

**DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220**

November 4, 2022
Department of the Treasury
2022-2023 Priority Guidance Plan

Joint Statement by:

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We are pleased to announce the release of the 2022–2023 Priority Guidance Plan.

In Notice 2022-21, the Department of the Treasury (Treasury Department) and the Internal Revenue Service (Service) solicited recommendations for items to be included in the plan from all interested parties, including taxpayers, tax practitioners, and industry groups. The Treasury Department and the Service recognize the importance of public input in formulating a Priority Guidance Plan that focuses resources on guidance items that are most important to taxpayers and tax administration. Solicitation of input on, and issuance of, this plan reflects an emphasis on taxpayer engagement with the Treasury Department and the Service through a variety of channels, consistent with the directive of the Taxpayer First Act, Pub. L. 116-25, 133 Stat. 981.

The 2022–2023 Priority Guidance Plan contains 205 guidance projects that are priorities for allocating Treasury Department and Service resources during the 12-month period from July 1, 2022 through June 30, 2023 (the plan year). The projects on the plan will be the focus of our

efforts during the plan year. However, the plan does not provide any deadline for completing the projects.

Some projects that were on the 2021-2022 Priority Guidance Plan are not included on the 2022-2023 plan because they are no longer considered priorities for purposes of allocating resources during the 2022- 2023 plan year. Some of those projects may be considered for inclusion on a future priority guidance plan.

In addition to the items on the 2022–2023 plan, the Appendix lists the more routine guidance that is generally published each year.

We intend to update the 2022–2023 plan during the plan year to reflect additional items that become priorities, guidance that is published during the plan year, and projects that may result from legislative developments. The periodic updates allow us flexibility throughout the plan year to consider comments received from taxpayers and tax practitioners relating to additional projects and to respond to developments arising during the plan year.

The published guidance process can be fully successful only if we have the benefit of the insight and experience of taxpayers and practitioners who must apply the rules. Therefore, we invite the public to continue to provide us with their comments and suggestions throughout the plan year.

Additional copies of the 2022–2023 Priority Guidance Plan can be obtained from the IRS website at <http://www.irs.gov/uac/Priority-Guidance-Plan>.

**OFFICE OF TAX POLICY
AND
INTERNAL REVENUE SERVICE**

2022-2023 PRIORITY GUIDANCE PLAN

UPDATED AS OF September 30, 2022

RELEASED November 4, 2022

CONSOLIDATED RETURNS

1. Regulations under §1502 removing obsolete rules and updating regulations to reflect statutory changes.
2. Regulations regarding life-nonlife consolidated groups under §1.1502-47.
3. Final regulations regarding split waiver elections under §1.1502-21(b)(3). Proposed and temporary regulations were published on July 8, 2020.

CORPORATIONS AND THEIR SHAREHOLDERS

1. Guidance under the provisions of Part 2 of Subtitle A of the Inflation Reduction Act regarding computation and reporting of the excise tax under §4501 on the repurchase of corporate stock.
2. Guidance regarding procedures for submitting private letter ruling requests under §355.
3. Regulations relating to the requirements under §355, including the active trade or business requirement and the prohibition on device for the distribution of earnings and profits.
4. Regulations and other guidance under §382(h)(6). Proposed regulations were published on September 10, 2019 and January 14, 2020.
5. Regulations and other guidance regarding the application of §382 to Controlled Foreign Corporations and related issues.

EMPLOYEE BENEFITS

A. Retirement Benefits

1. Guidance relating to certain IRS, Tax Exempt and Government Entities, Employee Plans programs, including the Pre-approved Plan Program, the Determination Letter Program, and the Employee Plans Compliance Resolution System (EPCRS).
 - PUBLISHED 08/22/22 in IRB 2022-34 as NOT. 2022-33 (RELEASED on 08/03/22).
 - TO BE PUBLISHED 10/17/22 in IRB 2022-42 as NOT. 2022-45 (RELEASED on 09/26/22).
2. Regulations under §72(t) relating to the 10 percent additional tax on early distributions.
3. Regulations and related guidance under §§219, 408, 408A, and 4973 and related guidance under §408(m).
4. Final regulations on the application of the normal retirement age regulations under §401(a) to governmental plans. Proposed regulations were published on January 27, 2016.
5. Regulations relating to the timing of the use or allocation of forfeitures in qualified retirement plans.
6. Regulations updating electronic delivery rules and other guidance for providing applicable notices and making participant elections.
7. Final regulations relating to SECURE Act modifications to §401(a)(9) and addressing other issues under §401(a)(9). Proposed regulations were published on February 24, 2022.
8. Regulations relating to SECURE Act modifications to certain rules governing §401(k) plans.
9. Guidance on student loan payments and qualified retirement plans and §403(b) plans.
10. Regulations and related guidance on closed defined benefit plans and related matters. Proposed regulations were published on January 29, 2016.
11. Guidance on missing participants, including guidance on uncashed checks.
12. Final regulations and related guidance on the exception to the unified plan rule for §413(e) multiple employer plans. Proposed regulations were published on March 28, 2022.

