



2022: TaxNewsFlash Year in Review

January 31, 2023

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Looking for a quick way to identify what happened in the U.S. 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 federal tax developments to help users quickly identify what happened in 2022 in the federal tax arena.

Editions of *TaxNewsFlash* addressing federal legislative, administrative, and judicial tax developments are listed. The list includes KPMG's special reports, including analyses and observations regarding tax provisions in the legislation commonly called the "Inflation Reduction Act" and in the so-called "CHIPS Act."

The list is divided into five broad topics: (1) Legislative, (2) Executive Branch / Administrative, (3) Judicial, (4) Treaties / Puerto Rico, and (5) 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.
- Some items (such as KPMG reports) may be listed in multiple places.
- The list does not reference editions of *TaxNewsFlash* on matters other than U.S. 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, and transfer pricing. See the [TaxNewsFlash U.S. home page](#) for links to these publications.

Biden Tax Agenda

For KPMG reports of possible tax legislation during the Biden Administration, see [TaxNewsFlash-Biden Tax Agenda](#)

Coronavirus (COVID-19) tax developments

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

BEPS

For KPMG reports about OECD's base erosion and profit shifting (BEPS) initiative and tax transparency, see [TaxNewsFlash-BEPS](#)

Taxation of the Digitalized Economy

For KPMG 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 2022.

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Legislative

Enacted Legislation

- Dec 29 - [President signs Consolidated Appropriations Act](#)
- Sep 30 - [KPMG report: Accounting for tax provisions in the “Inflation Reduction Act of 2022” and CHIPS legislation](#)
- Sep 23 - [KPMG report: Tax provisions in the “Inflation Reduction Act of 2022” relevant to the banking industry; potential implications](#)
- Aug 16 - [President signs budget reconciliation legislation; KPMG’s report on tax law changes](#)
- Aug 9 - [KPMG report: Overview of investment tax credit for investments in semiconductor manufacturing](#)
- Aug 9 - [President signs CHIPS legislation that includes advanced investment tax credit for semiconductor manufacturing](#)

House

- Dec 23 - [House passes Consolidated Appropriations Act \(with revenue provisions\)](#)
- Aug 12 - [House passes reconciliation bill with tax provisions](#)
- Jul 28 - [House passes CHIPS bill with advanced investment tax credit for semiconductor manufacturing](#)
- Apr 1 - [House passes cannabis bill with tax provisions](#)
- Feb 4 - [House passes trade bill with tax measure concerning health insurance](#)

Senate

- Dec 22 - [Senate passes Consolidated Appropriations Act \(with revenue provisions\)](#)
- Dec 20 - [Senate Appropriations Committee releases text of omnibus appropriations bill, including limited tax provisions](#)
- Sep 8 - [Senate Finance Committee leaders release text of retirement tax legislation](#)
- Aug 10 - [KPMG report: Initial analysis and observations about tax law changes in budget reconciliation bill \(as passed by Senate\)](#)
- Aug 9 - [Legislative text of reconciliation bill with tax provisions](#)
- Aug 7 - [Senate passes reconciliation bill with tax provisions](#)

Aug 3 - [KPMG report: Initial impressions of corporate alternative minimum tax provision in draft Senate reconciliation bill](#)

Aug 2 - [KPMG report: Initial impressions of “carried interest” provision in draft Senate reconciliation bill](#)

Jul 29 - [KPMG report: Initial impressions of energy tax provisions in draft Senate reconciliation bill](#)

Jul 27 - [Updated: Reported agreement on Senate reconciliation bill, legislative text and summary of bill](#)

Jul 27 - [Senate passes CHIPS bill, includes advanced investment tax credit for semiconductor manufacturing](#)

Jun 22 - [Senate Finance approves retirement tax legislation](#)

Joint Committee on Taxation

Aug 9 - [JCT revenue estimates and distributional analysis of budget reconciliation bill](#)

Jul 25 - [JCT revenue estimates of tax proposals in Biden Administration’s FY 2023 budget](#)

Jul 18 - [JCT report on tax incentives for residential real estate, ahead of Senate Finance hearing](#)

Jul 11 - [JCT report on tax incentives for residential real estate, ahead of Ways and Means hearing](#)

Jun 28 - [JCT overview of federal tax system \(2022\)](#)

Mar 8 - [JCT releases “Bluebook” on tax legislation in 116th Congress](#)

Jan 13 - [JCT list of expiring federal tax provisions, 2021-2031](#)

Executive Branch / Administrative

Legislative Proposals

Sep 16 - [KPMG report: Student loan forgiveness and state reporting](#)

Mar 30 - [KPMG report: International tax proposals in Biden Administration’s budget for FY 2023](#)

Mar 28 - [KPMG report: Initial impressions of tax proposals in Biden Administration’s budget for FY 2023](#)

Mar 28 - [FY 2023 budget: “Green Book”—Treasury’s explanation of tax proposals](#)

Mar 28 - [FY 2023 budget: Initial document is released](#)

Final Regulations

Dec 28 - **T.D. 9971:** [Final regulations: Exception for U.S. real property interests held by foreign pension funds \(text of regulations\)](#)

Dec 12 - **T.D. 9970:** [Final regulations: Health insurance coverage limited to testing, diagnosis not “minimum essential coverage” \(COVID-19\)](#)

