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

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

Revenue Rulings

Ruling #	Date released	IRS summary	Code Section(s)
Rev. Rul.	12/16/24	Provides various prescribed rates for federal income	42
2025-01		tax purposes including applicable federal interest	280G
		rates, the adjusted applicable federal interest rates,	382
		the adjusted federal long-term rate, and the adjusted	467
		federal long-term tax-exempt rate. These rates are	468
		determined as prescribed by § 1274.	482
			483
			1274
			1288
			7520
			7872
Rev. Rul.	12/20/24	Provides tables of covered compensation under	401
<u>2025-02</u>		§401(I)(5)(E) and regs thereunder, for 2025 plan year.	

Revenue Procedures

Rev. Proc.	Date	IRS summary	Code
#	released		Section(s)
# <u>Rev. Proc.</u> <u>2024-1</u>	released 12/30/24	Revised procedures for letter rulings and information letters issued by the Associate Chief Counsel (Corporate), Associate Chief Counsel (Employee Benefits, Exempt Organizations, and Employment Taxes), Associate Chief Counsel (Energy, Credits, and Excise Tax), Associate Chief Counsel (Financial Institutions and Products), Associate Chief Counsel (Income Tax and Accounting), Associate Chief Counsel (International), Associate Chief Counsel (Passthroughs, Trusts and Estates), and Associate Chief Counsel (Procedure and Administration). This	Section(s)
		procedure also contains procedures for determination letters issued by the Large Business and International Division, Small Business/ Self Employed Division, Wage and Investment Division,	

		and Tax Exempt and Government Entities Division.	
		Rev. Proc. 2024-1 is superseded.	
Rev. Proc.	12/30/24	Explains when and how an Associate office within the	
2024-2	, ,	Office of Chief Counsel provides technical advice,	
		conveyed in technical advice memoranda (TAMs). It	
		also explains the rights that a taxpayer has when a	
		field office requests a TAM regarding a tax matter.	
		Rev. Proc. 2024-2 is superseded.	
Rev. Proc.	12/30/24	Updates Rev. Proc. 2024-3 to provide a revised list of	
2024-3	,,	areas under the juris diction of the Associate Chief	
		Counsel (Corporate), Associate Chief Counsel	
		(Financial Institutions and Products), the Associate	
		Chief Counsel (Income Tax and Accounting), Associate	
		Chief Counsel (Passthroughs, Trusts and Estates),	
		Associate Chief Counsel (Energy, Credits, and Excise	
		Tax), Associate Chief Counsel (Procedure and	
		Administration), and Associate Chief Counsel	
		(Employee Benefits, Exempt Organizations, and	
		Employment Taxes) (EEE) relating to issues on which	
		the Internal Revenue Service will not issue letter	
		rulings or determination letters. Areas under the	
		jurisdiction of the Associate Chief Counsel	
		(International) and the Commissioner, Tax Exempt	
		and Government Entities (TEGE) Division are provided	
		in separate revenue procedures.	
Rev. Proc.	12/30/24	Updates Rev. Proc. 2024-4 relating to the types of	
2024-4	, ,	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 the procedures that apply to	
		requests for determination letters and private letter	
		rulings.	
Rev. Proc.	12/30/24	Sets forth procedures for issuing determination	
2024-5		letters on issues under the jurisdiction of the Director,	
		Exempt Organizations (EO) Rulings and Agreements.	
		Specifically, it explains the procedures for issuing	
		determination letters on tax-exempt status (in	
		response to applications for recognition of exemption	
		from Federal income tax under § 501 or § 521 other	
		than those subject to Rev. Proc. 2025-4 (relating to	
		pension, profit-sharing, stock bonus, annuity, and	
		employee stock ownership plans), private foundation	
		status, and other determinations related to tax-	
		exempt organizations. These procedures also apply to	
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		revocation or modification of determination letters.	
		This revenue procedure also provides guidance on the	
		exhaustion of administrative remedies for purposes	
		of declaratory judgment under § 7428. Finally, this	
		revenue procedure provides guidance on applicable	
		user fees for requesting determination letters.	
Rev. Proc.			
2024-6			
Rev. Proc.	12/30/24	Areas in which rulings will not be issued, Associate	
<u>2024-7</u>		Chief Counsel (International).	
Rev. Proc.	12/17/24	Modifies section 7 of Rev. Proc. 2024-23, to modify	174
<u>2024-8</u>		the procedures under section 446 and §1.446-1(e) for	446
		obtaining IRS automatic consent to change methods	
TCJA		of accounting for research or experimental	
		expenditures paid or incurred in tax years beginning	
		after December 31, 2021. The revenue procedure	
		expands the waiver of the eligibility rules in section	
		5.01(1)(d) and (f) of Rev. Proc. 2015-13 to accounting	
		method changes described in section 7.01 of Rev.	
		Proc. 2024-23 that are made for any tax year	
		beginning in 2022, 2023, or 2024. This revenue	
		procedure also permits a taxpayer to make a change	
		under section 7.01 of Rev. Proc. 2024-23 regardless of	
		whether the taxpayer made a change for the same	
		item for any other taxable year beginning in 2022,	
		2023, or 2024. The revenue procedure will be	
		effective for Forms 3115, Application for Change in	
		Accounting Method, filed on or after the date this	
		revenue procedure is released to the public.	
Rev. Proc.			
2024-9			
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Notices