13. Regulations on the definition of governmental plan under §414(d). An ANPRM was published on November 8, 2011.
14. Regulations on the definition of church plan under §414(e).
15. Final regulations under §415 regarding §7873 treaty fishing rights income. Proposed regulations were published on November 15, 2013.
16. Final regulations under §417(e) that update the minimum present value requirements for defined benefit plans. Proposed regulations were published on November 25, 2016.
17. Regulations on mortality tables used to determine present value under §430 for single-employer defined benefit pension plans. Proposed regulations were published on April 28, 2022.
18. Guidance regarding changes to §§430, 431, and 432 and relief provided by the American Rescue Plan Act of 2021 (ARP Act).
 - PUBLISHED 07/25/22 in IRB 2022-30 as REV. RUL. 2022-13 (RELEASED on 07/07/22).
19. Final regulations under §3405 regarding distributions made to payees, including military and diplomatic payees, with an address outside the United States. Proposed regulations were published on May 31, 2019.
20. Regulations relating to the reporting requirements under §6057. Proposed regulations were published on June 21, 2012.
21. Guidance updating electronic filing requirements for employee benefit plans to reflect changes made by the Taxpayer First Act.

B. Executive Compensation, Health Care and Other Benefits, and Employment Taxes

1. Final regulations on recapture of excess employment tax credits under the Families First Coronavirus Response Act (FFCRA), the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) and the ARP Act. Proposed and temporary regulations were published on July 29, 2020, and September 10, 2021.
2. Regulations under §86 regarding rules for lump-sum elections.
3. Regulations under §§119 and 132 regarding employer-provided meals.
4. Regulations updating the classification system for the line of business determination under §1.132-4 for purposes of qualified employee discounts and no-additional-cost services.

5. Proposed regulations relating to qualified nonpersonal use vehicles.
6. Regulations on income inclusion and various other issues under §409A. Proposed regulations were published on December 8, 2008, and on June 22, 2016.
7. Regulations and other guidance under §§419A and 501(c)(9) relating to welfare benefit funds, including voluntary employees' beneficiary associations (VEBAs).
8. Regulations under §457(f) and related guidance on ineligible plans. Proposed regulations were published on June 22, 2016.
9. Guidance on contributions to and benefits from paid family and medical leave programs.
10. Guidance updating Rev. Procs. 2016-33 and 2017-14 regarding procedures for Certified Professional Employer Organizations.
11. Final regulations under §§4980H and 105(h) related to HRAs. Proposed regulations were published on September 30, 2019.
12. Guidance relating to Service Industry Tip Compliance Agreements.

ENERGY SECURITY

1. Guidance under provisions of Part 1 of Subtitle D of the Inflation Reduction Act addressing clean electricity and reducing carbon emissions, including regulations on the definition of qualifying energy property under §48.
2. Guidance on lifecycle analysis submission and review process under §45Q.
3. Guidance under provisions of Part 2 of Subtitle D of the Inflation Reduction Act addressing clean fuels.
 - PUBLISHED 10/03/22 IN IRB 2022-40 AS NOT. 2022-39 (RELEASED on 09/13/22).
4. Guidance under provisions of Part 3 of Subtitle D of the Inflation Reduction Act addressing clean energy and energy efficiency incentives for individuals, including regulations under §179D to clarify the definition of designer and other issues.
5. Guidance under provisions of Part 4 of Subtitle D of the Inflation Reduction Act addressing clean vehicles.
6. Guidance under provisions of Part 5 of Subtitle D of the Inflation Reduction Act addressing investments in clean energy manufacturing and energy security.

7. Guidance under provisions of Part 7 of Subtitle D of the Inflation Reduction Act addressing incentives for clean electricity and clean transportation.
8. Guidance under provisions of Part 8 of Subtitle D of the Inflation Reduction Act addressing credit monetization.
9. Notice under §45J regarding credit for production from advanced nuclear power facilities.
10. Guidance on public utility property under §168(i)(10) for purposes of normalization.

EXCISE TAX

1. Final regulations under §§4051 and 4071 on heavy trucks, tractors, trailers, and tires. Proposed regulations were published on March 31, 2016.
2. Regulations regarding mechanical dye injection under §4082.
3. Guidance regarding fuel registration under §4101.
4. Guidance regarding constructive sale price under §4216.
5. Guidance under §4261(e)(3) regarding the application of the air transportation excise tax under §4261 to the purchase of mileage awards.
6. Regulations under §§4661, 4662, 4671, and 4672 that will provide definitions and other guidance related to the Superfund chemical taxes.

EXEMPT ORGANIZATIONS

1. Guidance revising Rev. Proc. 80-27 regarding group exemption letters. Notice 2020-36 was published on May 18, 2020.
2. Final regulations on §509(a)(3) supporting organizations. Proposed regulations were published on February 19, 2016.
3. Regulations under §512 regarding the allocation of expenses in computing unrelated business taxable income and addressing how changes made to §172 net operating losses by section 2303(b) of the CARES Act apply for purposes of §512(a)(6).
4. Guidance under §4941 regarding a private foundation's investment in a partnership in which disqualified persons are also partners.
5. Regulations under §4966 regarding donor advised funds, including excise taxes on sponsoring organizations and fund management.

