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

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

### **Revenue Rulings**

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

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

			1274
			1274
			1288
			7520
D D I	5 /2 A /2 A	01 1 2 0 1 7 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	7872
Rev. Rul.	5/24/24	Obsoletes Rev. Rul. 75-38 which identified the District	508
<u>2024-10</u>		of Columbia and each State with statutory provisions	
		that, in 1975, satisfied the private foundation	
		governing instrument requirements of section 508(e).	
		Due to material changes in the laws of a number of	
		jurisdictions since 1975, the jurisdictional list set forth	
		in Rev. Rul. 75-38 is no longer accurate.	
		Also see <u>PMTA 2024-03</u> (4/23/24).	
Rev. Rul.	5/9/24	Provides rates for interest determined under Section	6621
<u>2024-11</u>		6621 for the calendar quarter beginning July 1, 2024,	
		will be 8% for overpayments (7% in the case of a	
		corporation), 8% for underpayments, and 10% for	
		large corporate underpayments. The rate of interest	
		paid on the portion of a corporate overpayment	
		exceeding \$10,000 will be 5.5%.	
		<u>IR-2024-138</u> (5/9/24)	
Rev. Rul.	5/15/24	Provides various prescribed rates for federal income	42
<u>2024-12</u>		tax purposes for June 2024, including the applicable	280G
		federal interest rates, the adjusted applicable federal	382
		interest rates, the adjusted federal long-term rate,	467
		and the adjusted federal long-term tax-exempt rate.	468
		These rates are determined as prescribed by § 1274.	482
Rev. Rul.	6/18/24	Provides various prescribed rates for federal income	483
<u>2024-13</u>		tax purposes including the applicable federal interest	1274
		rates, the adjusted applicable federal interest rates,	1288
		the adjusted federal long-term rate, and the adjusted	7520
		federal long-term tax-exempt rate. These rates are	7872
		determined as prescribed by § 1274.	
Rev. Rul.	6/17/24	Advises taxpayers of IRS position challenging certain	732
<u>2024-14</u>		partnership related-party transactions under the	734
		codified economic substance doctrine in	743
		§7701(o). Under the ruling, the IRS applies the	754
		economic substance doctrine in 3 situations involving	755
		related parties where some or all of whom are	7701(o)
		partners in a partnership, and the parties: (1) create	
		basis disparities through various methods; (2)	
		capitalize on these basis disparities either by	
		transferring a partnership interest in a	

nonrecognition transaction or by making a current or liquidating distribution of partnership property to a partner; and (3) claim a basis adjustment under §§ 732(b), 734(b), or 743(b). The ruling holds that these transaction structures lack economic substance under § 7701(o). In such cases, the Service will disregard the basis adjustments.	
<u>IR-2024-166</u> (6/17/24)	

## **Revenue Procedures**

Rev. Proc.	Date	IRS summary	Code
#	released		Section(s)
Rev. Proc.	1/2/24	Revised procedures for letter rulings and information	
<u>2024-1</u>		letters issued by Associate Chief Counsel (Corporate),	
		Associate Chief Counsel (Employee Benefits, Exempt	
		Organizations, and Employment Taxes), Associate	
		Chief Counsel (Financial Institutions and Products),	
		Associate Chief Counsel (Income Tax and Accounting),	
		Associate Chief Counsel (International), Associate	
		Chief Counsel (Passthroughs and Special Industries),	
		and Associate Chief Counsel (Procedure and	
		Administration). This procedure also contains	
		procedures for determination letters issued by Large	
		Business and International Division, Small Business/	
		Self Employed Division, Wage and Investment	
		Division, and Tax Exempt and Government Entities	
		Division. Rev. Proc. 2023-1 is superseded.	
Rev. Proc.	1/2/24	Explains when and how an Associate office within	
<u>2024-2</u>		Office of Chief Counsel provides technical advice,	
		conveyed in technical advice memoranda (TAMs). It	
		also explains rights that a taxpayer has when a field	
		office requests a TAM regarding a tax matter. Rev.	
	. / . /	Proc. 2023-2 is superseded.	
Rev. Proc.	1/2/24	No rulings list. Provides a revised list of areas of Code	
<u>2024-3</u>		under jurisdiction of Associate Chief Counsel	
		(Corporate), Associate Chief Counsel (Financial	
		Institutions and Products), Associate Chief Counsel	
		(Income Tax and Accounting), Associate Chief Counsel	
		(Passthroughs and Special Industries), Associate Chief	
		Counsel (Procedure and Administration), and	
		Associate Chief Counsel (Employee Benefits, Exempt	

		Organizations and Employment Taxes) relating to matters on which the Service will not issue letter rulings or determination letters. Rev. Proc. 2023-3 is superseded.	
Rev. Proc. 2024-4	1/2/24	Updates Rev. Proc. 2023-4, relating to types of advice IRS provides to taxpayers on issues under the jurisdiction of the Commissioner, Tax Exempt and Government Entities Division, Employee Plans Rulings and Agreements, and procedures that apply to requests for determination letters and private letter rulings.	
Rev. Proc. 2024-5	1/2/24	Per TE/GE email: "provides that EO Determinations will now issue a determination letter to an organization currently recognized as described in Section 501(c)(3) that seeks recognition as described in a different paragraph of Section 501(c).  Section 3.01(1) of Rev. Proc. 2024-5 provides that EO Determinations will issue a determination letter to an organization currently recognized as described in Section 501(c)(3) that seeks recognition as described in a different paragraph of Section 501(c) if the organization establishes that as of the submission date of its application, it:  1. Has distributed its assets to another Section 501(c)(3) organization or government entity, and  2. Otherwise meets the requirements for the Section 501(c) status requested.  It further provides that the new determination letter will only be effective from the submission date of the new application.  Accordingly, an organization currently recognized as described in Section 501(c)(3) that seeks recognition as described in a different paragraph of Section 501(c) must:  1. Represent that its assets have been distributed as of the submission date of its application and provide a description of the assets distributed, the date of distribution and the name, EIN, and address of the recipient and	501

		Agree to submission (postmark) date for recognition under the new paragraph of Section 501(c)	
		The required representation may be included with the organization's supplemental responses in the single PDF file submitted with its Form 1024, Application for Recognition of Exemption Under Section 501(a) or Section 521 of the Internal Revenue Code, or Form 1024-A, Application for Recognition of Exemption Under Section 501(c)(4) of the Internal Revenue Code.	
		This procedure also applies to an organization automatically revoked under Section 6033(j) that was described in Section 501(c)(3) that seeks retroactive reinstatement as described in a different paragraph of Section 501(c).	
		Section 501(c)(3) organizations seeking to be recognized as described in Section 501(c)(4) are subject to the same requirement to file Form 8976 within 60 days of formation as new Section 501(c)(4) organizations.	
		An organization previously described in Section 501(c)(3) that submits Form 8976 within 60 days of seeking to be described in Section 501(c)(4) may have reasonable cause for not filing Form 8976 within 60 days of formation. Such an organization may seek reasonable cause relief from any penalty for late filing Form 8976 by following the instructions in the correspondence from the IRS regarding the penalty.	
Rev. Proc. 2024-6		Not issued as of 5/31/24	
Rev. Proc. 2024-7	1/2/24	Areas in which rulings will not be issued, Associate Chief Counsel (International).	
Rev. Proc. 2024-8	12/8/23	Provides issuers of qualified mortgage bonds under §143(a), and issuers of mortgage credit certificates under § 25(c), with a list of qualified census tracts.  Qualified census tracts consist of households in which 70 percent or more of the families have income that is 80 percent or less of the statewide median family income. This revenue procedure modifies and supersedes Rev. Proc. 2014-14.	143
Rev. Proc. 2024-9	12/22/23	Modifies sections 7 and 19 of Rev. Proc. 2023-24 to provide procedures under § 446 and § 1.446-1(e) to obtain automatic consent of IRS to change methods of	174 446 460