Dec 8 - **T.D. 9969:** [Final regulations: Special enforcement matters, centralized partnership audit regime](#)

Oct 11 - **T.D. 9968:** [Final regulations providing guidance under section 36B regarding premium tax credit, employer coverage for employee family members](#)

Oct 7 - **T.D. 9967:** [Final, temporary, and proposed regulations: Low-income housing credit average income test \(text of regulations\)](#)

Aug 24 - **T.D. 9965:** [Final regulations: Requirements related to “surprise” medical billing](#)

Aug 4 - **T.D. 9963:** [Final regulations: Removal of signature requirement for section 754 elections](#)

Jul 27 - **T.D. 9959:** [KPMG report: Correcting amendments to final foreign tax credit regulations](#)

Jan 28 - **T.D. 9960:** [KPMG report: Regulations addressing tax treatment of U.S. partnerships and S corporations that own stock of CFCs and PFICs](#)

Jan 26 - [Final regulations implementing funding to support state and local governments \(COVID-19\)](#)

Jan 24 - **T.D. 9960:** [Final regulations: Rules for determining stock ownership, sections 951A and 958 \(text of regulations\)](#)

Jan 5 - **T.D. 9959:** [KPMG report: Initial analysis of final regulations concerning foreign tax credit](#)

Jan 4 - **T.D. 9959:** [KPMG report: Foreign tax credit and certain deductions of life insurance companies \(final regulations\)](#)

Proposed or Temporary Regulations

Dec 29 - **REG-114666-22:** [Proposed regulations: Use of an electronic medium to make participant elections and spousal consents \(text of regulations\)](#)

Dec 28 - **REG-100442-22:** [Proposed regulations: Foreign government income exception and definition of domestically controlled qualified investment entities \(text of regulations\)](#)

Dec 9 - **REG-113839-22:** [Proposed regulations: Single-entity treatment of consolidated groups for purposes of section 951\(a\)\(2\)\(B\) in context of section 959\(b\) distributions](#)

Dec 8 - **REG-106384-20:** [IRS announces mortality tables for defined benefit pension plans under Notice 2022-22 will apply in 2023 \(timing of finalization of proposed regulations\)](#)

Dec 6 - **REG-106134-22:** [Proposed regulations: Certain syndicated conservation easement transactions identified as listed transactions \(text of regulations\)](#)

Nov 21 - **REG-112096-22:** [KPMG report: Proposed foreign tax credit regulations](#)

Nov 18 - **REG-112096-22:** [Proposed regulations: Guidance relating to the foreign tax credit \(text of regulations\)](#)

Oct 20 - **REG-121509-00:** [Proposed regulations withdrawn: Exclusion from gross income of PTEP and related basis adjustments](#)

Oct 7 - **REG-113068-22:** [Final, temporary, and proposed regulations: Low-income housing credit average income test \(text of regulations\)](#)

Sep 9 - **REG-125693-19:** [Proposed regulations: Guidance relating to IRS Independent Office of Appeals \(text of regulations\)](#)

Jul 5 - **REG-130675-17:** [Proposed regulations: Foreign currency contract under section 1256 includes only foreign currency forward contracts \(text of regulations\)](#)

Jun 24 - **REG-130975-08:** [Proposed regulations: Administration expenses, claims against estates, interest expense on amounts owed by estates \(text of regulations\)](#)

May 4 - **REG-122770-18:** [Proposed regulations: Updated actuarial tables for valuing annuities, terms of years, and remainder interests](#)

Apr 27 - **REG-106384-20**: [Proposed regulations: Mortality tables for determining present value under defined benefit pension plans](#)

Apr 26 - **REG-118913-21**: [Proposed regulations: Basic exclusion amount, estate and gift taxes](#)

Apr 5 - **REG-114339-21**: [Proposed regulations: Guidance under section 36B regarding premium tax credit, employer coverage for employee family members \(text of regulations\)](#)

Mar 25 - **REG-121508-18**: [Proposed regulations: Multiple employer plans \(text of regulations\)](#)

Feb 23 - **REG-105954-20**: [Proposed regulations: Required minimum distributions \(text of regulations\)](#)

Jan 28 - **REG-118250-20**: [KPMG report: Regulations addressing tax treatment of U.S. partnerships and S corporations that own stock of CFCs and PFICs](#)

Jan 24 - **REG-118250-20**: [Proposed regulations: Domestic partnerships and S corporations holding PFICs and CFCs \(text of regulations\)](#)

Revenue Rulings

Dec 8 - **Rev. Rul. 2022-24**: [Covered compensation tables for 2023 plan year](#)

Nov 29 - **Rev. Rul. 2022-23**: [Interest rates, tax underpayments and overpayments \(increase for first quarter 2023\)](#)

Aug 15 - **Rev. Rul. 2022-15**: [Interest rates, tax underpayments and overpayments \(increase for fourth quarter 2022\)](#)

Jul 7 - **Rev. Rul. 2022-13**: [Multiemployer defined benefit plan receiving special financial assistance not deemed in "critical status" under section 432\(b\)\(7\) following merger](#)

May 20 - **Rev. Rul. 2022-11**: [Interest rates, tax underpayments and overpayments \(increase for third quarter 2022\)](#)

