



2019: TaxNewsFlash Year in Review

January 23, 2020

kpmg.com



Looking for a quick way to identify what happened in the federal tax arena in 2019? 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 2019 U.S. federal tax developments. This list references relevant editions of *TaxNewsFlash* addressing federal legislative, administrative, judicial, and other tax developments. It also lists KPMG's special reports on key developments, including analyses and practical observations.

The list is divided into five broad topics: Legislative, Executive Branch / Administrative, Judicial, Treaties/Puerto Rico/ Other, and KPMG Reports. Some of these topics are further divided into subtopics. Note that:

- Each item links to the underlying *TaxNewsFlash*. The date of each item is the date in 2019 on which the underlying TNF was published.
- 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 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.

Tax Reform: Developments and Analysis

Some developments relating to the 2017 tax legislation commonly called the "Tax Cuts and Jobs Act" -- or "TCJA" -- are marked "[TCJA]" in red font in the list below, for ease of reference. However, if you are searching for TCJA-related developments in particular, you may want to look at the [KPMG developments and analysis guide](#). This easy-to-use guide is organized by topic and links to TCJA-related federal tax developments (including Treasury and IRS guidance) and relevant KPMG analyses and observations. You also can find a host of resources on TCJA-related developments, including links to webcasts, on [KPMG's tax reform webpage](#).

Taxation of the Digitalized Economy

For KPMG's reports of 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](#). These developments generally are not included in the list below.

Contents

Legislative	2
Enacted Legislation	2
House	3
Senate	3
Joint Committee on Taxation	4
Executive Branch / Administrative	4
President’s Budget	4
Final Regulations (including Final Temporary Regulations)	5
Proposed Regulations	7
OIRA	10
Revenue Rulings	12
Revenue Procedures	12
Notices	14
Announcements	15
IRS Practice Units	15
LB&I Directives	16
Other	16
Judicial	18
Supreme Court	18
Circuit Court	20
Tax Court	21
Treaties / Puerto Rico / Other	22
KPMG Reports	22

Legislative

Enacted Legislation

Dec 21 - [KPMG report: Tax provisions enacted in December 2019 appropriations legislation \[includes some TCJA-related provisions\]](#)

Jul 1 - [President signs IRS administration bill](#)

House

- Dec 19 - [House passes bill to modify state and local tax deduction limitation](#) **[TCJA]**
- Dec 17 - [House approves government funding bills, including tax provisions](#) **[partially TCJA-related]**
- Dec 16 - [Government funding bills include some tax provisions](#) **[partially TCJA-related]**
- Dec 11 - [Ways and Means approves “SALT cap” bill](#) **[TCJA related]**
- Nov 19 - [Ways and Means subcommittee discussion draft of “green energy” bill](#)
- Oct 24 - [Ways and Means approves health-related tax bills, including proposed vaping excise tax](#)
- Oct 23 - [Ways and Means drug pricing bill, with tax provision](#)
- Jul 26 - [“Carbon fee” legislation introduced](#)
- Jul 25 - [House passes multiemployer pension bill](#)
- Jul 25 - [House passes tax bill, benefits for same-sex couples \(PRIDE Act\)](#)
- Jul 17 - [House passes repeal of excise tax on high-cost employer-sponsored health coverage \(“Cadillac tax”\)](#)
- Jul 10 - [Ways and Means approves multiemployer pension bill](#)
- Jun 26 - [Ways and Means approves bill extending healthcare-related PCORI fee](#)
- Jun 21 - [Ways and Means approves three tax bills](#) **[partially TCJA-related]**
- Jun 18 - [Ways and Means schedules mark-up of tax bills](#) **[partially TCJA-related]**
- Jun 16 - [House Ways and Means hearing, fringe benefit UBTI](#) **[TCJA]**
- Jun 10 - [House passes revised version of IRS administration bill](#)
- May 23 - [U.S. House passes retirement tax bill, includes kiddie tax relief](#) **[partially TCJA-related]**
- May 8 - [Ways and Means, Finance committees to hold tax-related hearings](#)
- Apr 9 - [House passes H.R. 1957, Taxpayer First Act of 2019](#)
- Apr 2 - [Ways and Means approves two tax bills](#)
- Mar 29 - [Bipartisan retirement legislation released](#)
- Mar 28 - [Bipartisan IRS modernization bill released](#)
- Mar 27 - [Ways and Means holds first hearing on 2017 tax law](#) **[TCJA]**
- Jan 2 - [Ways and Means Chairman Brady’s discussion draft for technical corrections legislation](#) **[TCJA]**

Senate

- Dec 19 - [Senate approves government funding, with tax provisions](#) **[partially TCJA-related]**
- Dec 16 - [Government funding bills include some tax provisions](#) **[partially TCJA-related]**
- Nov 8 - [Proposal to revise opportunity zone rules](#) **[TCJA]**
- Oct 15 - [Senate Finance disaster tax relief taskforce report](#)
- Sep 17 - [Senate Finance taskforce’s report on expiring health-related tax provisions](#)
- Sep 12 - [Wyden’s mark-to-market plan for capital gains](#)
- Aug 28 - [Senate Finance employment and community development taskforce report findings](#)
- Aug 26 - [KPMG report: The “Wyden bill”—a new approach to taxing carried interest](#)
- Aug 13 - [Senate Finance taskforces issue reports on expiring tax provisions](#)
- Jun 24 - [U.S. Senate Finance Committee leaders’ letter concerning France’s proposed digital services tax](#)

- Jun 14 - [Senate passes IRS administration bill](#)
- May 24 - [KPMG report: Senator Wyden's carried interest bill; preliminary observations](#)
- May 23 - [Wyden introduces carried interest bill](#)
- May 22 - [Senate passes bill to modify 2017 "kiddie tax" changes \[TCJA\]](#)
- May 8 - [Ways and Means, Finance committees to hold tax-related hearings](#)
- Feb 28 - [Senate Finance leaders introduce bipartisan tax extenders, disaster tax relief bill](#)
- Feb 27 - [Senate confirms Desmond as IRS Chief Counsel](#)
- Feb 8 - [Senate Finance leadership's position on proposed EU digital services tax](#)

Joint Committee on Taxation¹

- Nov 1 - [JCT "Bluebook" on tax legislation in 115th Congress](#)
- Jul 8 - [JCT description, tax proposals in FY 2020 budget recommendations](#)
- Jun 6 - [JCT overview of GILTI and FDII provisions \(sections 250 and 951A\) \[TCJA\]](#)
- May 16 - [JCT report about IRS disclosures for public inspection, calendar year 2018](#)
- May 16 - [JCT overview, formation of taskforces on certain temporary and disaster relief tax provisions](#)
- Apr 12 - [JCT overview of "BEAT" provisions under section 59A \[TCJA\]](#)
- Mar 28 - [JCT overview of section 163\(j\), limitation on deduction of business interest \[TCJA\]](#)
- Mar 25 - [JCT report, distributional effects of Public Law 115-97 \(U.S. tax law\) \[TCJA\]](#)
- Mar 20 - [JCT report on federal tax system, in effect for 2019](#)
- Mar 13 - [JCT overview of section 199A deduction, qualified business income \[TCJA\]](#)
- Mar 8 - [JCT report on expired, expiring federal tax provisions](#)
- Jan 18 - [Expiring tax provisions listed in JCT report](#)
- Jan 3 - [KPMG report: Preliminary analysis and observations regarding certain exempt organization provisions in JCT Bluebook \[TCJA\]](#)
- Jan 3 - [KPMG report: JCT Bluebook clarifies intended application of enhanced charitable contribution deduction \[TCJA\]](#)

Executive Branch / Administrative

President's Budget

- Mar 18 - [Trump Administration's FY 2020 budget: "Analytical Perspectives"](#)
- Mar 11 - [Trump Administration budget proposals for FY 2020](#)

¹ Some other TNFs also may refer to JCT publications not included in this list.

Final Regulations (including Final Temporary Regulations)

