



2020: TaxNewsFlash Year in Review

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Looking for a quick way to identify what happened in the federal tax arena last year? Want to see if you missed any recent federal tax developments? Or, just looking for an easy way to find a *TaxNewsFlash* (TNF) on a particular topic of interest from last year?

KPMG LLP has compiled an easy-to-use list of many recent U.S. federal tax developments to help users quickly identify what happened in 2020 in the federal tax arena.

Editions of *TaxNewsFlash* addressing federal legislative, administrative, and judicial tax developments are listed. The list also includes KPMG's special reports, including reports on U.S. responses to COVID-19 and on some potential tax implications of the 2020 elections. It also includes reports with analyses and observations on legislative and administrative developments relating to the 2017 tax law (Pub. L. No. 115-97), commonly called the Tax Cuts and Jobs Act (or "TCJA").

The list is divided into six broad topics: Legislative, Executive Branch / Administrative, Judicial, Treaties / Puerto Rico / Other, 2020 Elections, and KPMG Reports. Most of these topics are further divided into subtopics. Note that:

- Each item includes a link to the underlying *TaxNewsFlash*.
- In most cases, developments are listed in reverse chronological order (i.e., most recent first); however, court cases generally are listed in alphabetical order.
- Developments relating to COVID-19 are marked "COVID-19" in green font while those related to the TCJA are marked "[TCJA]" in red font, for ease of reference.
- Some items (such as KPMG reports) may be listed in multiple places.
- The list does not reference editions of *TaxNewsFlash* on matters other than federal tax developments. It also generally does not include editions of "specialty" *TaxNewsFlash* publications that address matters such as FATCA, exempt organizations, trade and customs, cooperatives, digital taxation, and transfer pricing. See the [TaxNewsFlash U.S. home page](#) for links to these publications.

Coronavirus (COVID-19) tax developments

For KPMG's reports of tax developments in response to the coronavirus (COVID-19), see [Coronavirus \(COVID-19\) tax developments](#). To read more, see [COVID-19: Insights on Tax Impacts](#)

Tax Reform: Developments and analysis guide

This [website](#) links to federal tax developments (including Treasury and IRS guidance and enacted legislation), as well as to KPMG analyses and observations, regarding provisions in the 2017 tax law.

Taxation of the Digitalized Economy

For KPMG's reports on developments concerning the tax treatment of the digital economy, including digital services tax and the taxation of online, remote sales, see [**Taxation of the Digitalized Economy**](#)

Catching Up on Capitol Hill

For more observations regarding developments relevant to business taxation, listen to the [**Catching Up on Capitol Hill**](#) podcast series, which includes podcasts recorded in 2020 as well as more recently.

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Legislative

Enacted Legislation

Dec 30 - [KPMG report: Favorable tax provisions for renewable energy industry enacted](#)

Dec 28 - [President signs year-end funding, **COVID-19** relief legislation; tax provisions are enacted](#)

Dec 23 - [President vetoes defense authorization bill; status of year-end funding and **COVID** relief bill uncertain \[See January 4, 2021 TNF for \[Beneficial ownership reporting requirement in defense authorization veto override\]\(#\)\]](#)

Dec 22 - [Compensation and benefit-related tax provisions in year-end funding and **COVID** relief legislation](#)

Dec 22 - [Year-end funding and **COVID** relief legislation; charitable giving provisions extended, expanded](#)

Dec 21 - [Year-end funding and **COVID** relief legislation; includes important tax measures](#)

Dec 21 - [Proposal to clarify the deductibility of PPP expenses](#)

Jul 10 - [Congress passes unemployment relief for tax-exempt entities \(**COVID-19**\)](#)

Jul 6 - [Extension of PPP loan application deadline enacted \(**COVID-19**\)](#)

Jun 5 - [President signs legislation providing payroll tax deferral for taxpayers with forgiven PPP loans \(**COVID-19**\)](#)

Apr 24 - [President signs PPP funding legislation](#)

Mar 27 - [KPMG report: Tax provisions in the CARES Act \(**COVID-19** “phase 3” response\): Preliminary analysis and observations](#)

Mar 27 - [President signs CARES Act “phase 3” **COVID-19** bill, following House passage](#)

Mar 19 - [President signs “phase 2” coronavirus bill, includes tax relief for paid leave \(**COVID-19**\)](#)

Jan 8 - [Reminder of energy-related excise tax extenders enacted in late 2019](#)

House

Dec 7 - [House passes bill with cannabis tax provisions](#)

Jul 30 - [House passes child care support bill, includes tax provisions \(**COVID-19**\)](#)

Jul 2 - [Congress passes PPP extension bill; House passes infrastructure bill \(**COVID-19**\)](#)

Jun 22 - [House infrastructure bill released, contains tax provisions](#)

May 28 - [House passes bill, payroll tax deferral for taxpayers with forgiven PPP loans \(**COVID-19**\)](#)

May 15 - [House passes **COVID-19**-related legislation \(HEROES Act\)](#)
 May 12 - [COVID-19-related legislation unveiled in House, includes tax proposals](#)
 Apr 23 - [House passes **COVID-19** legislation, with additional Paycheck Protection Program funds](#)
 Mar 23 - [House Democrats release text of “phase 3” bill, response to coronavirus \(**COVID-19**\)](#)
 Mar 23 - [House to unveil “phase 3” bill, response to coronavirus \(**COVID-19**\)](#)
 Mar 17 - [House passes modifications to **COVID-19** bill](#)
 Mar 14 - [House passes bi-partisan bill to address coronavirus \(**COVID-19**\), includes tax credit provisions](#)
 Mar 12 - [House Democrats introduce bill to address coronavirus \(**COVID-19**\); possible tax relief proposals from administration](#)
 Feb 28 - [House passes health-related bill, includes proposed excise tax on vaping products](#)
 Feb 12 - [Ways and Means approves bills concerning investors in medical providers, “surprise” medical bills](#)

Senate

Dec 11 - [Senate passes defense bill with anti-money laundering disclosure provisions](#)
 Aug 26 - [Senate Finance Committee report on syndicated conservation-easement transactions](#)
 Jul 29 - [Compensation and benefits issues in Senate Republican **COVID-19** bills released this week](#)
 Jul 28 - [Senate Republican proposals would limit withholding for remote workers, nexus for employers \(**COVID-19**\)](#)
 Jul 27 - [Senate Republicans release **COVID-19** response bills, with tax provisions](#)
 Jul 22 - [Senate Finance Committee leaders' statement on UK's digital services tax](#)
 Jun 4 - [Senate passes bill, payroll tax deferral for taxpayers with forgiven PPP loans \(**COVID-19**\)](#)
 Apr 21 - [Senate passes **COVID-19** legislation, with additional Paycheck Protection Program funds](#)
 Apr 9 - [Legislation to increase CARES Act funding fails in Senate](#)
 Apr 7 - [Senate to propose additional funding for Paycheck Protection Program this week \(**COVID-19**\)](#)
 Mar 26 - [Senate passes “phase 3” coronavirus \(**COVID-19**\) bill](#)
 Mar 25 - [Senate's “phase 3” coronavirus \(**COVID-19**\) bill; initial impressions of tax provisions](#)
 Mar 25 - [Text of U.S. Senate's “phase 3” coronavirus bill \(**COVID-19**\)](#)
 Mar 22 - [Senate procedural vote fails to advance updated version of “phase 3” **COVID-19** bill](#)
 Mar 20 - [Senator Wyden releases small business bill \(**COVID-19**\)](#)
 Mar 19 - [Senate Republicans release draft “phase 3” coronavirus \(**COVID-19**\) bill, with tax provisions](#)
 Mar 18 - [Senate passes bill including tax relief for paid leave relating to coronavirus \(**COVID-19**\)](#)

Joint Committee on Taxation

May 1 - [JCT summary of current federal tax system \(2020\)](#)
 Apr 23 - [KPMG report: JCT description of employee retention credit, payroll deferral provisions in CARES Act](#)
 Apr 22 - [JCT description of tax provisions in CARES Act](#)
 Jan 16 - [JCT provides list of expiring tax provisions 2020-2029](#)

Executive Branch / Administrative

White House

- Feb 10 - [Trump Administration budget proposals for FY 2021](#)
- Aug 28 - **Notice 2020-65**: [Implementing executive action, employment tax deferral \(COVID-19\)](#)
- Aug 10 - [KPMG report: Initial impressions about presidential memorandum on deferring payroll tax obligations \(COVID-19\)](#)
- Aug 8 - [Executive memorandum: Deferral of collection of payroll taxes \(COVID-19\)](#)

Final Regulations

- Dec 31 - **T.D. 9942**: [Final regulations released to Federal Register: Simplified accounting for small businesses, long-term contracts \[TCJA\]](#)
- Dec 30 - **T.D. 9941**: [Final regulations released to Federal Register: Revenue recognition and timing of income inclusion under section 451 \[TCJA\]](#)
- Dec 28 - **T.D. 9932**: [Final regulations released to Federal Register: Section 162\(m\) deduction limitation on executive compensation \[TCJA\]](#)
- Dec 23 - **T.D. 9942**: [Final regulations: Simplified accounting for small businesses, long-term contracts \(text of regulations\) \[TCJA\]](#)
- Dec 21 - **T.D. 9941**: [Final regulations: Revenue recognition and timing of income inclusion under section 451 \(text of regulations\) \[TCJA\]](#)
- Dec 21 - **T.D. 9932**: [KPMG report: Final regulations, section 162\(m\) deduction limitation on executive compensation \[TCJA\]](#)
- Dec 18 - **T.D. 9932**: [Final regulations: Deduction for employee remuneration in excess of \\$1 million \(text of regulations\) \[TCJA\]](#)
- Dec 18 - **T.D. 9940**: [Final regulations: Misdirected direct-deposit refunds](#)
- Dec 15 - **T.D. 9939**: [Final regulations released to Federal Register: Parking deduction limitations under section 274 \[TCJA\]](#)
- Dec 11 - **T.D. 9928**: [Final regulations: Grandfathered group health plans, health insurance coverage](#)
- Dec 10 - **T.D. 9939**: [KPMG report: Final regulations addressing parking deduction limitations under section 274](#)
- Dec 10 - **T.D. 9921**: [Final regulations released to Federal Register: Source of income for certain sales of personal property, inventory \[TCJA\]](#)
- Dec 9 - **T.D. 9939**: [Final regulations: Qualified transportation and commuting expenses under section 274 \(text of regulations\) \[TCJA\]](#)
- Dec 7 - **T.D. 9937**: [Final regulations: Rollover rules for qualified plan loan offset amounts \[TCJA\]](#)

Dec 4 - **T.D. 9936:** [Final and proposed passive foreign investment company \(PFIC\) regulations \(text of regulations\)](#)

Dec 2 - **T.D. 9935:** [KPMG report: Final regulations under section 1031, like-kind exchanges](#) **[TCJA]**

Nov 30 - **T.D. 9935:** [Final regulations released to Federal Register: Like-kind exchanges](#) **[TCJA]**

Nov 30 - **T.D. 9933:** [Final regulations released to Federal Register: Separately computed UBTI](#) **[TCJA]**

Nov 27 - **T.D. 9912:** [Final regulations: Personal exemption at zero, implications for health plan premium tax credit](#) **[TCJA]**

Nov 27 - **T.D. 9926:** [Final regulations released to Federal Register: Withholding obligations incident to transfers of interests by foreign partners](#) **[TCJA]**

Nov 27 - **T.D. 9934:** [Final regulations released to Federal Register: Coordinating section 245A and section 951A](#) **[TCJA]**

Nov 24 - **T.D. 9922:** [KPMG report: Analysis of final and proposed foreign tax credit regulations](#) **[TCJA]**

Nov 24 - **T.D. 9909:** [KPMG report: Final regulations under sections 245A and 954\(c\)\(6\) and correcting amendments](#) **[TCJA]**

Nov 23 - **T.D. 9935:** [Final regulations: Like-kind exchanges \(text of regulations\)](#) **[TCJA]**