TCJA		accounting for expenditures paid or incurred in tax years beginning after December 31, 2021, to rely on interim guidance under §§174 and 460 provided in Notice 2023-63. This revenue procedure also clarifies section 9 of Rev. Proc. 2023-24 to provide that section 5 of Rev. Proc. 2000-50 is obsoleted for costs of developing computer software paid or incurred in any taxable year beginning after December 31, 2021, and continues to apply to costs of developing computer software paid or incurred in any taxable year beginning on or before December 31, 2021.	
Rev. Proc.	5/28/24	Obsoletes Rev. Rul. 75-38 which identified District of	
<u>2024-10</u>		Columbia and each State with statutory provisions	
		that, in 1975, satisfied the private foundation	
		governing instrument requirements of section 508(e).	
		Due to material changes in the laws of a number of	
		jurisdictions since 1975, the jurisdictional list set forth	
Rev. Proc.	3/25/24	in Rev. Rul. 75-38 is no longer accurate.  General Rules and Specifications for Substitute Form	
<u>2024-11</u>	3/23/24	941, Schedule B (Form 941), Schedule D (Form 941),	
202 : 11		Schedule R (Form 941), and Form 8974.	
		This revenue procedure provides general rules and	
		specifications from the IRS for paper and computer-	
		generated substitutes for Form 941; Schedule B (Form	
		941); Schedule D (Form 941); Schedule R (Form 941);	
		and Form 8974. This revenue procedure supersedes	
	- I- I	Rev Proc 2023-13.	
Rev. Proc.	2/7/24	Sets forth a temporary extension of time to perform	25E
<u>2024-12</u>		procedures under §§ 30D(d)(1)(H) and 25E(c)(1)(D)(i)	30D
IRA 2022		for provision of seller reports to the IRS. This revenue procedure modifies sections 5.01 and 6.03 of Rev.	
INA 2022		Proc. 2022-42 and section 7.03(1) of Rev. Proc. 2023-	
		33, providing new information for the timing and	
		manner of submission of seller reports for sales of	
		vehicles qualifying for the clean vehicle credit or the	
		previously-owned clean vehicle credit under §§ 30D	
		and 25E, respectively.	
		Extension for 2023 reports made in interest of	
		"sounds tax administration."	
Rev. Proc.	2/6/24	Provides: (1) two tables of limitations on depreciation	280F
<u>2024-13</u>		deductions for owners of passenger automobiles	
		placed in service by the taxpayer during calendar year	
		2024; and (2) a table of dollar amounts that must be	
		used to determine income inclusions by lessees of	

		passenger automobiles with a lease term beginning in calendar year 2024. The tables detailing these depreciation limitations and amounts used to determine lessee income inclusions reflect the automobile price inflation adjustments required by §280F(d)(7). For purposes of this revenue procedure, the term "passenger automobiles" includes trucks and vans.	
Rev. Proc.	2/12/24	Provides indexing adjustments for applicable dollar	4980H
2024-14		amounts under section 4980H(c)(1) and (b)(1). These	
		indexed amounts are used to calculate the employer	
ACA		shared responsibility payments (ESRP) under section	
7.67		4980H(a) and (b)(1), respectively.	
		450011(a) and (b)(1), respectively.	
		For 2024 (a) populty is \$2,000 and (b) is \$4,250	
Pov. Proc	2/20/24	For 2024, (a) penalty is \$2,900 and (b) is \$4,350.	61
Rev. Proc.	2/29/24	Sets forth Federal income tax treatment that may	61
<u>2024-15</u>		apply to certain legislatively authorized transactions	451
		entered into by a public utility to recover specified	1001
		costs through a surcharge to customers within the	
		utility's service area. The transactions in question	
		involve a securitization in which the issuance of debt	
		instruments is by a qualifying State financing entity.	
		The revenue procedure also modifies Rev. Proc. 2005-	
		62.	
Rev. Proc.		Not issued as of 5/31/24	
2024-16			
Rev. Proc.	3/19/24	Adds Ukraine, Belarus, Sudan, Haiti, Niger, and Iraq to	911
<u>2024-17</u>		the list of waiver countries for tax year 2023 for which	
		the minimum time requirements are waived.	
		Generally, U.S. citizens or resident aliens living and	
		working abroad are taxed on their worldwide income.	
		However, if their tax home is in a foreign country and	
		they meet either the bona fide residence test or the	
		physical presence test, they can choose to exclude	
		from their income a limited amount of their foreign	
		earned income (up to \$120,000 for 2023). Both the	
		bona fide residence test and the physical presence	
		test contain minimum time requirements. Revenue	
		Procedure 2024-17 provides a waiver under section	
		911(d)(4) for the time requirements for individuals	
		electing to exclude their foreign earned income who	
		must leave a foreign country because of war, civil	
		unrest, or similar adverse conditions in that country.	

Rev. Proc.	4/8/24	Supplements Rev. Proc. 2023-32 by publishing	42
<u>2024-18</u>		amounts of unused housing credit carryovers	
		allocated to qualified states under § 42(h)(3)(D) for	
		calendar year 2023 in addition to those amounts	
		published in Rev. Proc. 2023-32.	
Rev. Proc.	3/29/24	Provides clarifying and procedural guidance applicable	48
<u>2024-19</u>		to low-income communities bonus credit program	
		(Program) for 2024 Program year. Program was	
IRA 2022		established pursuant to Inflation Reduction Act of	
		2022. Under this Program, applicants investing in	
		certain solar and wind-powered electricity generation	
		facilities may apply for an allocation of environmental	
		justice solar and wind capacity limitation to increase	
		the amount of an energy investment credit under	
		section 48 for the taxable year in which the facility is	
		placed in service.	
		<u>IR-2024-86</u> (3/29/24)	
		IR-2024-149 (5/28/24) – Treasury, IRS and Dept of	
		Energy open application <u>portal</u> for 2024 Program Year	
		of the Low-Income Communities Bonus Credit	
		Program. Also see regs at <u>TD 9979</u> (8/15/23).	
Rev. Proc.	4/18/24	Provides domestic asset/liability percentages and	842
<u>2024-20</u>		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) for tax years beginning after December	
		31, 2022. This revenue procedure applies to foreign	
		insurance companies.	
Rev. Proc.	4/16/24	Provides issuers of qualified mortgage bonds and	25
<u>2024-21</u>		mortgage credit certificates with (1) nationwide	143
		average purchase price for residences located in the	
		United States, and (2) average area purchase price	
		safe harbors for residences located in statistical areas	
		in each state, the District of Columbia, Puerto Rico,	
		the Northern Mariana Islands, American Samoa, the	
	= 10 - 10 -	Virgin Islands, and Guam.	
Rev. Proc.	5/24/24	obsoletes Rev. Proc. 82-2 which identified the	501
<u>2024-22</u>		circumstances in which an organization could satisfy	
		$\S1.501(c)(3)-1(b)(4)$ (requiring that the assets of a	
		section 501(c)(3) organization be dedicated to an	
		exempt purpose) by operation of the law of certain	
		States or the District of Columbia. Due to material	
		changes in the law of many jurisdictions since 1982,	