- Dec 31 - **T.D. 9889**: [Final regulations for opportunity zones are released to Federal Register](#) **[TCJA]**
- Dec 30 - **T.D. 9890**: [KPMG report: Final regulations on withholding and reporting income to foreign persons \(initial impressions\)](#)
- Dec 20 - **T.D. 9889**: [KPMG report: Initial impressions of final regulations for opportunity zones](#) **[TCJA]**
- Dec 20 - **T.D. 9882**: [KPMG report: Analysis of final and proposed foreign tax credit regulations](#) **[TCJA]**
- Dec 19 - **T.D. 9889**: [Final regulations: Opportunity zones \(text of regulations and FAQs\)](#) **[TCJA]**
- Dec 19 - **T.D. 9888**: [Final regulations: Defining predecessor, successor and limiting recognition of gain under section 355\(e\) \(initial impressions\)](#)
- Dec 16 - **T.D. 9888**: [Final regulations: Defining predecessor, successor and limiting recognition of gain under section 355\(e\) \(text of regulations\)](#)
- Dec 16 - **T.D. 9882**: [Regulations relating to foreign tax credits released to Federal Register](#) **[TCJA]**
- Dec 16 - **T.D. 9887**: [Final regulations: Dividend equivalents from sources within the United States \(text of regulations\)](#)
- Dec 12 - **T.D. 9885**: [KPMG report: Analysis of final regulations and additional proposed regulations under section 59A \("BEAT"\)](#) **[TCJA]**
- Dec 9 - **T.D. 9885**: [KPMG report: "BEAT" final regulations, provisions applicable to insurance companies](#) **[TCJA]**
- Dec 3 - **T.D. 9882**: [KPMG report: Initial impressions about final and proposed foreign tax credit regulations](#) **[TCJA]**
- Dec 2 - **T.D. 9885**: [KPMG report: Initial impressions, final regulations and additional proposed regulations under section 59A \("BEAT"\)](#) **[TCJA]**
- Dec 2 - **T.D. 9882**: [Regulations: Foreign tax credits \(text of regulations\)](#) **[TCJA]**
- Dec 2 - **T.D. 9885**: [Regulations implementing BEAT rules \(text of regulations\)](#) **[TCJA]**
- Nov 22 - **T.D. 9884**: [Final regulations: Basic exclusion amount, estate and gift taxes \(text of regulations\)](#) **[TCJA]**
- Nov 18 - **T.D. 9833**: [Final regulations: Ownership-attribution rules for persons related to CFC; rents derived in active conduct of trade or business](#) **[TCJA]**
- Nov 8 - **T.D. 9881**: [Final regulations: Health insurance providers fee, electronic filing requirements](#)
- Nov 1 - **T.D. 9880**: [KPMG report: Removal of documentation rules under section 385; future proposed regulations may eliminate per se funding rule](#)
- Oct 31 - **T.D. 9880**: ["Documentation regulations" under section 385 are removed; new regulations to be proposed](#)
- Oct 29 - **T.D. 9879**: [Final regulations: Information reporting of reportable sales of life insurance contracts, of death benefit payments; initial impressions](#) **[TCJA]**
- Oct 25 - **T.D. 9879**: [Final regulations: Information reporting under section 6050Y; reportable sales of life insurance contracts and death benefit payments](#)
- Oct 11 - **T.D. 9878**: [Final regulations: Timing of losses related to federally declared disasters](#)
- Oct 4 - **T.D. 9876 and T.D. 9877**: [Final regulations for partnerships: Disguised sales; recourse liabilities under section 752 \(text of regulations\)](#)
- Sep 19 - **T.D. 9875**: [Final regulations: Hardship distributions from section 401\(k\) plans \(text of regulations\)](#)

Sep 17 - **T.D. 9874:** [Regulations: Additional first-year depreciation deduction \(regulations released to Federal Register\)](#) **[TCJA]**

Sep 13 - **T.D. 9874:** [Regulations: Additional first-year depreciation deduction \(advance release of text of regulations by IRS\)](#) **[TCJA]**

Jul 23 - **T.D. 9871:** [Final regulations: Partnership allocations of foreign income taxes to partners](#)

Jul 17 - **T.D. 9872:** [Final regulations: Partner treated as lessee, when lessor elects to pass through investment tax credits to lessee](#)

Jul 11 - **T.D. 9870:** [Final regulations: Advance payments for goods, long-term contracts](#) **[TCJA]**

Jul 2 - **T.D. 9861:** [Final regulations: Truncated TINs for wage, tax statements furnished to employees](#)

Jun 28 - **T.D. 9869:** [Final regulations: Self-employment tax treatment, partners in partnership that owns disregarded entity \(text of regulations\)](#)

Jun 19 - **T.D. 9866:** [KPMG report: Initial impressions of final regulations under section 951A \(GILTI\) and certain guidance related to foreign tax credits, as well as new proposed regulations under sections 951A and 958 \(rules for determining stock ownership\)](#) **[TCJA]**

Jun 19 - **T.D. 9865:** [KPMG report: Initial impressions of temporary regulations under section 245A; denial of dividends received deduction for certain dividends from current or former CFCs](#) **[TCJA]**

Jun 18 - **T.D. 9863:** [KPMG report: Modification of discounting rules for insurance companies \(initial impressions about final regulations\)](#) **[TCJA]**

Jun 14 - **T.D. 9866:** [Final regulations: "Global intangible low-taxed income" \(GILTI\) \(text of regulations\)](#) **[TCJA]**

Jun 14 - **T.D. 9865:** [Regulations: Dividends received deduction limitation when from certain foreign corporations \(text of regulations\)](#) **[TCJA]**

Jun 13 - **T.D. 9867:** [Final regulations: Health reimbursement arrangements, account-based group health plans](#)

Jun 13 - **T.D. 9863:** [Final regulations: Modification of discounting rules for insurance companies](#) **[TCJA]**

Jun 13 - **T.D. 9868:** [Final regulations: Nonresident aliens, potential current beneficiaries of electing small business trusts](#) **[TCJA]**

Jun 11 - **T.D. 9864:** [Final regulations: State and local tax credits and charitable contributions \(text of regulations\)](#) **[TCJA]**

Jun 3 - **T.D. 9862:** [Final regulations: Transfers of property to REITs following corporate distributions](#)

May 29 - **T.D. 9859:** [KPMG report: Final regulations, amount determined under section 956 for corporate U.S. shareholders](#)

May 23 - **T.D. 9860:** [Final regulations: Certified professional employer organizations \(employee leasing companies\)](#)

May 22 - **T.D. 9859:** [Final regulations: Amount determined under section 956 for corporate U.S. shareholders \(text of regulations\)](#) **[TCJA]**

May 13 - **T.D. 9857:** [KPMG report: Qualified business units \(QBUs\), foreign currency gain or loss recognition and deferral \(report on final regulations\)](#)

May 10 - **T.D. 9857:** [Final regulations: Income, currency gain or loss of "qualified business unit" \(section 987\)](#)

Apr 16 - **T.D. 9847:** [Correcting amendments, final regulations under section 199A](#) **[TCJA]**

Apr 9 - **T.D. 9846:** [Corrections to final regulations under section 965](#) **[TCJA]**

Apr 8 - **T.D. 9854:** [Final regulations: Tax-exempt bonds, clarifying definition of "investment-type property"](#)

- Mar 25 - **T.D. 9853:** [Final regulations: Reportable transactions penalties](#)
- Mar 21 - **T.D. 9852:** [Final regulations: Verification and certification requirements for certain entities, reporting by FFIs](#)
- Mar 18 - **T.D. 9851:** [Final regulations: Income test qualification for RICs](#)
- Mar 11 - **T.D. 9849:** [Final regulations: 296 regulations withdrawn, 79 modified](#)
- Feb 27 - **T.D. 9850:** [Final regulations: Utility allowance rules, low-income housing credit \(section 42\)](#)
- Feb 22 - **T.D. 9848:** [Final regulations: Low-income housing credit under section 42, compliance monitoring](#)
- Feb 21 - **T.D. 9844:** [Final regulations: Centralized partnership audit regime \(text of regulations\)](#)
- Feb 5 - **T.D. 9847:** [KPMG report: Changes in corrected final regulations under section 199A](#) **[TCJA]**
- Feb 4 - **T.D. 9847:** [Final regulations under section 199A released to Federal Register](#) **[TCJA]**
- Feb 4 - **T.D. 9846:** [Final regulations released to Federal Register, "transition tax" under section 965](#) **[TCJA]**
- Feb 1 - [Final regulations under section 199A; new version reflects changes](#) **[TCJA]**
- Jan 30 - [Final regulations under section 965; new version reflects changes](#) **[TCJA]**
- Jan 24 - [KPMG report: Analysis and observations of final section 199A regulations](#) **[TCJA]**
- Jan 22 - [KPMG report: Regulations addressing treatment under section 199A, dividends paid by REITs](#) **[TCJA]**
- Jan 18 - [Final regulations under section 199A \(20% deduction\), text released by IRS](#) **[TCJA]**
- Jan 18 - [KPMG report: Final regulations relating to "transition tax" under section 965](#) **[TCJA]**
- Jan 15 - [Final regulations under section 965, text is released by IRS](#) **[TCJA]**

Proposed Regulations

- Dec 23 - **REG-100956-19:** [Proposed regulations: Source of income for certain sales of personal property, inventory \(text of regulations\)](#) **[TCJA]**
- Dec 20 - **REG-105495-19:** [KPMG report: Analysis of final and proposed foreign tax credit regulations](#) **[TCJA]**
- Dec 19 - **REG-116163-19:** [Proposed regulations: Misdirected direct-deposit refunds](#)
- Dec 17 - **REG-122180-18:** [KPMG report: Proposed regulations under section 162\(m\) to address tax law changes \(initial impressions\)](#) **[TCJA]**
- Dec 16 - **REG-122180-18:** [Proposed regulations: Deduction for employee remuneration in excess of \\$1 million \(text of regulations\)](#) **[TCJA]**
- Dec 16 - **REG-105495-19:** [Regulations relating to foreign tax credits released to Federal Register](#) **[TCJA]**
- Dec 13 - **REG-107431-19:** [Proposed regulations: Payments made to charities in return for consideration](#) **[TCJA]**
- Dec 12 - **REG-112607-19:** [KPMG report: Analysis of final regulations and additional proposed regulations under section 59A \("BEAT"\)](#) **[TCJA]**
- Dec 9 - **REG-112607-19:** [KPMG report: "BEAT" final regulations, provisions applicable to insurance companies](#) **[TCJA]**
- Dec 3 - **REG-105495-19:** [KPMG report: Initial impressions about final and proposed foreign tax credit regulations](#) **[TCJA]**

Dec 2 - **REG-112607-19**: [KPMG report: Initial impressions, final regulations and additional proposed regulations under section 59A \("BEAT"\)](#) **[TCJA]**

Dec 2 - **REG-105495-19**: [Regulations: Foreign tax credits \(text of regulations\)](#) **[TCJA]**

Dec 2 - **REG-112607-19**: [Regulations implementing BEAT rules \(text of regulations\)](#) **[TCJA]**

Nov 15 - **REG-118378-19**: [Proposed regulations: Transparency in health plans, insurance coverage](#)