Nov 20 - **T.D. 9934:** [Final regulations: Coordinating section 245A “extraordinary disposition rule” with section 951A “disqualified basis rule” \(text of regulations\)](#) **[TCJA]**

Nov 19 - **T.D. 9933:** [Final regulations: Separately computed UBTI \(text of regulations\)](#) **[TCJA]**

Nov 18 - **T.D. 9923:** [Final regulations: ABLE accounts under section 529A](#)

Nov 5 - **T.D. 9916:** [Final regulations released to Federal Register: Additional first year depreciation deduction under section 168\(k\)](#) **[TCJA]**

Nov 5 - **T.D. 9930:** [Final regulations: Updated life expectancy, distribution period tables for retirement plans \(text of regulations\)](#)

Nov 5 - **T.D. 9919:** [Regulations released to Federal Register: Section 864\(c\)\(8\) treatment, sale of U.S. trade or business partnership interests on look-through basis](#) **[TCJA]**

Nov 3 - **T.D. 9929:** [Final rule on public disclosure of health plan and health insurance coverage information](#)

Nov 2 - **T.D. 9922:** [Final and proposed regulations released to Federal Register: Foreign tax credit \(text of regulations\)](#) **[TCJA]**

Nov 2 - **T.D. 9901:** [KPMG report: Correcting amendments to final regulations, FDII and GILTI \(updated November 2, 2020\)](#) **[TCJA]**

Oct 30 - **T.D. 9901:** [KPMG report: Correcting amendments to final regulations, FDII and GILTI](#) **[TCJA]**

Oct 23 - **T.D. 9927:** [Final regulations released to Federal Register: Consolidated NOLs](#) **[TCJA]**

Oct 21 - **T.D. 9927:** [KPMG report: Final regulations on consolidated NOLs, inclusive of insurance company regulations](#) **[TCJA]**

Oct 19 - **T.D. 9914:** [Final regulations released to Federal Register: Eligible terminated S corporations](#) **[TCJA]**

Oct 16 - **T.D. 9918:** [Final regulations released to Federal Register: Deductions allowed estates, non-grantor trusts](#) **[TCJA]**

Oct 15 - **T.D. 9926:** [KPMG report: Initial impressions of final regulations, withholding and reporting obligations on dispositions of certain partnership interests](#) **[TCJA]**

Oct 13 - **T.D. 9927:** [Final regulations: Consolidated NOLs \(text of regulations released by IRS\)](#) **[TCJA]**

Oct 12 - **T.D. 9922:** [KPMG report: Treasury responds to insurance comments in proposed and final regulations on foreign tax credit](#) **[TCJA]**

Oct 9 - **T.D. 9911:** [Final regulations released to Federal Register: Computing and reporting life insurance reserves](#) **[TCJA]**

Oct 9 - **T.D. 9913:** [Final regulations: "Qualifying relative" and personal exemption amount clarified](#) **[TCJA]**

Oct 8 - **T.D. 9910:** [Final regulations released to Federal Register: BEAT provisions under section 59A](#) **[TCJA]**

Oct 7 - **T.D. 9926:** [Final regulations: Withholding obligations incident to transfers of interests by foreign partners \(text of regulations\)](#) **[TCJA]**

Oct 5 - **T.D. 9922:** [KPMG report: Initial impressions of final and proposed foreign tax credit regulations](#) **[TCJA]**

Oct 5 - **T.D. 9921:** [KPMG report: Final regulations on source of income for certain sales of personal property, including inventory](#) **[TCJA]**

Oct 5 - **T.D. 9924:** [Final regulations released to Federal Register: Federal income tax withholding from employees' wages](#) **[TCJA]**

Oct 2 - **T.D. 9925:** [Final regulations released to Federal Register: Deductibility of meal and entertainment expenses](#) **[TCJA]**

Oct 2 - **T.D. 9925:** [KPMG report: Final regulations on deductibility of meal and entertainment expenses \(initial impressions\)](#) **[TCJA]**

Oct 1 - **T.D. 9923:** [Final regulations: Guidance concerning ABLE accounts \(text of final regulations\)](#) **[TCJA]**

Oct 1 - **T.D. 9924:** [Final regulations: Federal income tax withholding from employees' wages](#) **[TCJA]**

Sep 30 - **T.D. 9925:** [Final regulations: Deductibility of meal and entertainment expenses \(text of regulations\)](#) **[TCJA]**

Sep 29 - **T.D. 9922:** [Final and proposed regulations: Foreign tax credit \(text of regulations\)](#) **[TCJA]**

Sep 29 - **T.D. 9921:** [Final regulations: Source of income for certain sales of personal property, inventory \(text of regulations\)](#) **[TCJA]**

Sep 28 - **T.D. 9920:** [Final regulations: Income tax withholding, periodic retirement and annuity payments](#) **[TCJA]**

Sep 22 - **T.D. 9908:** [KPMG report: Initial impressions of final and proposed regulations, relief concerning repeal of section 958\(b\)\(4\)](#) **[TCJA]**

Sep 21 - **T.D. 9919:** [Final and temporary regulations: Section 864\(c\)\(8\) and tax treatment on sale of U.S. trade or business partnership interests on a look-through basis \(text of regulations\)](#) **[TCJA]**

Sep 21 - **T.D. 9908:** [Final and proposed regulations: Relief provided concerning repeal of section 958\(b\)\(4\) \(text of regulations\)](#) **[TCJA]**

Sep 21 - **T.D. 9916:** [Final regulations: Additional first year depreciation deduction under section 168\(k\) \(text of regulations\)](#) **[TCJA]**

Sep 21 - **T.D. 9918:** [Final regulations: Deductions allowed estates, non-grantor trusts](#) **[TCJA]**

Sep 18 - **T.D. 9917:** [Final regulations: Excise tax on college net investment income \(text of regulations\)](#) **[TCJA]**

Sep 16 - **T.D. 9915:** [Final regulations: Rehabilitation credit and rules coordinating with other credits, released to Federal Register](#) **[TCJA]**

Sep 15 - **T.D. 9914:** [Final regulations: Eligible terminated S corporations](#) **[TCJA]**

Sep 15 - **T.D. 9915:** [Final regulations: Rehabilitation credit and rules coordinating with other credits \(text of regulations\)](#) **[TCJA]**

Sep 15 - **T.D. 9911:** [KPMG report: Final regulations on computing and reporting life insurance reserves \(initial impressions\)](#) **[TCJA]**

Sep 9 - **T.D. 9911:** [Final regulations, Rev. Rul. 2020-19: Computing and reporting life insurance reserves for insurance companies \(text of guidance\)](#) **[TCJA]**

Sep 8 - **T.D. 9905:** [Regulations on business interest expense deduction limitations under section 163\(j\); effective date and reliance clarifications and changes](#) **[TCJA]**

Sep 3 - **T.D. 9905:** [Business interest expense deduction limitations under section 163\(j\), regulations released to Federal Register](#) **[TCJA]**

Sep 3 - **T.D. 9906:** [Final regulations: Nuclear power plant decommissioning](#)

Sep 1 - **T.D. 9910:** [Final regulations: BEAT provisions under section 59A \(text of regulations\)](#) **[TCJA]**

Aug 21 - **T.D. 9909:** [Regulations under sections 245A, 951A, 954; treatment of dividends from foreign corporations \(text of regulations\)](#) **[TCJA]**

Aug 7 - **T.D. 9907:** [Final regulations: Payments made to charities in return for consideration \(text of regulations\)](#) **[TCJA]**

Aug 4 - **T.D. 9905:** [KPMG reports: Initial analysis of regulations, guidance under section 163\(j\)](#)

Jul 31 - **T.D. 9905:** [Final regulations: Rule for swaps with significant nonperiodic payments](#)

Jul 31 - **T.D. 9901:** [KPMG report: Analysis of final FDII regulations](#) **[TCJA]**

Jul 28 - **T.D. 9905:** [Regulations, IRS guidance: Business interest expense deduction limitations under section 163\(j\) \(text of regulations and guidance\)](#) **[TCJA]**

Jun 24 - **T.D. 9899:** [Final regulations: Qualified business income under section 199A; REIT income received by RICs; previously suspended losses; trusts and estates](#)

Jul 21 - **T.D. 9902:** [KPMG report: Initial impressions about final and proposed regulations, high-tax exception under GILTI and subpart F](#) **[TCJA]**

Jul 20 - **T.D. 9902:** [Regulations: GILTI and subpart F high-tax exception \(text of final and proposed regulations\)](#) **[TCJA]**

Jul 10 - **T.D. 9901:** [KPMG report: Initial impressions of final regulations related to deduction for FDII and GILTI under section 250](#) **[TCJA]**

Jul 9 - **T.D. 9901:** [Final regulations: Deduction under section 250, FDII and GILTI \(text of regulations\)](#) **[TCJA]**

Jul 7 - **T.D. 9900:** [KPMG report: Insurance-related measures in consolidated NOL regulations](#)

Jun 24 - **T.D. 9899:** [Final regulations: Qualified business income under section 199A; REIT income received by RICs; previously suspended losses; trusts and estates](#)

May 13 - **T.D. 9897:** [Final regulations: Funding rule under section 385 \(text of regulations\)](#)

Apr 9 - **T.D. 9896:** [KPMG report: Initial impressions of final regulations implementing “anti-hybrid” provisions \(sections 245A\(e\), 267A, and 1503\(d\)\)](#) **[TCJA]**

Apr 7 - **T.D. 9896:** [Regulations: Hybrid arrangements \(text of final and proposed regulations\)](#) **[TCJA]**

Mar 23 - **T.D. 9898:** [Final regulations: Foreign tax credit, and section 901\(m\) “covered asset acquisitions”](#)

Mar 20 - **T.D. 9895:** [Final regulations: Foreign tax credit, section 901\(m\) and “covered asset acquisitions” \(text of regulations\)](#)

Feb 14 - **T.D. 9891:** [Corrections to final regulations, transfers to partnerships with related foreign partners](#)

Feb 4 - **T.D. 9893:** [Final regulations: Employer-provided vehicles, fleet average and cents-per-mile valuation rules](#) **[TCJA]**

Jan 29 - **T.D. 9892:** [Final regulations: Return due dates, extended due date amendments](#)

Jan 23 - **T.D. 9889**: [KPMG report: Analysis and observations about final regulations and future of opportunity zone investments](#) **[TCJA]**

Jan 17 - **T.D. 9891**: [Final regulations: Transfers to partnerships with related foreign partners \(text of regulations\)](#)

Proposed or Temporary Regulations

Dec 29 - **REG-114615-16**: [Proposed regulations: Process, user fee for estate tax closing letter](#)

Dec 4 - **REG-111950-20**: [Final and proposed passive foreign investment company \(PFIC\) regulations \(text of regulations\)](#)

Nov 24 - **REG-101657-20**: [KPMG report: Analysis of final and proposed foreign tax credit regulations](#) **[TCJA]**

Nov 20 - **REG-123652-18**: [Proposed regulations: Special enforcement matters, centralized partnership audit regime](#)

Nov 5 - [Regulations released to Federal Register: Section 864\(c\)\(8\) treatment, sale of U.S. trade or business partnership interests on look-through basis](#) **[TCJA]**

Nov 5 - **REG-106808-19**: [Final regulations released to Federal Register: Additional first year depreciation deduction under section 168\(k\)](#)

Nov 2 - **REG-101657-20**: [Final and proposed regulations released to Federal Register: Foreign tax credit \(text of regulations\)](#) **[TCJA]**

Oct 29 - **REG-119890-18**: [Proposed regulations: Low-income housing credit, average income test](#)

Oct 12 - **REG-101657-20**: [KPMG report: Treasury responds to insurance comments in proposed and final regulations on foreign tax credit](#)

Oct 5 - **REG-101657-20**: [KPMG report: Initial impressions of final and proposed foreign tax credit regulations](#) **[TCJA]**

Sep 29 - **REG-101657-20**: [Final and proposed regulations: Foreign tax credit \(text of regulations\)](#) **[TCJA]**

Sep 22 - **REG-110059-20**: [KPMG report: Initial impressions of final and proposed regulations, relief concerning repeal of section 958\(b\)\(4\)](#) **[TCJA]**