6. Regulations under §4967 regarding prohibited benefits, including excise taxes on donors, donor advisors, related persons, and fund management.
7. Regulations under §4958 regarding donor advised funds and supporting organizations.
8. Guidance regarding the public-support computation with respect to distributions from donor advised funds.
9. Regulations under §6104(c). Proposed regulations were published on March 15, 2011.
 - PUBLISHED 08/16/22 in FR as TD 9964 (FILED on 08/15/22).
10. Regulations designating an appropriate high-level Treasury official under §7611. Proposed regulations were published on August 5, 2009.

FINANCIAL INSTITUTIONS AND PRODUCTS

1. Final regulations relating to the definition of registered form under §§149(a) and 163(f). Proposed regulations were published on September 19, 2017.
2. Guidance under §166 on the conclusive presumption of worthlessness for bad debts. Notice 2013-35, which requested comments on the existing rules, was published on June 10, 2013.
3. Regulations under §249 relating to the amount of a repurchase premium attributable to the cost of borrowing.
4. Guidance under §§446, 1275, and 6050H to address the treatment and reporting of capitalized interest on modified home mortgages.
5. Guidance addressing issues relating to mark-to-market accounting under §475.
6. Guidance regarding application of the cure provisions under §851(i) for regulated investment companies (RICs) and §856(c)(7) and (g)(5) for real estate investment trusts (REITs).
7. Guidance clarifying the definition of income in §856(c)(3) for purposes of the REIT qualification tests.
8. Guidance under §860G(e) for modifications of certain mortgage loans held by a real estate mortgage investment conduit.
9. Regulations under §1001 on the modification of debt instruments, including issues relating to disregarded entities.
10. Guidance on the constant yield election under §1276(b).

11. Guidance on the treatment of fees relating to debt instruments and other securities.

GENERAL TAX ISSUES

1. Guidance under the provisions of Part 1 of Subtitle A of the Inflation Reduction Act regarding the Corporate Alternative Minimum Tax.
2. Guidance regarding individual tax credits, including guidance under §§25A and 32.
3. Final regulations under §36B regarding the premium tax credit.
4. Regulations on research credit substantiation under §41.
5. Final regulations under §42 regarding the low-income housing credit average income test.
6. Final regulations under §42 relating to compliance monitoring.
7. Guidance under §42 regarding reallocation of certain disaster-related additional housing credits if refunded to the state agency following the original allocation.
8. Regulations under §45D that revise and clarify certain rules relating to the new markets tax credit.
9. Guidance regarding the advanced manufacturing investment credit under §48D established by section 107 of the CHIPS Act of 2022.
10. Regulations under §§46 through 50 to update regulations to reflect statutory changes, remove obsolete rules, and revise certain reporting procedures related to claiming the rehabilitation credit.
11. Regulations under §118 to reflect statutory changes and define master development plan.
12. Guidance under §118 to clarify the safe harbor under Rev. Proc. 2016-36 regarding distribution lines.
13. Regulations under §152 regarding dependency deductions. Proposed regulations were published on January 19, 2017.
14. Guidance regarding §163(j).
15. Guidance on applying the state and local tax deduction cap under §164.
16. Guidance under §170 regarding charitable contributions.

17. Guidance under §170 regarding conservation easements, including facade easements.
18. Regulations under §172 regarding computation of the net operating loss (NOL) deduction.
19. Guidance addressing amortization of research and experimental expenditures under §174 and related issues.
20. Regulations under §199A related to the determination of unadjusted basis immediately after acquisition (UBIA) of qualified property, the definition of qualified business income (QBI) and other issues.
21. Regulations under §267 regarding related party transactions and partnerships.
22. Guidance under §280F clarifying the business use of an aircraft by parties related to a lessee.
23. Guidance on monetized installment sales under §453.
24. Guidance under §§1400Z–1 and 1400Z–2 concerning opportunity zones.
25. Regulations on health insurance reporting under §§6055 and 6056.
26. Guidance under §7701 providing criteria for treating an entity as an integral part of a state, local, or tribal government, and guidance on tribally chartered corporations.
27. Regulations under §301.7701-3 regarding REITs and RICs.
28. Guidance regarding the application of the 60-month limitation under §301.7701-3(c)(1)(iv) on the redomiciliation of an entity.
29. Guidance under §301.9100 regarding relief for late regulatory elections.
30. Guidance on the tax treatment of transactions involving digital assets.
31. Guidance concerning validation of digital asset transactions, including staking.

GIFTS AND ESTATES AND TRUSTS

1. Final regulations under §§1014(f) and 6035 regarding basis consistency between estate and person acquiring property from decedent. Proposed and temporary regulations were published on March 4, 2016.
2. Guidance regarding availability of §1014 basis adjustment at the death of the owner of a grantor trust described in §671 when the trust assets are not included in the owner's gross estate for estate tax purposes.