Nov 7 - **REG-132210-18**: [Proposed regulations: Updated life expectancy, distribution period tables for retirement plans](#)

Nov 6 - **REG-131071-18**: [Proposed regulations: Eligible terminated S corporations \(initial impressions\)](#) **[TCJA]**

Nov 4 - **REG-131071-18**: [Proposed regulations: Eligible terminated S corporations \(text of regulations\)](#) **[TCJA]**

Nov 1 - **REG-123112-19**: [KPMG report: Removal of documentation rules under section 385; future proposed regulations may eliminate per se funding rule](#)

Oct 31 - **REG-123112-19**: ["Documentation regulations" under section 385 are removed; new regulations to be proposed](#)

Oct 9 - [Proposed regulations: Contribution limits applicable to ABLE accounts](#) **[TCJA]**

Oct 8 - **REG-118784-18**: [Proposed regulations: Transition from interbank offered rates \(IBORs\) to other reference rates](#)

Oct 8 - **REG-106282-18**: [Public hearing scheduled; regulations on dividends received deduction limitations from controlled foreign corporations](#) **[TCJA]**

Oct 3 - **REG-104223-18**: [KPMG report: Initial impressions of proposed regulations addressing repeal of section 958\(b\)\(4\); relief provided by Rev. Proc. 2019-40](#) **[TCJA]**

Oct 1 - **REG-104223-18**: [Proposed regulations, Rev. Proc. 2019-40: Relief provided concerning repeal of section 958\(b\)\(4\) \(text of regulations\)](#) **[TCJA]**

Sep 27 - **REG-136401-18**: [Proposed regulations: Employer shared-responsibility provisions, health reimbursement arrangements](#)

Sep 17 - **REG-106808-19**: [Regulations: Additional first-year depreciation deduction \(regulations released to Federal Register\)](#) **[TCJA]**

Sep 13 - **REG-125710-18**: [KPMG report: Proposed regulations on treatment of built-in items for section 382 \(initial impressions\)](#) **[TCJA]**

Sep 13 - **REG-106808-19**: [Regulations: Additional first-year depreciation deduction \(advance release of text of regulations by IRS\)](#) **[TCJA]**

Sep 9 - **REG-125710-18**: [Proposed regulations: Built-in gains and losses under section 382\(h\) \(text of regulations\)](#) **[TCJA]**

Sep 6 - **REG-104870-18 and REG-104554-18**: [KPMG report: Proposed regulations on changes to income recognition rules; initial impressions](#) **[TCJA]**

Sep 5 - **REG-104870-18 and REG-104554-18**: [Proposed regulations: Timing of income inclusion under section 451 \(text of regulations\)](#) **[TCJA]**

Aug 22 - **REG-101378-19**: [Proposed regulations: Employer-provided vehicles, fleet average and cents-per-mile valuation rules](#) **[TCJA]**

Aug 13 - **REG-130700-14**: [KPMG report: Initial impressions of cloud-computing, digital-content transactions \(proposed regulations\)](#)

Aug 9 - **REG-130700-14**: [Proposed regulations: Classification of cloud-computing transactions, transactions involving digital content \(text of regulations\)](#)

- Jul 12 - **REG-105474-18**: [KPMG report: Proposed passive foreign investment company \(PFIC\) regulations; initial impressions and observations](#) **[TCJA]**
- Jul 10 - **REG-105474-18**: [Proposed regulations: Passive foreign investment companies \(PFICs\) and PFIC insurance exception \(text of regulations\)](#) **[TCJA]**
- Jul 2 - **REG-121508-18**: [Proposed regulations: Multiple employer plans \(MEPs\)](#)
- Jun 28 - **REG-106877-18**: [Proposed regulations: Section 4968 excise tax, net investment income of colleges, universities \(text of regulations\)](#) **[TCJA]**
- Jun 25 - **REG-118425-18**: [KPMG report: Section 199A implications for cooperatives; initial impressions of proposed regulations](#)
- Jun 19 - **REG-101828-19**: [KPMG report: Initial impressions of final regulations under section 951A \(GILTI\) and certain guidance related to foreign tax credits, as well as new proposed regulations under sections 951A and 958 \(rules for determining stock ownership\)](#) **[TCJA]**
- Jun 18 - **REG-118425-18**: [Proposed regulations: Rules under section 199A for cooperatives and patrons \(text of regulations\)](#) **[TCJA]**
- Jun 14 - **REG-106282-18**: [Regulations: Dividends received deduction limitation when from certain foreign corporations \(text of regulations\)](#) **[TCJA]**
- Jun 14 - **REG-101828-19**: [Proposed regulations: Section 958 \(determining stock ownership\) and section 951A \(GILTI\) \(text of regulations\)](#) **[TCJA]**
- Jun 6 - **REG-109826-17**: [Proposed regulations: Exception for U.S. real property interests held by foreign pension funds \(initial impressions\)](#)
- Jun 6 - **REG-109826-17**: [Proposed regulations: Exception for U.S. real property interests held by foreign pension funds \(text of regulations\)](#)
- May 30 - **REG-132240-15**: [Proposed regulations: Withholding on distributions, guidance under section 3405](#)
- May 20 - **REG-125135-15**: [KPMG report: Ownership-attribution rules for CFC related persons; rents from active conduct of trade or business \(proposed regulations\)](#)
- May 17 - **REG-125135-15**: [Proposed regulations: Ownership-attribution rules for persons related to CFC; rents derived in active conduct of trade or business](#)
- May 9 - **REG-105476-18**: [KPMG report: Proposed regulations, withholding obligations incident to transfers of interests by foreign partners, partnerships engaged in U.S. trade or business](#) **[TCJA]**
- May 8 - **REG-104464-18**: [EU comment letter on FDI proposed regulations; alleged "prohibited export subsidy" under WTO obligations](#) **[TCJA]**
- May 7 - **REG-105476-18**: [Proposed regulations: Tax withholding, information reporting concerning partnerships with foreign partners \(text of regulations\)](#) **[TCJA]**
- Apr 30 - **REG-120186-18**: [Proposed regulations under section 1400Z-2 for qualified opportunity zones, released to Federal Register](#) **[TCJA]**
- Apr 18 - **REG-120186-18**: [Opportunity zones: Highlights of the second set of proposed regulations](#) **[TCJA]**
- Apr 17 - **REG-117062-18**: [Proposed regulations: Nonresident aliens, potential current beneficiaries of electing small business trusts](#) **[TCJA]**
- Apr 17 - **REG-120186-18**: [Proposed regulations: Qualified opportunity zone funds under section 1400Z-2 \(text of regulations released by IRS\)](#) **[TCJA]**
- Mar 27 - **REG-143686-07**: [Notice of withdrawal of proposed regulations under Subchapter C](#)
- Mar 25 - **REG-113943-17**: [Proposed regulations: Transfers of property to REITs](#)

- Mar 22 - **REG-135671-17**: [Proposed regulations: Corporate partners, transactions involving equity interest of partner](#)
- Mar 22 - **REG-103083-18**: [Proposed regulations: Life insurance contracts, reportable sales and reportable death benefits](#) **[TCJA]**
- Mar 18 - **REG-104352-18**: [Proposed regulations under “anti-hybrid” provisions; hearing cancelled](#) **[TCJA]**
- Mar 11 - **REG-105600-18**: [Proposed foreign tax credit regulations, hearing cancelled](#) **[TCJA]**
- Mar 8 - **REG-104464-18**: [KPMG report: Initial impressions, observations on proposed FDII, GILTI regulations under section 250](#) **[TCJA]**
- Mar 7 - **REG-104352-18**: [Proposed regulations, “anti-hybrid” provisions \(hearing scheduled for March 20\)](#) **[TCJA]**
- Mar 5 - **REG-104259-18**: [Proposed “BEAT” regulations, hearing scheduled for March 25](#) **[TCJA]**
- Mar 5 - **REG-105600-18**: [Proposed foreign tax credit regulations, corrections](#) **[TCJA]**
- Mar 4 - **REG-104464-18**: [Proposed regulations under section 250 for FDII deductions \(text released\)](#) **[TCJA]**
- Feb 27 - **REG-105600-18**: [Proposed foreign tax credit regulations, hearing scheduled for March 14](#) **[TCJA]**
- Feb 4 - **REG-134652-18**: [Final regulations under section 199A released to Federal Register](#) **[TCJA]**
- Jan 29 - **REG-104390-18 and REG-115420-18**: [Public hearings scheduled: GILTI and opportunity zone proposed regulations](#) **[TCJA]**
- Jan 22 - **REG-134652-18**: [KPMG report: Regulations addressing treatment under section 199A, dividends paid by REITs](#) **[TCJA]**
- Jan 18 - **REG-134652-18**: [Final regulations under section 199A \(20% deduction\), text released by IRS](#) **[TCJA]**
- Jan 7 - **REG-115420-18**: [Public hearing, proposed regulations for opportunity zones](#) **[TCJA]**

