

## Federal Tax Regulations Issued in 2025 (at 2/11/26)

The table below lists tax regulations issued by the Treasury Department and IRS in 2025. The links will take you to the text of the regulations (usually in the Federal Register) and other helpful information.

- For more information on the regulations including comments submitted on proposed regulations, visit <http://www.regulations.gov>.
- Federal Register - <https://www.gpo.gov/fdsys/browse/collection.action?collectionCode=FR>
- IRS Items from the Federal Register - <https://www.federalregister.gov/agencies/internal-revenue-service>
- IRS archival content - <https://www.irs.gov/privacy-disclosure/tax-code-regulations-and-official-guidance>
- IRS Electronic Reading Room (FOIA) - <https://www.irs.gov/privacy-disclosure/foia-library>
- Overview to IRS Guidance - <https://www.irs.gov/newsroom/understanding-irs-guidance-a-brief-primer>
- Office of Information and Regulatory Affairs (OIRA) in OMB - <https://www.reginfo.gov/public/>
  - Check status of regulations - <https://www.reginfo.gov/public/do/eoPackageMain>
  - Treasury regulations under review and whether “economically significant” - [click](#)

List of regulations issued in: [2024](#) [2023](#) [2022](#) [2021](#) [2020](#) [2019](#) [2018](#) [2017](#) [2016](#) [2015](#) [2014](#) [2013](#) [2012](#) [2011](#)

NOTE: [Executive Order 14192](#) (1/31/25), Unleashing Prosperity Through Deregulation will reduce the number of regulations issued by Treasury/IRS and most federal agencies.

- “Purpose. The ever-expanding morass of complicated Federal regulation imposes massive costs on the lives of millions of Americans, creates a substantial restraint on our economic growth and ability to build and innovate, and hampers our global competitiveness. ...”
- [Reg cap for 2025: To issue a new regulation, the agency must identify at least 10 existing regs to repeal.](#)
- Treasury Secretary and OMB Director to reinstate 4/11/18 [Memorandum of Agreement](#) on review of tax regs under [Executive Order 12866](#) (9/30/93) issued by President Clinton.
  - Meaning: tax regs must be reviewed by Office of Information and Regulatory Affairs (OIRA) within OMB
    - President Biden (and earlier Presidents) had removed this for most tax regs.
  - Excerpt of [4/11/18 Memorandum](#); also see [Treasury press release of 4/12/18](#):

Title of Regulation	Status	Citation	<a href="#">IRC Sections</a>	Additional Information
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1. *OIRA review of tax regulatory actions.* A tax regulatory action will be subject to review by OIRA under section 6 of Executive Order 12866 if it is likely to result in a rule that may:
  - (a) create a serious inconsistency or otherwise interfere with an action taken or planned by another agency;
  - (b) raise novel legal or policy issues, such as by prescribing a rule of conduct backed by an assessable payment; or
  - (c) have an annual non-revenue effect on the economy of \$100 million or more, measured against a no-action baseline.
  
2. *Analysis of tax regulatory actions.*
  - (a) Tax regulatory actions within the scope of paragraph 1 will be subject to the analytical requirements applicable to significant regulations under section 6(a)(3)(B) of Executive Order 12866.
  - (b) Tax regulatory actions with likely effects described in paragraph 1(c) will also be subject to the analytical requirements applicable to economically significant regulations under section 6(a)(3)(C) of Executive Order 12866.
  
5. Treasury will not publish in the Federal Register or otherwise publicly release any tax regulatory action within the scope of paragraph 1 unless OIRA notifies Treasury that it has waived or concluded its review. In the rare event of a policy disagreement that could not be resolved during the review process, OIRA will facilitate a principals meeting to resolve any remaining issues and, if needed, elevate those issues to the President.

Title of Regulation	Status	Citation	<a href="#">IRC Sections</a>	Additional Information
Excise Tax on Designated Drugs  IRA 2022	Prop. Regs.	<a href="#">REG-115560-23</a> (1/2/25)	5000D	“proposed regulations relating to the excise tax on certain sales of designated drugs by manufacturers, producers, and importers during statutorily defined periods. The proposed regulations would provide substantive rules that relate to the imposition and calculation of the tax. The proposed regulations would affect manufacturers, producers, and

