68 is superseded. Rates are same as last year.

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

Ann #	Date	IRS summary	Code
	released		Section(s)
Ann.	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	

	1		
		future regs finalizing the proposed regs will apply	
	10/0:/0-	beginning in the 2026 distribution calendar year.	
Ann.	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	
		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.	
		tunpayers.	
		<u>IR-2025-14</u> (1/15/25)	
Ann.	3/21/25	The competent authorities of the United States and the	
2025-08		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	
	2/27/25	for benefits under paragraph 3 of Article 10 (Dividends).	
<u>Ann.</u>	3/27/25	issued pursuant to § 521(b) of P. L. 106-170, the Ticket	
<u>2025-13</u>		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 th 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	
2025-16		entered into a Competent Authority Arrangement under	
		paragraph 3 of Article 25 (Mutual Agreement	
<u> </u>	1	,	

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).	

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 news release. 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 2025-01 (1/17/25) released in IR-2025-17 (1/17/25)

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

<u>FS 2025-05</u> (8/21/25) released in <u>IR-2025-86</u> (8/21/25)

- Modification of sections 25C, 25D, 25E, 30C, 30D, 45L, 45W, and 179D under OBBBA
- Appears to be a supplement to prior FS on sections 25C, 25D, 30D and 25E as the 7 new FAQs are all that are in this FS.

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).

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

Notice 2025-36 (7/3/25) – lists 83 IRB guidance 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).

Obsoletes:

- 1. Notice 2008-83, Application of Section 382(h) to Banks
 - Repealed by Congress in ARRA 2009 (P.L. 111-5)

Guidance relating to §341 repealed by American Taxpayer Relief Act of 2012 (P.L. 112-240):

- 2. Rev. Proc. 77-27, PLRs under §341
- 3. Rev. Rul. 79-235, Collapsible Corporations; Holding Period; Property Acquired by Exchange
- 4. Rev. Rul. 79-226, Collapsible Corporations; Sale of Property Constructed Within 3 Years of Liquidation
- 5. Rev. Rul. 77-306, Collapsible Corporations; "Construction" or "Production" from Lease
- 6. Rev. Rul. 73-500, Collapsible Corporation; Sale of "Substantially All of the Properties"
- 7. Rev. Rul. 73-378, Collapsible Corporation; Reorganization; Exchange and Sale of Stock
- 8. Rev. Rul. 72-422 "Construction" under §341
- 9. Rev. Rul. 72-48 Collapsible corporation and property produced
- 10. Rev. Rul. 72-24 Collapsible corporation and foreign corporation
- 11. Rev. Rul. 71-353 "Beneficiary" under §341
- 12. Rev. Rul. 70-397 Collapsible corporation and liquidation
- 13. Rev. Rul. 70-93 Collapsible corporation and certain gain
- 14. Rev. Rul. 69-378 Collapsible corporation and construction
- 15. Rev. Rul. 69-33 Collapsible corporation and transferee corporation
- 16. Rev. Rul. 69-32 Time and manner to consent to §341(f)(2)
- 17. Rev. Rul. 68-476 Collapsible corporation and shareholder gain

- 18. Rev. Rul. 68-472 Restoration of damaged building and "construction" under §341
- 19. Rev. Rul. 64-125 3-year rule under §341(d)(3)

Provisions repealed or amended by TCJA (P.L. 115-97):

- 20. Notice 2005-38, Section 965 Limitations on Dividends Received Deduction and Other Guidance
- 21. Notice 2005-10, Domestic Reinvestment Plans and Other Guidance Under Section 965
- 22. Rev. Rul. 2003-34, Special Estimated Tax Payments
- 23. Rev. Rul. 76-414, Capital Gains; Alternative Tax; Sale of Patent by Corporate Taxpayer
- 24. Rev. Rul. 62-3 mutual insurance company
- 25. Rev. Rul. 56-247 alternative tax and §1201
- 26. Ann. 78-170 alternative tax under §1201

Guidance related to §1034 on sale of a residence repealed by TRA 1997 (P.L. 105-34):

- 27. Rev. Rul. 78-136, Sale of Residence; Replacement Period; Armed Forces; Divorced Spouse
- 28. Rev. Rul. 75-238, Husband and wife sale prior to marriage
- 29. Rev. Rul. 74-250, Residence Replaced by Two Residences; Husband and Wife Separated
- 30. Rev. Rul. 56-396 §1034 and installment sale

Guidance related to repealed Code sections:

- 31. Notice 2011-76, Due Dates for Filing Form 706, Form 706-NA, or Form 8939, Extension of Time to Pay Estate Tax, and Penalty Relief for Recipients of Property Acquired from Decedents Who Died in 2010
- 32. Notice 88-7, Application of Section 382(I)(5)(D) to Certain Transactions in Which the Federal Savings and Loan Insurance Corporation Establishes a Federal Mutual Domestic Building and Loan Association
- 33. Rev. Proc. 83-79 estimated tax under §6153
- 34. Rev. Rul. 82-35, Farms; Special Use Value; Liens