OIRA

- Dec 19 - [Final regulations, opportunity zones; OIRA review completed](#) **[TCJA]**
- Dec 18 - [Regulations pending OIRA review: Business interest limitation under section 163\(j\)](#) **[TCJA]**
- Dec 17 - [Regulations pending OIRA review: Hybrid dividends and payments](#) **[TCJA]**
- Dec 9 - [Final regulations on opportunity zones, pending OIRA review](#) **[TCJA]**
- Dec 5 - [Proposed regulations, payments made to charitable entities; OIRA review completed](#) **[TCJA]**
- Dec 5 - [Regulations pending OIRA review: Special rules for nuclear decommissioning costs under section 468A](#)
- Nov 11 - [BEAT proposed and final regulations; OIRA review completed](#) **[TCJA]**
- Oct 31 - [Foreign tax credit regulations; OIRA review completed](#) **[TCJA]**
- Oct 30 - [Regulations pending OIRA review: Payments to charitable entities in return for consideration](#) **[TCJA]**
- Oct 22 - [Regulations on interest in corporations as stock or indebtedness \(OIRA review completed\)](#)
- Oct 22 - [Regulations to update tables for required minimum distribution rules, section 401\(a\)\(9\) \(OIRA review completed\)](#)
- Oct 9 - [Regulations pending OIRA review: Stock or indebtedness, interest in corporations](#)

- Oct 4 - [Regulations pending OIRA review: Foreign tax credit guidance](#) **[TCJA]**
- Sep 26 - [Regulations on eliminating interbank offered rates](#) (OIRA review completed)
- Sep 17 - [Regulations under section 59A or "BEAT" provisions](#) (pending OIRA review) **[TCJA]**
- Sep 13 - [Final regulations: Additional first-year depreciation](#) (OIRA review completed) **[TCJA]**
- Sep 9 - [Regulations: Additional first-year depreciation allowance](#) (OIRA review completed) **[TCJA]**
- Aug 29 - [Regulations pending OIRA review: Guidance on eliminating interbank offered rates](#)
- Aug 21 - [Proposed regulations under section 451\(b\) and \(c\); OIRA review completed](#) **[TCJA]**
- Aug 14 - [Regulations pending OIRA review: Tables for required minimum distribution rules, section 401\(a\)\(9\)](#)
- Jul 26 - [Final regulations for additional first-year depreciation allowance](#) (pending OIRA review) **[TCJA]**
- Jul 24 - [Proposed regulations: Determining built-in gains and losses](#) (OIRA review completed) **[TCJA]**
- Jul 11 - [Regulations on tax treatment of cloud computing; OIRA review completed](#)
- Jun 25 - [Regulations concerning excise tax on college net investment income](#) (OIRA review completed) **[TCJA]**
- Jun 19 - [OIRA review completed: Proposed regulations regarding multiple employer plan \(MEP\) rules](#)
- Jun 18 - [Regulations pending OIRA review: Proposed regulations under section 451\(b\)](#) **[TCJA]**
- Jun 14 - [Regulations: Distilled spirits standards, malt beverage labeling rules](#) (OIRA review completed)
- Jun 14 - [Regulations pending OIRA review: Tax treatment of cloud computing, computer programs, digital content](#)
- Jun 11 - [OIRA review completed, final regulations on health reimbursement arrangements \(HRAs\)](#)
- Jun 6 - [GILTI regulations under sections 951\(b\) and 951A; OIRA review completed](#) **[TCJA]**
- Jun 5 - [Regulations: Dividend received deduction, branch loss recapture](#) (sections 91 and 245A); OIRA review completed **[TCJA]**
- Jun 3 - [Regulations concerning SALT credits, charitable contributions; sections 164 and 170\(c\) guidance](#) (OIRA review completed) **[TCJA]**
- May 30 - [Regulations pending OIRA review: Proposed regulations under section 245A](#) **[TCJA]**
- May 23 - [Proposed regulations: Passive income exception for foreign insurance companies](#) (OIRA review completed) **[TCJA]**
- May 20 - [OIRA review: Distilled spirits standards, malt beverage labeling rules](#) (proposed regulations)
- May 20 - [Proposed regulations: Domestic production activities deduction for agricultural, horticultural cooperatives](#) (OIRA review completed) **[TCJA]**
- May 16 - [Regulations pending OIRA review: Global intangible low-taxed income \(GILTI\) provisions under sections 951\(b\) and 951A](#) **[TCJA]**
- May 16 - [Regulations pending OIRA review: Excise tax on college net investment income](#) (section 4968) **[TCJA]**
- May 15 - [Regulations pending OIRA review: Dividend received deduction](#) (section 245A), branch loss recapture (section 91) **[TCJA]**
- May 14 - [Proposed regulations: Multiple employer plan \(MEP\) regulations subject to OIRA review](#)
- May 9 - [Proposed regulations under section 897\(l\), qualified foreign pension fund requirements](#) (OIRA review completed)
- May 7 - [OIRA review of final regulations, health reimbursement arrangements](#)
- Apr 17 - [OIRA review completed; proposed regulations under qualified opportunity funds](#) (section 1400Z-2) **[TCJA]**
- Apr 12 - [OIRA review of proposed regulations: Determining built-in gains and losses](#) **[TCJA]**

- Apr 12 - [OIRA review of proposed regulations: Guidance under section 451\(c\)](#) **[TCJA]**
- Apr 5 - [Proposed regulations pending OIRA review: Passive income exception under section 1297 for foreign insurance companies](#) **[TCJA]**
- Apr 3 - [Regulations pending OIRA review: Domestic production activities deduction for agricultural, horticultural cooperatives \(section 199A\(g\)\)](#) **[TCJA]**
- Mar 25 - [OIRA review: SALT credits, charitable contributions; guidance under sections 164 and 170\(c\)](#) **[TCJA]**
- Mar 15 - [Status of Treasury proposed regulations pending OIRA review](#)
- Mar 12 - [Regulations pending OIRA review, qualified opportunity funds \(section 1400Z-2\)](#) **[TCJA]**
- Feb 23 - [OIRA review completed; proposed regulations under section 250 for FDII deductions](#) **[TCJA]**
- Jan 17 - [OIRA review completed, final regulations under section 199A \(20% deduction\)](#) **[TCJA]**
- Jan 14 - [OIRA review completed, final regulations under section 965 transition tax](#) **[TCJA]**

Revenue Rulings

- Dec 6 - [Rev. Rul. 2019-28: No change to interest rates on tax underpayments, overpayments](#)
- Oct 9 - [Rev. Rul. 2019-24: Tax treatment of transactions involving cryptocurrency](#)
- Sep 27 - [Rev. Rul. 2019-22: Fringe benefit aircraft valuations, second half 2019](#)
- Aug 28 - [Rev. Rul. 2019-21: No change to interest rates for tax overpayments, underpayments \(fourth quarter 2019\)](#)
- Aug 14 - [Rev. Rul. 2019-19: Failure to cash retirement plan distribution check does not change gross income](#)
- Jun 5 - [Rev. Rul. 2019-15: Interest rates, tax overpayments and underpayments \(third quarter 2019\)](#)
- May 9 - [Rev. Rul. 2019-13: Cash distributions during the post-termination transition period](#)
- Apr 16 - [Rev. Rul. 2019-10: Fringe benefit aircraft valuations, first half 2019](#)
- Mar 29 - [Rev. Rul. 2019-11: Tax treatment of state and local tax refunds](#)
- Mar 13 - [Rev. Rul. 2019-06: Covered compensation tables for 2019 plan year](#)

Revenue Procedures

- Dec 16 - [Rev. Proc. 2020-10: Third six-year remedial amendment cycle, pre-approved defined benefit plans](#)
- Dec 12 - [Rev. Proc. 2020-9: Extended deadline, plan amendments and hardship distributions](#)
- Nov 26 - [Rev. Proc. 2019-48: Rules for using per diem rates to substantiate expenses incurred away from home](#) **[TCJA]**
- Nov 14 - [Rev. Proc. 2019-46: Business standard mileage rate rules reflecting 2017 tax law changes](#)
- Nov 8 - [Rev. Proc. 2019-43: List of automatic changes, accounting methods](#)
- Nov 6 - [Rev. Proc. 2019-44: Inflation adjustments for 2020, individual taxpayers](#)
- Oct 3 - [Rev. Proc. 2019-40: KPMG report: Initial impressions of proposed regulations addressing repeal of section 958\(b\)\(4\); relief provided by Rev. Proc. 2019-40](#) **[TCJA]**