		the invitediational list out fouth in Box. Bure 02.2 is us	
		the jurisdictional list set forth in Rev. Proc. 82-2 is no	
		longer accurate.	
		Also see <u>PMTA 2024-02</u> (4/23/24)	
Rev. Proc.	4/30/24	Annual procedure that provides the List of Automatic	446
<u>2024-23</u>		Changes to which the automatic method of	481
		accounting change procedures apply under the	
		method of accounting change guidance.	
		Changes of method of accounting are covered in in	
		Rev. Proc. 2015-13, as clarified and modified by Rev.	
		Proc. 2015-33, and as modified by Rev. Proc. 2021-34,	
		by Rev. Proc. 2021-26, by Rev. Proc. 2017-59, and by	
		section 17.02(b) and (c) of Rev. Proc. 2016-1,	
		apply. The definitions in section 3 of Rev. Proc. 2015-	
Dov. Dros	E /1 /2 4	13 apply to this revenue procedure.	255
Rev. Proc.	5/1/24	Provides updated procedures for taxpayers requesting	355
<u>2024-24</u>		private letter rulings from the IRS regarding certain	
		matters pertaining to section 355 transactions,	
		including representations, information, and analysis to	
		be submitted with those requests. This revenue	
		procedure modifies Rev. Proc. 2017-52 and	
		supersedes Rev. Proc. 2018-53.	
		IRS seeks specific comments by 7/30/24; see Notice	
		<u>2024-38</u> (5/1/24).	
Rev. Proc.	5/9/24	Provides 2025 inflation adjusted amounts for Health	223
<u>2024-25</u>		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.	
Rev. Proc.	6/7/24	Updates existing procedures and provides additional	25E
2024-26	-, · , <del>-</del> ·	procedures for qualified manufacturers to submit	30D
		information regarding new clean vehicles to ensure	222
IRA 2022		the vehicles satisfy the requirements of § 30D(d) and	
1104 2022		(e) for the applicable calendar year and therefore are	
		eligible for the clean vehicle credit under § 30D. This	
		revenue procedure also updates existing procedures	
		regarding seller report updates and	
		rescissions. Modifies section 7.03(4) of Rev. Proc.	
		2023-33, and modifies section 5.04 of Rev. Proc. 2023-	
		38.	
		<u>IR-2024-158</u> (6/7/24)	

# Notices

Notice #	Date released	IRS summary	Code Section(s)
Notice 2024- 01	12/20/23	Provides indexing factors to be used by group health plans and health insurance issuers to calculate qualifying payment amount (QPA) for items or services provided on or after January 1, 2024, and before January 1, 2025. The No Surprises Act (NSA) added parallel provisions at Code sections 9816 and 9817, ERISA sections 716 and 717, and PHS Act sections 2799A-1 and 2799A-2. These provisions provide protections against balance-billing for certain out-of-network items or services provided to patients. The QPA is the basis for determining individual cost sharing for items and services covered by the balance-billing protections in the NSA, under certain circumstances. The QPA for a given calendar year is based on information regarding median rates for certain items and services from prior years and is indexed based on changes in the consumer price index. In addition to providing the indexing factor for adjusting 2023 amounts for 2024, the notice also provides cumulative adjustments for prior years and examples of how to apply the percentage increases.  Provides guidance in the form of questions and	9816
O2 SECURE Act 2.0	12/20/23	answers with respect to certain provisions of the SECURE 2.0 Act of 2022.	
Notice 2024- 03  SECURE Act 2.0 and other provisions	12/20/23	Sets forth 2023 Cumulative List of Changes in Plan Qualification Requirements for Defined Contribution Qualified Pre-approved Plans (2023 Cumulative List). The 2023 Cumulative List will assist pre approved plan providers applying to IRS for opinion letters for the fourth remedial amendment cycle for defined contribution qualified pre approved plans (Cycle 4) under the IRS's pre-approved plan program. The 2023 Cumulative List identifies recent changes in	401 402 402A 411 413 414 415 416

		Revenue Code that were not taken into account during the first three remedial amendment cycles for defined contribution qualified pre-approved plans and that will be taken into account by the IRS with respect to the form of a plan submitted to the IRS for Cycle 4. The Cycle 4 submission period begins on February 1, 2024, and ends on January 31, 2025.	
Notice 2024-	12/14/23	Sets forth updates on corporate bond monthly	417
<u>04</u>		yield curve, corresponding spot segment rates for	430
		December 2023 used under § 417(e)(3)(D), 24- month average segment rates applicable for	431
		December 2023, and 30-year Treasury rates, as	
		reflected by the application of §430(h)(2)(C)(iv).	
Notice 2024-	12/20/23	Provides safe harbor regarding incremental cost	45W
<u>05</u>		of certain qualified commercial clean vehicles	
		placed in service in calendar year 2024 for	
IRA 2022		purposes of the credit for qualified commercial	
		clean vehicles under § 45W. This notice also	
		requests comments regarding additional types or classes of vehicles that should be included in the	
		safe harbor in the future.	
		<u>IR-2023-245</u> (12/20/23)	
Notice 2024-	12/15/23	Provides safe harbors for a method that can be	40B
<u>06</u>		used to qualify for and calculate the SAF	6426(k)
IRA 2022		sustainable aviation fuel (SAF) credit, the Renewable Fuel Standard program method. It	
INA 2022		also discusses other methods, informing the	
		public that the current Greenhouse Gases,	
		Regulated Emissions, and Energy Use in	
		Technologies (GREET) model of the Argonne	
		National Laboratory and existing GREET-based	
		models do not currently meet the applicable	
		requirements to be used for the SAF credit, but	
		federal agencies are working to modify the GREET model so that it does.	
		GREET HOUSE SO CHACK GOES.	
		<u>IR-2023-240</u> (12/15/23)	
		Appendix A of this notice supersedes Appendix B	
		of <u>Notice 2023-6 (</u> 12/19/22).	
Notice 2024-	12/19/23	Provides automatic relief to eligible taxpayers	6651
<u>07</u>		from additions to tax for failure to pay with	

		respect to certain income tax returns for 2020 and 2021. For eligible taxpayers, these additions to tax will be waived or, to the extent previously assessed or paid, will be abated, refunded, or credited to other outstanding tax liabilities, as appropriate, for the relief period, which begins on the date the IRS issued an initial balance due notice or February 5, 2022, whichever is later, and ends on March 31, 2024.  IR-2023-244 (12/19/23)  FS-2023-28 (Dec. 2023)	
Notice 2024-	12/14/23	Provides optional 2024 standard mileage rates	61
<u>08</u>		for taxpayers to use in computing deductible	162
		costs of operating an automobile for business,	213
		charitable, medical, or moving expense purposes. This notice also provides the amount taxpayers	274
		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. Additionally, this notice provides the	
		maximum fair market value of employer-	
		provided automobiles first made available to	
		employees for personal use in calendar year 2024	
		for which employers may use the fleet-average valuation rule in § 1.61-21(d)(5)(v) or the vehicle	
		cents-per-mile valuation rule in § 1.61-21(e).	
		Business: 67 cents/mile	
		30 cents/mile represents depreciation	
		Medical/moving: 21 cents/mile	
		Charitable set at 14 cents per §170(i).	
Notice 2024-	12/28/23	Provides procedures for applicable entities to	45
<u>09</u>		claim the statutory exception to the application of the phaseouts for elective payment projects	45Y
		that begin construction during calendar year	48
IRA 2022		2024 that fail to satisfy the domestic content requirement.	48E
		<u> </u>	