Mar 21 - **Rev. Rul. 2022-7**: [Federal, state, and local government employees also subject to disclosure restrictions regarding returns](#)

Feb 23 - **Rev. Rul. 2022-5**: [Interest rates, tax underpayments and overpayments \(increase for second quarter 2022\)](#)

Jan 5 - **Rev. Rul. 2022-2**: [Covered compensation tables for 2022 plan year](#)

Revenue Procedures

Dec 30 - [Notice of filing of petition for addition of polyphenylene sulfide to Superfund list \(**Rev. Proc. 2022-26**\)](#)

Dec 29 - **Rev. Proc. 2023-11**: [Updated guidelines for accounting method changes for specified R&E expenditures](#)

Dec 28 - [Notice of filing of petition for addition of polyoxymethylene to Superfund list \(**Rev. Proc. 2022-26**\)](#)

Dec 23 - **Rev. Proc. 2023-10**: [Insurance companies, unpaid loss discount factors for 2022 accident year](#)

Dec 12 - **Rev. Proc. 2023-8**: [Automatic changes to accounting methods to comply with section 174](#)

Dec 12 - **Rev. Proc. 2022-42**: [Procedures for manufacturers and sellers of clean vehicles to qualify for tax incentives](#)

Nov 16 - **Rev. Proc. 2022-39**: [Procedures for eligible taxpayers to file qualified amended returns](#)

Nov 7 - [Rev. Proc. 2022-40: Program for approving 403\(b\) retirement plans](#)

Oct 19 - [KPMG report: "Superfund" tax refunds for exported chemicals and listed substances \(Rev. Proc. 2022-26\)](#)

Oct 18 - [Rev. Proc. 2022-38: Inflation adjustments for 2023, individual taxpayers](#)

Oct 11 - [Rev. Proc. 2022-19: Taxpayer assistance procedures for S corporations under section 1362\(f\)](#)

Sep 22 - [Rev. Proc. 2022-35: Updated list of countries, deposit interest paid to nonresident aliens \(Turkey\)](#)

Sep 14 - [Rev. Proc. 2022-36: Foreign insurance companies; effectively connected net investment income \(2021\)](#)

Jul 8 - [Rev. Proc. 2022-32: Simplified method to obtain extension of time to make "portability" election with respect to decedent's unused exclusion amount](#)

Jun 28 - [Rev. Proc. 2022-26: Procedures for requesting that substances be added or removed from Superfund list](#)

Jun 21 - [Rev. Proc. 2022-28: No rulings to be issued regarding whether transactions result in employer reversion from qualified plan](#)

Apr 29 - [Rev. Proc. 2022-24: HSA inflation-adjusted amounts for 2023](#)

Apr 19 - [Rev. Proc. 2022-23: Late elections for depreciation of Indian reservation and biofuel property and accounting for film, TV and theater production costs](#)

Mar 30 - [Rev. Proc. 2022-21: Nationwide average purchase price, residences located in United States](#)

Mar 18 - [Rev. Proc. 2022-20: Teleconferences satisfying the public approval requirements for tax-exempt qualified private activity bonds](#)

Mar 17 - [KPMG report: Updated list of automatic changes \(Rev. Proc. 2022-14\)](#)

Mar 16 - [Rev. Proc. 2022-17: Automobile depreciation deduction limits for 2022](#)

Jan 31 - [Rev. Proc. 2022-14: List of automatic changes, accounting methods](#)

Jan 19 - [Rev. Proc. 2022-13: Tax Court review of employment tax determinations under section 7436](#)

Jan 14 - [Rev. Proc. 2022-10: Pilot program, "fast-track processing" of letter ruling requests by corporate taxpayers](#)

Jan 12 - [IRS corrects Rev. Proc. 2021-54: Insurance companies, unpaid loss discount factors for 2021 accident year](#)

Notices

Dec 30 - [KPMG report: Analysis and observations on initial guidance on new 1% stock repurchase excise tax \(Notice 2023-2\)](#)

Dec 30 - [Notice 2023-11: Temporary relief for foreign financial institutions required to report U.S. TINs](#)

Dec 29 - [Notice 2023-1: Intention to propose regulations on requirements of clean vehicle credit under section 30D](#)

Dec 29 - [Notice 2023-3: Standard mileage rates for 2023](#)

Dec 29 - [Notice 2023-9: Safe harbor for "incremental cost" of commercial clean vehicles eligible for tax credit under section 45W](#)

Dec 27 - [Notice 2023-7: Interim guidance on new corporate alternative minimum tax \(CAMT\)](#)

Dec 27 - [Notice 2023-2: Interim guidance on new 1% excise tax on repurchases of corporate stock](#)

Dec 23 - [Notice 2023-10: Delay of implementation of \\$600 reporting threshold for Forms 1099-K](#)