- Oct 1 - [Proposed regulations, **Rev. Proc. 2019-40**: Relief provided concerning repeal of section 958\(b\)\(4\) \(text of regulations\) \[TCJA\]](#)
- Sep 30 - [Rev. Proc. 2019-39](#): [Recurring remedial amendment periods for correcting section 403\(b\) plans](#)
- Sep 24 - [Rev. Proc. 2019-38](#): [Section 199A "safe harbor" for rental real estate \[TCJA\]](#)
- Sep 13 - [Rev. Proc. 2019-33](#): [Regulations: Additional first-year depreciation deduction \(advance release of text of regulations by IRS\)](#)
- Sep 6 - [Rev. Proc. 2019-37](#): [Automatic consent to change method of accounting, section 451 proposed regulations \[TCJA\]](#)
- Aug 29 - [Rev. Proc. 2019-36](#): [Foreign insurance companies; effectively connected net investment income \(2018\)](#)
- Aug 27 - [Rev. Proc. 2019-23](#): [Updated list of countries, deposit interest paid to nonresident aliens](#)
- Aug 9 - [Rev. Proc. 2019-34](#): [KPMG report: Guidance on accounting method change for insurance companies \(Rev. Proc. 2019-34\) \[TCJA\]](#)
- Aug 6 - [Rev. Proc. 2019-34](#): [Simplified procedures for insurance companies to change methods of accounting \[TCJA\]](#)
- Jul 31 - [Rev. Proc. 2019-33](#): [Relief for bonus depreciation late elections, or revoking prior elections \[TCJA\]](#)
- Jul 25 - [Rev. Proc. 2019-32](#): [Extension of time for partnerships filing superseding Forms 1065](#)
- Jul 23 - [Rev. Proc. 2019-30 and Rev. Proc. 2019-31](#): [KPMG report: Section 846 and revised discount factors and guidance on accounting method change \(insurance companies\) \[TCJA\]](#)
- Jul 22 - [Rev. Proc. 2019-29](#): [Health insurance premium tax credit, contribution percentage for 2020](#)
- Jul 22 - [Rev. Proc. 2019-30](#): [Insurance companies, automatic consent for accounting method change \[TCJA\]](#)
- Jul 22 - [Rev. Proc. 2019-31](#): [Insurance companies, revised unpaid loss discount factors for 2018 accident year \[TCJA\]](#)
- May 29 - [Rev. Proc. 2019-25](#): [HSA inflation-adjusted amounts for 2020](#)
- May 21 - [Rev. Proc. 2019-26](#): [Automobile depreciation deduction limits for 2019](#)
- May 7 - [Rev. Proc. 2019-22](#): [Private schools' use of website to publicize racially nondiscriminatory policy](#)
- May 1 - [Rev. Proc. 2019-20](#): [Expansion of retirement plan determination letter program](#)
- Apr 19 - [Rev. Proc. 2019-19](#): [Employee plan compliance, self-correction program update](#)
- Apr 11 - [Rev. Proc. 2019-18](#): [Safe harbor for professional sports team, valuation of certain player contracts](#)
- Apr 3 - [Rev. Proc. 2019-17](#): [General public use requirements, qualified residential rental projects financed with tax-exempt bonds](#)
- Mar 28 - [Rev. Proc. 2019-15](#): [List of countries eligible for section 911\(d\)\(1\) waiver for 2018](#)
- Feb 13 - [Rev. Proc. 2019-13](#): [Safe harbor method of accounting, 100% first-year depreciation for passenger automobiles \[TCJA\]](#)
- Jan 18 - [Rev. Proc. 2019-11](#): [Final regulations under section 199A \(20% deduction\), text released by IRS \[TCJA\]](#)

Notices

- Dec 31 - **Notice 2020-05:** [Standard mileage rates for 2020](#)
- Dec 27 - **Notice 2019-66:** [Changes proposed in 2019 draft instructions for Form 1065 and Schedule K-1](#)
- Dec 18 - **Notice 2020-3:** [Default rate of withholding, periodic payments including retirement and annuity distributions](#) **[TCJA]**
- Dec 16 - **Notice 2020-2:** [Extended phase-in provisions under section 871\(m\) regulations](#)
- Dec 10 - **Notice 2019-67:** [Mortality rates, tables for defined benefit pension plans \(2021\)](#)
- Dec 9 - **Notice 2019-66:** [Relief from broad partner tax basis capital account reporting for 2019](#)
- Dec 6 - **Notice 2019-65:** [Regulations under section 987, additional deferral of effective date](#)
- Dec 4 - **Notice 2019-64:** [Required amendments list \(2019\) for qualified retirement plans](#)
- Dec 2 - **Notice 2019-63:** [Health coverage information-reporting deadline extension](#)
- Nov 13 - **Notice 2019-60:** [Additional temporary nondiscrimination relief through 2020, closed defined benefit plans](#)
- Nov 6 - **Notice 2019-59:** [Pension plans, cost-of-living adjustments for 2020](#)
- Nov 1 - **Notice 2019-58:** [KPMG report: Removal of documentation rules under section 385; future proposed regulations may eliminate per se funding rule](#)
- Oct 11 - **Notice 2019-58:** [Treatment of certain interests in corporations as stock or indebtedness, expiration of temporary regulations](#)
- Sep 30 - **Notice 2019-54:** [More time for drought-affected farmers, ranchers to replace livestock](#)
- Sep 25 - **Notice 2019-55:** [Per diem rates, substantiation of employee lodging, meals, incidentals \(2019-2020\)](#)
- Sep 17 - **Notice 2019-52:** [Low-income housing credit, expanded California wildfire-related disaster relief](#)
- Sep 3 - **Notice 2019-50:** [Annual fee imposed on health insurance providers for 2020](#)
- Aug 23 - **Notice 2019-49:** [Nondiscrimination relief for “closed” defined benefit plans extended through 2020](#)
- Aug 22 - **Notice 2019-46:** [Relief for domestic partnerships or S corporations, determining GILTI amounts \(initial impressions and observations\)](#) **[TCJA]**
- Jul 17 - **Notice 2019-45:** [Expanded list of preventive care for certain chronic conditions \(HSA eligibility\)](#)
- Jul 12 - **Notice 2019-43:** [Beginning construction “continuity safe harbor” extended for national security concerns \(sections 45 and 48\)](#)
- Jun 25 - **Notice 2019-42:** [Opportunity zones designated in Puerto Rico](#) **[TCJA]**
- Jun 18 - **Notice 2019-27:** [Guidance for cooperatives and patrons on QBI deduction](#) **[TCJA]**
- Jun 18 - **Notice 2019-27:** [Proposed regulations: Rules under section 199A for cooperatives and patrons \(text of regulations\)](#) **[TCJA]**
- Jun 11 - **Notice 2019-12:** [Final regulations: State and local tax credits and charitable contributions \(text of regulations\)](#) **[TCJA]**
- May 31 - **Notice 2019-36 and Notice 2019-37:** [IRS notices: Oil and gas, marginal well factors, percentage depletion for 2019](#)
- May 30 - **Notice 87-7:** [Proposed regulations: Withholding on distributions, guidance under section 3405](#)
- May 22 - **Notice 2019-39:** [Current refundings for certain targeted state, local, Indian tribal government bond programs](#)

- May 10 - [Notice 2019-31: Inflation adjustment factor, carbon oxide sequestration \(section 45Q\)](#)
- May 8 - [Notice 2019-34: Maximum FMV of vehicle for 2019 to use special valuation of employee use of employer-provided vehicles; future proposed regulations intended](#)
- May 7 - [Notice 2019-33: Future guidance on tax reserves used by public utilities; request for comments](#)
- May 2 - [Notice 2019-32: Request for comments, carbon oxide sequestration credit \(section 45Q and future regulations\)](#)
- Apr 24 - [Notice 2019-30: Recommendations requested for 2019-2020 priority guidance plan \[TCJA\]](#)
- Mar 28 - [Notice 2019-24: Housing expense limit adjustments, foreign locations for 2019](#)
- Mar 26 - [Notice 2019-22: Credit phase-out, qualified plug-in electric vehicles \(General Motors, LLC\)](#)
- Mar 22 - [Notice 2019-25: Expanded estimated tax penalty waiver for 2018, individual taxpayers](#)
- Mar 22 - [Notice 2019-26: Updated mortality improvement rates, tables for defined benefit pension plans \(for 2020\)](#)
- Mar 12 - [Notice 2019-10: Comments requested, fuel excise tax regulations related to power take-off](#)
- Mar 7 - [Notice 2019-20: Penalty relief, partnership negative tax basis capital account reporting](#)
- Mar 6 - [Notice 2019-18: Lump-sum payments instead of future annuity payments \(defined benefit plans\)](#)
- Feb 28 - [Notice 2019-17: Estimated tax penalty relief for individual farmers, fishermen](#)
- Jan 18 - [Notice 2019-07: Relating to rental real estate and section 199A \(20% deduction\) \[TCJA\]](#)
- Jan 16 - [Notice 2019-11: Estimated tax penalty waiver for 2018, individual taxpayers \[TCJA\]](#)
- Jan 11 - [Notice 2019-08: Values for employee personal use of employer-provided vehicles \[TCJA\]](#)

Announcements

- Mar 27 - [Announcement 2019-03: APMA program, APA statistics for 2018](#)

IRS Practice Units

- Nov 6 - [IRS practice unit: Examining taxpayers electing partial disposition of building](#)
- Oct 23 - [IRS practice unit: Evaluation of withholding agent's electronic books and records, reliability of Forms W-8](#)
- Sep 6 - [IRS practice unit: French levies eligible for U.S. foreign tax credits](#)
- Aug 1 - [IRS practice unit: Source of income, nonresident alien individuals \[TCJA\]](#)
- Jun 13 - [IRS practice unit: Allocation of success-based fees in certain acquisitions](#)
- May 10 - [IRS practice unit: Transaction costs in a corporate separation](#)
- Apr 30 - [IRS practice unit: Taxation of shipping and air transport income](#)
- Apr 8 - [IRS practice units: Interest capitalization, accounting for developers and subcontractors](#)
- Mar 22 - [IRS practice unit: Foreign-initiated adjustments, competent authority guidance](#)
- Mar 15 - [IRS practice unit: Automatic exchange of information](#)
- Mar 8 - [IRS practice unit: Competent authority, under tax treaty's MAP article](#)
- Feb 27 - [IRS practice unit: Self-employment tax and partners](#)
- Jan 29 - [IRS practice units: Permanent establishment status and issues](#)
- Jan 28 - [IRS practice unit: Energy-efficient commercial buildings, section 179D deduction \(expired\)](#)

LB&I Directives

- Nov 27 - [IRS guidance on BBA field exam procedures, partnership returns](#)
- Nov 6 - [IRS adds new compliance campaign on cross-border activities \(LB&I division\) \[TCJA\]](#)
- Aug 19 - [IRS directive on U.S. creditability of two French social taxes; change in IRS position](#)
- Aug 5 - [IRS withdraws LB&I directive on cost-sharing arrangements](#)
- Jul 23 - [IRS adds six new compliance campaigns \(LB&I division\)](#)
- Jun 5 - [IRS directive, selecting transfer pricing issues involving cost sharing arrangements](#)
- Apr 17 - [IRS adds three new compliance campaigns \(LB&I division\)](#)
- Jan 30 - [LB&I focus guide for 2019; IRS strategic goals](#)