Sep 21 - **REG-110059-20**: [Final and proposed regulations: Relief provided concerning repeal of section 958\(b\)\(4\) \(text of regulations\)](#)

Sep 8 - **REG-107911-18**: [Regulations on business interest expense deduction limitations under section 163\(j\); effective date and reliance clarifications and changes](#) **[TCJA]**

Sep 3 - **REG-107911-18**: [Business interest expense deduction limitations under section 163\(j\), regulations released to Federal Register](#) **[TCJA]**

Aug 21 - **REG-124737-19**: [Regulations under sections 245A, 951A, 954; treatment of dividends from foreign corporations \(text of regulations\)](#) **[TCJA]**

Aug 17 - **REG-116475-19**: [Proposed regulations: Rollover rules for qualified plan loan offset amounts](#) **[TCJA]**

Aug 12 - **REG-107213-18**: [KPMG report: Proposed regulations on carried interest, initial analysis](#) **[TCJA]**

Aug 6 - **REG-107213-18**: [Proposed regulations on "carried interest" \(section 1061\) released to Federal Register](#) **[TCJA]**

Aug 4 - **REG-107911-18**: [KPMG reports: Initial analysis of regulations, guidance under section 163\(j\)](#)

Jul 31 - **REG-107213-18:** [Proposed regulations under section 1061, “carried interest” rules \(text of regulations\)](#) **[TCJA]**

Jul 30 - **REG-132766-18:** [Proposed regulations: Simplified accounting for small businesses, long-term contracts \(text of regulations\)](#) **[TCJA]**

Jul 29 - **REG-112042-19:** [Proposed regulations: Excise taxes on air transportation of persons or property; aircraft management services exemption](#)

Jul 28 - **REG-107911-18:** [Regulations, IRS guidance: Business interest expense deduction limitations under section 163\(j\) \(text of regulations and guidance\)](#) **[TCJA]**

Jul 27 - **REG-111879-20:** [Regulations: Refundable employment tax credits; assessment for erroneous refundable credits](#) **(COVID-19)**

Jul 24 - **REG-111879-20:** [Regulations: Rules for refundable employment tax credits](#) **(COVID-19)**

Jul 21 - **REG-127732-19:** [KPMG report: Initial impressions about final and proposed regulations, high-tax exception under GILTI and subpart F](#) **[TCJA]**

Jul 20 - **REG-127732-19:** [Regulations: GILTI and subpart F high-tax exception \(text of final and proposed regulations\)](#) **[TCJA]**

Jul 10 - **REG-130081-19:** [Proposed regulations: Grandfathered group health plans, group health insurance coverage](#)

Jul 7 - **REG-125716-18:** [KPMG report: Insurance-related measures in consolidated NOL regulations](#)

Jul 2 - **REG-125716-18:** [Regulations: Consolidated net operating losses \(text of regulations\)](#) **[TCJA]**

Jul 1 - **REG-123027-19:** [Proposed regulations: Low-income housing credit compliance-monitoring duties under section 42](#)

Jun 23 - **REG-119307-19:** [KPMG report: Proposed regulations and guidance on qualified transportation fringe benefits](#) **[TCJA]**

Jun 19 - **REG-119307-19:** [Proposed regulations: Qualified transportation and commuting expenses under section 274 \(text of regulations\)](#) **[TCJA]**

Jun 11 - **REG-117589-18:** [Proposed regulations: Limitations on like-kind exchanges](#) **[TCJA]**

Jun 8 - **REG-118997-19:** [Proposed regulations: “Qualifying relative” and personal exemption amount clarified](#) **[TCJA]**

Jun 8 - **REG-109755-19:** [Proposed regulations: Treatment of certain medical care arrangements under section 213](#)

Jun 5 - **REG-122345-18:** [Proposed regulations: Excise tax on excess compensation, parachute payments made by tax-exempt organizations](#) **[TCJA]**

May 29 - **REG-112339-19:** [Proposed regulations on credit for carbon oxide sequestration \(section 45Q\) released to Federal Register](#)

May 28 - **REG-112339-19:** [Proposed regulations: Credit for carbon oxide sequestration under section 45Q](#)

May 26 - **REG-100320-20:** [Proposed regulations: Income tax withholding, periodic retirement and annuity payments](#) **[TCJA]**

May 26 - **REG-124810-19:** [Proposed regulations: Personal exemption at zero, implications for health plan premium tax credit](#) **[TCJA]**

May 21 - **REG-124327-19:** [Proposed regulations: Rehabilitation credit and rules coordinating with other credits](#) **[TCJA]**

May 12 - **REG-104591-18:** [Proposed regulations: Disallowed deductions and information reporting for fines, penalties](#) **[TCJA]**

May 7 - **REG-113295-18:** [Proposed regulations: Deductions allowed estates, non-grantor trusts](#) **[TCJA]**

Apr 7 - **REG-106013-19:** [Regulations: Hybrid arrangements \(text of final and proposed regulations\)](#) **[TCJA]**

Apr 2 - **REG-132529-17:** [KPMG report: Proposed regulations on computing and reporting life insurance reserves for insurance companies](#)

Apr 1 - **REG-132529-17:** [Proposed regulations: Computing and reporting reserves, life insurance companies](#)

Feb 24 - **REG-100814-19:** [Proposed regulations: Deductibility of meal and entertainment expenses](#) **[TCJA]**

Feb 21 - **REG-100814-19:** [Proposed regulations: Deductibility of business meal expenses \(text of regulations\)](#) **[TCJA]**

Feb 11 - **REG-132741-17:** [Proposed regulations: Federal income tax withholding from employee wages](#) **[TCJA]**

Jan 15 - **REG-130700-14:** [Proposed regulations on cloud-computing, digital-content transactions; public hearing scheduled](#)

Jan 10 - **REG-125710-18:** [Proposed regulations: Revised applicability date for regulations under section 382\(h\) related to built-in gain, loss](#)

OIRA

Dec 31 - [Final regulations on limiting business interest expense deductions under section 163\(j\), OIRA review completed](#) **[TCJA]**

Dec 28 - [Final regulations pending OIRA review: "Carried interest" provision under section 1061](#) **[TCJA]**

Dec 28 - [Final regulations pending OIRA review: Credit for carbon oxide sequestration \(section 45Q\)](#)

Dec 21 - [Final regulations pending OIRA review: Domestic production activities deduction for agricultural, horticultural cooperatives](#) **[TCJA]**

Dec 17 - [Final regulations pending OIRA review: Business interest expense deduction limitation under section 163\(j\)](#) **[TCJA]**

Dec 15 - [Final regulations pending OIRA review: Denial of deduction for fines, penalties](#) **[TCJA]**

Dec 14 - [Final regulations under section 451\(b\), OIRA review completed](#) **[TCJA]**

Nov 23 - [Regulations on exception from passive income for foreign insurance companies; OIRA review completed](#) **[TCJA]**

Nov 19 - [Final regulations on like-kind exchanges, OIRA review completed](#) **[TCJA]**

Nov 18 - [Regulations pending OIRA review: Final regulations under section 451\(b\)](#) **[TCJA]**

Oct 29 - [Final regulations pending OIRA review: Like-kind exchanges](#) **[TCJA]**

Oct 22 - [Regulations pending OIRA review: Exception from passive income for foreign insurance companies](#) **[TCJA]**

Oct 12 - [Final regulations on consolidated NOLs, OIRA review completed](#) **[TCJA]**

Sep 23 - [Final regulations pending OIRA review: Consolidated NOLs](#) **[TCJA]**

Sep 22 - [Final and proposed regulations on foreign tax credit; OIRA review completed](#) **[TCJA]**

Sep 17 - [Final regulations on additional first-year depreciation under section 168\(k\), OIRA review completed](#) **[TCJA]**

Sep 9 - [Final regulations, excise tax on college net investment income; OIRA review completed](#) **[TCJA]**

Sep 3 - [Regulations pending OIRA review: Section 168\(k\) final regulations on additional first-year depreciation](#) **[TCJA]**

Sep 1 - [Regulations pending OIRA review: Foreign tax credit](#) **[TCJA]**

Aug 25 - [Final regulations pending OIRA review: Excise tax on college net investment income](#) **[TCJA]**

Aug 24 - [Final regulations: "BEAT" provisions under section 59A, OIRA review completed](#) **[TCJA]**

Aug 8 - [Regulations under section 954, coordinating rules under sections 245A and 951A; OIRA review completed](#) **[TCJA]**

Aug 5 - [Final regulations pending OIRA review: "BEAT" provisions under section 59A](#) **[TCJA]**

Aug 3 - [Status of OIRA review of regulations under 2017 tax law](#) **[TCJA]**

Jul 20 - [Proposed regulations on "carried interest" rules under section 1061; OIRA review completed](#) **[TCJA]**

Jul 17 - [Regulations pending OIRA review: Section 954, and coordinating rules under sections 245A and 951A](#) **[TCJA]**

Jul 14 - [Regulations on limiting business interest expense deductions under section 163\(j\); OIRA review completed](#) **[TCJA]**

Jul 8 - [OIRA review completed: Regulations on high-taxed GILTI exclusion, subpart F income](#) **[TCJA]**

Jul 6 - [Final regulations: Domestic production activities deduction for agricultural, horticultural cooperatives; OIRA review completed](#) **[TCJA]**

Jun 19 - [Proposed regulations, consolidated NOLs: OIRA review completed](#) **[TCJA]**

Jun 17 - [Regulations pending OIRA review: GILTI, high-taxed subpart F income, foreign corporations' E&P](#) **[TCJA]**

Jun 16 - [Regulations pending OIRA review: Limitation of business interest expense deduction under section 163\(j\)](#) **[TCJA]**

Jun 15 - [Final regulations under section 250, deduction for FDII and GILTI; OIRA review completed](#) **[TCJA]**

Jun 9 - [Proposed regulations pending OIRA review: Consolidated NOLs](#) **[TCJA]**

Jun 3 - [Proposed regulations pending OIRA review: "Carried interest" under section 1061](#) **[TCJA]**

May 28 - [OIRA review and expectations for more regulations, under 2017 tax law](#) **[TCJA]**

May 27 - [Final regulations pending OIRA review: Section 250 deduction for FDII and GILTI](#) **[TCJA]**

May 19 - [Final regulations: Domestic production activities deduction for agricultural, horticultural cooperatives \(pending OIRA review\)](#) **[TCJA]**

Apr 23 - [Proposed regulations: Separately computed UBTI \(text of regulations\)](#) **[TCJA]**

Apr 21 - [Proposed regulations concerning like-kind exchanges; OIRA review completed](#) **[TCJA]**

Apr 20 - [Final regulations, section 199A treatment for deductions involving REITs and RICs; OIRA review completed](#) **[TCJA]**

Apr 17 - [Proposed regulations, separately computed UBTI; OIRA review completed](#) **[TCJA]**

Apr 15 - [Proposed regulations pending OIRA review: Separately computed UBTI](#) **[TCJA]**

Mar 26 - [Regulations pending OIRA review: Excise tax on tax-exempt organization compensation](#) **[TCJA]**

Mar 21 - [Proposed regulations, limitation of business interest expense deduction under section 163\(j\); OIRA review completed](#) **[TCJA]**

Mar 20 - [Proposed regulations, denial of deduction for fines, penalties; OIRA review completed](#) **[TCJA]**

Mar 14 - [Regulations pending OIRA review: Credit for carbon oxide sequestration, section 45Q](#)

Mar 13 - [OIRA update: Expectations for issuance of regulations, under 2017 tax law](#) **(TCJA) [TCJA]**

Mar 12 - [Proposed regulations, net operating loss \(NOL\) deduction; OIRA review completed](#) **[TCJA]**

