



# TaxNewsFlash

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## Final regulations released to Federal Register: Revenue recognition and timing of income inclusion under section 451

The U.S. Treasury Department and IRS today released for publication in the Federal Register final regulations (T.D. 9941) regarding the timing of income inclusion under an accrual method of accounting, including the treatment of advance payments for goods, services, and certain other items.

The [final regulations](#) [PDF 573 KB] (169 pages) reflect legislative changes made by the 2017 U.S. tax law (Pub. L. No. 115-97), the law that is often referred to as the “Tax Cuts and Jobs Act” and finalize regulations that were proposed in September 2019. Read KPMG’s initial impressions about the proposed regulations: [TaxNewsFlash](#)

The IRS on December 21, 2020, posted a version of these final regulations on its website. That version of the final regulations includes the following statement:

*This document has been submitted to the Office of the Federal Register (OFR) for publication and will be pending placement on public display at the OFR and publication in the Federal Register. The version of the final rule released today may vary slightly from the published document if minor editorial changes are made during the OFR review process. The document published in the Federal Register will be the official document.*

Read a [computer-generated document](#) [PDF 2.8 MB] that provides a comparison of the version of the final regulations submitted today for publication in the Federal Register against the version posted by the IRS on December 21, 2020. This unofficial document was produced by KPMG for the purpose of showing what changes, if any, were made to the regulations prior to being released to the Federal Register for publication. It has not been reviewed for accuracy.

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