3. Regulations under §2010 addressing whether gifts that are includible in the gross estate should be excepted from the special rule of § 20.2010-1(c). Proposed regulations were published on April 27, 2022.
4. Guidance on portability regulatory elections under §2010(c)(5)(A).
 - PUBLISHED 07/25/22 in IRB 2022-30 as REV. PROC. 2022-32 (RELEASED on 07/08/22).
5. Regulations under §2032(a) regarding imposition of restrictions on estate assets during the six-month alternate valuation period. Proposed regulations were published on November 18, 2011.
6. Final regulations under §2053 regarding the deductibility of certain interest expenses and amounts paid under a personal guarantee, certain substantiation requirements, and the applicability of present value concepts in determining the amount deductible. Proposed regulations were published on June 28, 2022.
7. Regulations under §20.2056A-2 for qualified domestic trust elections on estate tax returns, updating obsolete references.
8. Regulations under §2632 providing guidance governing the allocation of generation-skipping transfer (GST) exemption in the event the IRS grants relief under §2642(g), as well as addressing the definition of a GST trust under §2632(c), and providing ordering rules when GST exemption is allocated in excess of the transferor's remaining exemption.
9. Final regulations under §2642(g) describing the circumstances and procedures under which an extension of time will be granted to allocate GST exemption. Proposed regulations were published on April 17, 2008.
10. Final regulations under §2801 regarding the tax imposed on U.S. citizens and residents who receive gifts or bequests from certain expatriates. Proposed regulations were published on September 10, 2015.
11. Regulations under §7520 regarding the use of actuarial tables in valuing annuities, interests for life or terms of years, and remainder or reversionary interests. Proposed regulations were published on May 5, 2022.

INSURANCE COMPANIES AND PRODUCTS

1. Regulations under §72 on the exchange of property for an annuity contract. Proposed regulations were published on October 18, 2006.

2. Guidance relating to the diversification requirements under §817(h) for certain mortgage-backed securities purchased in the To-Be-Announced (TBA) market and for certain TBA contracts. Rev. Proc. 2018-54 was published on November 5, 2018.
3. Regulations under §§101 and 6050Y relating to §1035 exchanges and certain corporate acquisitions.

INTERNATIONAL

A. Deemed Inclusions from Foreign Entities, etc.

1. Regulations under subpart F, including coordination with the repeal of §958(b)(4). Proposed regulations were published on July 23, 2020, and September 22, 2020.
2. Regulations and other guidance addressing the treatment of foreign entities held by domestic partnerships and S corporations under §§953, 958, and 1291 – 1298. Proposed regulations were published on January 25, 2022.
3. Guidance under §954, including guidance regarding the use of foreign statement reserves for purposes of measuring qualified insurance income under §954(i).
4. Regulations under §§959 and 961 concerning previously taxed earnings and profits under subpart F. Notice 2019-01 was published on January 7, 2019.
5. Final regulations under §§1297 and 1298, including regulations addressing when foreign insurance income is excluded from passive income under §1297(f). Proposed regulations were published on January 15, 2021.

B. Inbound Transactions

1. Regulations under §59A concerning the base-erosion and anti-abuse tax. Final regulations and proposed regulations were published on December 6, 2019, and final regulations were published on October 9, 2020.
 - PUBLISHED 07/18/22 in IRB 2022-29 as NOT. 2022-30 (RELEASED on 06/27/22).
2. Regulations under §871(m), including with respect to non-delta-one transactions. Final and temporary regulations were published January 24, 2017. Notice 2018-72 (delaying the applicability date of portions of the final regulations) was published on October 1, 2018. Final regulations were published on December 17, 2019. Notice 2020-2 (extending the transition relief in Notice 2018-72 for two years) was published on January 13, 2020.
 - PUBLISHED 09/12/22 in IRB 2022-37 as NOT. 2022-37 (RELEASED on 08/23/22).

3. Final regulations to treat hybrid instruments and certain tax-favored equity as a financing transaction for purposes of §1.881-3. Proposed regulations were published on April 8, 2020, and final regulations related to hybrid instruments (but not tax-favored equity) were published on November 12, 2020.
4. Guidance under §882 on the appropriate replacement to 30-day LIBOR for computing interest expense on excess U.S.-connected liabilities.
5. Final regulations under §§897 and 1445 relating to changes in the Protecting Americans from Tax Hikes Act of 2015. Proposed regulations were published on June 7, 2019.

C. Outbound Transactions

1. Regulations under §245A regarding deduction in respect of foreign source-portion of certain dividends received by domestic corporations from specified 10-percent owned foreign corporations.
2. Regulations addressing the inbound transfer of intangible property subject to §367(d).
3. Proposed modification of regulations under §987 on income and currency gain or loss with respect to a §987 qualified business unit. Final regulations were published on December 8, 2016. Notice 2021-59 (providing guidance regarding the applicability date of the final regulations beyond that provided in earlier Notices) was published on October 25, 2021.
 - PUBLISHED 08/22/22 in IRB 2022-34 as NOT. 2022-34 (RELEASED on 08/14/22).
4. Modification of regulations under §367 regarding certain triangular reorganizations involving one or more foreign corporations. Notice 2016-73 was published on December 27, 2016. Notice 2014-32 was published on May 12, 2014.
5. Regulations under §367 regarding application to certain transfers of stock to foreign corporations in exchange for property under §304. Notice 2012-15 was published on February 27, 2012.
6. Regulations under §367 regarding application to transactions involving certain transfers of intangible property by a domestic corporation to a foreign corporation in an exchange described in §361(a) or (b). Notice 2012-39 was published on July 30, 2012.

D. Foreign Tax Credits

1. Regulations related to the foreign tax credit, including on the source-based attribution requirement for withholding taxes on royalties, the cost recovery requirement, and the allocation and apportionment of foreign income taxes.