The phaseouts for elective payment and the statutory exception apply to the following credits:  • Renewable Electricity Production Credit (IRC § 45Y) • Clean Electricity Production Credit (IRC § 45Y) • Energy Credit (IRC § 48) • Clean Electricity Investment Credit (IRC § 48E)  Applicable entities are generally tax-exempt organizations, state and local governments, Indian tribal governments, Alaska Native Corporations, the Tennessee Valley Authority or rural electric cooperatives.  Domestic content is generally defined as steel, iron or manufactured products that are manufactured or produced in the United States.  Generally, unless a statutory exception applies, the phaseouts for elective payment apply to projects that produce 1 or more megawatts of electricity and that fail to satisfy the domestic content requirement.  IR-2023-252 (12/28/23)  Notice 2024- 10  IRA 2022  IRA 2022  12/15/23  Provides additional interim guidance regarding application of new corporate alternative minimum tax (CAMT), as added to the Code by IRA 2022. Provides additional rules for determining adjusted financial statement income (AFSI) of a U.S. Shareholder when a controlled foreign corporation (CFC) pays a dividend to the U.S. Shareholder or another CFC and modifies and clarifies the interim guidance provided in Notice 2023-64 regarding the applicable financial statement (AFS) of members of a tax consolidated group.  IR-2023-241 (12/15/23)  Notice 2024- 11  12/28/23  Votice 2024- 12/28/23  Updates the list of treaties that meet the requirements of section 1(h)(11) (qualified dividends).				
S 45)  Clean Electricity Production Credit (IRC § 45Y)  Energy Credit (IRC § 48)  Clean Electricity Investment Credit (IRC § 48E)  Applicable entities are generally tax-exempt organizations, state and local governments, Indian tribal governments, Alaska Native Corporations, the Tennessee Valley Authority or rural electric cooperatives.  Domestic content is generally defined as steel, iron or manufactured products that are manufactured or produced in the United States.  Generally, unless a statutory exception applies, the phaseouts for elective payment apply to projects that produce 1 or more megawatts of electricity and that fail to satisfy the domestic content requirement.  IR-2023-252 (12/28/23)  Notice 2024- 10  IRA 2022  Provides additional interim guidance regarding application of new corporate alternative minimum tax (CAMT), as added to the Code by IRA 2022. Provides additional rules for determining adjusted financial statement income (AFSI) of a U.S. Shareholder when a controlled foreign corporation (CFC) pays a dividend to the U.S. Shareholder or another CFC and modifies and clarifies the interim guidance provided in Notice 2023-64 regarding the applicable financial statement (AFS) of members of a tax consolidated group.  IR-2023-241 (12/15/23)  Notice 2024- 11  Notice 2024- 12/28/23  Updates the list of treaties that meet the requirements of section 1(h)(11) (qualified			statutory exception apply to the following	6417
Energy Credit (IRC § 48)     Clean Electricity Investment Credit (IRC § 48E)     Applicable entities are generally tax-exempt organizations, state and local governments, Indian tribal governments, Alaska Native Corporations, the Tennessee Valley Authority or rural electric cooperatives.  Domestic content is generally defined as steel, iron or manufactured products that are manufactured or produced in the United States.  Generally, unless a statutory exception applies, the phaseouts for elective payment apply to projects that produce 1 or more megawatts of electricity and that fail to satisfy the domestic content requirement.  IR-2023-252 (12/28/23)  Provides additional interim guidance regarding application of new corporate alternative minimum tax (CAMT), as added to the Code by IRA 2022. Provides additional rules for determining adjusted financial statement income (AFSI) of a U.S. Shareholder when a controlled foreign corporation (CFC) pays a dividend to the U.S. Shareholder or another CFC and modifies and clarifies the interim guidance provided in Notice 2023-64 regarding the applicable financial statement (AFS) of members of a tax consolidated group.  IR-2023-241 (12/15/23)  Notice 2024-12/28/23 Updates the list of treaties that meet the requirements of section 1(h)(11) (qualified)			1	
Clean Electricity Investment Credit (IRC § 48E)  Applicable entities are generally tax-exempt organizations, state and local governments, Indian tribal governments, Alaska Native Corporations, the Tennessee Valley Authority or rural electric cooperatives.  Domestic content is generally defined as steel, iron or manufactured products that are manufactured or produced in the United States.  Generally, unless a statutory exception applies, the phaseouts for elective payment apply to projects that produce 1 or more megawatts of electricity and that fail to satisfy the domestic content requirement.  IR-2023-252 (12/28/23)  Provides additional interim guidance regarding application of new corporate alternative minimum tax (CAMT), as added to the Code by IRA 2022. Provides additional rules for determining adjusted financial statement income (AFSI) of a U.S. Shareholder when a controlled foreign corporation (CFC) pays a dividend to the U.S. Shareholder or another CFC and modifies and clarifies the interim guidance provided in Notice 2023-64 regarding the applicable financial statement (AFS) of members of a tax consolidated group.  IR-2023-241 (12/15/23)  Notice 2024-11 (12/28/23)  Notice 2024-12 (12/28/23)  Updates the list of treaties that meet the requirements of section 1(h)(11) (qualified)			Clean Electricity Production Credit (IRC § 45Y)	
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organizations, state and local governments, Indian tribal governments, Alaska Native Corporations, the Tennessee Valley Authority or rural electric cooperatives.  Domestic content is generally defined as steel, iron or manufactured products that are manufactured or produced in the United States.  Generally, unless a statutory exception applies, the phaseouts for elective payment apply to projects that produce 1 or more megawatts of electricity and that fail to satisfy the domestic content requirement.  IR-2023-252 (12/28/23)  Provides additional interim guidance regarding application of new corporate alternative for determining adjusted financial statement income (AFSI) of a U.S. Shareholder when a controlled foreign corporation (CFC) pays a dividend to the U.S. Shareholder or another CFC and modifies and clarifies the interim guidance provided in Notice 2023-64 regarding the applicable financial statement (AFS) of members of a tax consolidated group.  IR-2023-241 (12/15/23)  Notice 2024-11 (12/28/23)  Notice 2024-11 (12/28/23)  Vigilate the list of treaties that meet the requirements of section 1(h)(11) (qualified			,	
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Notice 2024- 12/28/23 Updates the list of treaties that meet the requirements of section 1(h)(11) (qualified	<u>10</u>	12/15/23	application of new corporate alternative minimum tax (CAMT), as added to the Code by IRA 2022. Provides additional rules for determining adjusted financial statement income (AFSI) of a U.S. Shareholder when a controlled foreign corporation (CFC) pays a dividend to the U.S. Shareholder or another CFC and modifies and clarifies the interim guidance provided in Notice 2023-64 regarding the applicable financial statement (AFS) of members of a tax consolidated group.	56A
		12/28/23	Updates the list of treaties that meet the	1
	<u>11</u>			