- Mar 6 - [Final regulations pending OIRA review: Section 199A treatment for deductions involving REITs and RICs](#) **[TCJA]**
- Mar 3 - [Regulations on UBTI, separately computed for each trade or business activity; OIRA review completed](#) **[TCJA]**
- Feb 28 - [Regulations implementing “carried interest” measures; OIRA review completed](#) **[TCJA]**
- Feb 27 - [Regulations concerning hybrid dividends and payments; OIRA review completed](#) **[TCJA]**
- Feb 20 - [Proposed regulations pending OIRA review: Like-kind exchanges](#) **[TCJA]**
- Feb 20 - [Proposed regulations pending OIRA review: Net operating loss \(NOL\) deduction](#) **[TCJA]**
- Feb 10 - [Proposed regulations pending OIRA review: Business interest deduction limitation](#) **[TCJA]**
- Feb 5 - [Regulations on business interest limitation under section 163\(j\); OIRA review completed](#) **[TCJA]**
- Feb 4 - [Regulations pending OIRA review: Denial of deduction for fines, penalties](#) **[TCJA]**
- Feb 4 - [Regulations pending OIRA review: UBTI separately computed for each trade or business activity](#) **[TCJA]**
- Jan 15 - [Regulations pending OIRA review: Implementing “carried interest” measures](#) **[TCJA]**
- Jan 14 - [Regulations concerning nuclear decommissioning costs; OIRA review completed](#)

Revenue Rulings

- Dec 3 - [Rev. Rul. 2020-28: Interest rates, tax overpayments and underpayments \(first quarter 2021\)](#)
- Nov 19 - [Rev. Rul. 2020-27: No deduction of eligible expenses for 2020 if reasonable expectation of PPP loan forgiveness](#)
- Nov 5 - [Rev. Rul. 2020-23, Notice 2020-80: Distributions from terminating section 403\(b\) plans](#)
- Oct 19 - [Rev. Rul. 2020-24: Withholding and reporting requirements; payments from qualified plans to state’s unclaimed property funds](#)
- Oct 2 - [Rev. Rul. 2020-21: Fringe benefit aircraft valuations, second half 2020](#)
- Sep 9 - [Final regulations, Rev. Rul. 2020-19: Computing and reporting life insurance reserves for insurance companies \(text of guidance\)](#) **[TCJA]**
- Sep 3 - [Rev. Rul. 2020-18: Interest rates, tax overpayments and underpayments \(fourth quarter 2020\)](#)
- Jun 4 - [Rev. Rul. 2020-13: Interest rates, tax overpayments and underpayments \(third quarter 2020\)](#)
- Apr 20 - [Rev. Rul. 2020-8: KPMG report: Initial impressions of Rev. Rul. 2020-8 and 10-year limitations period, foreign tax credit and NOL carrybacks](#)
- Apr 17 - [Rev. Rul. 2020-8: 10-year limitations period, foreign tax credit and NOL carrybacks](#)
- Feb 28 - [Rev. Rul. 2020-7: No change to interest rates on tax underpayments, overpayments \(second quarter 2020\)](#)
- Feb 10 - [Rev. Rul. 2020-05: Adjustments to basis for life insurance contracts](#) **[TCJA]**
- Jan 29 - [Rev. Rul. 2020-4: Low-income housing credit](#)
- Jan 3 - [Rev. Rul. 2020-2: Covered compensation tables for 2020 plan year](#)

Revenue Procedures

- Dec 29 - [Rev. Proc. 2021-9: Residential living facility safe harbor election under section 163\(j\)](#) **[TCJA]**

Nov 19 - [Rev. Proc. 2020-51](#): Safe harbor for claiming deductions by taxpayers that received PPP loans

Nov 6 - [Rev. Proc. 2020-50](#): Additional first year depreciation deduction; late elections allowed, or elections may be revoked **[TCJA]**

Nov 4 - [Rev. Proc. 2020-48](#): Insurance companies, unpaid loss discount factors for 2020 accident year

Nov 4 - [Rev. Proc. 2020-49](#): Extended relief regarding tax-exempt bonds **(COVID-19)**

Oct 26 - [Rev. Proc. 2020-45](#): Inflation adjustments for 2021, individual taxpayers

Oct 19 - [Rev. Proc. 2020-46](#): Waiver of 60-day rollover requirement for retirement plans, IRAs; updated conditions

Oct 16 - [Rev. Proc. 2020-43](#): Maximum amount allowed to be newly made available for “excepted benefit” HRAs for 2021

Oct 12 - [Rev. Proc. 2020-44](#): Interim guidance, transition from LIBOR and IBOR to alternative reference rates

Sep 8 - [Rev. Proc. 2020-40](#): Extension of plan amendment deadlines, pre-approved plans

Sep 8 - [Rev. Proc. 2020-41](#): Foreign insurance companies; effectively connected net investment income (2019)

Aug 14 - [Rev. Proc. 2020-39](#): Normalization rules for public utilities, 2017 tax law changes (TCJA) **[TCJA]**

Jul 8 - [Rev. Proc. 2020-37](#): Automobile depreciation deduction limits for 2020

Jun 11 - [Rev. Proc. 2020-16](#): Empowerment zone designation extension procedures

Jun 4 - [Rev. Proc. 2020-34](#): Relief for mortgage loans, lease arrangements of certain trusts **(COVID-19)**

May 29 - [Rev. Proc. 2020-15](#): Updated list of countries, deposit interest paid to nonresident aliens

May 26 - [Rev. Proc. 2020-33](#): Income requirements for use by issuers of qualified mortgage bonds, mortgage credit certificates

May 20 - [Rev. Proc. 2020-32](#): HSA inflation-adjusted amounts for 2021

May 7 - [Rev. Proc. 2020-30](#): Relief from creating foreign branch separate units under the dual consolidated loss rules **(COVID-19)**

May 4 - [Rev. Proc. 2020-19](#): Temporary modification to safe harbor for distributions by REITs and RICs **(COVID-19)**

Apr 30 - [Rev. Proc. 2020-29](#): IRS temporary procedures for electronic submission of requests for letter rulings, closing agreements, other advice **(COVID-19)**

Apr 22 - [Rev. Proc. 2020-25](#): KPMG report: Relief for taxpayers to correct, change QIP depreciation methods **[TCJA]**

Apr 21 - [Rev. Proc. 2020-20 and Rev. Proc. 2020-27](#): FAQs: Relief for nonresidents remaining in United States **(COVID-19)**

Apr 17 - [Rev. Proc. 2020-25](#): Depreciation of qualified improvement property

Apr 17 - [Rev. Proc. 2020-22](#): KPMG report: Relief to make or withdraw a real property trade or business or farming business election and certain other elections related to the CARES Act changes to section 163(j)

Apr 13 - [Rev. Proc. 2020-26](#): Safe harbors, loan forbearance programs under CARES Act **(COVID-19)**

Apr 10 - [Rev. Proc. 2020-22](#): Section 163(j) interest expense deduction limitations, elections for real property trade, farming businesses **(COVID-19)**

Apr 10 - [Rev. Proc. 2020-14](#): List of countries eligible for section 911(d)(1) waiver for 2019

Apr 10 - [Rev. Proc. 2020-24](#): KPMG report: Initial impressions of IRS guidance implementing NOL provisions in CARES Act **(COVID-19)**

Apr 9 - [Rev. Proc. 2020-24](#): Guidance on NOL carryback measures from CARES Act **(COVID-19)**

- Apr 8 - [Rev. Proc. 2020-23: Relief for partnerships, allowing amended returns \(COVID-19\)](#)
 Mar 2 - [Rev. Proc. 2020-17: U.S. reporting relief concerning certain tax-favored foreign trusts](#)
 Feb 21 - [Rev. Proc. 2020-13: Guidance for farmers on uniform capitalization rules \[TCJA\]](#)
 Feb 19 - [Rev. Proc. 2020-12: Carbon oxide sequestration credit under section 45Q](#)

Notices

- Dec 22 - [Notice 2021-2: Standard mileage rates for 2021](#)
 Dec 22 - [Notice 2021-3: Extension of relief allowing retirement plan elections, spousal consents to be signed remotely \(COVID-19\)](#)
 Dec 22 - [Notice 2021-4: Extension of temporary dyed fuel tax relief, Wisconsin terminals](#)
 Dec 14 - [Notice 2020-88: Reallocations of section 48A credits under qualifying advanced coal project program](#)
 Dec 11 - [Notice 2020-78: Work opportunity tax credit \(WOTC\) transition relief](#)
 Dec 9 - [Notice 2020-86: Q&A guidance on safe harbor retirement plans](#)
 Nov 24 - [Notice 2020-84: Self-insured health insurance annual fee](#)
 Nov 20 - [Notice 2020-83: Required amendments list \(2020\) for qualified retirement plans and 403\(b\) plans](#)
 Nov 16 - [Notice 2020-82: Contributions to defined benefit plans, extended due date \(COVID-19\)](#)
 Nov 16 - [Notice 2020-75: KPMG report: IRS to respect deduction for elective passthrough entity taxes of various states](#)
 Nov 9 - [Notice 2020-75: Future regulations, deductibility of payments by partnerships and S corporations for state and local income taxes \[TCJA\]](#)
 Nov 5 - [Rev. Rul. 2020-23, Notice 2020-80: Distributions from terminating section 403\(b\) plans](#)
 Oct 26 - [Notice 2020-79: Pension plans, cost-of-living adjustments for 2021](#)
 Oct 2 - [Notice 2020-76: Relief for health coverage information reporting \(now due March 2, 2021\)](#)
 Oct 1 - [Notice 2020-70: Electronic filing of Form 1040-NR allowed in certain instances](#)
 Sep 22 - [Notice 2020-74: More time for drought-affected farmers, ranchers to replace livestock](#)
 Sep 17 - [Notice 2020-73: Deferred applicability dates for foreign currency guidance under section 987 \(income, currency gain or loss of "qualified business unit"\)](#)
 Sep 11 - [Notice 2020-71: Per diem rates, substantiation of employee lodging, meals, incidentals \(2020-2021\)](#)
 Sep 9 - [Notice 2020-66: Medicaid coverage of COVID-19 testing and diagnostic services](#)
 Sep 8 - [Notice 2020-68: Retirement plan Q&As](#)
 Sep 1 - [Notice 2020-69: Future regulations to apply sections 951 and 951A to certain S corporations with accumulated earnings and profits \[TCJA\]](#)
 Aug 31 - [KPMG report: Initial analysis of Notice 2020-65, guidance on employee payroll tax deferral](#)
 Aug 28 - [Notice 2020-65: Implementing executive action, employment tax deferral \(COVID-19\)](#)
 Aug 21 - [Notice 2020-63: New IRS address for vehicle section 30B certifications, reporting](#)
 Aug 13 - [Notice 2020-60: Community newspaper pension plans, alternative minimum funding standards](#)
 Aug 7 - [Notice 2020-55: Postponed deadline, federal excise tax for sports fishing, archery equipment \(COVID-19\)](#)

Aug 6 - [Notice 2020-61: Special rules for single-employer defined benefit pension plans \(COVID-19\)](#)

Aug 6 - [Notice 2020-62: Safe harbor explanations about eligible rollover distributions \(COVID-19\)](#)

Aug 4 - [Notice 2020-59: KPMG reports: Initial analysis of regulations, guidance under section 163\(j\)](#)

Jul 30 - [Notice 2020-58: Rehabilitation credit under section 47, deadline relief \(COVID-19\)](#)

Jul 28 - [Notice 2020-59: Regulations, IRS guidance: Business interest expense deduction limitations under section 163\(j\) \(text of regulations and guidance\)](#)

Jul 9 - [Notice 2020-54: Reporting qualified sick leave, qualified family leave wages \(COVID-19\)](#)

Jul 1 - [Notice 2020-53: Temporary relief, low-income housing credit under section 42 \(COVID-19\)](#)

Jun 29 - [Notice 2020-52: Mid-year amendment to safe harbor section 401\(k\) plan \(COVID-19\)](#)

Jun 23 - [Notice 2020-48: Postponed deadline, federal excise tax for sports fishing, archery equipment \(COVID-19\)](#)

Jun 23 - [Notice 2020-51: Waiver of 2020 required minimum distributions, retirement plans \(COVID-19\)](#)

Jun 19 - [Notice 2020-50: Retirement plan distributions and loans, CARES Act relief \(COVID-19\)](#)