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				importers of designated drugs that sell such drugs during statutorily defined periods.” <a href="#">Rev. Proc. 2025-9</a> (12/31/24)
Classification of Digital Content Transactions and Cloud Transactions	Final Regs.	<a href="#">TD 10022</a> (1/14/25)	861 937	“final regulations modifying the rules for classifying transactions involving computer programs, including by applying the rules to transfers of digital content. These final regulations also provide rules for the classification of cloud transactions. These rules apply for purposes of the international provisions of the Internal Revenue Code and generally affect taxpayers engaging in transactions involving digital content or cloud transactions.”  Notice 2025-06 (1/10/25): Requests comments on any potential implications if characterization rules currently contained in §§1.861-18 and 1.861-19, as amended and added, respectively, by TD 10022, were to apply to all provisions of IRC, including the need for additional guidance, and seeks specific comments on the possible impacts and guidance that may be necessary with respect to certain identified provisions. Treasury and IRS have published TD 10022 containing final regs that provide rules for characterizing digital content and cloud transactions. TD 10022 applies solely to certain enumerated international provisions of the IRC.
Source of Income from Cloud Transactions	Prop. Regs.	<a href="#">REG-107420-24</a> (1/14/25)	861	“proposed rules for determining the source of income from cloud transactions for purposes of the international provisions of the Internal Revenue Code. These proposed rules would generally affect taxpayers who earn gross income from engaging in cloud transactions.”
Credit for Production of Clean Hydrogen and Energy Credit	Final Regs.	<a href="#">TD 10023</a> (1/10/25)	45V 48	“final regulations implementing the credit for production of clean hydrogen and certain provisions of the energy credit as enacted by the Inflation Reduction Act of 2022. The

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IRA 2022				regulations provide rules for: determining lifecycle greenhouse gas emissions rates resulting from hydrogen production processes; petitioning for provisional emissions rates; verifying production and sale or use of clean hydrogen; modifying or retrofitting existing qualified clean hydrogen production facilities; using electricity from certain renewable or zero-emissions sources to produce qualified clean hydrogen; and electing to treat part of a specified clean hydrogen production facility instead as property eligible for the energy credit. These regulations affect all taxpayers who produce qualified clean hydrogen and claim the clean hydrogen production credit, elect to treat part of a specified clean hydrogen production facility as property eligible for the energy credit, or produce electricity from certain renewable or zero-emissions sources used by taxpayers or related persons to produce qualified clean hydrogen.”
Section 45Y Clean Electricity Production Credit and Section 48E Clean Electricity  IRA 2022	Final Regs	<a href="#">TD 10024</a> (1/15/25)  <a href="#">Advance Release</a> (1/7/25)	45Y 48E	“final regulations regarding the clean electricity production credit and the clean electricity investment credit established by the Inflation Reduction Act of 2022. These final regulations provide rules for determining greenhouse gas emissions rates resulting from the production of electricity; petitioning for provisional emissions rates; and determining eligibility for these credits in various circumstances. The final regulations affect all taxpayers that claim the clean electricity production credit with respect to a qualified facility or the clean electricity investment credit with respect to a qualified facility or energy storage technology, as applicable, that is placed in service after 2024.”  <a href="#">Treasury press release of 1/7/25</a>  <a href="#">Rev. Proc. 2025-14</a> (1/15/25)

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Guidance on Clean Electricity Low- Income Communities Bonus Credit Amount Program  IRA 2022	Final Regs	<a href="#">TD 10025</a> (1/13/25)	48E	<p>“final regulations concerning the program to allocate clean electricity low-income communities bonus credit amounts established pursuant to the Inflation Reduction Act of 2022 for calendar years 2025 and succeeding years. Applicants investing in certain clean electricity generation facilities that produce electricity without combustion and gasification may apply for an allocation of capacity limitation to increase the amount of the clean electricity investment credit for the taxable year in which the facility is placed in service. This document provides definitions and requirements that are applicable for the program. The final regulations affect taxpayers seeking allocations of capacity limitation to claim an increased clean electricity investment credit.”</p> <p><a href="#">Treasury press release of 1/8/25</a></p>
Catch-Up Contributions  SECURE 2.0 Act of 2022	Prop. Regs	<a href="#">REG-101268-24</a> (1/13/25)  <a href="#">Advance Release</a> (1/10/25)	401 403 414	<p>“proposed regs that would provide guidance for retirement plans that permit participants who have attained age 50 to make additional elective deferrals that are catch-up contributions. The proposed regs reflect statutory changes made by the SECURE 2.0 Act of 2022, including the requirement that catch-up contributions made by certain catch-up eligible participants must be designated Roth contributions. The proposed regulations would affect participants in, beneficiaries of, employers maintaining, and administrators of certain retirement plans.”</p> <p><a href="#">IR-2025-07</a> (1/10/25)</p>
Rules Regarding Certain Disregarded Payments and Dual Consolidated Losses	Final Regs.	<a href="#">TD 10026</a> (1/14/25)	1503 7701	<p>“s final regulations regarding certain disregarded payments that give rise to deductions for foreign tax purposes and avoid the application of the dual consolidated loss (“DCL”) rules. The final regulations affect domestic corporate owners that make</p>