- 35. Rev. Rul. 82-10, Bond Premium Amortization; Yield Method
- 36. Rev. Rul. 81-146, Valuation; Special Use and Eligible Joint Interest Elections
- 37. Rev. Rul. 74-231, Maximum Tax on Earned Income; Partnership
- 38. Rev. Rul. 63-30 add'l depreciation under §179
- 39. Rev. Rul. 55-71 excise tax on jewelry, furs, and related articles and estate and gift taxes

Guidance related to amended or repealed regulations:

- 40. Notice 2025-3, Transitional Relief Under Sections 3403, 3406, 6721, 6722, 6651, and 6656 with Respect to the Reporting of Information and Backup Withholding on Digital Assets Under Section 6045 for Digital Asset Brokers Providing Trading Front End Services
- 41. Rev. Rul. 76-243, Allocation of Income; Advance Charter Hire Payment Guidance related to former §29, credit for facilities producing coke or coke gas:
- 42. Rev. Proc. 2004-27
- 43. Rev. Proc. 2001-34, Qualified Fuel Under Section 29(c)(1)(C)
- 44. Rev. Rul. 94-48, Section 29 Credit; Production Attributable to Net Profits Interest
- 45. Rev. Rul. 93-54, Section 29 Credit; Recompletions
- 46. Rev. Rul. 93-46, Section 29 Credit; Royalty Owners
- 47. Rev. Rul. 90-70, Credit for Producing Fuel from a Nonconventional Fuel Source
- 48. Rev. Rul. 86-127, Credit for Producing Fuel from a Nonconventional Source
- 49. Rev. Rul. 86-100, Credit for Producing Fuel from a Nonconventional Source
- 50. Rev. Rul. 86-2, Credit for Producing Oil from a Nonconventional Source
- 51. Rev. Rul. 85-77, Nonconventional Fuel Source Credit; Price-Support Payments
- 52. Ann. 2004-42, Credit for Producing Fuel from a Nonconventional Source
- 53. Ann. 2003-70, Section 29 Test Procedures and Significant Chemical Change
- 54. Ann. 2003-46
- 55. Ann. 90-31, Credit for Producing Fuel from a Nonconventional Source Oil Produced from Tar Sands

Guidance now covered by final regulations:

- 56. Notice 2011-82, Guidance on Electing Portability of Deceased Spousal Unused Exclusion Amount
- 57. Notice 2003-8, Information Reporting for Securities Futures Contracts
- 58. Notice 2000-62, Returns Relating to Payments of Qualified Tuition and Related Expenses, and to Payments of Interest on Education Loans
- 59. Notice 96-12, Mark to Market for Securities Dealers: The Dealer-Customer Relationship
- 60. Rev. Rul. 75-424, Real Estate Investment Trust; Mortgages on Microwave Transmission Property
- 61. Rev. Rul. 71-286
- 62. Rev. Rul. 69-94
- 63. Rev. Rul. 59-109
- 64. Rev. Rul. 56-6
- 65. Rev. Rul. 54-444

Guidance related to past tax year that is not applicable to current or future tax years:

- 66. Notice 2016-75, Section 45R 2016 Guidance with Respect to the Tax Credit for Employee Health Insurance Expenses of Certain Small Employers
- 67. Notice 2016-20, Qualified Zone Academy Bond Allocations for 2015 and 2016
- 68. Notice 2015-11, Qualified Zone Academy Bond Allocations for 2014
- 69. Notice 2015-8, Section 45R 2015 Guidance with Respect to the Tax Credit for Employee Health Insurance Expenses of Certain Small Employers
- 70. Notice 2014-6, Section 45R Transition Relief with Respect to the Tax Credit for Employee Health Insurance Expenses of Certain Small Employers
- 71. Notice 2013-3, Qualified Zone Academy Bond Allocations for 2012 and 2013
- 72. Notice 2012-21, Extension of Time to File an Estate Tax Return Solely to Elect Portability of a Deceased Spousal Unused Exclusion Amount
- 73. Notice 2011-88, Postponement of Backup Withholding Requirement for Payment Card and Third Party Network Payments Made Under Section 6050W
- 74. Notice 2010-11, Extension of Temporary Suspension of AHYDO Rules

- 75. Notice 2005-89, Temporary Relief for Certain REITs and Taxable REIT Subsidiaries that Provide Accommodations to Persons Affected by Hurricanes Katrina and Rita
- 76. Rev. Proc. 2019-34 simplified procedures for method changes for insurance companies
- 77. Rev. Proc. 2011-19, Qualified Zone Academy Bond Allocations for 2011
- 78. Rev. Proc. 80-49 "procedures for the partial revocation of a section 2032A election made on or before August 30, 1980"
- 79. Rev. Rul. 82-62, Valuation; Special Use Value; Retroactive Election
- 80. Ann. 91-58, New Form 706-QDT for Reporting and Paying Estate Tax with Respect to Qualified Domestic Trust; Due Date is September 16, 1991

Guidance seeking public comment and guidance is no longer needed:

- 81. Notice 2013-48, Application of Wash Sale Rules to Money Market Fund Shares
- 82. Notice 2011-73, Request for Comments on Health Coverage Affordability Safe Harbor for Employers (Section 4980H)
- 83. Notice 2008-94, Guidance on §§ 162(m)(5) and 280G(e)