Jun 12 - [Notice 2020-49: Postponed time-sensitive actions, New Markets Tax Credits \(COVID-19\)](#)

Jun 11 - [Notice 2020-46: Employer leave-based donation programs \(COVID-19\)](#)

Jun 10 - [Notice 2020-47: Recommendations for guidance items for 2020-2021 Priority Guidance Plan](#)

Jun 8 - [Notice 2020-44: Self-insured health insurance annual fee](#)

Jun 5 - [Notice 2020-43: Comments requested on tax capital reporting by partnerships, and interim methods provided](#)

Jun 4 - [Notice 2020-39: Relief for qualified opportunity zones and investors \(COVID-19\) \[TCJA\]](#)

Jun 3 - [Notice 2020-42: Temporary relief allowing retirement plan elections, spousal consents to be signed remotely \(COVID-19\)](#)

May 29 - [KPMG report: Initial impressions of Notice 2020-41 and "beginning of construction" under sections 45 and 48 \(COVID-19\)](#)

May 28 - [Notice 2020-35: Postponed deadlines for employment taxes, employee benefit plans, IRAs, HSAs, MSAs, other time-sensitive actions \(COVID-19\)](#)

May 27 - [Notice 2020-41: Extension of safe harbor, "beginning of construction" under sections 45 and 48 \(COVID-19\)](#)

May 15 - [Notice 2020-34: Reference price, natural gas from marginal wells during 2019](#)

May 12 - [Notice 2020-29, Notice 2020-33: Expanded relief for health-related cafeteria plans \(COVID-19\)](#)

Apr 30 - [Notice 2020-32: Deductibility of expenses when loan is forgiven under Paycheck Protection Program \(COVID-19\)](#)

Apr 10 - [Notice 2020-26: KPMG report: Initial impressions of IRS guidance implementing NOL provisions in CARES Act \(COVID-19\)](#)

Apr 10 - [Notice 2020-23: IRS announces extensions for section 1031 "like-kind exchange" deadlines \(COVID-19\)](#)

Apr 9 - [Notice 2020-23: Relief for taxpayers affected by coronavirus pandemic \(COVID-19\)](#)

Mar 31 - [Notice 2020-22: Penalty relief, reduced federal employment tax deposits in anticipation of tax credits \(COVID-19\)](#)

Mar 27 - [Notice 2020-21: Employment tax credits for certain paid leave \(COVID-19\)](#)

Mar 27 - [Notice 2020-20: Extension of time to file returns, make payments of federal gift and generation-skipping transfer taxes \(COVID-19\)](#)

Mar 21 - [Notice 2020-18: Extension of time to file returns, make payments of federal income tax, response to coronavirus](#)

- Mar 18 - [**Notice 2020-17:** Extension of time to make payments of federal income tax, response to coronavirus \(COVID-19\)](#)
- Mar 11 - [**Notice 2020-15:** High-deductible health plans, expenses related to coronavirus \(COVID-19\)](#)
- Mar 6 - [**Notice 2020-14:** Defined benefit plans, 2020 cumulative list for plan qualification requirements](#)
- Feb 21 - [**Notice 2020-13:** Housing expense limit adjustments, foreign locations for 2020](#)
- Feb 19 - [**Notice 2020-12:** Carbon oxide sequestration credit under section 45Q](#)
- Jan 24 - [**Notice 2020-6:** Relief for reporting required minimum distributions for IRAs for 2020](#)
- Jan 17 - [**Notice 2020-4:** Extension of temporary dyed fuel tax relief, Wisconsin terminals](#)
- Jan 15 - [**Notice 2020-8:** Biodiesel, renewable fuel credits for 2018-2019](#)

Announcements

- Oct 20 - [**Announcement 2020-40:** Termination of United States-Hong Kong shipping agreement; effective January 1, 2021](#)
- Sep 22 - [**Announcement 2020-12:** No information reporting by lenders, PPP loans forgiven under CARES Act \(COVID-19\)](#)
- Sep 10 - [**Announcement 2020-17:** Postponed deadline for reporting, paying excise taxes on minimum required contributions](#)
- Aug 21 - [**Announcement 2020-13:** Competent authority arrangement implementing arbitration process, United States-Switzerland tax treaty](#)
- Aug 12 - [**Announcement 2020-14:** Increased user fees for employee plan rulings and determinations](#)
- Jun 1 - [**Announcement 2020-7:** Third six-year cycle pre-approved defined contribution plans](#)
- May 19 - [**Announcement 2020-6:** References to NAFTA in U.S. income tax treaties, replaced with USMCA](#)

IRS Practice Units

- Dec 21 - [IRS practice units: Determining liability allocations; recourse vs. nonrecourse liabilities](#)
- Dec 4 - [IRS practice units: Modified simplified production method; costs for UNICAP purposes](#)
- Oct 1 - [IRS practice unit, cost-sharing arrangements with stock-based compensation](#)
- Sep 18 - [IRS practice unit: Overall foreign and domestic losses](#)
- Sep 15 - [IRS practice unit: Overview of dollar value LIFO](#)
- Sep 10 - [IRS practice unit: Foreign-earned income exclusion, audit techniques](#)
- Aug 27 - [IRS practice unit: Foreign-earned income for purposes of section 911](#)
- Aug 19 - [IRS practice units: LIFO pooling requirements; distributions not from accumulated earnings and profits](#)
- Aug 14 - [IRS practice unit: Section 986\(c\) gain or loss, pre-2017 tax law \(TCJA\)](#)
- Jul 29 - [IRS practice units: Receipts from related CFC; accuracy-related penalties](#)
- Jul 20 - [IRS practice unit: Foreign tax credit limitation and computation](#)
- Jul 14 - [IRS LB&I division releases practice units for IRS examiners](#)
- Jul 6 - [IRS practice unit: Reasonable cause and good faith](#)

Jun 3 - [IRS practice unit: Flow-through entities, effects for individual's foreign tax credit](#)
 May 27 - [IRS practice unit: Taxation of the disposition of U.S. real property interests \(USRPI\) by foreign persons](#)
 May 11 - [IRS practice units: Accounting method changes, foreign earned income exclusion, other topics](#)
 Apr 29 - [IRS practice units: Installment method, substantiation requirements, and foreign currency translation](#)
 Apr 13 - [IRS practice unit: Statute of limitations on assessment of tax](#)
 Apr 8 - [IRS practice unit: Adjustment for overwithholding on Form 1042](#)
 Mar 11 - [IRS practice unit: Computing alternative minimum tax, foreign tax credit \(individual taxpayers\)](#)
 Feb 10 - [IRS practice unit: Interest capitalization for self-constructed assets](#) **[TCJA]**
 Jan 28 - [IRS practice unit: Overview of the enhanced oil recovery tax credit](#)
 Jan 22 - [IRS practice unit: FDAP payments – Statistical sampling and projection procedures](#)

LB&I Directives

Oct 22 - [KPMG report: Comments regarding Rev. Proc. 94-69 and disclosure of change in tax position by large corporate taxpayers after exam is opened](#)
 Oct 9 - [LB&I Focus Guide for FY 2021](#)
 Oct 6 - [New IRS compliance campaign on nonresident alien rental income from U.S. property \(LB&I division\)](#)
 Sep 29 - [New IRS compliance campaign on consolidated NOL carryovers \(LB&I division\)](#)
 Sep 17 - [IRS adds four compliance campaigns \(LB&I division\)](#)
 Sep 16 - [LB&I directive allows examiners to accept R&D expenses as reported on taxpayer financial statements](#)
 Jul 14 - [IRS LB&I division releases practice units for IRS examiners](#)
 Jul 6 - [IRS adds section 965 compliance campaign under TCJA \(LB&I division\)](#) **[TCJA]**
 Jul 2 - [LB&I memo on activities postponed, continued and resuming](#) **(COVID-19)**
 May 1 - [IRS adds new compliance campaign on TCJA \(LB&I division\)](#) **[TCJA]**
 Mar 19 - [LB&I directive: Centralized risking of cases with research issues](#)
 Feb 27 - [IRS adds new compliance campaigns on fuel credit, research issues \(LB&I division\)](#)

Other (including FAQs)

Dec 29 - [TTB announcement: Permanent reduction of excise tax rates for beer and spirits, tax credits for wine](#)
 Dec 21 - [PLR: REIT preferential dividends](#)
 Dec 18 - [TTB guidance, extended tax-free withdrawal of distilled spirits for hand sanitizers](#) **(COVID-19)**
 Dec 14 - [IRS provides tax relief for taxpayers affected by Hurricane Zeta \(Alabama\)](#)
 Dec 11 - [FBAR filings: Deadline extended, again, for individuals with signature authority](#)
 Dec 11 - [TTB reminder: Due date for tax returns, payments for alcohol industry annual filers](#)
 Dec 10 - [Updated FAQs on PPP loans; questionnaires to verify loan eligibility and forgiveness](#)
 Dec 9 - [IRS contacts taxpayers about qualified opportunity fund requirements](#)

Dec 3 - [IRS reminder: Employers must file Forms W-2, other wage statements and provide Forms 1099-NEC by February 1, 2021](#)

Dec 2 - [IRS to conceal sensitive taxpayer data on business tax transcripts](#)

Dec 1 - [Tier 2 tax rates for railroads, no changes for 2021](#)

Nov 20 - [PLR: Income received by REIT from leasing of advertising signs affixed to buildings](#)

Nov 19 - [IRS Priority Guidance Plan for 2020-2021](#)

Nov 19 - [IRS offers clarifications in FAQs addressing interaction of ERC and PPP loans in acquisitions](#)

Nov 16 - [IRS updates FAQs on employee retention credit, interaction with PPP relief \(COVID-19\)](#)

Nov 13 - [IRS request for comments, Regulations that can be rescinded, modified or waived to assist taxpayers with economic recovery \(COVID-19\)](#)

Nov 2 - [Interim final rule: Accessibility to COVID-19 vaccine for individuals in the United States](#)

Oct 22 - [IRS releases draft version of Form 1065 instructions, partner tax basis capital reporting](#)

Oct 22 - [IRS provides temporary procedures allowing fax of material advisor disclosure statement \(COVID-19\)](#)

Oct 19 - [FBAR filing extensions clarified; FBAR for 2019 deemed timely if filed by October 31, 2020](#)

Oct 19 - [IRS field advice memo: Transfer of intangible assets by partners to partnerships intended to shift pre-contribution gain to foreign partners](#)

Oct 19 - [Tax relief for taxpayers in California affected by wildfires](#)

Oct 19 - [Tax relief for taxpayers in Louisiana affected by Hurricane Delta](#)

Oct 9 - [IRS Chief Counsel memo: Fraud penalty in TEFRA syndicated conservation easement cases](#)

Oct 9 - [TTB reminder: Alcohol industry, third quarter excise tax returns due October 14](#)

Oct 9 - [U.S. Treasury, quarterly list of countries cooperating with international boycott \(possible future change\)](#)

Oct 8 - [FAQs to allow fax submission of paper copy of Form 8886 \(reportable transaction disclosures\)](#)

Oct 8 - [Updated FAQs on PPP loans; extension of deferral period \(COVID-19\)](#)

Oct 6 - [FBAR filing deadline; relief for persons affected by recent natural disasters](#)

Oct 5 - [Tax relief for taxpayers in Florida affected by Hurricane Sally](#)

Oct 1 - [IRS expands enforcement focus on abusive micro-captive insurance schemes](#)

Sep 24 - [Tax relief for taxpayers in Alabama affected by Hurricane Sally](#)

Sep 22 - [Treasury announces New Markets Tax Credit \(NMTC\) allocations for 2020, increased to \\$5 billion](#)

Sep 18 - [IRS provides FAQs on "Bridge phase" under Compliance Assurance Process \(CAP\)](#)

Sep 17 - [Tax relief for taxpayers affected by Oregon wildfires](#)

Sep 16 - [IRS release on expedited request for letter rulings \(COVID-19\)](#)

Sep 16 - [Treasury's CDFI Fund to consider NMTC requests for reporting extensions \(COVID-19\)](#)