E. Transfer Pricing

1. Annual Report on the Advance Pricing Agreement Program. Announcement 2022-7 was published April 11, 2022.
2. Regulations under §§367 and 482, including (1) regulations addressing the changes to §§367(d) and 482 on aggregation, realistic alternatives, and the definition of intangible property, and (2) regulations under §482 clarifying certain aspects of the arm's length standard, including periodic adjustments. Proposed and temporary regulations were published on September 16, 2015.
3. Regulations under §482 clarifying the effects of group membership (e.g., passive association) in determining arm's length pricing, including specifically with respect to financial transactions.
4. Guidance updating Rev. Proc. 2015-41, providing the procedures for requesting and obtaining advance pricing agreements and guidance on the administration of executed advance pricing agreements.

F. Sourcing and Expense Allocation

1. Regulations under §861, including on the character and source of income arising in transactions involving intellectual property and the provision of digital goods and services. Proposed regulations were published on August 14, 2019.

G. Other

1. Regulations under §894(c) on claiming treaty benefits with respect to U.S. source FDAP income paid to a fiscally transparent entity, including guidance regarding beneficial ownership.
2. Regulations relating to certain foreign currency contracts, including the definition of a foreign currency contract under §1256(g)(2), in light of the decision in Wright v. Commissioner, 809 F.3d 877 (6th Cir. 2016).
 - PUBLISHED 07/6/22 in FR as REG-130675-17 (NPRM) (RELEASED on 07/05/22).
3. Guidance under Chapter 3 (§§1441-1446) and Chapter 4 (§§1471–1474), including updates to the qualified intermediary withholding agreement (primarily relating to

regulations under §1446(a) and (f)) and to the withholding foreign partnership and trust withholding agreements (limited changes only), all starting for the 2023 calendar year. Notice 2022-23, setting forth proposed requirements for qualified intermediaries for purposes of §1446(a) and (f) that will apply on January 1, 2023, was published on May 16, 2022.

4. Finalization of remaining portions of the regulations under Chapter 3 (§§1441–1464) and Chapter 4 (§§1471–1474) that were proposed on December 18, 2018, including provisions relating to withholding agent obligations under §§1.1461-1, 1.1461-2, 1.1471-1 through 1.1471-5, 1.1473-1, and 1.1474-1 and 1.1474-2 (providing for the elimination of withholding on payments of gross proceeds, deferral of withholding on foreign pass-thru payments, elimination of withholding on certain insurance premiums, and clarification of the definition of investment entity; and providing guidance concerning certain due diligence requirements of withholding agents and refunds and concerning credits of amounts withheld). (Portions of the proposed regulations were finalized in T.D. 9890, published on January 2, 2020.)
5. Guidance under §§6039F, 6048, and 6677 on foreign trust reporting and reporting with respect to large foreign gifts, and regulations under §§643(i) and 679 relating to certain transactions between U.S. persons and foreign trusts. Revenue Procedure 2020-17 excepting certain tax-favored foreign retirement and non-retirement trusts from §6048 reporting was published on March 16, 2020.
6. Guidance updating Rev. Proc. 2015-40, providing the procedures for requesting and obtaining assistance from the U.S. competent authority under U.S. tax treaties.
7. Revenue Procedure updating the list of countries with which the United States has in force an information exchange agreement, such that bank deposit interest paid to residents of such countries must be reported by payors to the extent required under Treas. Reg. §§ 1.6049-8(a) and 1.6049-4(b)(5).
 - PUBLISHED 10/03/22 in IRB 2022-40 as REV.PROC. 2022-35 (RELEASED on 09/22/22).

PARTNERSHIPS

1. Final regulations regarding the application of §163(j) to partnerships, S corporations, and their owners. Proposed regulations were published on September 14, 2020.
2. Final regulations regarding the stock of a corporate partner under §337(d). Proposed regulations were published on March 25, 2019.
3. Regulations under §469(h)(2) concerning limited partners and material participation. Proposed regulations were published on November 28, 2011.

4. Final regulations on the fractions rule under §514(c)(9)(E). Proposed regulations were published on November 23, 2016.
5. Final regulations under §§704, 734, 743, and 755 arising from the American Jobs Creation Act of 2004, regarding the disallowance of certain partnership loss transfers and no reduction of basis in stock held by a partnership in a corporate partner. Proposed regulations were published on January 16, 2014.
6. Regulations under §704(d) regarding charitable contributions and foreign taxes in determining limitation on allowance of partner's share of loss.
7. Guidance under §707 on disguised sales.
8. Guidance on partnership terminations under §708.
9. Guidance on abusive use of partnerships for inappropriate basis adjustments.
10. Final regulations under §752 regarding related person rules. Proposed regulations were published on December 16, 2013.
11. Final regulations streamlining the §754 election statement. Proposed regulations were published on October 12, 2017.
 - PUBLISHED 08/05/22 in FR as TD 9963 (FILED on 08/04/22).
12. Final regulations under §§761 and 1234 on the tax treatment of noncompensatory partnership options. Proposed regulations were published on February 5, 2013.
13. Final regulations addressing adjustments to bases and capital accounts and the tax and book basis of partnership property. Proposed regulations were published on February 2, 2018. (Reproposed on August 17, 2018, in combination with proposed regulations addressing revisions to chapter 63 made by the Tax Technical Corrections Act of 2018.)

