



TaxNewsFlash

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Notice 2024-44: Further extended phase-in provisions under section 871(m) regulations

The IRS today released [Notice 2024-44](#) announcing an additional two-year extension—through 2026—of the transition relief provided under Notice 2022-37 (read [TaxNewsFlash](#)) for taxpayers to comply with the final regulations with respect to dividend equivalents under sections 871(m), 1441, 1461, and 1473.

Notice 2024-44 states that the Treasury Department and IRS continue to evaluate the section 871(m) regulations and will take into account comments already received, and welcome any additional comments regarding tax policy considerations, legal authority for, and the IRS administrative feasibility of any suggested modifications to the section 871(m) regulations. The notice also states that the Treasury Department and IRS intend to provide sufficient time for taxpayers and withholding agents to implement any changes to the section 871(m) regulations.

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