Sep 14 - [TTB reminder: Extra semi-monthly excise tax periods, five due dates in September 2020 \(COVID-19\)](#)

Sep 11 - [Tax relief for Puerto Rico taxpayers affected by Tropical Storm Isaias](#)

Sep 10 - [IRS expands list of forms and returns available for digital signature \(COVID-19\)](#)

Sep 1 - [IRS launches BBA centralized partnership audit regime webpage](#)

Aug 31 - [IRS provides tax relief to taxpayers affected by Hurricane Laura](#)

Aug 28 - [IRS temporarily allows digital signing of certain forms and returns, including Form 1120 series, e-file authorizations, Form 8832 check-the-box elections](#)

Aug 28 - [PLR: Payments under wireless service agreements constitute rents from real property for REIT](#)

Aug 27 - [IRS opens application period for 2021 Compliance Assurance Process \(CAP\) program](#)

Aug 25 - [IRS provides tax relief for taxpayers affected by California wildfires, Iowa derecho](#)

Aug 24 - [IRS interim guidance on designation of cases for litigation](#)

Aug 24 - [IRS reminder, required minimum distribution rollovers, repayments due by August 31 \(COVID-19\)](#)

Aug 21 - [IRS statement on failure-to-deposit penalties, employers claiming new tax credits \(COVID-19\)](#)

Aug 17 - [IRS makes electronic filing available for Form 1040-X](#)

Aug 17 - [IRS reminder, last round of ITINs expiring in 2020; renewal encouraged to prevent refund delays](#)
 Aug 13 - [IRS reminder of heavy highway use tax deadline, August 31](#)
 Aug 12 - [IRS adds new FAQ on like-kind exchanges and deadlines \(COVID-19\)](#)
 Aug 12 - [FAQs on PPP loans; payments of fees and health benefits \(COVID-19\)](#)
 Aug 4 - [FAQs address PPP loan forgiveness issues \(COVID-19\)](#)
 Aug 3 - [IRS issues FAQs on leave-sharing plans \(COVID-19\)](#)
 Aug 3 - [IRS updated FAQs on retirement plan distribution rules, partial terminations \(COVID-19\)](#)
 Jul 31 - [TTB resources: Distilled spirits plant, resources for determining excise tax owed](#)
 Jul 31 - [IRS updates FAQs on deferral of employment tax deposits, payments \(COVID-19\)](#)
 Jul 30 - [IRS concept unit on accuracy-related penalties, tax professionals urge caution](#)
 Jul 29 - [IRS's temporary procedure for filing Form 3115, accounting method changes \(COVID-19\)](#)
 Jul 27 - [IRS offers tax relief for Michigan storm and Utah earthquake victims](#)
 Jul 20 - [PLR: Taxable REIT subsidiary found not operating a disqualifying healthcare facility](#)
 Jul 17 - [U.S. Treasury, quarterly list of countries cooperating with international boycott \(no changes\)](#)
 Jul 16 - [U.S. Treasury awards \\$3.548 billion in New Markets Tax Credit \(NMTC\) allocations](#)
 Jul 15 - [IRS closures of several P.O. Box addresses for business tax payments including employment tax payments](#)
 Jul 15 - [IRS notification regarding delay in processing advance payment of employer credits](#)
 Jul 14 - [Proposed changes to Form 1065 for partnerships with international tax items](#)
 Jul 14 - [U.S. investigation of French digital services tax; additional 25% customs duties suspended until January 2021](#)
 Jul 7 - [IRS memorandum for TE/GE employees, modified examination timelines \(COVID-19\)](#)
 Jul 6 - [IRS provides FAQs on treatment of certain payments to health care providers \(COVID-19\)](#)
 Jun 29 - [FAQs on PPP loans, maturity of loans \(COVID-19\)](#)
 Jun 29 - [New FAQs on faxing refund claims, NOL carrybacks under CARES Act \(COVID-19\)](#)
 Jun 29 - [National Taxpayer Advocate report to Congress identifying taxpayer challenges \(COVID-19\)](#)
 Jun 26 - [IRS updated FAQs on deferral of employment tax deposits, payments \(COVID-19\)](#)
 Jun 25 - [IRS offers settlement for docketed Tax Court cases involving conservation easement transactions](#)
 Jun 24 - [TTB release: Extension of relief from notice requirement for destruction of beer \(COVID-19\)](#)
 Jun 24 - [U.S. Treasury relief, reduced assessments from banks paid to Comptroller of Currency \(COVID-19\)](#)
 Jun 23 - [IRS updated FAQs on employee retention credit \(COVID-19\)](#)
 Jun 23 - [Tax relief for taxpayers affected by April storms in Mississippi, South Carolina, Tennessee](#)
 Jun 19 - [Treasury Secretary seeks "pause" in OECD Pillar 1 discussions of digital economy](#)
 Jun 19 - [Tobacco industry's special occupation tax due July 1](#)
 Jun 17 - [PPP loan-forgiveness application forms \(COVID-19\)](#)
 Jun 17 - [IRS Services and Enforcement employees continue to accept, transmit documents by email \(COVID-19\)](#)
 Jun 17 - [Tax impacts for infrastructure \(COVID-19\)](#)
 Jun 15 - [Updated FAQs, relief for nonresidents and foreign business employees affected by travel disruptions \(COVID-19\)](#)
 Jun 12 - [PLR: REIT's gross income includes section 481\(a\) adjustments from depreciation, amortization changes](#)
 Jun 4 - [Extension of QI/WP/WT certification due date](#)
 Jun 2 - [United States launches investigation of digital services taxes](#)
 Jun 1 - [TTB final regulations: Excise taxes on alcoholic beverages](#)
 May 28 - [IRS provides FAQs on treatment of NOL carrybacks and AMT by C corporations \(COVID-19\)](#)
 May 28 - [IRS provides FAQs for individuals claiming the "medical condition exception" in 2020 \(COVID-19\)](#)
 May 28 - [FAQs on "Main Street Lending Program" \(COVID-19\)](#)

May 27 - [Updated FAQs on employee retention credit and PPP repayments](#)

May 21 - [U.S. Labor Department, ERISA rule allows retirement plan information to be provided electronically](#)

May 19 - [PLR: REIT's retirement facilities not health care facilities, TRS can provide residential services](#)

May 18 - [TTB guidance, tax-free withdrawal of distilled spirits for hand sanitizers \(COVID-19\)](#)

May 18 - [IRS fact sheet, tax credits for COVID-19-related paid leave](#)

May 18 - [Treasury provides PPP loan forgiveness form, instructions](#)

May 15 - [IRM update, addressing CARES Act provisions concerning net operating losses and minimum tax credits](#)

May 15 - [IRS provides FAQs on aviation excise tax holiday under CARES Act](#)

May 13 - [FAQs for PPP borrowers, safe harbor from SBA audit for "good faith" certification](#)

May 12 - [Renewable electricity, refined coal production inflation factors, reference prices for 2020](#)

May 8 - [IRS updates FAQs on employee retention credit, treatment of health plan expenses and PPP repayments](#)

May 7 - [IRS releases FAQs on emergency relief grants to students being excluded from income \(COVID-19\)](#)

May 7 - [Tax relief for taxpayers affected by early February 2020 storms in Oregon](#)

May 6 - [New deadline of May 14 to repay Paycheck Protection Program \(PPP\) loans for SBA "good faith" certification](#)

May 5 - [Employer retention credit can be claimed if Paycheck Protection Program \(PPP\) loan repaid by May 7 \(COVID-19\)](#)

May 4 - [IRS relief regarding tax-exempt bonds \(COVID-19\)](#)

May 4 - [TTB release: FAQs on destruction of beer, recovery of taxes paid \(COVID-19\)](#)

Apr 30 - [IRS adds new FAQs on faxing refund claims, NOL carrybacks under CARES Act \(COVID-19\)](#)

Apr 30 - [FAQs on "Main Street" lending program \(COVID-19\)](#)

Apr 29 - [IRS updates, expands FAQs on employee retention credit \(COVID-19\)](#)

Apr 29 - [Extension of healthcare, health plan coverage, employee benefit plan timeframes \(COVID-19\)](#)

Apr 28 - [IRS adds to FAQs on postponed tax return filing, paying deadlines](#)

Apr 24 - [Treasury issues guidance on Paycheck Protection Program \(PPP\); Trump signs PPP funding legislation](#)

Apr 23 - [IRS expands FAQs on postponed tax return filing, paying deadlines](#)

Apr 23 - [IRS provides FAQs on NOL carrybacks for taxpayers with section 965 inclusions \[TCJA\]](#)

Apr 23 - [Treasury releases updated FAQs on Paycheck Protection Program](#)

Apr 22 - [FAQs on payroll support for air carriers and contractors \(COVID-19\)](#)

Apr 20 - [Excise tax relief, distilled spirits used to produce hand sanitizers \(COVID-19\)](#)

Apr 20 - [Section 45K: Nonconventional source production credit, reference price for 2019](#)

Apr 17 - [IRS FAQs on tax credits for required paid leave provided employees by SMEs \(COVID-19\)](#)

Apr 17 - [IRS expands FAQs on faxing refund claims, NOL carrybacks under CARES Act \(COVID-19\)](#)

Apr 15 - [LB&I activities that are temporarily suspended, continued \(COVID-19\)](#)

Apr 13 - [IRS provides Q&As on "quick refunds" process for NOL carrybacks under CARES Act \(COVID-19\)](#)

Apr 13 - [IRS cautions certain mechanisms for requesting taxpayer records not available \(COVID-19\)](#)

Apr 13 - [IRS issues FAQs on deferral of employment tax deposits and payments \(COVID-19\)](#)

Apr 10 - [IRS updates FAQs on postponed tax return filing, paying deadlines \(COVID-19\)](#)

Apr 10 - [IRS re-issues Form 941 to address employee retention credit \(COVID-19\)](#)

Apr 8 - [IRS statement on corporate tax refunds \(COVID-19\)](#)

Apr 8 - [U.S. Treasury quarterly list, countries cooperating with international boycott \(no changes\)](#)

Apr 7 - [Treasury guidance, Q&As on loan program for air carriers, eligible businesses \(COVID-19\)](#)

Apr 6 - [IRS Appeals to temporarily accept, transmit documents by email \(COVID-19\)](#)

Apr 2 - [Treasury "fact sheet" on lending programs under CARES Act](#)

Apr 1 - [Postponed payment, reporting date for TTB excise taxes \(COVID-19\)](#)