Other

- Dec 30 - [Craft beverage excise tax provisions extended through 2020; wine credit transfers \[TCJA\]](#)
- Dec 27 - [Changes proposed in 2019 draft instructions for Form 1065 and Schedule K-1](#)
- Dec 20 - [FBAR filings: Deadline again extended for individuals with signature authority](#)
- Dec 11 - [IRS and TTB agree to whistleblower process regarding federal excise taxes](#)
- Nov 22 - [IRS offers tax relief for taxpayers affected by South Dakota storms](#)
- Nov 22 - [Tier 2 tax rates for railroads, no changes for 2020](#)
- Nov 15 - [TTB voluntary disclosure program for unreported changes in control or proprietorship](#)
- Nov 12 - [IRS focus on "syndicated conservation easement" transactions](#)
- Nov 12 - [IRS releases draft instructions for BBA partnership forms](#)
- Nov 4 - [TTB excise tax penalty relief for industry affected by California wildfires](#)
- Nov 1 - [PLR: Amounts REIT receives from tenants for boat slips, marina storage](#)
- Oct 31 - [Draft of revised Form 8996 for reporting opportunity zone fund data \[TCJA\]](#)
- Oct 17 - [IRS directive, work opportunity tax credit \(WOTC\)](#)
- Oct 11 - [IRS nonacquiescence, transfer of non-capital asset; capital asset sale or exchange treatment](#)
- Oct 10 - [IRS Chief Counsel Attorney Memorandum advises election under section 952\(c\) is obsolete \(implications for insurance companies\)](#)
- Oct 9 - [IRS priority guidance plan for 2019-2020](#)
- Oct 9 - [U.S. Treasury's quarterly list, countries cooperating with international boycott \(no changes\)](#)
- Oct 7 - [IRS provides tax relief for taxpayers affected by Tropical Storm Imelda](#)
- Oct 1 - [IRS guidance limits reach of life insurance reserve election](#)
- Sep 30 - [IRS releases draft versions of Forms 1065, 1120-S for 2019 tax year](#)
- Sep 26 - [IRS releases "tax gap" estimates](#)
- Sep 25 - [Tax relief for taxpayers affected by storms in Mississippi \(February-March 2019\)](#)
- Sep 19 - [U.S. agencies propose rule to implement 2% withholding tax on certain foreign payments](#)
- Sep 19 - [U.S. contractors, exemption from Afghanistan taxes](#)
- Sep 12 - [IRS announces application period for 2020 Compliance Assurance Process \(CAP\) program](#)
- Sep 6 - [IRS relief procedures for certain expatriates, U.S. tax law compliance](#)

Sep 3 - [IRS to waive dyed fuel penalty in Florida; hurricane-related relief](#)

Aug 14 - [IRS to waive estimated tax penalty automatically for 2018](#)

Aug 13 - [IRS releases revised Form 8283 for noncash contributions](#)

Aug 1 - [Reminder: Heavy highway vehicle use tax return \(Form 2290\) due September 3](#)

Jul 26 - [IRS notifies virtual currency owners to pay back taxes, file amended returns](#)

Jul 18 - [IRS provides tax relief for Texas storm victims](#)

Jul 16 - [IRS reminder: Q&As provide guidance about section 965 transition tax \[TCJA\]](#)

Jul 11 - [IRS relief, taxpayers in Missouri affected by April 2019 storms](#)

Jul 1 - [IRS updates FAQs on opportunity zones \[TCJA\]](#)

Jun 28 - [IRS provides Q&As concerning section 965 \(including transfer and consent agreements\) \[TCJA\]](#)

Jun 20 - [IRS updates FAQs, QBI deduction for cooperatives and patrons \[TCJA\]](#)

Jun 14 - [IRS considering new CAP applications; publicly traded corporations must express interest by July 26](#)

Jun 5 - [Section 45: Renewable electricity, refined coal production inflation factors, reference prices \(2019\)](#)

Jun 4 - [IRS to stop faxing tax transcripts, mailing returns to third parties](#)

Jun 3 - [IRS provides relief for taxpayers affected by Oklahoma storms, flooding](#)

May 31 - [IRS releases draft Form W-4 for 2020, provides FAQs \[TCJA\]](#)

May 30 - [Hearing on FDII and GILTI proposed regulations, set for July 10, 2019 \[TCJA\]](#)

May 23 - [U.S. Treasury awards \\$3.5 billion in New Markets Tax Credit \(NMTC\) allocations](#)

May 16 - [IRS replaces coordinated industry case program with large corporate compliance program](#)

May 7 - [IRS reminder: May 13 deadline, EIN requirements for responsible parties](#)

Apr 25 - [IRS announces Peter Blessing appointed Associate Chief Counsel \(International\)](#)

Apr 18 - [Reminder of May 13 deadline: EIN requirements for responsible parties](#)

Apr 15 - [Enhanced oil recovery, marginal well production credits; reference price \(2018\)](#)

Apr 8 - [IRS provides Form 1065 FAQs, negative capital account reporting](#)

Apr 5 - [IRS priority guidance plan for 2018-2019 \(second quarter update\)](#)

Mar 28 - [IRS Appeals guidance on partnership audit procedures under Bipartisan Budget Act \(BBA\)](#)

Mar 27 - [IRS revises EIN application process](#)

Mar 26 - [Tax relief for taxpayers affected by storms, flooding in Iowa](#)

Mar 22 - [IRS relief for storm victims in Nebraska](#)

Mar 14 - [Form 1065 instructions \(2018\), requirement to provide partnership representative's taxpayer identification number removed](#)

Mar 14 - [IRS reminder about retirement plan correction program, electronic submissions](#)

Mar 7 - [IRS relief for certain taxpayers affected by Alabama storms](#)

Mar 6 - [Treasury policy statement on tax regulatory process](#)

Mar 1 - [Olson to retire as National Taxpayer Advocate](#)

Feb 25 - [TTB return is updated, firearms and ammunition excise tax](#)

Feb 21 - [Request for information, grandfathered group health plans and insurance coverage](#)

Feb 18 - [Opportunity zone hearing on proposed regulations: Oral comments highlight need for greater clarity for investments to move forward \[TCJA\]](#)

Feb 15 - [IRS acquiescence: Tax Court decision, hockey team's pregame meals as de minimis fringe benefit](#)

Feb 12 - [IRS National Taxpayer Advocate's report for 2018](#)

Feb 5 - [U.S. Treasury's quarterly list, countries cooperating with international boycott \(no changes\)](#)

- Jan 30 - [IRS operations after shutdown ended](#)
- Jan 29 - [Public hearings scheduled: GILTI and opportunity zone proposed regulations](#) [TCJA]
- Jan 28 - [IRS announces tax filing season opens for individual taxpayers](#)
- Jan 25 - [IRS addresses partial government shutdown impact on Tax Court cases](#)
- Jan 25 - [IRS addresses partial government shutdown impact on Tax Court cases](#)
- Jan 23 - [IRS final forms, instructions: Implementing U.S. tax law changes](#) [TCJA]
- Jan 16 - [IRS updates contingency plan for IRS operations during government shutdown](#)
- Jan 15 - [IRS release, effects of partial government shutdown on IRS operations](#)
- Jan 14 - [IRS statement on sequestration, refundable AMT credits for corporations](#) [TCJA]
- Jan 10 - [Accounting for AMT credit refunds resulting from tax reform, effects of sequestration](#) [TCJA]
- Jan 7 - [IRS announces tax filing season for individuals begins January 28](#)
- Jan 7 - [Public hearing, proposed regulations for opportunity zones](#) [TCJA]
- Jan 7 - [IRS final forms, instructions for implementing U.S. tax law changes](#) [TCJA]
- Jan 4 - [IRS release, filing season for certain business tax returns](#)

Judicial

Supreme Court

- Mar 4 - ***BNSF Railway Co. v. Loos***: [U.S. Supreme Court: Wages paid to injured railroad worker are taxable compensation](#)
- Feb 20 - ***Dawson v. Steager***: [U.S. Supreme Court: State taxation, pensions of former law enforcement employees](#)
- May 13 - ***Franchise Tax Board of California v. Hyatt***: [U.S. Supreme Court: States retain sovereign immunity in other state courts \(tax audit-related civil action\)](#)
- Jun 21 - ***North Carolina Department of Revenue v. Kimberly Rice Kaestner 1992 Family Trust***: [U.S. Supreme Court: In-state beneficiary insufficient for state to tax undistributed trust income](#)
- Oct 28 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Guidance on nexus, taxation of remote sales by U.S. states \(Arizona, Hawaii, Louisiana, Michigan, North Carolina, South Carolina\)](#)
- Oct 14 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Marketplace guidance, sales and use tax \(California, Maine, Massachusetts, Texas\)](#)
- Oct 7 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Marketplace guidance, sales and use tax \(Maryland, Wisconsin\)](#)
- Sep 23 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Remote seller and marketplace guidance, sales and use tax \(Alabama, Florida, Louisiana, Massachusetts\)](#)
- Sep 9 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Remote sellers and marketplace nexus guidance \(updates from numerous states\)](#)
- Jul 22 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: States impose tax collection for marketplace facilitators \(Ohio, Wisconsin\)](#)

Jul 15 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: States impose tax collection for marketplace facilitators \(California, Connecticut, Illinois, Indiana, Pennsylvania, Wisconsin\)](#)

Jul 1 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Sales tax collection requirements for remote sellers, marketplace facilitators \(California, Connecticut, Maine, Utah\)](#)