- Dec 21 - [Notice 2023-8: Guidance regarding withholding on transfers of publicly traded partnership interests](#)
- Dec 20 - [Notice 2023-4: Indexing factor for use by group health plans and health insurance issuers in 2023](#)
- Dec 19 - [Notice 2023-6: Guidance on new sustainable aviation fuel credits](#)
- Dec 8 - [IRS announces mortality tables for defined benefit pension plans under Notice 2022-22 will apply in 2023](#)
- Dec 2 - [KPMG report: Analysis and observations about prevailing wage and apprenticeship requirement \(Notice 2022-61\)](#)
- Nov 29 - [Notice 2022-61: Guidance on prevailing wage and apprenticeship requirements under clean energy tax incentives](#)
- Nov 21 - [Notice 2022-62: Required amendments list \(2022\) for qualified retirement plans and 403\(b\) plans](#)
- Nov 14 - [Notice 2022-59: Self-insured health insurance annual fee](#)
- Nov 3 - [Notice 2022-56 - Notice 2022-58: Additional requests for comments on upcoming clean energy tax guidance](#)
- Oct 21 - [Notice 2022-55: Pension plans, cost-of-living adjustments for 2023](#)
- Oct 11 - [Notice 2022-41: Additional permitted election changes for health coverage under "cafeteria plans"](#)
- Oct 7 - [Notice 2022-52: Extended temporary relief, low-income housing credit under section 42](#)
- Oct 7 - [Notice 2022-53: Required minimum distributions](#)
- Oct 5 - [Notice 2022-46 - Notice 2022-51: Requests for comments on upcoming clean energy tax guidance](#)
- Sep 28 - [Notice 2022-43: Farmers, ranchers affected by drought allowed more time to replace livestock](#)
- Sep 26 - [Notice 2022-44: Per diem rates, substantiation of employee lodging, meals, incidentals \(2022-2023\)](#)
- Sep 26 - [Notice 2022-45: Extension of time to amend certain eligible retirement plans for qualifying distributions \(COVID-19\)](#)
- Sep 23 - [Notice 2022-38: Carbon oxide sequestration credit under section 45Q, inflation adjustment factor for 2022, final year for pre-BBA equipment](#)
- Sep 16 - [Notice 2022-42: Intent to amend noncompulsory payment regulations under section 901 with respect to amended Puerto Rico tax decrees](#)
- Sep 13 - [Notice 2022-39: Guidance regarding one-time claim for alternative fuels excise tax credits](#)
- Aug 24 - [Notice 2022-36: Penalty relief for certain taxpayers filing returns for tax years 2019 and 2020 \(COVID-19\)](#)
- Aug 23 - [Notice 2022-37: Further extended phase-in provisions under section 871\(m\) regulations](#)
- Aug 15 - [Notice 2022-34: Deferred applicability dates for foreign currency guidance under section 987](#)
- Aug 3 - [Notice 2022-33: Extended deadline of December 31, 2025, for amending retirement plans or IRAs](#)
- Jun 29 - [Notice 2022-31: Defined benefit pension plans sponsored by newspapers, alternative minimum funding standards](#)
- Jun 27 - [Notice 2022-30: Deferral of provisions under section 59A and 6038A regulations relating to reporting of qualified derivative payments](#)
- May 20 - [Notice 2022-20 and Notice 2022-24: Electricity production credit; percentage depletion for oil and gas produced from marginal properties](#)
- May 18 - [KPMG report: Proposed changes to qualified intermediary \(QI\) agreement \(Notice 2022-23\)](#)

- May 13 - [Notice 2022-27: Six-month extension allowing retirement plan elections and spousal consents to be signed remotely \(COVID-19\)](#)
- May 3 - [Notice 2022-23: Proposed changes to QI withholding agreement for dispositions of publicly traded partnership interests](#)
- Apr 29 - [Notice 2022-17 - Notice 2022-19: Oil and gas—reference prices for 2021, inflation adjustment factor and phase-out for enhanced oil recovery credit](#)
- Apr 27 - [Notice 2022-22: Mortality rates, tables for defined benefit pension plans \(2023\)](#)
- Apr 26 - [Notice 2022-21: Request for recommendations for IRS 2022-2023 Priority Guidance Plan](#)
- Apr 15 - [Notice 2022-15: Superfund excise taxes, relief regarding failure to deposit penalties](#)
- Mar 18 - [Notice 2022-11: Indexing factor for provisions aimed at preventing surprise medical bills](#)
- Mar 15 - [Notice 2022-13: Waiver of addition to tax under section 6654 for certain farmers, fishermen](#)
- Mar 4 - [Notice 2022-10: Housing expense limit adjustments, foreign locations for 2022](#)
- Jan 28 - [Notice 2022-8: Defined benefit plans, 2022 cumulative list for plan qualification requirements](#)
- Jan 18 - [Notice 2022-6: Determination of substantially equal periodic payments](#)
- Jan 11 - [Notice 2022-5: Extended temporary relief, low-income housing credit under section 42 \(COVID-19\)](#)

Announcements

- Dec 23 - [Announcement 2023-1: Applicable reference standard for energy efficient commercial building property deduction](#)
- Dec 23 - [Announcement 2023-2: Transitional guidance for broker reporting on digital assets](#)
- Nov 10 - [Announcement 2022-23: New renewable electricity production credit amounts for calendar year 2022](#)
- Jun 9 - [Announcement 2022-13: Increased mileage rates for remainder of 2022](#)
- Mar 30 - [Announcement 2022-7: APMA program, APA statistics for 2021](#)
- Mar 14 - [Announcement 2022-6: Temporary suspension of prototype IRA opinion letter program](#)