		Under section 1(h)(11), a dividend paid to an individual shareholder from either a domestic corporation or a "qualified foreign corporation" generally is subject to tax at the reduced rates applicable to certain capital gains. A qualified foreign corporation includes certain foreign corporations that are eligible for benefits of a comprehensive income tax treaty with the United States that the Secretary determines is satisfactory for purposes of this provision and that includes an exchange of information program.	
Notice 2024-	12/22/23	Clarifies and modifies Notice 2023-63 which	174
<u>12</u>		announced that Treasury and IRS intend to issue proposed regulations providing rules addressing	
TCJA		capitalization and amortization of specified	
		research or experimental expenditures under §174. This notice clarifies rules in Notice 2023-63	
		relating to research performed under a contract.	
		This notice also modifies the reliance rules Notice 2023-63 by removing the requirement that	
		taxpayers must rely on all of the rules in sections	
		3 through 9 of Notice 2023-63. Finally, this notice	
		clarifies that section 5 of Rev. Proc. 2000-50 (costs of developing computer software) is	
		obsoleted for amounts paid or incurred in taxable	
	10/00/00	years beginning after December 31, 2021.	250(1)
Notice 2024- 13	12/29/23	Beginning January 1, 2023, energy efficient home improvement credit allows for a credit, subject to	<u>25C(h)</u>
<u>-5</u>		certain limitations and caps, equal to 30% of a	
IRA 2022		taxpayer's expenses for certain energy efficiency	
		improvements and related costs. Beginning January 1, 2025, taxpayers claiming the credit	
		must also satisfy a product identification number	
		(PIN) requirement for certain categories of products. Notice 2024-13 requests comments on	
		several general and specific questions relating to	
		this PIN requirement and outlines a PIN	
		assignment system that the IRS is considering.	

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		Applies to "qualified energy property"	
		(§25C(d)(2)) and exterior windows and doors	
		listed at §25C(c)(3)(B)&(C).	
		Comments sought by 2/27/24.	
		<u>IR-2023-253</u> (12/29/23)	
Notice 2024-		Not issued as of 5/31/24	
14			
Notice 2024-		Not issued as of 5/31/24	
15			
Notice 2024-	12/28/23	Announces that Treasury and IRS intend to issue	332
<u>16</u>		proposed regs that will address certain basis	368
		consequences of internal restructuring	961
		transactions in which a U.S. corporation acquires	
		stock of a controlled foreign corporation ("CFC")	
		from another CFC. In particular, the notice	
		announces rules under which basis provided	
		under section 961(c) in stock of a second-tier CFC	
		held by a first-tier CFC will be transferred to a	
		U.S. corporation that acquires the second-tier	
		CFC from the first-tier CFC in a liquidation	
		described in section 332 or an asset	
		reorganization described in section 368(a)(1).	
Notice 2024-		Not issued as of 5/31/24	
17			
Notice 2024-	1/12/24	Addresses availability of administrative	6011
<u>18</u>		exemptions from requirement to file certain	6037
		returns and other documents in electronic form.	
TFA 2019		This notice also addresses availability of	
		information about procedure to request a waiver	
		of the requirement to file electronically Forms	
		1120, 1120-S, 1120-F, and 1065. In addition,	
		provides information about publications	
		pertaining to failed attempts to electronically file	
		Forms 1120, 1120-S, and 1120-F using IRS filing	
		systems. Lastly, this notice obsoletes Notice	
		2010-13, Form 1120, Form 1120-F, Form 1120S,	
		Form 990, and Form 990-PF Electronic Filing	
		Waiver Request Procedures, and modifies Notice	
		2023-60, as released on August 11, 2023, but not	
		published in IRB.	
Notice 2024	1/11/24		751
Notice 2024- 19	1/11/24	Provides relief from certain penalties imposed solely for failure of a partnership with unrealized	751

Notice 2024- 20 IRA 2022	1/19/24	receivables or inventory items to furnish Part IV of Form 8308, Report of a Sale or Exchange of Certain Partnership Interests, by January 31, 2024, to the transferor and transferee in certain transfers of partnership interests that occurred in calendar year 2023.  Provides taxpayers with a list of eligible census tracts in advance of 2023 filing season and to explain how taxpayers can identify the 11-digit census tract identifier for the location where the property is placed in service. IRS intends to propose regulations including this information in the future, but taxpayers may rely on the notice until proposed regulations are published.  IR-2024-16 (1/19/24)	30C
		FAQs  Appendices A & B corrected by IR-2024-107 (4/12/124)	
Notice 2024- 21	1/12/24	Sets forth updates on corporate bond monthly yield curve, corresponding spot segment rates for January 2024 used under § 417(e)(3)(D), 24-month average segment rates applicable for January 2024, and 30-year Treasury rates, as reflected by application of § 430(h)(2)(C)(iv).	417 430
Notice 2024- 22 SECURE Act 2.0	1/12/24	Initial guidance on pension-linked emergency savings accounts (PLESAs), which are individual accounts, in defined contribution plans, that are designed to encourage employees to save for financial emergencies. The notice provides initial guidance regarding anti-abuse rules under IRC §402A(e)(12) to assist in implementation of SECURE 2.0 Act section 127 provisions.	
Notice 2024- 23	1/25/24	Provides relief from 12-month limitation for taxpayers making rollovers to certain 529 plans. Maryland Prepaid College Trust, which is a qualified tuition plan under section 529 has experienced numerous system issues in recent years. Many taxpayers moved their money out of MPCT because of the issues. In July, MPCT determined it owed taxpayers additional money,	529

	1		
		and section 529 only allows one tax-free rollover	
		per 12-month period (generally).	
		<u>IR-2024-20</u> (1/25/24)	
Notice 2024-	2/15/24	Sets forth updates on corporate bond monthly	417
<u>24</u>		yield curve, corresponding spot segment rates for	430
		January 2024 used under § 417(e)(3)(D), 24-	
		month average segment rates applicable for	
		February 2024, and 30-year Treasury rates, as	
N: 2024	2/40/24	reflected by application of § 430(h)(2)(C)(iv).	40
Notice 2024-	3/18/24	Resident populations of the 50 states, the District	42
<u>25</u>		of Columbia, Puerto Rico, and the insular areas	142 146
		for purposes of determining the 2024 calendar year (1) state housing credit ceiling under section	140
		42(h) of the Code, (2) private activity bond	
		volume cap under section 146, and (3) private	
		activity bond volume limit under section 142(k)	
		are reproduced.	
Notice 2025-	2/27/24	IRS is granting an administrative exemption from	1461
<u>26</u>		electronic filing requirements for Form 1042,	1474
		Annual Withholding Tax Return for U.S. Source	6011
		Income of Foreign Persons, set forth in final regs	
		issued under sections 6011(e), 1461, and 1474	
		(TD 9972, 88 FR 11754). Notice 2024-26	
		announces that withholding agents (both U.S.	
		and foreign persons) are administratively exempt	
		from the requirement to electronically file Forms	
		1042 required to be filed in calendar year 2024	
		(applicable to Forms 1042 filed in 2024 for taxable year 2023). Additionally, this notice	
		announces that withholding agents that are	
		foreign persons are administratively exempt from	
		the requirements to electronically file Forms	
		1042 required to be filed in calendar year 2025	
		(applicable to Forms 1042 filed in 2025 for	
		taxable year 2024).	
		The administrative exemption from the	
		electronic filing requirements for Form 1042 is	
		automatic, and withholding agents are not	
		required to file a waiver request to utilize this	
		exemption.	
Notice 2024-	3/5/24	Requests additional comments on any situations	6417
<u>27</u>		in which an election under §6417(a) could be	6418

