



TaxNewsFlash

United States



No. 2022-275
September 22, 2022

Rev. Proc. 2022-35: Updated list of countries, deposit interest paid to nonresident aliens (Turkey)

The IRS today released an advance version of [Rev. Proc. 2022-35](#) [PDF 144 KB] that updates prior IRS guidance and adds a new country—**Turkey**—to the current published list of countries with which the Treasury Department and the IRS have determined it is appropriate to have an automatic exchange relationship with respect to the information collected under Treas. Reg. §§1.6049-4(b)(5) and 1.6049-8(a) relating to payments of deposit interest of \$10 or more made by U.S. financial institutions to nonresident alien individuals. This is referred to as the list of countries under Section 3 of Rev. Proc. 2022-35.

Background

Previously, the reporting of U.S. deposit interest was only required on interest paid to U.S. persons or to nonresident alien individuals who were residents of Canada.

The Treasury Department and IRS in April 2012 finalized regulations providing that U.S. deposit interest payments made to nonresident alien individuals must be reported annually to the IRS—if such interest is paid to a nonresident alien individual who is a resident of a country with which the United States has in effect an information exchange agreement, and under which the United States agrees to provide (and to receive) information and under which the competent authority is the Treasury Secretary or delegate. The 2012 regulations also stated that the IRS would issue a revenue procedure identifying those countries with which the United States has in force information exchange agreements, and that this revenue procedure would be updated “as appropriate.” The first revenue procedure was Rev. Proc. 2012-24, issued in April 2012.

The IRS then in 2014 issued [Rev. Proc. 2014-64](#) [PDF 20 KB] that provided two lists:

- The list of countries under Section 3 of Rev. Proc. 2014-64 concerns those countries with which the United States has in effect an income tax or other agreement relating to the exchange of tax information (as defined pursuant to section 6103(k)(4)) and with which the United States agrees to provide as well as receive information under which the competent authority is the Treasury Secretary or delegate.
- A second list of countries under Section 4 of Rev. Proc. 2014-64 concerns those countries with which Treasury and the IRS determined that automatic exchange of deposit interest information is appropriate.

Since 2014, the IRS has periodically issued guidance that updates and adds countries to one or both of the lists of countries. Before today, the most recent release was September 2021—read [TaxNewsFlash](#).

kpmg.com/socialmedia



The information contained in TaxNewsFlash is not intended to be “written advice concerning one or more Federal tax matters” subject to the requirements of section 10.37(a)(2) of Treasury Department Circular 230, as the content of this document is issued for general informational purposes only, is intended to enhance the reader’s knowledge on the matters addressed therein, and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.

KPMG International Limited is a private English company limited by guarantee and does not provide services to clients. No member firm has any authority to obligate or bind KPMG International or any other member firm vis-à-vis third parties, nor does KPMG International have any such authority to obligate or bind any member firm.

Direct comments, including requests for subscriptions, to [Washington National Tax](#). For more information, contact KPMG’s Federal Tax Legislative and Regulatory Services Group at + 1 202.533.4366, 1801 K Street NW, Washington, DC 20006-1301.

To unsubscribe from TaxNewsFlash-United States, reply to [Washington National Tax](#).

[Privacy](#) | [Legal](#)