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				or receive such payments. This document also announces additional transition relief for the application of the DCL rules to certain foreign taxes that are intended to ensure that multinational enterprises pay a minimum level of tax.”
Guidance under Section 2801 Regarding the Imposition of Tax on Certain Gifts and Bequests from Covered Expatriates  Heroes Earnings Assistance and Relief Tax Act of 2008 (HEART Act), <a href="#">P.L. 110-245</a> (6/17/08)	Final Regs	<a href="#">TD 10027</a> (1/14/25)  <a href="#">Advance Release</a> (1/10/25)	2801 6001 6011 6060 6071 6081 6091 6101 6107 6109	“final regulations that provide guidance on the application of a tax on United States citizens and residents, as well as certain trusts, that receive, directly or indirectly, gifts or bequests from certain individuals who relinquished United States citizenship or ceased to be lawful permanent residents of the United States. The final regulations also provide guidance on the method of reporting and paying this tax. The final regulations primarily affect United States citizens and residents, as well as certain trusts, that receive one or more such gifts or bequests.”
Certain Partnership Related-Party Basis Adjustment Transactions as Transactions of Interest	Final Regs	<a href="#">TD 10028</a> (1/14/25)  <a href="#">Advance Release</a> (1/10/25)	6011	“final regulations that identify certain partnership related-party basis adjustment transactions and substantially similar transactions as transactions of interest, a type of reportable transaction. Material advisors and certain participants in these transactions are required to file disclosures with the IRS and are subject to penalties for failure to disclose. The final regulations affect participants in these transactions as well as material advisors.”  <a href="#">IR-2025-06</a> (1/10/25)
Automatic Enrollment Requirements Under Section 414A  SECURE 2.0 Act of 2022	Prop. Regs.	<a href="#">REG-100669-24</a> (1/14/25)  <a href="#">Advance Release</a> (1/10/25)	414 414A	“proposed regs that would provide guidance with respect to the automatic enrollment requirements that apply to certain retirement plans. The proposed regulations reflect statutory changes made by the SECURE 2.0 Act of 2022 requiring that certain cash or deferred arrangements and salary reduction agreements be eligible automatic contribution arrangements

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				<p>that satisfy additional specified requirements. The proposed regs would affect participants in, beneficiaries of, employers maintaining, and administrators of certain retirement plans that include cash or deferred arrangements or annuity contracts purchased under salary reduction agreements and other retirement plans that include eligible automatic contribution arrangements.”</p> <p><a href="#">IR-2025-09</a> (1/10/25) – “In general, unless an employee opts out, a plan must automatically enroll the employee at an initial contribution rate of at least 3% of the employee’s pay and automatically increase the initial contribution rate by one percentage point each year until it reaches at least 10% of pay.”</p>
Micro-Captive Listed Transactions and Micro-Captive Transactions of Interest	Final Regs	<a href="#">TD 10029</a> (1/14/25)	6011	“final regulations that identify transactions that are the same as, or substantially similar to, certain micro-captive transactions as listed transactions, a type of reportable transaction, and certain other micro-captive transactions as transactions of interest, another type of reportable transaction. Material advisors and certain participants in these listed transactions and transactions of interest are required to file disclosures with the IRS and are subject to penalties for failure to disclose. The final regulations affect participants in these transactions as well as material advisors.”
Base Erosion and Anti-Abuse Tax Rules for Qualified Derivative Payments on Securities Lending Transactions  TCJA	Prop. Regs.	<del><a href="#">REG-107895-24</a></del> (1/14/25)	59A 6038A	“proposed regulations regarding the base erosion and anti-abuse tax imposed on certain large corporate taxpayers with respect to certain payments made to foreign related parties. The proposed regulations relate to how qualified derivative payments with respect to securities lending transactions are determined and reported. The proposed regulations would affect corporations with substantial gross receipts that make payments to foreign related parties.”