		made for a credit that was purchased in a	
IRA 2022		transfer for which an election under § 6418(a) is	
		made. Such sequence of events is referred to as	
		"chaining" in this notice.	
Notice 2024-	3/7/24	Invites the public to submit recommendations for	
28	3,7,21	items to be included on the 2024-2025 Priority	
20		Guidance Plan. Comments due by 5/31/24.	
Notice 2024-	3/19/24	Sets forth updates on the corporate bond	417
29	3/19/24	monthly yield curve, the corresponding spot	430
<u>23</u>		segment rates for February 2024 used under §	430
		417(e)(3)(D), the 24-month average segment	
		rates applicable for March 2024, and the 30-year	
		Treasury rates, as reflected by the application of	
Notice 2024	3/22/24	§ 430(h)(2)(C)(iv).	<b>1</b> E
Notice 2024-	5/22/24	Modifies Notice 2023-29 by expanding the	45 45Y
<u>30</u>		Nameplate Capacity Attribution Rule under section 4.02(1)(b) to include additional	45 Y 48 E
IRA 2022			48E
IKA ZUZZ		attribution property and by adding two 2017	
		North American Industry Classification System	
		(NAICS) industry codes to the table in section	
		3.03(2) for purposes of determining the Fossil	
		Fuel Employment rate.	
		<u>IR-2024-77</u> (3/22/24).	
Notice 2024-	3/20/24	Provides for adjustments to the limitation on	911
31	3/20/24	housing expenses for purposes of §911 for the	911
31		2024 tax year. These adjustments are made on	
		basis of geographic differences in housing costs	
		relative to housing costs in the United States. If	
		the limitation on housing expenses is higher for	
		2024 tax year than the adjusted limitations on	
		housing expenses provided in Notice 2023-26,	
		qualified taxpayers may apply the adjusted	
		limitations in this notice for the 2024 tax year to	
		their 2023 tax year.	
Notice 2024	3/25/24	Provides guidance for qualified student loan	144
Notice 2024-	3/23/24	bonds to clarify certain requirements for tax-	1 <del>44</del>
<u>32</u>		exempt bond financing for loan programs of	
		general application approved by a State under §	
		144(b)(1)(B) (State Supplemental Loan	
		programs). Specifically, this notice addresses	
		1	
		eligibility of borrowers of loans through State	
		Supplemental Loan programs and the loan size	
		limitation for State Supplemental Loans. This	

Notice 2024- 33 IRA 2022	4/15/24	notice also provides guidance on whether an issue of State or local bonds the proceeds of which are used to finance or refinance qualified student loans or to finance qualified mortgage loans is a refunding issue.  Provides limited relief to CAMT taxpayers from addition to tax under § 6655 for failure to pay estimated income tax with respect to its CAMT liability under § 55 for the 2024 first quarterly installment of estimated income tax due on or before April 15, 2024 (or on or before May 15, 2024, for taxpayers with taxable years beginning in February 2024).	55 6655
Notice 2024- 34	4/10/24	Sets forth updates on corporate bond monthly yield curve, corresponding spot segment rates for March 2024 used under §417(e)(3)(D), 24-month average segment rates applicable for April 2024, and 30-year Treasury rates, as reflected by application of § 430(h)(2)(C)(iv).	417 430
Notice 2024- 35 Secure Act 1.0 Secure Act 2.0	4/16/24	Provides relief with respect to certain RMDs that are not made in 2024. This relief was provided with respect to certain RMDs in 2021, 2022, and 2023, and is being extended in this notice to certain RMDs in 2024. Provides that if certain requirements are met, a plan will not fail to be qualified for failing to make a specified RMD in 2024, and a taxpayer will not be assessed an excise tax for failing to take the RMD. This notice also announces that the final regs intended to be published relating to RMDs are anticipated to apply for purposes of determining RMDs for calendar years beginning on or after January 1, 2025.	401
Notice 2024- 36 IRA 2022	4/29/24	Announces 2024 allocation round of the section 48C qualifying advanced energy project credit to allocate approximately \$6 billion of section 48C credits, with approximately \$2.4 billion in section 48C credits to be allocated to projects located in section 48C(e) energy communities census tracts. Also updates and modifies Appendices A, B and C, as published in Notice 2023-18 and Notice 2023-44.	48C