IRS Practice Units

- Oct 18 - [IRS practice unit: "Report of Foreign Bank and Financial Accounts" \(FBAR\)](#)
- Aug 30 - [IRS practice unit: Rules for determining stock ownership under section 958](#)
- Jul 26 - [IRS practice unit: Allowance of deductions and credits on Form 1120-F delinquent returns](#)
- Jun 24 - [IRS practice unit: Energy efficient commercial buildings deduction](#)
- Apr 26 - [IRS practice unit: Country-by-country \(CbC\) report in the transfer pricing risk analysis process](#)
- Mar 31 - [IRS practice unit: Deferred compensation received by nonresident alien individuals](#)
- Mar 22 - [IRS practice unit: Penalties for erroneous claims for refund or credit](#)
- Jan 4 - [IRS practice unit: Overview of section 245A dividends received deduction](#)

LB&I Directives

- Sep 26 - [LB&I memo providing updated guidance on the statute of limitations with respect to section 965 examinations](#)
- Feb 9 - [IRS adds a new compliance campaign \(LB&I division\)](#)

Other (including FAQs)

- Dec 30 - [IRS provides tax relief for taxpayers in New York affected by winter storm](#)
- Dec 30 - [Notice of filing of petition for addition of polyphenylene sulfide to Superfund list](#)
- Dec 30 - [TTB guidance: Industry circular on calculating tax rates for distilled spirits](#)
- Dec 29 - [Proposed regulations concerning electronically filed returns; OIRA review completed](#)
- Dec 29 - [IRS provides FAQs on clean vehicle credits for new, previously owned and commercial vehicles](#)
- Dec 29 - [Treasury releases white paper on critical mineral and battery component requirements for clean vehicle tax credits](#)
- Dec 28 - [IRS provides updated FAQs on Form 1099-K](#)
- Dec 28 - [Notice of filing of petition for addition of polyoxymethylene to Superfund list](#)
- Dec 22 - [IRS provides FAQs on energy efficient home improvements and residential clean energy property credits](#)
- Dec 22 - [U.S. Treasury release: No change to list of countries cooperating with international boycott](#)
- Dec 19 - [Treasury timeline for providing guidance on "Inflation Reduction Act" tax provisions](#)
- Dec 19 - [IRS provides tax relief for taxpayers in Florida affected by Hurricane Nicole](#)
- Dec 9 - [FBAR filings: Extended deadline is April 15, 2024, for individuals with signature authority](#)
- Dec 8 - [IRS announces mortality tables for defined benefit pension plans under Notice 2022-22 will apply in 2023](#)
- Dec 2 - [IRS provides tax relief for certain taxpayers affected by snowstorm in New York](#)
- Nov 28 - [Tier 2 tax rates for railroads, no changes for 2023](#)
- Nov 18 - [Treasury to allocate \\$5 billion in New Markets Tax Credit \(NMTC\) authority for 2022](#)
- Nov 17 - [IRS provides tax relief for certain taxpayers affected by storm and flooding in Illinois](#)
- Nov 4 - [IRS Priority Guidance Plan for 2022-2023](#)
- Oct 28 - [O'Donnell appointed IRS "Acting Commissioner"](#)
- Oct 28 - [Treasury awards \\$5 billion in New Markets Tax Credit \(NMTC\) allocations](#)
- Oct 25 - [TTB announcement: Foreign alcohol producers may now register with online TTB system for 2023](#)
- Oct 19 - [IRS reminder: Deadline to file 2019 and 2020 tax returns to get penalty relief postponed in declared disaster areas \(COVID-19\)](#)
- Oct 11 - [IRS expands penalty relief for dyed diesel fuel in Florida; hurricane-related relief](#)
- Oct 7 - [Final regulations providing guidance under section 36B regarding premium tax credit; OIRA review completed](#)
- Oct 6 - [FBAR filing deadline relief for persons affected by certain natural disasters](#)
- Oct 5 - [IRS provides tax relief for taxpayers affected by Hurricane Ian \(North Carolina and South Carolina\)](#)
- Sep 30 - [IRS to waive dyed diesel fuel penalty in Florida; hurricane-related relief](#)

Sep 30 - [Final regulations concerning low-income housing credit average income test; OIRA review completed](#)

Sep 30 - [U.S. Treasury release: No change to list of countries cooperating with international boycott](#)

Sep 29 - [Final regulations: Beneficial ownership information reporting](#)

Sep 29 - [IRS provides tax relief for taxpayers in Florida affected by Hurricane Ian](#)

Sep 27 - [IRS provides tax relief for certain taxpayers affected by storms in Alaska](#)

Sep 23 - [TTB temporary and proposed regulations: Implementation of refund procedures for federal excise tax benefits applicable to imported alcohol](#)

Sep 22 - [Final regulations concerning beneficial ownership information reporting; OIRA review completed](#)

Sep 21 - [IRS guidance on tax treatment of PPP loan forgiveness based on misrepresentations or omissions \(COVID-19\)](#)

Sep 19 - [IRS updates information on pre-screening and certification process of Work Opportunity Tax Credit \(WOTC\)](#)

Sep 19 - [IRS provides tax relief for taxpayers in Puerto Rico affected by Hurricane Fiona](#)

Sep 19 - [Final regulations pending OIRA review: Guidance under section 36B regarding premium tax credit](#)