S CORPORATIONS

1. Regulations under subchapter S to conform with statutory changes and provide further guidance on the calculation of certain items of income, loss, and deduction under §1361.
2. Revenue procedure under §1362(f) regarding the validity or continuation of an S corporation election, or qualified subchapter S subsidiary election, in certain situations involving disproportionate distributions, inconsistent tax return filings, or errors or omissions on Form 2553, Election by a Small Business Corporation, or Form 8869, Qualified Subchapter S Subsidiary Election.

TAX ACCOUNTING

1. Revenue procedure under §263(a) concerning the capitalization of natural gas transmission and distribution property.
2. Regulations under §472 concerning dollar-value last-in, first-out (LIFO) inventories.
3. Final regulations amending §1.472-8 concerning the inventory price index computation (IPIC) method.
4. Guidance regarding the treatment of capitalized costs for §355 distributions, reorganizations, and certain other transactions under § 1.263(a)-5(a) .
5. Final regulations under §453B regarding non-recognition of gain or loss on disposition of certain installment sales.
6. Regulations under §263A regarding interest capitalization requirements for improvements to designated property.
7. Update to Rev. Proc. 92-29 to reflect statutory changes and address other issues.

TAX ADMINISTRATION

1. Guidance regarding waiver of mandatory electronic filing.
2. Final regulations under §6011 as amended by the Taxpayer First Act. Proposed regulations were published on July 23, 2021.
3. Regulations regarding information reporting on digital assets under §6045.
4. Regulations under §6045A, as amended by the Infrastructure Investment and Jobs Act, regarding transfer reporting and digital assets.
5. Regulations under §6050I, as amended by the Infrastructure Investment and Jobs Act, regarding information reporting of transactions involving digital assets.
6. Regulations under §6103(j) regarding disclosures to the Census Bureau.
7. Revenue Procedure under §6108 regarding requesting special statistical studies and compilations.
 - PUBLISHED 08/15/22 in IRB 2022-33 as REV. PROC. 2022-29. (RELEASED on 08/01/22.)
8. Regulations under §6212 regarding last known address for business taxpayers.

9. Regulations under the Centralized Partnership Audit Regime established by the Bipartisan Budget Act of 2015.
10. Final regulations under §6241. Proposed regulations were published on November 24, 2020.
11. Regulations under §6311 as amended by the Taxpayer First Act regarding payment of taxes by debit and credit cards.
12. Regulations under §6335.
13. Regulations under §6501 to define the return that starts the limitations period on assessment.
14. Regulations to update regulations under §6621.
15. Notice providing relief from certain late-filing penalties.
 - PUBLISHED 09/06/22 in IRB 2022-36 as NOT. 2022-36 (RELEASED on 08/24/22).
16. Regulations to update regulations under §6662.
17. Guidance regarding special rules for qualified amended returns filed by certain large corporations.
18. Final regulations on safe harbors in §§6721 and 6722 for de minimis errors on information returns and payee statements under section 202 of the Protecting Americans from Tax Hikes Act of 2015. Proposed regulations were published on October 17, 2018.
19. Regulations regarding supervisory approval of proposed penalties under §6751(b).
20. Guidance under §7123 concerning alternative dispute resolution.
21. Guidance under §7508A.
22. Regulations under §7602(c)(1) regarding notifications of third-party contacts as updated by the Taxpayer First Act.
23. Regulations regarding the Independent Office of Appeals established under the Taxpayer First Act.
 - PUBLISHED 09/13/22 in FR as REG-125693-19 (NPRM) (Filed on 09/09/22).

24. Regulations to update the enrolled actuary user fee.
25. Final regulations to update the enrolled agent and enrolled retirement plan agent user fee. Proposed regulations were published on March 1, 2022.
 - PUBLISHED 09/29/22 in FR as TD 9966 (FILED on 09/27/22).
26. Regulations under 31 U.S.C. §330 governing practice before the Internal Revenue Service.

TAX-EXEMPT BONDS

1. Guidance under §142, as amended by the Infrastructure Investment and Jobs Act.
2. Guidance under §§144(b) and 150 on qualified student loan bonds.
3. Regulations under §§148 and 150 on refunding bonds.
4. Revenue procedure on the recovery of rebate under §148.
5. Final regulations on bond reissuance under §150. Proposed regulations were published on December 31, 2018.

APPENDIX – Regularly Scheduled Publications

JULY 2022

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288, and 7520.
 - PUBLISHED 07/05/22 in IRB 2022-27 as REV. RUL. 2022-12 (RELEASED on 06/15/22).
2. Notice under §42 providing the qualified disaster zone resident population estimates for purposes of determining the applicable dollar limitation of the additional low-income housing allocations, as described in section 305 of the Taxpayer Certainty and Disaster Tax Relief Act of 2020.
3. Notice setting forth updates for the corporate bond yield curve for plan years beginning in July 2022, the 24-month average segment rates, the funding segment rates applicable for July 2022, the spot segment rates for June 2022 that are used for determining minimum present values, and the 30-year Treasury rates.
 - PUBLISHED 08/08/22 in IRB 2022-32 as NOT. 2022-32 (RELEASED on 07/22/22).