Appendix A provides definitions and examples of qualifying advanced energy projects. Appendix B provides the application process that the Department of Energy will use to evaluate concept papers and § 48C applications to decide whether recommend a project for a section 48C allocation. Appendix C contains a list of census tracts that are section 48C(e) energy community census tracts that are section 48C(e) energy community census tracts.    R-2024-124 (4/29/24)				
Notice 2024- 37  IRA 2022  A/30/24  A/30/24  Brovides safe harbors for new 40BSAF-GREET 2024 model as a qualifying method to qualify for and calculate the sustainable aviation fuel (SAF) credit. This notice also provides a safe harbor for the use of the United States Department of Agriculture Climate Smart Agriculture Pilot Program to further reduce the lifecycle greenhouse gas emissions reduction percentage calculated using 40BSAF-GREET 2024 for domestic soybean and domestic corn feedstocks.  IR-2024-127 (4/30/24) – "SAF credit applies to a qualified fuel mixture containing sustainable aviation fuel for certain sales or uses after Dec. 31, 2022, and before Jan. 1, 2025."  Notice 2024- 38  Solution 19 Accompanies Rev. Proc. 2024-24, which provides procedures for requesting private letter rulings from the IRS regarding certain matters pertaining to section 355 transactions. Specifically, this notice requests public feedback on the provisions set forth in the Rev. Proc. 2024-24 and describes the Treasury Department's and IRS's views and concerns relating to certain matters addressed in the revenue procedure. Comments due by 7/30/24.  Notice 2024- 39  IRA 2022  6/10/24  Brublishes inflation adjustment factor for the carbon oxide sequestration credit under § 45Q for calendar year 2024. The inflation adjustment factor is used to determine the amount of credit allowable under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make an election under § 45Q for taxpayers that make			qualifying advanced energy projects. Appendix B provides the application process that the Department of Energy will use to evaluate concept papers and § 48C applications to decide whether recommend a project for a section 48C allocation. Appendix C contains a list of census tracts that are section 48C(e) energy community census tracts.	
37  IRA 2022  IRA 2024  IRA 2022  IRA 2026  IRA 2026  IRA 2027  IRA 2026  IRA 2027  IRA 2027  IRA 2027  IRA 2028  IRA 2028  IRA 2020  IR	Notice 2024	4/20/24		40B
Notice 2024- 38    Solution   Sol	<u>37</u>	4/30/24	2024 model as a qualifying method to qualify for and calculate the sustainable aviation fuel (SAF) credit. This notice also provides a safe harbor for the use of the United States Department of Agriculture Climate Smart Agriculture Pilot Program to further reduce the lifecycle greenhouse gas emissions reduction percentage calculated using 40BSAF-GREET 2024 for domestic soybean and domestic corn feedstocks.  IR-2024-127 (4/30/24) – "SAF credit applies to a qualified fuel mixture containing sustainable aviation fuel for certain sales or uses after Dec.	
procedures for requesting private letter rulings from the IRS regarding certain matters pertaining to section 355 transactions. Specifically, this notice requests public feedback on the provisions set forth in the Rev. Proc. 2024-24 and describes the Treasury Department's and IRS's views and concerns relating to certain matters addressed in the revenue procedure. Comments due by 7/30/24.  Notice 2024- 39 6/10/24 Publishes inflation adjustment factor for the carbon oxide sequestration credit under § 45Q for calendar year 2024. The inflation adjustment factor is used to determine the amount of credit allowable under § 45Q for taxpayers that make an election under § 45Q(b)(3) to have the dollar	Nation 2024	F /4 /2 4		255
carbon oxide sequestration credit under § 45Q for calendar year 2024. The inflation adjustment factor is used to determine the amount of credit allowable under § 45Q for taxpayers that make an election under § 45Q(b)(3) to have the dollar	<u>38</u>		procedures for requesting private letter rulings from the IRS regarding certain matters pertaining to section 355 transactions. Specifically, this notice requests public feedback on the provisions set forth in the Rev. Proc. 2024-24 and describes the Treasury Department's and IRS's views and concerns relating to certain matters addressed in the revenue procedure. Comments due by 7/30/24.	
for calendar year 2024. The inflation adjustment factor is used to determine the amount of credit allowable under § 45Q for taxpayers that make an election under § 45Q(b)(3) to have the dollar	Notice 2024-	6/10/24	Publishes inflation adjustment factor for the	45Q
IRA 2022 factor is used to determine the amount of credit allowable under § 45Q for taxpayers that make an election under § 45Q(b)(3) to have the dollar	<u>39</u>		carbon oxide sequestration credit under § 45Q	
allowable under § 45Q for taxpayers that make an election under § 45Q(b)(3) to have the dollar			for calendar year 2024. The inflation adjustment	
an election under § 45Q(b)(3) to have the dollar	IRA 2022		factor is used to determine the amount of credit	
			allowable under § 45Q for taxpayers that make	
amounts applicable under § 45Q(a)(1) or (2)			an election under § 45Q(b)(3) to have the dollar	
			amounts applicable under § 45Q(a)(1) or (2)	

		apply. This notice also obsoletes Notice 2009-83	
		and Notice 2011-25.	
Notice 2024-	5/15/24	Provides guidance on corporate bond monthly	417
40	3, 13, 2 :	yield curve, corresponding spot segment rates	430
		used under § 417(e)(3), and the 24-month	
		average segment rates under §430(h)(2) of the	
		Internal Revenue Code. In addition, this notice	
		provides guidance as to the interest rate on 30-	
		year Treasury securities under §	
		417(e)(3)(A)(ii)(II) as in effect for plan years	
		beginning before 2008 and the 30-year Treasury	
		weighted average rate under § 431(c)(6)(E)(ii)(I).	
Notice 2024-	5/16/24	Modifies existing domestic content safe harbor in	45
41	3/10/24	Notice 2023-38, provides a new elective safe	45Y
<u> </u>	Corrected	harbor for determining the domestic content	48
IRA 2022	version	bonus credit amounts under §§ 45, 45Y, 48, and	48E
	released	48E, and requests comments regarding the new	.52
	by IRS on	elective safe harbor to inform the development	
	5/24/24	of any future updates.	
	, = 1, = 1		
		IR-2024-140 (5/16/24)	
Notice 2024-	5/15/24	Specifies updated static mortality tables to be	430
42		used for defined benefit pension plans under §	
		430(h)(3)(A) and section 303(h)(3)(A) of the	
		Employee Retirement Income Security Act of	
		1974, Pub. L. No. 93-406, as amended (ERISA).	
		These updated static mortality tables, issued	
		pursuant to regulations under § 430(h)(3)(A),	
		apply for purposes of calculating the funding	
		target and other items for valuation dates	
		occurring during the 2025 calendar year.	
Notice 2024-	5/22/24	Amends regs under sections 59A and 6038A to	59A
<u>43</u>		defer the applicability date of certain provisions	6038A
		of the regulations relating to the reporting of	
TCJA		qualified derivative payments ("QDPs").	
Notice 2024-	5/22/24	Provides guidance for complying with the final	871
<u>44</u>		regulations with respect to dividend equivalents	1441
		under IRC sections 871(m), 1441, 1461, and 1473	1461
		(collectively referred to as the section 871(m)	1473
		regulations) in 2025, 2026, and 2027, extending	
		the transition relief provided in Notice 2022-37	
		for two years.	
Notice 2024-			
45			

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Notice 2024- 46	6/5/24	Announces that the IRS Commissioner has determined that the February 3, 2023, derailment of a freight train operated by a common carrier in East Palestine, Ohio, is "an event of a catastrophic nature under § 139(c)(3)" and thus a qualified disaster for purposes of §139. As a result, certain payments made by the common carrier to individuals affected by the Derailment are excludable from gross income as qualified disaster relief payments under §139(a).  The common carrier issued 1099-MISC to affected individuals for 2023 payments.  See the notice for how to report this if the individual already filed their 2023 return and if they have not yet done so. The notice and IR-2024-156 (6/5/24) also explain that some payments, such as for lost wages or those made to businesses, are taxable.  Observation: If a payment was for damages to	<u>139</u>
		property, it likely is not "income" so not taxable.	
Notice 2024- 47 IRA 2022	6/13/24	Extends the relief provided in Notice 2024-33, which waived the estimated tax penalty imposed under § 6655 (for a corporation's failure to pay estimated income tax) to the extent attributable to the revised corporate alternative minimum tax (CAMT) under § 55, but only with respect to an installment of estimated tax due on April 15, 2024, or May 15, 2024, with respect to a tax year that began in 2024. The relief from the addition to tax under § 6655 provided by Notice 2024-33 is extended to any installment of estimated tax by a corporate taxpayer with respect to a taxable year that began in 2024 that is due on or before August 15, 2024, to the extent attributable to the CAMT.	55 6655
Notice 2024-	6/7/24	Publishes lists of information that taxpayers may	45
<u>48</u>		use to determine whether they meet certain	45Y
IRA 2022		requirements under the Statistical Area Category or the Coal Closure Category as described in	48 48E
IIIA 2022		sections 3.03 and 3.04 of Notice 2023-29 for	HOL
		purposes of qualifying for energy community	
	•	· · · · · · · · · · · · · · · · · · ·	