Sep 16 - [PLR: REIT status regarding certain marina properties](#)

Sep 15 - [IRS opens application period for 2023 Compliance Assurance Process \(CAP\) program](#)

Sep 14 - [Request for information: Advanced explanation of benefits and good faith estimate for covered individuals under "no surprises" provisions](#)

Sep 13 - [Final regulations pending OIRA review: Low-income housing credit average income test](#)

Sep 8 - [IRS provides tax relief for certain taxpayers affected by storms in Arizona](#)

Sep 2 - [IRS provides tax relief for taxpayers affected by water crisis \(Mississippi\)](#)

Aug 18 - [IRS Appeals invites input on enhancing video conferences](#)

Aug 17 - [Proposed regulations pending OIRA review: Electronically filed returns](#)

Aug 17 - [Guidance on changes to electric vehicles tax credit under "Inflation Reduction Act"](#)

Aug 10 - [IRS provides tax relief for taxpayers affected by storms in Missouri](#)

Aug 3 - [IRS extends tax relief for taxpayers affected by wildfires in New Mexico](#)

Aug 3 - [IRS provides tax relief for taxpayers affected by water issues in U.S. Virgin Islands \(St. Croix\)](#)

Aug 2 - [IRS provides tax relief for taxpayers affected by storms in Kentucky](#)

Jul 8 - [PLR: IRS grants consent to taxpayer's request regarding cost-sharing arrangement and intangible development costs](#)

Jul 6 - [IRS provides tax relief for taxpayers affected by storms in Montana and Oklahoma](#)

Jun 24 - [IRS announces Superfund chemical excise tax rates](#)

Jun 24 - [IRS provides FAQs on the reinstated Superfund chemical excise tax](#)

Jun 16 - [Form 4419 relating to transmitter control codes for filing information returns electronically phased out beginning August 2022](#)

May 26 - [IRS releases tax collection data for fiscal year 2021](#)

May 20 - [Final versions of Form 5500 series, annual employee benefit plan reports](#)

May 20 - [PLR: Tax treatment of REIT's section 481\(a\) adjustment](#)

May 12 - [IRS provides tax relief for taxpayers affected by wildfires in New Mexico](#)

May 6 - [GLAM: Allocation and apportionment of deferred compensation expense for purposes of calculating FDII—departure from prior IRS legal advice](#)

May 5 - [IRS corrects renewable electricity production inflation factors, reference prices for 2022](#)

Apr 18 - [IRS reminds employers of penalty relief related to claims for employee retention credit \(COVID-19\)](#)

Apr 13 - [Renewable electricity production inflation factors, reference prices for 2022](#)

Apr 12 - [IRS announces taxpayers may soon receive letters relating to qualified opportunity funds](#)

Apr 4 - [U.S. Treasury release: No change to list of countries cooperating with international boycott](#)

Mar 31 - [IRS provides tax relief for taxpayers affected by storms in Puerto Rico](#)

Mar 18 - [AOD 2022-2: IRS nonacquiescence to Eleventh Circuit's decision, relocation benefits provided by railroad to employees](#)

- Mar 18 - [PLR: Liability-waiver payments received from tenants, relating to self-storage facilities, deemed rents from real property for REIT income tests](#)
- Mar 3 - [IRS updates FAQs on paid sick and family leave credits \(COVID-19\)](#)
- Feb 16 - [IRS releases FAQs about relief for partnerships and S corporations preparing Schedules K-2 and K-3 for 2021](#)
- Feb 15 - [IRS updates FAQs on emergency relief grants to students; no information reporting requirement for education institutions \(COVID-19\)](#)
- Feb 4 - [AOD 2022-1: IRS nonacquiescence to Fifth Circuit's decision; limitations period for backup withholding](#)
- Feb 4 - [PLR: IRS revokes REIT private letter ruling](#)
- Jan 20 - [IRS provides tax relief for taxpayers affected by Tennessee storms, tornadoes](#)
- Jan 19 - [IRS reminder: Employers must file Forms W-2 and provide Forms 1099-MISC and 1099-NEC by January 31, 2022](#)
- Jan 12 - [National Taxpayer Advocate report to Congress identifying taxpayer challenges](#)
- Jan 11 - [IRS provides tax relief for taxpayers affected by Washington State flooding, mudslides](#)
- Jan 10 - [U.S. tax season starts January 24, 2022; most individual returns due April 18, 2022](#)
- Jan 6 - [IRS provides FAQs regarding research credit claims](#)
- Jan 4 - [IRS modifies Hurricane Ida-related tax relief for taxpayers in six states](#)
- Jan 3 - [IRS provides tax relief for taxpayers affected by Colorado wildfires](#)

Judicial

Supreme Court

- Jun 21 - ***Bittner v. United States***: [U.S. Supreme Court grants certiorari, whether penalty for FBAR violation applies on per-account or per-form basis](#)
- Apr 21 - ***Boechler, P.C. v. Commissioner***: [U.S. Supreme Court: 30-day time limit to petition for review of collection determination subject to equitable tolling](#)
- Apr 18 - ***New York v. Yellen***: [U.S. Supreme Court: Certiorari denied in states' challenge to 2017 tax law limiting SALT deduction](#)