AUGUST 2022

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288, and 7520.
 - PUBLISHED 08/01/22 in IRB 2022-31 as REV. RUL. 2022-14 (RELEASED on 07/15/22).
2. Revenue procedure providing annual indexing required under §36B.
 - PUBLISHED 08/15/22 in IRB 2022-33 as REV. PROC. 2022-34 (RELEASED on 07/31/2022).
3. Notice setting forth updates for the corporate bond yield curve for plan years beginning in August 2022, the 24-month average segment rates, the funding segment rates applicable for August 2022, the spot segment rates for July 2022 that are used for determining minimum present values, and the 30-year Treasury rates.
 - PUBLISHED 09/06/22 in IRB 2022-36 as NOT. 2022-35 (RELEASED on 08/22/22).
4. Revenue procedure providing the domestic asset/liability percentages and the domestic investment yield percentages for taxable years beginning after December 31, 2019, for foreign companies conducting insurance business in the United States.
5. Revenue ruling providing the average annual effective interest rates charged by each Farm Credit Bank District.
 - PUBLISHED 08/29/22 in IRB 2022-35 as REV. RUL. 2022-16.

SEPTEMBER 2022

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288, and 7520.
 - PUBLISHED 09/06/22 in IRB 2022-36 as REV. RUL. 2022-17 (RELEASED on 08/16/22).
2. Notice under §274 regarding the deemed substantiation of travel expenses using per diem rates.
 - PUBLISHED 10/11/22 in IRB 2022-41 as NOT. 2022-44 (RELEASED on 09/23/22).
3. Notice identifying the counties that experienced exceptional, extreme, or severe drought during the preceding 12-month period ending August 31, 2022 for purposes of

determining whether the replacement period within which to replace livestock sold on account of drought is extended under §1033(e)(2)(B) and Notice 2006-82.

- TO BE PUBLISHED 10/17/22 in IRB 2022-42 as NOT. 2022-43 (RELEASED on 09/28/22).
4. Revenue ruling under §6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period October through December 2022.
 - PUBLISHED 08/29/22 in IRB 2022-35 as REV. RUL. 2022-15 (RELEASED on 08/15/22).
 5. Update of Notice 2004-83 to add approved applicants for designated private delivery service status under §7502(f). Will be published only if any new applicants are approved.
 6. Notice setting forth updates for the corporate bond yield curve for plan years beginning in September 2022, the 25-year average segment rates for 2023, the 24-month average segment rates, the funding segment rates applicable for September 2022, the spot segment rates for August 2022 that are used for determining minimum present values, and the 30-year Treasury rates.
 - PUBLISHED 10/03/22 in IRB 2022-40 as NOT. 2022-40 (RELEASED on 09/19/22).
 7. Revenue ruling setting forth the terminal charge and the standard industry fare level (SIFL) cents-per-mile rates for the second half of 2022 for use in valuing personal flights on employer-provided aircraft.
 8. Notice on annual adjustment in the fee imposed to fund the Patient Centered Outcomes Research Trust Fund.

OCTOBER 2022

1. Revenue procedure under §1 and other sections of the Code regarding inflation adjusted items for 2023.
2. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288 and 7520.
 - PUBLISHED 10/03/22 in IRB 2022-40 as REV. RUL. 2022-18 (RELEASED on 09/16/22).
3. Revenue procedure providing the amounts of unused housing credit carryover allocated to qualified states under §42(h)(3)(D) for the calendar year.

4. Update of Revenue Procedure 2005-27 listing the tax deadlines that may be extended by the Commissioner under §7508A in the event of a Presidentially-declared disaster or terrorist attack. Will be published only if there are any updates.
5. Notice setting forth updates for the corporate bond yield curve for plan years beginning in October 2022, the 24-month average segment rates, the funding segment rates applicable for October 2022, the spot segment rates for September 2022 that are used for determining minimum present values, and the 30-year Treasury rates.
6. Revenue procedure providing the unpaid loss discount factors and salvage discount factors for the 2022 accident year to be used for computing discounted unpaid losses under §846 and discounted estimated salvage recoverable under §832.

NOVEMBER 2022

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288 and 7520.
2. Notice under §274 regarding the 2023 optional standard mileage rates.
3. Revenue ruling setting forth covered compensation tables under §401(l)(5)(E) that are used for purposes of applying the permitted disparity rules under §401(l) to defined benefit plans for the 2022 plan year.
4. Revenue ruling providing the “base period T-Bill rate” as required by §995(f)(4).
5. Update of Revenue Procedure 2019-09 regarding adequate disclosure for purposes of the §6662 substantial understatement penalty and the §6694 preparer penalty. Will be published only if there are any updates.
6. Notice setting forth updates for the corporate bond yield curve for plan years beginning in November 2022, the 24-month average segment rates, the funding segment rates applicable for November 2022, the spot segment rates for October 2022 that are used for determining minimum present values, and the 30-year Treasury rates.
7. Notice setting forth cost-of living adjustments effective January 1, 2023, applicable to the dollar limits on benefits and contributions under qualified retirement plans and other limitations applicable to deferred compensation plans.
8. Federal Register Notice on Railroad Retirement Tier 2 tax rate.
9. Notice updating mortality improvement rates and static mortality tables to be used by defined benefit plans for 2023.
10. Revenue Procedure modifying Rev. Proc. 2023-5, allowing for the new electronic submission process for Form 8940, *Request for Miscellaneous Determination*.