		bonus credit amounts or rates under sections 45, 45Y, 48, and 48E. These lists are provided in Appendix 1 and Appendix 2 to this notice. Appendix 1 to this notice pertains to the Statistical Area Category, and Appendix 2 to this notice pertains to the Coal Closure Category.  IR-2024-157 (6/7/24)	
Notice 2024- 49 IRS 2022	5/31/24	Provides guidance on registration requirements for clean fuel production credit. Taxpayer must be registered as a producer of clean fuel at the time of production to be eligible to claim the clean fuel production credit. It provides guidance regarding the registration requirement, including information about the time, form, and manner of such registration with the IRS. A taxpayer must have a signed registration letter dated on or before January 1, 2025, for the taxpayer to be eligible to claim the clean fuel production credit for production starting January 1, 2025.  IR-2024-153 (5/31/24)	45Z
Notice 2024- 50		(3/32/23)	
Notice 2024- 51			
Notice 2024- 52			
Notice 2024- 53	6/18/24	Sets forth updates on the corporate bond monthly yield curve, the corresponding spot segment rates for May 2024 used under §417(e)(3)(D), the 24-month average segment rates applicable for June 2024, and the 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).	417 430
Notice 2024- 54	6/17/24	Announces that Treasury and IRS intend to issue 2 sets of proposed regs that would provide special rules for certain transactions under §§ 732, 734, 743, 755, and 1502. First, proposed regs under §§ 732, 734, 743, and 755 would provide special rules for cost recovery of positive basis adjustments or the ability to take positive basis adjustments into account in computing gain or loss on the disposition of basis adjusted	732 734 743 754 755 1502

		property following certain transactions. Second, proposed regs under § 1502 would provide rules to clearly reflect the taxable income and tax liability of a consolidated group whose members own interests in a partnership.  FS-2024-21 (6/17/24) on New guidance focused on "basis shifting" transactions using partnerships. Basis shifting transactions generally fall into 3 groups:  1) Transfer of p/s interest to related party. 2) Distribution of property to a related party. 3) Liquidation of related p/s or partner.	
Notice 2024-	6/20/24	R-2024-166 (6/17/24)  Provides guidance on the application of the	72(t)
55	0,20,24	exceptions to the 10 percent additional tax under	, 2(0)
		section 72(t)(1) for emergency personal expense	
SECURE Act		distributions and domestic abuse victim	
2.0		distributions.	
		<u>IR-2024-170</u> (6/20/24)	

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

Ann #	Date	IRS summary	Code
	released		Section(s)
Ann.	12/21/23	Announces a Voluntary Disclosure Program for	
<u>2024-03</u>		taxpayers to resolve refunds or credits for erroneous	
		Employee Retention Credit (ERC) claims. The	
CARES Act		announcement explains taxpayer eligibility criteria,	
		terms, and procedures for taxpayers electing to	
		participate in the Voluntary Disclosure Program.	
		IR-2023-247 (12/21/23)	
		(,,,	
A := :=	1/16/24		COFOL
<u>Ann.</u>	1/16/24	Informs filers that digital assets should not be included	60501
<u>2024-04</u>		in section 6050I reporting until after final regulations	
111.6		under section 6050I are issued.	
IIJA		Observation: The above text is from the email sent by	
		the IRS to subscribers announcing the announcement.	
		The announcement itself as well as the news release –	

		IR-2024-12 (1/16/24) do not say "final regulations" but just "regulations." Arguably, the IRS is referring to final regulations since proposed regulations are not binding. Also, while not mentioned by the IRS, since §6050I uses "digital assets" as defined under §6045(g), final §6045 are likely needed before the §6050I regulations are finalized. At 1/16/24, no regulations have been released on the IIJA changes to §6050I. When the IRS postponed the effective date of the §6045 broker reporting rule for digital assets (Ann. 2023-02 (12/23/23)), they specifically said the rule would not be effective until final regulations were issued.	
<u>Ann.</u> <u>2024-05</u>	12/29/23	The United States provided a diplomatic notification, dated July 8, 2022, to the Government of the Republic of Hungary of its termination of the United States-Hungary Tax Treaty. In respect of tax withheld at source, the United States-Hungary Tax Treaty ceases to have effect with respect to amounts paid or credited on or after January 1, 2024. In respect of other taxes, the United States-Hungary Tax Treaty ceases to have effect with respect to taxable periods beginning on or after January 1, 2024.	
Ann. 2024-10 IIJA 2021	2/23/24	Addresses income tax treatment of certain lead service line replacement programs for residential property owners. The replacement of lead service lines under these programs does not result in income to residential property owners. Water systems and state governments are not required to file information returns or furnish payee statements with respect to the replacement of lead service lines under these programs.	61
Ann. 2024-16	3/29/24	Advance Pricing and Mutual Agreement report covering calendar year 2023. This Announcement is issued pursuant to § 521(b) of Pub. L. 106-170, the Ticket to Work and Work Incentives Improvement Act of 1999, which requires Treasury to report annually to the public concerning advance pricing agreements (APAs) and the Advance Pricing and Mutual Agreement Program (APMA Program), formerly known as the Advance Pricing Agreement Program (APA Program). This twenty-fifth report describes the experience, structure, and activities of the APMA Program during calendar year 2023.	482

<u>Ann.</u> 2024-19	4/5/24	Addresses the Federal income tax treatment of amounts paid for purchase of energy efficient property and improvements as part of the Department of Energy's "Home Energy Rebate Programs" under §§ 50121 and 50122 of the Inflation Reduction Act of 2022. The announcement also provides coordination rules for taxpayers who receive such amounts and wish to claim a Federal tax credit under § 25C.  Generally, the rebates are not taxable but reduce the basis of property acquired with the rebate and will not count as expenditures for the §25C credit.  IR-2024-97 (4/5/24)	25C 61
Ann. 2024-24 IRA 2022	5/17/24	Notifies taxpayers of the applicable Reference Standard 90.1 required under § 179D(c)(2) as part of the definition of energy efficient commercial building property (EECBP). This announcement supplements and supersedes Announcement 2023-1 by affirming ASHRAE/IES Reference Standard 90.1-2022 as the applicable Reference Standard 90.1 for EECBP placed in service after December 31, 2028, and the construction of which did not begin by December 31, 2022.	179D
Ann. 2024-25 IRA 2022	5/17/24	Provides total amount of unallocated environmental justice solar and wind capacity limitation (Capacity Limitation) that has been carried over from the 2023 Low-Income Communities Bonus Credit Program (Program) year to the 2024 Program year. Additionally, this announcement states the distribution of the carried over Capacity Limitation among the facility categories, category 1 sub-reservations, and application options for the 2024 Program year.  IR-2024-142 (5/17/24)	48
Ann. 2024- 26	6/21/24	Provides notice of the partial suspension of the U.SRussia tax treaty.	

#### **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.

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

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

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

- Premium Tax Credit
- Replaces FS-2023-13 (2/24/22)

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

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

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

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

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

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

#### <u>FS-2024-15</u> (4/17/24) released in <u>IR-2024-113</u> (4/17/24)

- Residential energy credits under section 25C and 25D
- Replaces FS-2022-42 (Dec. 2022)

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

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