Notice #	Date	IRS summary	Code
	released		Section(s)
Notice 2025-	12/16/24	Sets forth updates on corporate bond monthly	417
<u>01</u>		yield curve, the corresponding spot segment	430
		rates for November 2024 used under	
		§417(e)(3)(D), 24-month average segment rates	
		applicable for December 2024, and 30-year	
		Treasury rates, as reflected by the application of	
		§ 430(h)(2)(C)(iv).	

Notice 2025-	12/14/24	Provides relief from certain penalties imposed	751
02	12,11,21	solely for failure of a partnership with unrealized	6050K
<u> </u>		receivables or inventory items to furnish Part IV	6721
		of Form 8308, Report of a Sale or Exchange of	6722
		Certain Partnership Interests, by January 31,	0722
		2025, to the transferor and transferee in certain	
		transfers of partnership interests occurring in	
Nation 2025	12/27/24	calendar year 2024.	2402
Notice 2025-	12/27/24	Provides transitional relief under provisions of	3403
<u>03</u>		the IRC with respect to reporting of information	3406
		and backup withholding on digital assets for	6045
		digital asset brokers providing trading front-end	6721
		services.	6722
			6651
		Notice refers to <u>TD 10021</u> (12/3024) final regs	6656
		under §6045. Also see Treasury <u>press release of</u>	
		<u>12/27/24</u> .	
Notice 2025-	12/18/24	Treasury and IRS intend to issue proposed regs	482
<u>04</u>		that, for purposes of applying section 482,	
		provide a new simplified and streamlined	
		approach ("SSA") for pricing certain controlled	
		transactions involving baseline marketing and	
		distribution activities. It also provides guidance	
		concerning application of the SSA to in-scope	
		transactions undertaken by parties subject to	
		U.S. tax with respect to those transactions before	
		issuance of those proposed regulations.	
Notice 2025-	12/19/24	Provides the optional 2025 standard mileage	61
<u>05</u>		rates for taxpayers to use in computing	162
		deductible costs of operating an automobile for	213
		business, charitable, medical, or moving expense	217
		purposes. This notice also provides amount	274
		taxpayers must use in calculating reductions to	
		basis for depreciation taken under the business	
		standard mileage rate, and the maximum	
		standard automobile cost that may be used in	
		computing the allowance under a fixed and	
		variable rate plan. Provides the maximum fair	
		market value of employer-provided automobiles	
		first made available to employees for personal	
		use in calendar year 2025 for which employers	
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		may use the fleet-average valuation rule in §1.61-	

21(d)(5)(v) or the vehicle cents-per-mile valuation rule in § 1.61-21(e).	
<u>IR-2024-312</u> (12/19/24)	
Business rate = 70 cents per mile which includes 33 cents per mile for depreciation (up from 67 cents per mile in 2024 and 30 cents for depreciation).	
Medical and moving = 21 cents per mile (same as 2024)	
Charitable = 14 cents per mile as fixed per §170(i).	
For more in use of standard mileage rate, see Rev. Proc. 2019-46.	

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

Ann #	Date	IRS summary	Code
	released		Section(s)
Ann.	12/18/24	On July 19, 2024, Treasury and IRS published proposed	401
<u>2025-02</u>		regulations regarding required minimum distributions	403
		(RMDs) under section 401(a)(9) and related provisions	408
		in the Federal Register (89 FR 58644). The proposed	457
		regs were generally proposed to apply for purposes of	
		determining RMDs for calendar years beginning on or	
		after January 1, 2025. This announcement provides that	
		Treasury and IRS anticipate that certain portions of	
		future regs finalizing the proposed regs will apply	
		beginning in the 2026 distribution calendar year.	

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 <u>news release</u>. 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.

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