Circuit Court

- Jul 26 - ***Affordable Bio Feedstock, Inc. v. United States***: [Eleventh Circuit: Taxpayer's claim for reimbursement of "protest payments" denied, no statutory basis for refund](#)
- Apr 26 - ***Aspro, Inc. v. Commissioner***: [Eighth Circuit: Expert witness testimony excluded and deductions for management fees denied; Tax Court affirmed](#)
- Apr 6 - ***Baturin v. Commissioner***: [Fourth Circuit: Payments to Russian scientist—taxable compensation or exempt from tax as a grant?](#)
- Aug 5 - ***Cross Refined Coal, LLC v. Commissioner***: [D.C. Circuit: Partnership upheld as valid, despite IRS claims it never would have been profitable without refined-coal tax credits](#)
- Mar 18 - ***CSX Corp. v. United States***: [AOD 2022-2: IRS nonacquiescence to Eleventh Circuit's decision, relocation benefits provided by railroad to employees](#)

Apr 22 - **Delek US Holdings LLC v. United States:** [Sixth Circuit: Tax credit applied against fuel excise tax reduces excise tax liability](#)

Aug 25 - **Eaton Corp. v. Commissioner:** [Sixth Circuit: Tax Court decision affirmed, taxpayer not liable for 40% penalty upon cancellation of APAs](#)

Jul 8 - **Equity Investment Associates LLC v. United States:** [Fourth Circuit: IRS summons to taxpayer not quashed despite criminal referral of taxpayer's agent](#)

Aug 4 - **Exxon Mobile Corp. v. United States:** [Fifth Circuit: Credit for renewable fuels reduces excise tax, but deduction limited to excise tax actually paid](#)

Aug 24 - **Grajales v. Commissioner:** [Second Circuit: Early distribution 10% exaction is tax, not a penalty requiring written supervisory approval; Tax Court affirmed](#)

Mar 25 - **Laidlaw's Harley Davidson Sales, Inc. v. Commissioner:** [Ninth Circuit: Prior supervisory approval for penalty assessment for listed transaction; Tax Court reversed](#)

Mar 3 - **Mann Construction, Inc. v. United States:** [Sixth Circuit: IRS failed to comply with notice-and-comment process in issuing Notice 2007-83 regarding "listed transactions"](#)

Nov 22 - **Moore v. United States:** [Ninth Circuit: Rehearing en banc denied in section 965 case](#)

Jun 7 - **Moore v. United States:** [Ninth Circuit: Mandatory repatriation tax under section 965 is constitutional](#)

Mar 14 - **Oakbrook Land Holdings LLC v. Commissioner:** [Sixth Circuit: Regulations on charitable donation of conservation easement upheld as valid; Tax Court affirmed](#)

Jan 7 - **PolSELLI v. IRS:** [Sixth Circuit: IRS summonses issued to banks of taxpayer's wife and taxpayer's lawyers](#)

Feb 4 - **Quezada v. IRS:** [AOD 2022-1: IRS nonacquiescence to Fifth Circuit's decision; limitations period for backup withholding](#)

Aug 5 - **Redleaf v. Commissioner:** [Eighth Circuit: Deductions denied for deferred cash payments of \\$51 million made to former spouse](#)

May 17 - **Reserve Mechanical Corp. v. Commissioner:** [Tenth Circuit: Taxpayer did not qualify as small insurance company; Tax Court decision affirmed](#)

May 11 - **Seaview Trading, LLC v. Commissioner:** [Ninth Circuit: Tax return considered filed when sent in response to IRS inquiry; Tax Court reversed](#)

Oct 26 - **Trafigura Trading LLC v. United States:** [DOJ will not seek U.S. Supreme Court review of case concerning crude oil tax imposed by section 4611\(b\)](#)

Mar 28 - **Trafigura Trading LLC v. United States:** [Fifth Circuit: Butane not eligible for tax credit; tax on exports of domestic crude oil held unconstitutional](#)

Mar 28 - **Vitol, Inc. v. United States:** [Fifth Circuit: Butane not eligible for tax credit; tax on exports of domestic crude oil held unconstitutional](#)

Mar 3 - **Whirlpool Financial Corp. v. Commissioner:** [Sixth Circuit: Rehearing en banc denied in subpart F income case](#)

District Court

Mar 23 - **CIC Services, LLC v. IRS:** [KPMG report: Federal district court vacates Notice 2016-66 \(microcaptive insurance transactions\)](#)

Apr 5 - **Liberty Global, Inc. v. United States:** [Temporary regulations under section 245A held invalid \(federal district court\)](#)

Tax Court

Mar 16 - ***AptarGroup, Inc. v. Commissioner***: [U.S. Tax Court: Compute foreign tax credit using same method that CFC used to apportion interest expense](#)

Mar 31 - ***Bats Global Market Holdings, Inc. v. Commissioner***: [U.S. Tax Court: Fees for use of securities exchanges not deductible under section 199](#)

Sep 26 - ***Belmont Interests v. Commissioner***: [U.S. Tax Court: Excess loss account included in income of consolidated group member](#)

Jun 15 - ***Chavis v. Commissioner***: [U.S. Tax Court: "Innocent spouse relief" not available as defense for trust fund recovery penalty liability](#)