- Mar 31 - [IRS provides Q&As on employee retention credit \(COVID-19\)](#)
- Mar 31 - [Draft IRS form, instructions for claiming advance payment of employer credits \(COVID-19\)](#)
- Mar 31 - [FAQs on employee retention credit in CARES Act \(COVID-19\)](#)
- Mar 31 - [IRS Services and Enforcement employees to accept, transmit documents by email \(COVID-19\)](#)
- Mar 30 - [PLRs: Parking revenue qualifies as rents from real property for REITs](#)
- Mar 27 - [IRS suspends certain administrative procedures \(COVID-19\)](#)
- Mar 26 - [U.S. Labor Department, additional guidance on paid sick leave, expanded FMLA \(COVID-19\)](#)
- Mar 25 - [New FAQs from IRS concerning QI / WP / WT](#)
- Mar 25 - [IRS extends time for certain financial institutions to file Form 8966, "FATCA Report" \(COVID-19\)](#)
- Mar 25 - [IRS suspends key compliance programs, responding to coronavirus \(COVID-19\)](#)
- Mar 24 - [U.S. Labor Department: Guidance about paid sick leave, expanded FMLA \(COVID-19\)](#)
- Mar 24 - [IRS provides FAQs on postponed tax return filing, paying deadlines \(COVID-19\)](#)
- Mar 20 - [Treasury expected to announce tax return filing extension \(COVID-19\)](#)
- Mar 20 - [Reminder of opportunity: payroll offsets using R&D tax credits \(COVID-19\)](#)
- Mar 20 - [PLR: Lease rights constitute real property for REIT purposes](#)
- Mar 19 - [PLR: REIT's operation of cold storage warehouses, treatment of amounts received for providing space and freezing](#)
- Mar 19 - [TTB guidance: Excise tax relief, distilled spirits used to produce hand sanitizers \(responding to COVID-19\)](#)
- Mar 13 - [AOD 2020-1: IRS nonacquiescence in payroll tax refund, professional employment organizations](#)
- Mar 6 - [IRS offers tax relief, taxpayers affected by tornadoes in Tennessee](#)
- Mar 6 - [IRS update to 2019-2020 priority guidance plan \(second quarter\)](#)
- Mar 5 - [SEC regulatory relief for companies affected by coronavirus](#)
- Feb 27 - [Former KPMG tax professional named National Taxpayer Advocate](#)
- Feb 21 - [IRS releases updated instructions for Form 1065 \(2019\)](#)
- Feb 19 - [IRS reminder: Revised Form W-4, new filing addresses for Form 941](#)
- Feb 7 - [PLR: Reimbursement payments, qualifying income for REIT's 95% income test only](#)
- Feb 7 - [U.S. Treasury quarterly list, countries cooperating with international boycott \(no changes\)](#)
- Jan 31 - [IRS update on "micro-captive insurance transactions"](#)
- Jan 27 - [IRS reminder: First oil spill liability tax due by January 29, 2020](#)
- Jan 22 - [IRS posts "training materials" on the 2017 U.S. tax law \[TCJA\]](#)
- Jan 21 - [IRS guidance on Form 8038-CP for bond issuers requesting tax credit payments](#)
- Jan 17 - [IRS to consider relief from double taxation related to section 965 repatriation](#)
- Jan 17 - [Inflation adjustment factors, Indian coal production credits for 2018 and 2019](#)
- Jan 16 - [IRS to restore sequestered funds \(AMT only\) to businesses pursuant to OMB determination](#)
- Jan 8 - [IRS National Taxpayer Advocate report for 2019](#)
- Jan 6 - [TTB reminder, federal excise tax return filing dates for 2020](#)
- Jan 2 - [IRS releases annual revenue procedures for 2020](#)

Judicial

Supreme Court

Jun 22 - **Altera Corp. v. Commissioner**: [U.S. Supreme Court denies certiorari, appeal from Ninth Circuit upholding cost-sharing regulations as valid](#)

May 4 - **CIC Services LLC v. IRS**: [U.S. Supreme Court grants certiorari in challenge to IRS notice and compliance with Administrative Procedure Act](#)

Jan 21 - **Lowe's Home Centers, LLC v. Dep't of Revenue**: [Washington State: Home improvement retailer entitled to bad debt deduction \(court decision\)](#)

Feb 25 - **Rodriguez v. FDIC**: [U.S. Supreme Court: Tax refund dispute when no tax allocation agreement of corporate members](#)

Feb 10 - **South Dakota v. Wayfair, Inc.**: [KPMG report: Nexus, taxation of remote sales, marketplace facilitators \(GA, NE, NC, WV\)](#)

Jan 27 - **South Dakota v. Wayfair, Inc.**: [KPMG report: Remote sellers and marketplace facilitators update \(AR, GA, LA, NC\)](#)

Jan 20 - **South Dakota v. Wayfair, Inc.**: [KPMG report: Remote sellers and marketplace facilitators update \(D.C., Georgia, Iowa, Kansas, Maryland, Nebraska\)](#)

Jan 13 - **South Dakota v. Wayfair, Inc.**: [KPMG report: Remote sellers and marketplace facilitators update \(Alaska, Illinois\)](#)

Jan 6 - **South Dakota v. Wayfair, Inc.**: [KPMG report: Sales tax obligations of marketplace facilitators \(Michigan, Missouri, Florida\)](#)

Circuit Court

Jan 14 - **Arlin Geophysical Co. v. United States**: [Tenth Circuit: No redemption rights following sales to enforce federal tax liens](#)

Jul 8 - **BNSF Railway Co. v. Oregon Dept. of Revenue**: [Ninth Circuit: Oregon's taxation of railroad intangible property held discriminatory](#)

May 13 - **Champions Retreat Golf Founders, LLC v. Commissioner**: [Eleventh Circuit: Conservation easement on golf course eligible for charitable deduction](#)

May 20 - **CSX Transportation, Inc. v. South Carolina Dep't of Revenue**: [Fourth Circuit: Real property tax impermissibly discriminates against railroads \(South Carolina\)](#)

Sep 1 - **McKenny v. United States**: [Eleventh Circuit: Settlement proceeds not return of capital, but taxable income](#)

Jun 18 - **Organic Cannabis Foundation, LLC v. Commissioner**: [Ninth Circuit: Mailbox rule not applicable for then-ineligible private delivery service](#)

Aug 12 - **Perkins v. Commissioner**: [Second Circuit: Income from gravel mined on Indian tribal land, taxable](#)

District Court

Feb 27 - **Vitol, Inc. v. United States:** [Federal district court: No alternative tax credit under section 6426 for butane](#)

Tax Court

Jan 8 - **Adams Challenge (UK) Ltd. v. Commissioner:** [U.S. Tax Court: UK entity's income from work on U.S. outer continental shelf held taxable](#)

Jan 6 - **Belair Woods, LLC v. Commissioner:** [U.S. Tax Court: Requirement for IRS supervisory approval before penalty assessments](#)

Jan 21 - **Chadwick v. Commissioner:** [U.S. Tax Court: IRS written supervisory approval required, trust fund recovery penalty under section 6672](#)

Nov 18 - **The Coca-Cola Co. v. Commissioner:** [U.S. Tax Court: Transfer pricing adjustments, deficiencies upheld](#)

Sep 9 - **Fowler v. Commissioner:** [U.S. Tax Court: Timely e-filed return triggers limitations period, even when initially rejected by IRS](#)

Jan 16 - **Laidlaw's Harley Davidson Sales, Inc. v. Commissioner:** [U.S. Tax Court: Written supervisory approval for penalty required before first formal communication to taxpayer](#)

May 12 - **Oakbrook Land Holdings, LLC v. Commissioner:** [U.S. Tax Court: Regulations on charitable donation of conservation easement upheld as valid](#)

Feb 18 - **Populous Holdings, Inc. v. Commissioner:** [KPMG report: Contractor's "substantial rights" for research tax credit \(U.S. Tax Court\)](#)

Jun 2 - **Sage v. Commissioner:** [U.S. Tax Court: Transfers of real estate to liquidating trusts not bona fide dispositions](#)

Aug 26 - **TGS-NOPEC Geophysical Co. v. Commissioner:** [U.S. Tax Court: Pre-TCJA section 199 deduction claimed for processed seismic data](#)

Aug 31 - **Thompson v. Commissioner:** [U.S. Tax Court: IRS supervisory approval for penalty assessment](#)

Jan 6 - **Tribune Media Co. v. Commissioner:** [U.S. Tax Court: Requirement for IRS supervisory approval before penalty assessments](#)

May 5 - **Whirlpool Financial Corp. v. Commissioner:** [U.S. Tax Court: U.S. taxpayer realized subpart F income on sales of appliances manufactured in Mexico](#)

Other

Jul 2 - **Bank of America Corp. v. United States:** [Federal Circuit: Jurisdiction for tax overpayment interest claims](#)

May 21 - **California Ridge Wind Energy, LLC v. United States:** [Federal Circuit: Section 1603 grants for wind energy firms, development fees not established](#)

Apr 23 - **General Mills, Inc. v. United States:** [Federal Circuit: Refunds claims for underpayment interest denied, not timely filed within special six-month period](#)

Jan 27 - **The National Association of Manufacturers v. United States:** [U.S. trade court: "Substitution drawbacks" of wine companies](#)

Treaties / Puerto Rico / Other

Dec 9 - [Relief for taxpayers affected by September 2020 storm and flooding \(Puerto Rico\)](#)

Aug 21 - **Announcement 2020-13:** [Competent authority arrangement implementing arbitration process, United States-Switzerland tax treaty](#)

Jun 16 - [Puerto Rico: Additional economic relief, tax measures \(COVID-19\)](#)

May 19 - **Announcement 2020-6:** [References to NAFTA in U.S. income tax treaties, replaced with USMCA](#)

Apr 24 - [Puerto Rico: Pending legislative proposals, economic and tax relief \(COVID-19\)](#)

Mar 26 - [Puerto Rico: Additional extension of deadlines, tax relief relating to coronavirus \(COVID-19\)](#)

Mar 26 - [Puerto Rico: Extended tax return filing, tax payment dates \(table format\) \(COVID-19\)](#)

Mar 17 - [Puerto Rico: Tax deadline extensions, response to coronavirus \(COVID-19\)](#)

Feb 7 - [Puerto Rico: Transition to "SURI" \(Internal Revenue Integrated System\), updates](#)

Jan 29 - [Puerto Rico: Deductible expenses, alternative basic or alternative minimum tax for 2019](#)

Jan 23 - [IRS offers tax relief for taxpayers affected by Puerto Rico earthquakes](#)

Jan 9 - [Puerto Rico: Tax relief for taxpayers affected by January 2020 earthquakes](#)

2020 Elections

Nov 23 - [Janet Yellen to be U.S. Treasury Secretary](#)

Nov 11 - [KPMG report: Election results so far; preliminary observations regarding effect on future tax agenda](#)

Oct 22 - [KPMG report: Tax proposals \(FAQs\) of Biden and Trump campaigns](#)

Sep 28 - [KPMG report: Trump campaign's tax proposals \(FAQs\)](#)

Sep 18 - [KPMG report: Biden's tax proposals \(FAQs, updated September 18\)](#)

Sep 14 - [KPMG report: Biden's tax proposals \(FAQs updated September 14\)](#)

Aug 24 - [KPMG report: Biden's tax proposals \(updated FAQs\)](#)

Aug 4 - [KPMG report: Biden's tax proposals \(FAQs\)](#)

KPMG Reports

- Dec 30 - [KPMG report: Favorable tax provisions for renewable energy industry enacted](#)
- Dec 29 - [KPMG report: Accounting and reporting implications of the CARES Act \(updated for December 2020 legislation\)](#)
- Dec 28 - [KPMG report: President signs year-end funding, **COVID-19** relief legislation; tax provisions are enacted](#)
- Dec 22 - [KPMG report: Compensation and benefit-related tax provisions in year-end funding and **COVID** relief legislation](#)
- Dec 22 - [KPMG report: Year-end funding and **COVID** relief legislation; charitable giving provisions extended, expanded](#)
- Dec 21 - [KPMG report: Final regulations, section 162\(m\) deduction limitation on executive compensation **\[TCJA\]**](#)
- Dec 16 - [KPMG report: SEC comments on accounting for income taxes](#)
- Dec 10 - [KPMG report: Final regulations addressing parking deduction limitations under section 274](#)
- Dec 7 - [KPMG report: Accounting for income taxes, considerations of attribute reduction on emergence from bankruptcy](#)
- Dec 2 - [KPMG report: Final regulations under section 1031, like-kind exchanges **\[TCJA\]**](#)
- Dec 2 - [KPMG report: Separately computed UBTI, analysis of final regulations **\[TCJA\]**](#)
- Nov 30 - [KPMG report: IRS partnership enforcement ramps up](#)
- Nov 24 - [KPMG report: Analysis of final and proposed foreign tax credit regulations **\[TCJA\]**](#)
- Nov 24 - [KPMG report: Final regulations under sections 245A and 954\(c\)\(6\) and correcting amendments **\[TCJA\]**](#)
- Nov 23 - [KPMG report: Personal tax planning guide for 2021](#)
- Nov 16 - [KPMG report: IRS to respect deduction for elective passthrough entity taxes of various states](#)
- Nov 11 - [KPMG report: Election results so far; preliminary observations regarding effect on future tax agenda](#)
- Nov 9 - [KPMG report: Modifications to LIBOR-related contracts](#)
- Nov 9 - [KPMG report: New proposed regulations on average income test](#)
- Nov 4 - [KPMG report: Year-end deadline to remove mandatory section 162\(m\) delay provisions in deferred compensation arrangements](#)
- Nov 2 - [KPMG report: Correcting amendments to final regulations, FDII and GILTI \(updated November 2, 2020\)](#)
- Nov 2 - [KPMG report: Special considerations for late year like-kind exchanges](#)
- Oct 30 - [KPMG report: Correcting amendments to final regulations, FDII and GILTI **\[TCJA\]**](#)
- Oct 22 - [KPMG report: Tax proposals \(FAQs\) of Biden and Trump campaigns](#)
- Oct 22 - [KPMG report: Comments regarding Rev. Proc. 94-69 and disclosure of change in tax position by large corporate taxpayers after exam is opened](#)
- Oct 21 - [KPMG report: Final regulations on consolidated NOLs, inclusive of insurance company regulations **\[TCJA\]**](#)
- Oct 19 - [KPMG report: IRS compliance campaign spotlights deduction of success-based fees](#)