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Credit for Qualified Commercial Clean Vehicles  IRA 2022	Prop. Regs.	<a href="#">REG-123525-23</a> (1/14/25)	25E 30D 45W 6417	“proposed regulations that would provide guidance on the qualified commercial clean vehicle credit enacted by the Inflation Reduction Act of 2022. These proposed regulations would affect eligible taxpayers that place a qualified commercial clean vehicle in service during a taxable year. These proposed regulations would also affect manufacturers of qualified commercial clean vehicles.”
Resolution of Federal Tax Controversies by the Independent Office of Appeals	Final Regs.	<a href="#">TD 10030</a> (1/15/25)	7803	“final regulations that provide guidance on the resolution of Federal tax controversies by the IRS Independent Office of Appeals (Appeals) under the Taxpayer First Act of 2019 (TFA). The final regulations provide that while the Appeals resolution process is generally available to all taxpayers to resolve Federal tax controversies, there are certain exceptions to consideration by Appeals. The final regulations also address certain procedural and timing rules that must be met before Appeals consideration is available. The regulations affect taxpayers requesting Appeals consideration of Federal tax controversies.”  Correction – <a href="#">FR 33895</a> (7/18/25)
Enhancing Coverage of Preventive Services under the Affordable Care Act  ACA	Withdrawal of notice of proposed rulemaking	<a href="#">REG-110878-24</a> (1/15/25)	9815	“This document withdraws a notice of proposed rulemaking that appeared in the Federal Register on October 28, 2024, regarding coverage of certain preventive services under the Affordable Care Act.”
Certain Employee Remuneration in Excess of 1,000,000 Dollars under Internal Revenue Code Section 162(m)	Prop. Regs.	<a href="#">REG-118988-22</a> (1/16/25)	162(m)	“proposed regulations under section 162(m) of the Internal Revenue Code, which limits the deduction for certain employee remuneration in excess of \$1,000,000 for Federal income tax purposes. These proposed regulations implement the amendments made to section 162(m) by the American Rescue Plan Act of 2021. These proposed regulations would

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ARPA 2021				affect publicly held corporations.”
<p>Multi-Year Reporting Requirements for Corporate Separations and Related Transactions</p> <p><b>Withdrawn</b> on 9/30/25 (<a href="#">FR 46776</a>)</p> <p>Treasury and IRS “received several comments in response to the proposed technical regulations and the proposed reporting regulations, which generally were critical of the proposed guidance. In response to the comments received, the Treasury Department and the IRS are withdrawing the proposed regulations.”</p>	Prop. Regs.	<a href="#">REG-116085-23</a> (1/16/25)	355	<p>“proposed regulations that would require multi-year tax reporting for corporate separations and related transactions. The information to be reported under these proposed regulations would establish the taxpayer’s position that the corporate separation and related transactions qualify for nonrecognition treatment under subchapter C of the Internal Revenue Code. The proposed regulations would affect corporations and their shareholders and security holders. Proposed regulations regarding certain matters relating to corporate separations, incorporations, and reorganizations qualifying for nonrecognition of gain or loss are published elsewhere in the Proposed Rules section of this issue of the Federal Register.” ...</p> <p>“would revise § 1.355–5 to require all covered filers, as defined in proposed § 1.355–5(b)(1), to file with the IRS an annual report with regard to each section 355 transaction (Form 7216, Multi-Year Reporting Related to Section 355 Transactions) that would be attached to the covered filer’s Federal income tax return” [<a href="#">Draft Form 7216</a> (1/13/25)]</p> <p><a href="#">IR-2025-11</a> (1/13/24)</p>
<p>Nonrecognition of Gain or Loss in Corporate Separations, Incorporations, and Reorganizations</p> <p><b>Withdrawn</b> on 9/30/25</p>	Prop. Regs.	<a href="#">REG-112261-24</a> (1/16/25)	355 357 361 368	<p>“proposed regulations regarding certain matters relating to corporate separations, incorporations, and reorganizations qualifying, in whole or in part, for nonrecognition of gain or loss. These matters include distributions and retentions of controlled corporation stock, assumptions of liabilities by controlled corporations, exchanges of property between distributing corporations and controlled corporations, and</p>