DECEMBER 2022

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288, and 7520.
2. Revenue ruling under §6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period January through March 2023.
3. Notice setting forth updates for the corporate bond yield curve for plan years beginning in December 2022, the 24-month average segment rates, the funding segment rates applicable for December 2022, the spot segment rates for November 2022 that are used for determining minimum present values, and the 30-year Treasury rates.
4. Notice setting forth required amendment deadlines for §401(a) plans with respect to certain changes in qualification requirements.

JANUARY 2023

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288, 7520, and 7702.
2. Revenue procedure under §280F providing limitations on depreciation deductions for owners of passenger automobiles first placed in service during the calendar year and amounts to be included in income by lessees of passenger automobiles first leased during the calendar year.
3. Revenue procedure updating the procedures for issuing private letter rulings, determination letters, and information letters on specific issues under the jurisdiction of the Chief Counsel.
4. Revenue procedure updating the procedures for furnishing technical advice, including technical expedited advice, to certain IRS offices, in the areas under the jurisdiction of the Chief Counsel.
5. Revenue procedure updating the previously published list of “no-rule” issues under the jurisdiction of certain 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) on which advance letter rulings or determination letters will not be issued.
6. Revenue procedure updating the procedures for issuing determination letters and letter rulings on issues under the jurisdiction of the Office of the Commissioner, Tax Exempt and Government Entities Division, Employee Plans Rulings and Agreements Office.

7. Revenue procedure updating the procedures for issuing determination letters under the jurisdiction of the Office of the Commissioner, Tax Exempt and Government Entities Division, Exempt Organizations Rulings and Agreements Office.
8. Revenue procedure updating the previously published list of “no-rule” issues under the jurisdiction of the Associate Chief Counsel (International) on which advance letter ruling or determination letters will not be issued.
9. Notice setting forth updates for the corporate bond yield curve for plan years beginning in January 2023, the 24-month average segment rates, the funding segment rates applicable for January 2023, the spot segment rates for December 2022 that are used for determining minimum present values, and the 30-year Treasury rates.
10. Revenue Procedure modifying Rev. Proc. 2023-5, allowing for the new electronic submission process for Form 8940, *Request for Miscellaneous Determination*.

FEBRUARY 2023

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288, and 7520.
2. Notice under §911 on the Housing Cost Amount for 2022.
3. Notice setting forth updates for the corporate bond yield curve for plan years beginning in February 2023, the 24-month average segment rates, the funding segment rates applicable for February 2023, the spot segment rates for January 2023 that are used for determining minimum present values, and the 30-year Treasury rates.

MARCH 2023

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288, and 7520.
2. Notice providing the calendar year resident population estimates used in determining the state housing credit ceiling under §42(h) and the private activity bond volume cap under §146.
3. Revenue procedure under §143 regarding average area purchase price.
4. Revenue ruling under §6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period April through June 2023.
5. Revenue ruling setting forth the terminal charge and the standard industry fare level (SIFL) cents-per-mile rates for the first half of 2021 for use in valuing personal flights on employer-provided aircraft.

6. Notice setting forth updates for the corporate bond yield curve for plan years beginning in March 2023, the 24-month average segment rates, the funding segment rates applicable for March 2023, the spot segment rates for February 2023 that are used for determining minimum present values, and the 30-year Treasury rates.
7. Revenue procedure providing the annual update to the List of Automatic Changes for taxpayer-initiated changes in method of accounting.

APRIL 2023

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288, and 7520.
2. Guidance providing the calendar year inflation adjustment factor and reference prices for the renewable electricity production credit under §45.
3. Revenue procedure providing a current list of countries and the dates those countries are subject to the §911(d)(4) waiver and guidance to individuals who fail to meet the eligibility requirements of §911(d)(1) because of adverse conditions in a foreign country.
4. Notice setting forth updates for the corporate bond yield curve for plan years beginning in April 2023, the 24-month average segment rates, the funding segment rates applicable for April 2023, the spot segment rates for March 2023 that are used for determining minimum present values, and the 30-year Treasury rates.

MAY 2023

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288, and 7520.
2. Guidance providing the inflation adjustment factor to be used in determining the enhanced oil recovery credit under §43 for tax years beginning in the calendar year.
3. Revenue Procedure under §223 of the Code and §54.9831-1(c)(3)(vii) of the Pension Excise Tax Regulations regarding the inflation adjusted items for 2023.
4. Notice regarding marginal well production credit under §45I for natural gas produced in 2022.
5. Notice regarding marginal production rates under §613A for oil and gas well depletion.
6. Notice setting forth updates for the corporate bond yield curve for plan years beginning in May 2023, the 24-month average segment rates, the funding segment rates applicable for May 2023, the spot segment rates for April 2023 that are used for determining minimum present values, and the 30-year Treasury rates.

JUNE 2023

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of §§42, 382, 1274, 1288, and 7520.
2. Notice setting forth the §45K(d)(2)(C) reference price for the nonconventional source production credit.
3. Notice setting forth the inflation adjustment factor for purposes of §45Q for calendar year 2023.
4. Revenue ruling under §6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period July through September 2023.
5. Notice setting forth updates for the corporate bond yield curve for plan years beginning in June 2023, the 24-month average segment rates, the funding segment rates applicable for June 2023, the spot segment rates for May 2023 that are used for determining minimum present values, and the 30-year Treasury rates.