Jun 24 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: States imposing tax collection obligations on remote sellers \(Louisiana, Nevada, New Hampshire\)](#)

Jun 10 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Sales tax obligations of marketplaces, remote sellers \(Arizona, Illinois, New York, Tennessee, Vermont\)](#)

Jun 3 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Tax collection requirements, remote sellers \(Colorado, Maryland, Oklahoma, Tennessee, Texas\)](#)

May 20 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Remote sellers collecting tax \(Louisiana, Virginia\)](#)

May 13 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Sales tax collection obligations of marketplace facilitators \(Colorado, Georgia, Indiana, Kansas\)](#)

May 6 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Economic nexus legislation, remote sales \(Georgia, South Carolina, Tennessee\)](#)

Apr 29 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Economic nexus legislative update \(California, Colorado\)](#)

Apr 15 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Economic nexus, marketplace providers collecting tax \(Arkansas, Idaho, Indiana\)](#)

Apr 8 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Economic nexus update, marketplace facilitators' tax collection obligations](#)

Apr 1 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: State legislative actions, sales and use tax guidance \(CA, KY, NY, ND, VA\)](#)

Mar 18 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: State legislative actions, sales and use tax for marketplace facilitators](#)

Mar 4 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: More state actions, economic nexus for remote sales](#)

Feb 25 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: State actions, economic nexus for remote sales](#)

Feb 18 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: State legislative proposals, economic nexus for retailers](#)

Jan 28 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: Legislation proposed in states focuses on "Wayfair" issues \(HI, IA, MA, ND, OK, RI, WI\)](#)

Jan 21 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: States follow up with action to "Wayfair" decision \(IN, MA, NY, ND, PA, WY\)](#)

Jan 14 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: More states respond to "Wayfair" decision \(MO, PA, SC, TX, VA\)](#)

Jan 7 - ***South Dakota v. Wayfair, Inc.***: [KPMG report: State, local responses to "Wayfair" decision \(DC, GA, IA, NE, UT, WV\)](#)

Mar 19 - ***Washington State Dept. of Licensing v. Cougar Den, Inc.***: [U.S. Supreme Court: No fuel tax by Washington State on Native American tribe](#)

Circuit Court

Nov 21 - **Altera Corp. v. Commissioner:** [Ninth Circuit's decision upholding section 482 stock-based compensation regulations is final](#)

Nov 12 - **Altera Corp. v. Commissioner:** [Ninth Circuit denies en banc rehearing, section 482 stock-based compensation case](#)

Aug 1 - **Altera Corp. v. Commissioner:** [KPMG joins amicus brief requesting en banc review by Ninth Circuit \(cost-sharing arrangements\)](#)

Jun 13 - **Altera Corp. v. Commissioner:** [KPMG report: Ninth Circuit reverses Tax Court \(again\), upholds cost-sharing regulations](#)

Jun 7 - **Altera Corp. v. Commissioner:** [Ninth Circuit reverses Tax Court, validity of cost-sharing arrangement regulations](#)

Sep 26 - **Alternative Carbon Resources, LLC v. United States:** [Federal Circuit: Alternative mixture fuel credit denial upheld](#)

Aug 16 - **Amazon.com, Inc. & Subsidiaries v. Commissioner:** [Ninth Circuit affirms Tax Court; intangible assets and valuation in cost-sharing arrangement](#)

Nov 22 - **Baker Hughes, Inc. v. United States:** [Fifth Circuit: No bad debt deduction for payment made to address subsidiary's undercapitalization](#)

Apr 16 - **Baldwin v. United States:** [Ninth Circuit: Mailbox rule for refund claims, regulations accorded deference](#)

Apr 2 - **Borenstein v. Commissioner:** [Second Circuit: Tax refund jurisdiction of Tax Court](#)

Mar 12 - **Dieringer v. Commissioner:** [Ninth Circuit: Estate tax deficiency sustained, overstated charitable deduction](#)

Feb 26 - **Feinberg v. Commissioner:** [Tenth Circuit: Medical marijuana company's deductions denied](#)

Sep 6 - **Flandreau Santee Sioux Tribe v. Haeder:** [Eighth Circuit: South Dakota use tax preempted for certain Indian tribal transactions](#)

Apr 25 - **Ginsburg v. United States:** [Federal Circuit: State brownfield tax credit amounts held subject to federal income tax](#)

Jun 11 - **Grecian Magnesite Mining, Industrial & Shipping Co., SA v. Commissioner:** [D.C. Circuit: Foreign partners and effectively connected income \("Grecian Magnesite" case cited in 2017 tax law\)](#)

[TCJA]

Feb 27 - **J.B. v. United States:** [Ninth Circuit: IRS third-party contact summons quashed, Publication 1 not reasonable notice](#)

May 6 - **Meruelo v. Commissioner:** [Eleventh Circuit: Taxpayer denied losses from S corporation's indebtedness](#)

May 15 - **Petersen v. Commissioner:** [Tenth Circuit: S corporation, employees/ESOP beneficiaries held section 267 "related persons"](#)

Sep 16 - **Pfizer, Inc. v. United States:** [Second Circuit: Jurisdiction of U.S. Court of Federal Claims, claim for overpayment interest](#)

May 24 - **RERI Holdings I, LLC v. Commissioner:** [D.C. Circuit: Charitable contribution denied, basis in donated property omitted](#)

May 7 - **SIH Partners LLLP v. Commissioner:** [Third Circuit: Loan guarantees by CFCs includible in taxpayer's gross income](#)

Nov 7 - **State of New York v. Mountain Tobacco Co.:** [Second Circuit: Untaxed cigarettes manufactured by and sold on Indian reservation](#)

Jun 28 - **WestRock Virginia Corp. v. United States:** [Federal Circuit: "Section 1603" cash award, open-loop biomass producing electricity](#)

Tax Court

Mar 13 - **ALT & Sons Holdings, Inc. v. Commissioner:** [U.S. Tax Court: S corporation liable for section 6699 penalty; extension application not filed](#)

Mar 6 - **Blue Lake Rancheria Economic Development Corp. v. Commissioner:** [U.S. Tax Court: Indian tribe not liable for employment taxes of corporate division](#)

Apr 24 - **Clay v. Commissioner:** [U.S. Tax Court: Written supervisory approval required before contact with taxpayers, accuracy-related penalty](#)

Oct 28 - **Coal Property Holdings, LLC v. Commissioner:** [U.S. Tax Court: Charitable donation denied, conservation easement not "protected in perpetuity"](#)

May 9 - **DAF Charters, LLC v. Commissioner:** [U.S. Tax Court: Employment tax obligations of charter yacht operator](#)

Oct 28 - **Eaton Corp. v. Commissioner:** [U.S. Tax Court: APAs cancelled; no transfer pricing adjustments and taxpayer not liable for 40% penalty](#)

Feb 25 - **Eaton Corp. v. Commissioner:** [U.S. Tax Court: Upper-tier CFC partners' E&P increased by partnership's section 951\(a\) income inclusions](#)

Feb 15 - **Jacobs v. Commissioner:** [IRS acquiescence: Tax Court decision, hockey team's pregame meals as de minimis fringe benefit](#)

Mar 11 - **Johnson v. Commissioner:** [U.S. Tax Court: Premium tax credit under Affordable Care Act](#)

Aug 28 - **Lipnick v. Commissioner:** [U.S. Tax Court: Taxpayer properly offset interest expenses against real estate income](#)

Feb 28 - **Palmolive Building Investors, LLC v. Commissioner:** [U.S. Tax Court: Determination of and IRS supervisory approval for penalties](#)

May 22 - **Romano-Murphy v. Commissioner:** [U.S. Tax Court: Lack of final administrative determination invalidates trust-fund-recovery penalty assessment](#)

Apr 11 - **Szygy Insurance Co. v. Commissioner:** [Tax Court: Captive does not qualify as insurance company, premiums paid not deductible](#)

Oct 28 - **U.S. Auto Sales, Inc. v. Commissioner:** [U.S. Tax Court: Notice of deficiency held invalid when two separate, but related, corporations identified](#)

Jan 25 - [IRS addresses partial government shutdown impact on Tax Court cases](#)

Treaties / Puerto Rico / Other

- Oct 8 - [Puerto Rico: Electronic filing requirements of Forms W-2 for tax year 2019](#)
- Sep 20 - [Tax treaty update: Protocol to United States-Luxembourg income tax treaty is ratified](#)
- Sep 20 - [Tax treaty update: Protocol to United States-Switzerland income tax treaty is ratified](#)
- Aug 30 - [Tax treaty update: Protocol to income tax treaty between United States and Japan, entry into force](#)
- Aug 30 - [Tax treaty update: Protocol to income tax treaty between United States and Spain, entry into force](#)
- Jul 17 - [Tax treaty update: U.S. Senate approves Protocols with Switzerland, Luxembourg, Japan](#)
- Jul 16 - [Tax treaty update: U.S. Senate approves Protocol with Spain](#)
- Jul 11 - [Tax treaty update: Senate expected to consider four Protocols](#)
- Jun 27 - [Puerto Rico: Sales and use tax holiday, school uniforms and supplies](#)
- Jun 25 - [Tax treaty update: Senate Foreign Relations approves four Protocols](#)
- Mar 8 - [IRS practice unit: Competent authority, under tax treaty's MAP article](#)
- Jan 10 - [Puerto Rico: Tax law changes affecting corporations, partnerships](#)
- Jan 9 - [Puerto Rico: New provisions related to individual taxation for 2019](#)
- Jan 9 - [Coal excise tax, lower tax rates beginning January 2019](#)
- Jan 3 - ["Oil spill" excise tax has expired](#)

KPMG Reports

Note that KPMG LLP has prepared numerous reports about the implementation of the TCJA in the United States. These reports include expanded discussions, analyses, and observations about provisions of the TCJA and TCJA-related guidance. Read more [here](#).