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<p><a href="#">(FR 46776)</a></p> <p>Treasury and IRS “received several comments in response to the proposed technical regulations and the proposed reporting regulations, which generally were critical of the proposed guidance. In response to the comments received, the Treasury Department and the IRS are withdrawing the proposed regulations.”</p>				<p>distributions and transfers of consideration to distributing corporation shareholders and creditors. The proposed regulations would affect corporations and their shareholders and security holders. Proposed regulations modifying the reporting requirements for corporate separations are published elsewhere in the Proposed Rules section of this issue of the Federal Register.”</p> <p>Correction – <a href="#">FR 13427</a> (3/24/25)</p>
<p>Estate Tax Closing Letter User Fee Update</p>	<p>Interim final rule</p>	<p><a href="#">TD 10031</a> (5/20/25)</p> <p><a href="#">REG-107459-24</a> (5/20/25)</p>	<p>300.12</p>	<p>“interim final regulations relating to the imposition of a user fee on authorized persons requesting the issuance of IRS Letter 627, also referred to as an estate tax closing letter. These regulations reduce the amount of the user fee imposed on a request for the issuance of an estate tax closing letter. The Independent Offices Appropriations Act of 1952 authorizes the charging of user fees. The text of the interim final regulations also serves as the text of the proposed regulations set forth in the notice of proposed rulemaking on this subject in the Proposed Rules section of this edition of the Federal Register.”</p> <p>Proposed fee is \$56.</p>
<p>Regulations Under Section 382(h) Related</p>		<p><a href="#">FR 28946</a> (7/2/25)</p>	<p>382</p>	

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<p>to Built-In Gain and Loss  <b>- Withdrawal</b> as of  7/2/25 <a href="#">FR 28946</a>  (7/2/25) of <a href="#">REG-125710-18</a> (9/10/19)  and <a href="#">REG-125710-18</a>  (1/14/20)</p> <p><b>TCJA</b></p>				
<p><b>Revocation</b>  <b>(by IRS, Congress</b>  <b>already revoked this –</b>  <b>see below)</b>  Gross Proceeds  Reporting by Brokers  that Regularly Provide  Services Effectuating  Digital Asset Sales</p> <p>IIJA 2021</p> <p><b>Revoked by H.J.Res. 25</b>  <b>(P.L. 119-5; 4/10/25) -</b>  <a href="#">here</a></p>	Final Regs	<p><a href="#">TD 10021</a>  (7/11/25)</p> <p><a href="#">TD 10021</a>  (12/30/24)</p> <p>30 pages of  preamble and 3  pages of regs</p>	6045	<p>“Pursuant to its authority under the Congressional Review Act (CRA), Congress passed a joint resolution disapproving the final rule titled “Gross Proceeds Reporting by Brokers that Regularly Provide Services Effectuating Digital Asset Sales,” and the President signed the resolution. Under the joint resolution and by operation of the CRA, this final rule has no legal force or effect. The Department of the Treasury (Treasury Department) and the IRS hereby remove this final rule from the Code of Federal Regulations (CFR) and revert the relevant text of the CFR back to the text that was in effect immediately prior to the effective date of this final rule.</p> <p>DATES: This final rule is effective on July 11, 2025.”</p>
<p>Determination of Line of  Business for Purposes of  No-Additional-Cost  Service and Qualified  Employee Discount  Fringe Benefits</p>	Prop. Regs	<p><a href="#">REG-132805-17</a>  (8/6/25)</p>	132	<p>“proposed regulations that would provide guidance regarding an employer’s line or lines of business for purposes of determining the exclusion from gross income for no-additional-cost services or qualified employee discounts provided to employees.”</p> <p>“would replace a business classification system that has not been updated since 1974 with a much more current classification system that is updated every five years. Under</p>

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				these proposed regulations, the application of the no-additional-cost benefit and employee discount exclusions from employee income under section 132(a)(1) and (2) would be determined under a classification system that more accurately reflects current economic activity than the system used under the existing regulations, thereby reducing burden in applying the exclusions from income under section 132(a)(1) and (2).”
Returns Relating to Sales or Exchanges of Certain Partnership Interests	Prop. Regs.	<a href="#">REG-108822-25</a> (8/19/25)	6050K	<p>“proposed regulations modifying information reporting obligations with respect to sales or exchanges of certain interests in partnerships owning inventory or unrealized receivables. The proposed regulations affect partnerships.”</p> <p>“As a result of the proposed changes to §1.6050K–1 and the associated changes in the instructions to <a href="#">Form 8308</a>, a partnership would be required to furnish the information reported on only Parts I, II, and III of Form 8308, or a statement that includes the same information, to the transferor and transferee in a section 751(a) exchange by the later of (1) January 31 of the year following the calendar year in which the section 751(a) exchange occurred, or (2) 30 days after the partnership has received notice of the exchange as specified under section 6050K and §1.6050K–1.”</p>
Disclosure of Returns and Return Information in Connection With Written Contracts or Agreements for the Acquisition of Property or Services for Tax Administration Purposes; Withdrawal	<b>Withdrawal</b> of proposed regs from 2018	REG–129260–16  <a href="#">Released 3/13/18</a>  <a href="#">Withdrawn 9/3/25</a>	6103 7345	<p>“This document withdraws a notice of proposed rulemaking that has been determined to be unnecessary. The notice of proposed rulemaking proposed to authorize the Department of State (State Department) to disclose returns and return information to its contractors who assist the State Department in carrying out certain responsibilities related to revoking or denying a passport of any individual certified to have a seriously delinquent tax debt.”</p> <p>Per IRS, prop. Regs “would add the State Department to the</p>