Oct 13 - ***Clark Raymond & Company PLLC v. Commissioner***: [U.S. Tax Court: Partnership distribution of "clients" was distribution of intangible assets](#)

Apr 6 - ***Continuing Life Communities Thousand Oaks LLC v. Commissioner***: [U.S. Tax Court: Accounting for deferred fees using GAAP by retirement community upheld](#)

Aug 25 - ***Deitch v. Commissioner***: [U.S. Tax Court: Partnership's payments to lender were deductible interest, and not payments on an equity interest](#)

Feb 28 - ***Estate of Levine v. Commissioner***: [U.S. Tax Court: Cash-surrender value of life insurance policies not includible in estate](#)

Nov 9 - ***Green Valley Investors, LLC v. Commissioner***: [U.S. Tax Court: Listing notice is legislative rule improperly issued under the Administrative Procedure Act](#)

Nov 29 - ***Hallmark Research Collective v. Commissioner***: [U.S. Tax Court: 90-day time limit to file deficiency petition is jurisdictional deadline not subject to equitable tolling](#)

Feb 23 - ***Hoops LP v. Commissioner***: [U.S. Tax Court: Professional basketball franchise not allowed deduction for deferred compensation when amounts not paid to players](#)

Aug 18 - ***Medtronic, Inc. v. Commissioner***: [U.S. Tax Court: Determination of transfer pricing method, on remand from Eighth Circuit](#)

Mar 21 - ***Oxbow Bend LLC v. Commissioner***: [U.S. Tax Court: Initial determination of penalties, after IRS supervisory approval was obtained](#)

Apr 12 - ***Pediatric Impressions Home Health, Inc. v. Commissioner***: [U.S. Tax Court: At-home private nurses were employees for federal employment tax purposes](#)

Jan 31 - ***TBL Licensing LLC v. Commissioner***: [U.S. Tax Court: Constructive transfer of intangible property in reorganization](#)

Other

Feb 24 - ***Ampersand Chowchilla Biomass, LLC v. United States***: [Federal Circuit: Request for Section 1603 grants denied; facilities not placed in service in 2009](#)

Treaties / Puerto Rico

- Dec 7 - [United States and Croatia sign income tax treaty](#)
- Sep 29 - [Puerto Rico: Tax-related hurricane relief](#)
- Sep 21 - [Puerto Rico: Extension of sales and use tax returns, payments as hurricane relief](#)
- Jul 16 - [Tax treaty update: United States terminates treaty with Hungary](#)
- Jul 11 - [Tax treaty update: U.S. income tax treaty with Hungary reportedly being terminated](#)
- Apr 13 - [Puerto Rico: Postponed due date for income tax returns, corporate annual reports, LLC annual fees](#)
- Mar 29 - [Tax treaty update: Senate Foreign Relations Committee approves income tax treaty with Chile](#)
- Jan 10 - [Puerto Rico: Program for taxpayers to resolve unpaid real property taxes offers relief, discounts](#)

KPMG Reports

- Dec 30 - [KPMG report: Analysis and observations on initial guidance on new 1% stock repurchase excise tax](#)
- Dec 19 - [KPMG report: Navigating the turbulent waters of the section 704\(c\) ceiling rule](#)
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- Oct 3 - [KPMG report: Tax treatment of cryptocurrency and challenges of cross-border reporting](#)
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- Sep 23 - [KPMG report: Tax provisions in the “Inflation Reduction Act of 2022” relevant to the banking industry; potential implications](#)

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Aug 10 - [KPMG report: Initial analysis and observations about tax law changes in budget reconciliation bill \(as passed by Senate\)](#)

Aug 9 - [KPMG report: Overview of investment tax credit for investments in semiconductor manufacturing](#)

Aug 3 - [KPMG report: Initial impressions of corporate alternative minimum tax provision in draft Senate reconciliation bill](#)

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Mar 18 - [KPMG report: Updated analysis of Pillar Two model rules for 15% global minimum tax following release of commentary](#)

Mar 17 - [KPMG report: Updated list of automatic changes \(Rev. Proc. 2022-14\)](#)

Mar 16 - [KPMG report: Understanding the excess business loss limitation](#)

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Feb 18 - [KPMG report: Initial impressions of draft rules for tax base determinations under Pillar One Amount A](#)

Feb 14 - [KPMG report: Treasury examines QOZ investments for reporting deficiencies](#)

Feb 6 - [KPMG report: Public consultation document on Pillar One—draft model rules for nexus and revenue sourcing](#)

Jan 28 - [KPMG report: Regulations addressing tax treatment of U.S. partnerships and S corporations that own stock of CFCs and PFICs](#)

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- Jan 13 - [KPMG report: Section 45Q credit for carbon oxide sequestration; considerations for equipment upgrades and the 80/20 Rule](#)
- Jan 6 - [KPMG report: Determining control in public M&A transactions](#)
- Jan 5 - [KPMG report: Recent SEC and FASB comments on accounting for income taxes](#)
- Jan 5 - [KPMG report: Initial analysis of final regulations concerning foreign tax credit](#)
- Jan 4 - [KPMG report: Foreign tax credit and certain deductions of life insurance companies \(final regulations\)](#)
- Jan 3 - [KPMG report: Congress reconvenes—What's next for tax legislation?](#)

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