Oct 15 - [KPMG report: Initial impressions of final regulations, withholding and reporting obligations on dispositions of certain partnership interests \[TCJA\]](#)

Oct 12 - [KPMG report: Summary and initial analysis of Pillar One Blueprint](#)

Oct 12 - [KPMG report: Summary and initial analysis of Pillar Two Blueprint](#)

Oct 12 - [KPMG report: Treasury responds to insurance comments in proposed and final regulations on foreign tax credit \[TCJA\]](#)

Oct 6 - [KPMG report: IRS expanded enforcement focus on abusive micro-captive insurance companies](#)

Oct 5 - [KPMG report: Initial impressions of final and proposed foreign tax credit regulations \[TCJA\]](#)

Oct 5 - [KPMG report: Final regulations on source of income for certain sales of personal property, including inventory \[TCJA\]](#)

Oct 5 - [KPMG report: Practical guide to tax credit ordering and usage rules](#)

Oct 2 - [KPMG report: Final regulations on deductibility of meal and entertainment expenses \(initial impressions\) \[TCJA\]](#)

Sep 28 - [KPMG report: Trump campaign's tax proposals \(FAQs\)](#)

Sep 28 - [KPMG report: Accounting for income taxes considerations of final regulations](#)

Sep 23 - [KPMG report: Initial impressions of final regulations, excise tax on college net investment income \[TCJA\]](#)

Sep 22 - [KPMG report: Initial impressions of final and proposed regulations, relief concerning repeal of section 958\(b\)\(4\) \[TCJA\]](#)

Sep 18 - [KPMG report: Biden's tax proposals \(FAQs, updated September 18\)](#)

Sep 15 - [KPMG report: Final regulations on computing and reporting life insurance reserves \(initial impressions\) \[TCJA\]](#)

Sep 14 - [KPMG report: New safe harbor in proposed like-kind exchange regulations \[TCJA\]](#)

Sep 14 - [KPMG report: Proposed regulations define "real property" for like-kind exchanges \[TCJA\]](#)

Sep 14 - [KPMG report: Biden's tax proposals \(FAQs updated September 14\)](#)

Sep 3 - [KPMG report: Highlights of final BEAT regulations under section 59A \[TCJA\]](#)

Sep 3 - [KPMG report: Regulations under sections 245A, 951A, 954 \(GILTI\); treatment of dividends from foreign corporations \[TCJA\]](#)

Sep 1 - [KPMG report: Telemedicine and tax \(COVID-19\)](#)

Aug 31 - [KPMG report: Initial analysis of Notice 2020-65, guidance on employee payroll tax deferral](#)

Aug 24 - [KPMG report: Biden's tax proposals \(updated FAQs\)](#)

Aug 17 - [KPMG report: Proposed regulations on qualified parking deductions \[TCJA\]](#)

Aug 13 - [KPMG report: Analysis of final and proposed regulations, high-tax exception under GILTI and subpart F \[TCJA\]](#)

Aug 12 - [KPMG report: Proposed regulations on carried interest, initial analysis \[TCJA\]](#)

Aug 10 - [KPMG report: Initial impressions about presidential memorandum on deferring payroll tax obligations \(COVID-19\)](#)

Aug 10 - [KPMG report: Deposits of federal employment taxes for equity-related transactions](#)

Aug 10 - [KPMG report: IRS addresses settlement period for stock options](#)

Aug 10 - [KPMG report: Taxation of advance sales of future mineral production](#)

Aug 5 - [KPMG reports: Initial analysis of regulations, guidance under section 163\(j\) \(printable version\) \[TCJA\]](#)

Aug 5 - [KPMG report: Tax and trade considerations for U.S. inbound investment](#)

Aug 4 - [KPMG report: Biden's tax proposals \(FAQs\)](#)

Aug 4 - [KPMG report: Tax issues that banks are facing due to COVID-19](#)

Aug 4 - [KPMG reports: Initial analysis of regulations, guidance under section 163\(j\) \[TCJA\]](#)

Jul 31 - [KPMG report: Analysis of final FDII regulations \[TCJA\]](#)

Jul 21 - [KPMG report: Initial impressions about final and proposed regulations, high-tax exception under GILTI and subpart F \[TCJA\]](#)

Jul 10 - [KPMG report: Initial impressions of final regulations related to deduction for FDII and GILTI under section 250 \[TCJA\]](#)

Jul 10 - [KPMG report: IRS reaffirms property owned by tax equity partnership is not public utility property \(PLR\)](#)

Jul 7 - [KPMG report: Insurance-related measures in consolidated NOL regulations \[TCJA\]](#)

Jun 23 - [KPMG report: Proposed regulations and guidance on qualified transportation fringe benefits \[TCJA\]](#)

Jun 22 - [KPMG report: Qualified opportunity zone rules, as of June 2020 \[TCJA\]](#)

Jun 18 - [KPMG report: Proposed regulations on carbon oxide sequestration credit, clarification provided](#)

Jun 8 - [KPMG report: IRS extends tax credit timelines for renewable energy projects](#)

Jun 5 - [KPMG report: IRS "GLAM" requiring holding-period segmentation when cash or property contributed to corporation without issuance of shares](#)

May 29 - [KPMG report: Initial impressions of Notice 2020-41 and "beginning of construction" under sections 45 and 48 \(COVID-19\)](#)

Mar 24 - [KPMG report: Timing considerations for QOF and QOF investors in light of COVID-19 \[TCJA\]](#)

May 22 - [KPMG report: Real estate, documenting changes in intent and dealer property analysis \(COVID-19\)](#)

May 22 - [KPMG report: Tax implications of distressed leases \(COVID-19\)](#)

May 11 - [KPMG report: CARES Act changes to business interest deduction limitations for partnerships \(COVID-19\)](#)

May 11 - [KPMG report: Healthcare REITs and whether to amend taxable REIT subsidiary leases \(COVID-19\)](#)

May 11 - [KPMG report: Use of elective stock dividends by publicly offered REITs \(COVID-19\)](#)

May 4 - [KPMG report: Property owned by tax equity partnership is not public utility property \(PLR\)](#)

Apr 30 - [KPMG report: Initial impressions of additional FAQs on the employee retention credit \(COVID-19\)](#)

Apr 30 - [KPMG report: Potential COVID-19 impact on health insurance exchange enrollment](#)

Apr 29 - [KPMG report: Accounting and financial reporting relating to CARES Act \(COVID-19\)](#)

Apr 24 - [KPMG report: Initial impressions of proposed regulations on separately computed UBTI \[TCJA\]](#)

Apr 24 - [KPMG report: IRS FAQs on NOL carrybacks for taxpayers with section 965 inclusions \(COVID-19\)](#)

Apr 23 - [KPMG report: JCT description of employee retention credit, payroll deferral provisions in CARES Act](#)

Apr 23 - [KPMG report: FAQs for determining U.S. trade or business or permanent establishment \(COVID-19\)](#)

Apr 22 - [KPMG report: Relief for taxpayers to correct, change QIP depreciation methods \(Rev. Proc. 2020-25\) \[TCJA\]](#)

Apr 21 - [KPMG report: COVID-19-related inventory impairments; cash flow opportunity for resellers](#)

Apr 20 - [KPMG report: Initial impressions of Rev. Rul. 2020-8 and 10-year limitations period, foreign tax credit and NOL carrybacks](#)

Apr 20 - [KPMG report: Section 1400Z-2 final regulations; observations on correcting amendments \(April 2020\) \[TCJA\]](#)

Apr 17 - [KPMG report: Relief to make or withdraw a real property trade or business or farming business election and certain other elections related to the CARES Act changes to section 163\(j\)](#)

Apr 16 - [KPMG report: ATNOL carrybacks under the CARES Act](#)

Apr 14 - [KPMG report: Tax considerations of disruptions in healthcare industry in COVID-19 environment](#)

Apr 10 - [KPMG report: Initial impressions of IRS guidance implementing NOL provisions in CARES Act \(COVID-19\)](#)

Apr 9 - [KPMG report: Initial impressions of final regulations implementing “anti-hybrid” provisions \(sections 245A\(e\), 267A, and 1503\(d\)\) \[TCJA\]](#)

Apr 8 - [KPMG report: Debt restructuring, considerations for private equity \(COVID-19\)](#)

Apr 6 - [KPMG report: Accounting and reporting impacts of CARES Act \(COVID-19\)](#)

Apr 3 - [KPMG report: Employer-related liquidity—tax credits, deferrals, and efficiencies \(COVID-19\)](#)

Apr 3 - [KPMG report: CARES Act, considerations for private equity funds with corporate portfolio companies \(COVID-19\)](#)

Apr 2 - [KPMG report: Proposed regulations on computing and reporting life insurance reserves for insurance companies](#)

Apr 2 - [KPMG report: Lending programs under CARES Act, including interactions with tax provisions \(COVID-19\)](#)

Mar 31 - [KPMG report: Income tax accounting \(COVID-19\)](#)

Mar 30 - [KPMG report: Cash-flow planning, leveraging tax accounting methods and credits \(COVID-19\)](#)

Mar 30 - [KPMG report: Compensation and benefits considerations \(COVID-19\)](#)

Mar 30 - [KPMG report: REIT considerations \(COVID-19\)](#)

Mar 27 - [KPMG report: Tax provisions in the CARES Act \(COVID-19 “phase 3” response\): Preliminary analysis and observations](#)

Mar 24 - [KPMG report: Timing considerations for QOF and QOF investors in light of COVID-19](#)

Mar 23 - [KPMG report: REITs and cash conservation in response to coronavirus \(COVID-19\)](#)

Mar 23 - [KPMG report: 2020 FBAR update; revisit the rules while relief is available](#)

Mar 23 - [KPMG report: Hotel REITs and taxable REIT subsidiaries; lease amendments in response to coronavirus \(COVID-19\)](#)

Mar 21 - [KPMG report: Income tax accounting, possible effects from coronavirus \(COVID-19\)](#)

Mar 21 - [KPMG report: New law \(H.R. 6201\) provides paid FMLA and sick leave \(COVID-19\)](#)

Mar 17 - [KPMG report: Employers providing employee hardship assistance related to coronavirus \(COVID-19\)](#)

Mar 16 - [KPMG report: Compensation and benefits concerns in uncertain times—telecommuting and other items \(COVID-19 considerations\)](#)

Feb 24 - [KPMG report: Claiming retroactively reinstated renewable fuel incentives](#)

Feb 24 - [KPMG report: Extended income recognition deferral for “specified goods”](#)

Feb 18 - [KPMG report: Contractor’s “substantial rights” for research tax credit \(U.S. Tax Court\)](#)

Jan 28 - [KPMG report: Highlights of recent tax law changes for the healthcare industry](#)

Jan 27 - [KPMG report: Expanded scope of \\$1 million section 162\(m\) deduction limitation on certain executive compensation, proposed regulations](#)

Jan 24 - [KPMG report: Transactions in the age of tax reform \[TCJA\]](#)

- Jan 23 - [KPMG report: Analysis and observations about final regulations and future of opportunity zone investments](#) **[TCJA]**
- Jan 22 - [KPMG report: Global withholding taxes, income and gains from listed securities \(2019\)](#)
- Jan 20 - [KPMG report: Tax planning guide 2020, for individual taxpayers](#)
- Jan 13 - [KPMG report: SEC comments on accounting for income taxes](#)

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