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				<p>list of agencies in §301.6103(n)–1(a)(1) whose officers and employees may disclose returns and return information to any person or to an officer or employee of such person for tax administration purposes to the extent necessary in connection with a written contract for the acquisition of property or services.”</p> <p>But not needed because State Dept already authorized per Reg. §301.6103(n)–1(a)(2)(ii) to disclose to contractors if authorized by IRS per FAST Act* and §7345.</p> <p>* Fixing America’s Surface Transportation (FAST) Act, Public Law 114–94 (2015).</p>
<p>Catch-Up Contributions</p> <p>SECURE 2.0 Act</p>	<p>Final Regs</p>	<p><a href="#">TD 10033</a> (9/16/25)</p>	<p>401 403 414</p>	<p>“final regulations that provide guidance for retirement plans that permit participants who have attained age 50 to make additional elective deferrals that are catch-up contributions. The regulations reflect statutory changes made by the SECURE 2.0 Act of 2022, including the requirement that catch-up contributions made by certain catch-up eligible participants must be designated Roth contributions. The regulations affect participants in, beneficiaries of, employers maintaining, and administrators of certain retirement plans.”</p> <p>Effective 11/17/25</p> <p><a href="#">IR-2025-91</a> (9/15/25)</p>
<p>Occupations that Customarily and Regularly Received Tips; Definition of Qualified Tips</p>	<p>Prop. Regs.</p>	<p><a href="#">REG-110032-25</a> (9/22/25)</p>	<p>224</p>	<p>“proposed regulations that identify occupations that customarily and regularly received tips on or before December 31, 2024, and provide a definition of “qualified tips” for purposes of the income tax deduction for qualified tips. These proposed regulations affect individuals who receive tips as part of their occupation.”</p>

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OBBBA 2025				<p>Includes several examples of voluntary tips and SSTB limitation + table of occupations that customarily and regularly receive tips and the Treasury Tipped occupation Code (TTOC) that will be reported on W-2 starting for 2026.</p> <p>Comments due by 10/22/25</p> <p><a href="#">IR-2025-92</a> (9/19/25).</p>
Preparer Tax Identification Number (PTIN) User Fee Update	Interim final rule	<a href="#">TD 10035</a> (9/30/25)	300.11	<p>“interim final regulations relating to the imposition of certain user fees on tax return preparers. These regs reduce from \$11 to \$10 the amount of the user fee to apply for or renew a preparer tax identification number (PTIN) and affect individuals who apply for or renew a PTIN. The Independent Offices Appropriation Act of 1952 authorizes the charging of user fees. The text of these interim final regulations also serves as the text of the proposed regulations set forth in the notice of proposed rulemaking on this subject in this issue in the Proposed Rules section of this edition of the Federal Register.”</p> <p>+ \$8.75 processing fee paid directly to third party</p> <p><a href="#">IR-2025-95</a> (9/29/25)</p>
Preparer Tax Identification Number (PTIN) User Fee Update	Prop. Regs	<a href="#">REG-108673-25</a> (9/30/25)	300.11	<p>“issuing interim final regulations that amend the current regulations to reduce from \$11 to \$10 the amount of the user fee imposed on tax return preparers to apply for or renew a preparer tax identification number (PTIN).”</p>
Section 42, Low-Income Housing Credit Average Income Test Procedures	Final regs Removal of Temp Regs	<a href="#">TD 10036</a> (9/30/25)	42	<p>“final regs setting forth recordkeeping and reporting requirements for average income test for purposes of the low-income housing credit. If a building is part of a residential rental project that satisfies the average income test, the building may be eligible to earn low- income housing credits.</p>

