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Announcement 2021-11: Competent authorities add individual savings plans as eligible for dividend benefits under United States-Switzerland tax treaty

Announcement 2021-11—which appears in the June 7, 2021 edition of the [Internal Revenue Bulletin 2021-23](#) [PDF 970 KB]—includes a competent authority arrangement as entered into by the competent authorities of the United States and Switzerland.

The competent authority arrangement implements a provision of a 2009 Protocol to the United States-Switzerland income tax treaty that, in relevant part, added individual retirement savings plans (IRSPs) to the list of U.S. and Swiss pension or other retirement arrangements that may be eligible for beneficial treatment under paragraph 3 of Article 10 (Dividends).

Specifically, the competent authority arrangement provides a specific list of the types of IRSPs that fall within the revised language of Article 10(3).

The competent authority arrangement supersedes a prior version that had been in force since 2004.

Once signed by the competent authorities, the arrangement takes effect retroactively for dividends paid on or after January 1, 2020.

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