- Dec 30 - [KPMG report: Final regulations on withholding and reporting income to foreign persons \(initial impressions\)](#)
- Dec 21 - [KPMG report: Tax provisions enacted in December 2019 appropriations legislation **\[partially TCJA-related\]**](#)
- Dec 20 - [KPMG report: Initial impressions of final regulations for opportunity zones **\[TCJA\]**](#)
- Dec 20 - [KPMG report: Analysis of final and proposed foreign tax credit regulations **\[TCJA\]**](#)
- Dec 17 - [KPMG report: Proposed regulations under section 162\(m\) to address tax law changes \(initial impressions\) **\[TCJA\]**](#)
- Dec 16 - [KPMG report: Section 409A and equity compensation](#)
- Dec 16 - [KPMG report: Year-in-review \(2019\), qualified plan guidance](#)
- Dec 12 - [KPMG report: Analysis of final regulations and additional proposed regulations under section 59A \("BEAT"\) **\[TCJA\]**](#)
- Dec 9 - [KPMG report: "BEAT" final regulations, provisions applicable to insurance companies **\[TCJA\]**](#)

- Dec 3 - [KPMG report: Initial impressions about final and proposed foreign tax credit regulations](#) **[TCJA]**
- Dec 2 - [KPMG report: Initial impressions, final regulations and additional proposed regulations under section 59A \(“BEAT”\)](#) **[TCJA]**
- Nov 15 - [KPMG report: 2019-2020 priority guidance plan and REITs](#)
- Nov 15 - [KPMG report: Private letter rulings concerning REITs in 2019](#)
- Nov 11 - [KPMG report: Rules for defined compensation arrangements under section 409A](#)
- Nov 11 - [KPMG report: Sale of partnership interests resulting in ordinary income](#)
- Nov 1 - [KPMG report: Removal of documentation rules under section 385; future proposed regulations may eliminate per se funding rule](#)
- Oct 24 - [KPMG report: Proposed regulations address TCJA gross income acceleration requirement](#) **[TCJA]**
- Oct 3 - [KPMG report: Initial impressions of proposed regulations addressing repeal of section 958\(b\)\(4\); relief provided by Rev. Proc. 2019-40](#) **[TCJA]**
- Oct 3 - [KPMG report: Changes proposed in draft versions, Form 1065 and Schedule K-1 for 2019](#)
- Oct 1 - [KPMG report: Nonresident state income tax withholding, cross-border business travelers](#)
- Sep 13 - [KPMG report: Proposed regulations on treatment of built-in items for section 382 \(initial impressions\)](#) **[TCJA]**
- Sep 10 - [KPMG report: U.S. Congress back in session, possible tax agenda](#)
- Sep 6 - [KPMG report: Proposed regulations on changes to income recognition rules; initial impressions](#) **[TCJA]**
- Aug 26 - [KPMG report: Mineral interest income and section 199A deduction](#) **[TCJA]**
- Aug 26 - [KPMG report: The “Wyden bill”—a new approach to taxing carried interest](#)
- Aug 21 - [KPMG report: Non-life insurance companies and “BEAT” considerations](#) **[TCJA]**
- Aug 13 - [KPMG report: Initial impressions of cloud-computing, digital-content transactions \(proposed regulations\)](#)
- Aug 9 - [KPMG report: Guidance on accounting method change for insurance companies \(Rev. Proc. 2019-34\)](#) **[TCJA]**
- Jul 25 - [KPMG report: Proposed regulations concerning university excise tax](#) **[TCJA]**
- Jul 23 - [KPMG report: Section 846 and revised discount factors and guidance on accounting method change \(insurance companies\)](#) **[TCJA]**
- Jul 15 - [KPMG report: Certification of professional employer organizations](#)
- Jul 12 - [KPMG report: Proposed passive foreign investment company \(PFIC\) regulations; initial impressions and observations](#) **[TCJA]**
- Jul 12 - [KPMG report: Status of digital services tax legislation, proposals](#)
- Jun 26 - [KPMG report: Excess business loss limitation under section 461\(l\)](#) **[TCJA]**
- Jun 25 - [KPMG report: Section 199A implications for cooperatives; initial impressions of proposed regulations](#) **[TCJA]**
- Jun 24 - [KPMG report: IRS position on multiple RAB shares in CSAs](#)
- Jun 24 - [KPMG report: Opportunity zones and REITs](#) **[TCJA]**
- Jun 19 - [KPMG report: Initial impressions of final regulations under section 951A \(GILTI\) and certain guidance related to foreign tax credits, as well as new proposed regulations under sections 951A and 958 \(rules for determining stock ownership\)](#) **[TCJA]**
- Jun 19 - [KPMG report: Initial impressions of temporary regulations under section 245A; denial of dividends received deduction for certain dividends from current or former CFCs](#) **[TCJA]**

Jun 18 - [KPMG report: Modification of discounting rules for insurance companies \(initial impressions about final regulations\)](#) **[TCJA]**

Jun 13 - [KPMG report: Ninth Circuit reverses Tax Court \(again\), upholds cost-sharing regulations](#)

May 29 - [KPMG report: Final regulations, amount determined under section 956 for corporate U.S. shareholders](#) **[TCJA]**

May 20 - [KPMG report: Ownership-attribution rules for CFC related persons; rents from active conduct of trade or business \(proposed regulations\)](#)

May 15 - [Developments and analysis guide for the 2017 tax law: New KPMG website](#) **[TCJA]**

May 13 - [KPMG report: Qualified business units \(QBUs\), foreign currency gain or loss recognition and deferral \(report on final regulations\)](#)

May 9 - [KPMG report: Proposed regulations, withholding obligations incident to transfers of interests by foreign partners, partnerships engaged in U.S. trade or business](#) **[TCJA]**

May 6 - [KPMG report: Employee or independent contractor; common law test in new tax paradigm](#) **[TCJA]**

Apr 29 - [KPMG report: Twenty questions about possible technical corrections to 2017 Tax Act](#) **[TCJA related]**

Apr 1 - [KPMG report: New tool for APA submissions](#)

Apr 1 - [KPMG report: Other provisions in U.S. tax law—tax accounting, compensation and benefits](#) **[TCJA]**

Mar 18 - [KPMG report: FBAR update for officers, employees](#)

Mar 8 - [KPMG report: Initial impressions, observations on proposed FDII, GILTI regulations under section 250](#) **[TCJA]**

Feb 25 - [KPMG report: Tax rules for parking deductions, increased UBTI](#) **[TCJA]**

Feb 12 - [KPMG report: Year-in-review list of U.S. federal tax developments for 2018 \(as reported in TaxNewsFlash\)](#)

Feb 11 - [KPMG report: Final section 263A regulations and taxpayers with “negative adjustments”](#)

Feb 11 - [KPMG report: Payment-acceleration events for section 965 installment payments and transfer agreements](#) **[TCJA]**

Feb 11 - [KPMG report: Section 451\(b\) and new book-tax conformity rules](#) **[TCJA]**

Feb 5 - [KPMG report: Changes in corrected final regulations under section 199A](#) **[TCJA]**

Jan 28 - [KPMG report: Possible penalty exposure, cost-sharing agreements and stock-based compensation](#)

Jan 24 - [KPMG report: Analysis and observations of final section 199A regulations](#) **[TCJA]**

Jan 22 - [KPMG report: Regulations addressing treatment under section 199A, dividends paid by REITs](#) **[TCJA]**

Jan 18 - [KPMG report: Final regulations relating to “transition tax” under section 965](#) **[TCJA]**

Jan 16 - [KPMG report: Interim guidance, taxing “excess” executive compensation of exempt organizations](#) **[TCJA]**

Jan 14 - [KPMG report: Tax policy and the 116th Congress – observations and preliminary analysis](#)

Jan 3 - [KPMG report: Preliminary analysis and observations regarding certain exempt organization provisions in JCT Bluebook](#) **[TCJA]**

Jan 3 - [KPMG report: JCT Bluebook clarifies intended application of enhanced charitable contribution deduction](#) **[TCJA]**

Contact us

For questions on legislative matters, contact a professional in the Federal Legislative and Regulatory Services group of KPMG's Washington National Tax:

John Gimigliano

T: +1 (202) 533-4022

E: jgimigliano@kpmg.com

Jennifer Acuña

T: +1 (202) 533-7064

E: jenniferacuna@kpmg.com

Carol Kulish

T: +1 (202) 533-5829

E: ckulish@kpmg.com

Jennifer Bonar Gray

T: +1 (202) 533-3489

E: jennifergray@kpmg.com

Tom Stout

T: +1 (202) 533-4148

E: tstoutjr@kpmg.com

www.kpmg.com

kpmg.com/socialmedia



The information contained herein 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.

The information contained herein is of a general nature and based on authorities that are subject to change. Applicability of the information to specific situations should be determined through consultation with your tax adviser.

KPMG is a global network of professional services firms providing Audit, Tax and Advisory services. We operate in 147 countries and territories and have more than 219,000 people working in member firms around the world. The independent member firms of the KPMG network are affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity. Each KPMG firm is a legally distinct and separate entity and describes itself as such.

© 2020 KPMG LLP, a Delaware limited liability partnership and the U.S. member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity. All rights reserved. Printed in the U.S.A. The KPMG name and logo are registered trademarks or trademarks of KPMG International. NDPPS 811721