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				These final regs affect owners of low-income housing projects, State or local housing credit agencies that monitor compliance with the requirements for low-income housing credits, and, indirectly, tenants in low-income housing projects.”
Interest Capitalization Requirements for Improvements That Constitute Designated Property	Final Regs	<a href="#">TD 10034</a> (10/2/25)	263A	“final regulations that, with regard to the interest capitalization requirements for improvements constituting designated property, remove the associated property rule and similar rules from the existing regulations. In addition, this document contains final regulations that modify the definition of “improvement” for purposes of applying those existing regulations. Lastly, this document contains final regulations that modify other rules in those existing regulations in light of the removal of the associated property rule. The final regulations affect taxpayers making improvements to real or tangible personal property that constitute the production of designated property.” A key change relates to an IRS loss in <i>Dominion Resources, Inc.</i> , 681 F.3d 1313 (Fed. Cir. 2012), regarding interpretation of the avoided cost rule.
Domestically Controlled Qualified Investment Entities	Prop. Regs.	<a href="#">REG-109742-25</a> (10/21/25)	897	“proposed regs that would modify existing regs on determination of whether a qualified investment entity is domestically controlled by removing a rule that looks to the shareholders of certain domestic corporations in determining whether foreign persons hold directly or indirectly stock in a qualified investment entity. The proposed regs would primarily affect foreign persons that own stock in a qualified investment entity that would be a United States real property interest if the qualified investment entity were not domestically controlled.”
Excise Tax on Repurchase of Corporate Stock	Final Regs	<a href="#">TD 10037</a> (11/24/25)	1275 4501 6011	“final regulations that provide guidance regarding the application of the excise tax on repurchases of corporate stock made after December 31, 2022. The regulations affect certain

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IRA 2022		47 pages		publicly traded corporations that repurchase their stock or whose stock is acquired by certain specified affiliates.” Effective 11/24/25. Correction – <a href="#">FR 59379</a> (12/19/25) Section 4501 effective for stock repurchases after 12/31/22. Reported on <a href="#">Form 7208</a> , Excise Tax on Repurchase of Corporate Stock. Correction – <a href="#">FR 6135</a> (2/11/26)
WITHDRAWN  Furnishing Identifying Number of Tax Return Preparer  <a href="#">REG-124791-11</a> (2/15/12)	Prop Regs withdrawn	<a href="#">REG-124791-11</a> (11/28/25)	6109	“This document withdraws a notice of proposed rulemaking regarding the eligibility of tax return preparers to obtain a preparer tax identification number (PTIN). The proposed regulations would have affected tax return preparers.”
Estate Tax Closing Letter User Fee Update	Final Regs	<a href="#">TD 10038</a> (12/1/25)	26 CFR part 300	“final regulations relating to the imposition of a user fee on authorized persons requesting the issuance of IRS Letter 627, also referred to as an estate tax closing letter. The final regulations adopt without change the text of the interim final rule and proposed regulations that reduced the amount of the user fee imposed on a request for the issuance of an estate tax closing letter from \$67 to \$56. The Independent Offices Appropriations Act of 1952 authorizes the charging of user fees. The final regulations affect persons who request an estate tax closing letter.” Effective 12/31/25 Prop rule was issued 5/20/25 (see earlier entry on this doc).
Income of Foreign Governments and of International Organizations	Final and Temporary Regs	<a href="#">TD 10042</a> (12/15/25)	882 892	“s final regulations relating to the taxation of the income of foreign governments from investments in the United States. In particular, these final regulations provide guidance for determining when a foreign government is engaged in

Title of Regulation	Status	Citation	<a href="#">IRC Sections</a>	Additional Information
TRA'86 TAMRA'88				commercial activity and when an entity is a controlled commercial entity. The final regulations will affect foreign governments that derive income from sources within the United States.”
Income of Foreign Governments and of International Organizations	Prop. Regs	<a href="#">REG-101952-24</a> (12/15/25)	892	“proposed regulations relating to the taxation of the income of foreign governments from investments in the United States. In particular, these proposed regulations provide guidance for determining when an acquisition of debt by a foreign government is considered to be commercial activity, and when a foreign government has effective control of an entity engaged in commercial activities. These proposed regulations will affect foreign governments that derive income from sources within the United States.”
WITHDRAWN  Relief From Joint and Several Liability	Withdrawal of proposed regulations	<a href="#">REG-132251-11</a> (8/13/13)  <a href="#">REG-134219-08</a> (11/20/15)  <a href="#">Withdrawal on 12/15/25</a>	6015	“t withdraws two notices of proposed rulemaking regarding relief from joint and several tax liability and relief from Federal income tax liability resulting from the operation of State community property laws. The proposed regulations would have affected married individuals who filed joint returns and later seek relief from joint and several liability.”
Updating Regulation References To Reflect Reorganizations at the Department of Justice and the Internal Revenue Service	Prop. Regs.	<a href="#">REG-110519-25</a> (12/15/25)	6103 6402 7430 7433	“proposed regulations that would update points of contact within the Department of Justice and the IRS. The proposed regulations are necessary to reflect a reorganization within the Department of Justice to identify new points of contact for matters involving the internal revenue laws. The proposed regulations would also update points of contact at the IRS for administrative claim submissions from taxpayers seeking civil damages for certain unauthorized collection actions or awards of administrative costs with respect to certain administrative proceedings.”
Entities Wholly Owned	Final Regs.	<a href="#">TD 10038</a>	6417	“final regulations regarding the Federal tax classification of

Title of Regulation	Status	Citation	<a href="#">IRC Sections</a>	Additional Information
by Indian Tribal Governments  IRA 2022		(12/16/25)	7701	entities wholly owned by Indian Tribal governments (Tribes). The final regulations provide that entities that are wholly owned by Tribes and organized or incorporated under the laws of one or more of the Tribes that own them generally are not recognized as separate entities for Federal tax purposes. The final regulations also provide that such entities, as well as certain Tribal corporations chartered by the Department of the Interior (DOI), are recognized as separate entities for Federal employment and certain Federal excise tax purposes. In addition, the final regulations provide that, for purposes of making elective payment elections (including determining eligibility for and the consequences of such elections) for energy credits under the Inflation Reduction Act of 2022, each of these types of Tribal entities is treated as an instrumentality of one or more Indian Tribal governments.”
Tribal General Welfare Benefits  Tribal General Welfare Exclusion Act of 2014	Final Regs	<a href="#">TD 10040</a> (12/16/25)	139E 7872	“final regulations regarding the exclusion from gross income of certain Tribal general welfare benefits. The regulations address the requirements that apply to determine whether the benefits an Indian Tribal government program provides qualify as Tribal general welfare benefits. These regulations affect Indian Tribal governments, agencies or instrumentalities of such governments, Federally recognized Tribes, members of such Tribes, such members’ spouses and dependents, and other Tribal program participants.”  Correction – <a href="#">FR 2084</a> (1/16/26)
Base Erosion and Anti-Abuse Tax Rules for Qualified Derivative Payments on Securities Lending Transactions	Final Regs	<a href="#">TD 10041</a> (12/18/25)	59A 6038A	“final regulations regarding the base erosion and anti-abuse tax imposed on certain large corporate taxpayers with respect to certain payments made to foreign related parties. The final regulations relate to how qualified derivative payments with respect to securities lending transactions are determined and reported. The final regulations affect corporations with

Title of Regulation	Status	Citation	<a href="#">IRC Sections</a>	Additional Information
TCJA 2017				substantial gross receipts that make payments to foreign related parties.”
Transparency in Coverage  ACA  No Surprises Act  <a href="#">Exec. Order 14221</a> (2/25/25)	Prop. Rule	<a href="#">REG-107111-25</a> (12/23/25)  87 pages	9815	“These proposed rules set forth proposed requirements that would amend the regulations under the Public Health Service Act, the Employee Retirement Income Security Act of 1974, and the Internal Revenue Code regarding price transparency reporting requirements for non-grandfathered group health plans and health insurance issuers offering non-grandfathered group and individual health insurance coverage. Specifically, these proposed rules would improve the standardization, accuracy, and accessibility of public pricing disclosures in line with the goals of the Executive Order 14221. With respect to the in-network rate and out-of-network allowed amount machine-readable files, these proposed rules would achieve these goals by adding new contextual files and additional data elements like product type, network name, and enrollment counts; changing the reporting level for aggregation of data; removing in-network rates for unlikely provider-to-service mappings; increasing the reporting period and lowering the claims threshold for out-of-network historical data; and reducing the reporting cadence. These proposed rules would also improve the findability of all of the publicly disclosed machine-readable files required under the Transparency in Coverage rules, including the prescription drug file, by requiring a text file and footer with website URLs and contact information for the files. These proposed rules would also require pricing information that is made available through an online consumer tool and paper (upon request), to also be made available by phone, and establish that the satisfaction of such requirement also satisfies the requirements of section 114 of the No Surprises Act (including for grandfathered group health plans and health insurance issuers offering

Title of Regulation	Status	Citation	<a href="#">IRC Sections</a>	Additional Information
				grandfathered group and individual health insurance coverage that are not otherwise subject to these proposed rules).”