

INTERNAL REVENUE BULLETIN



HIGHLIGHTS OF THIS ISSUE

These synopses are intended only as aids to the reader in identifying the subject matter covered. They may not be relied upon as authoritative interpretations.

ADMINISTRATIVE

Rev. Proc. 2022-20, page 945.

This revenue procedure provides guidance regarding the public approval requirement under § 147(f) of the Internal Revenue Code for tax-exempt qualified private activity bonds. Specifically, this revenue procedure provides that hearings held by teleconference as described in section 4 of this revenue procedure will be treated as held in a location that, based on the facts and circumstances, is convenient for residents of the approving governmental unit for the purpose of § 1.147(f)-1(d)(2) of the Income Tax Regulations.

Rev. Rul. 2022-7, page 935.

This ruling updates Rev. Rul. 2004-53 in accordance with the Taxpayer First Act by explaining that all recipients of returns or return information pursuant to section 6103(c), including government employees, are subject to the disclosure restrictions of section 6103(a). Rev. Rul. 2004-53 modified and superseded.

ADMINISTRATIVE; INCOME TAX

Notice 2022-13, page 940.

Notice 2022-13 provides a waiver of the addition to tax under section 6654 for underpayment of estimated income tax by qualifying farmers and fishermen described in the notice. Under the notice, the addition to tax is waived for farmers and fishermen who, by April 18, 2022, or, for those taxpayers who reside in Maine or Massachusetts, by April 19, 2022, file their 2021 federal income tax return and pay in full any tax reported as due on the return.

Bulletin No. 2022-14
April 4, 2022

EMPLOYEE PLANS

Notice 2022-14, page 941.

This notice sets forth updates on the corporate bond monthly yield curve, the corresponding spot segment rates for March 2022 used under § 417(e)(3)(D), the 24-month average segment rates applicable for March 2022, and the 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).

EXCISE TAX

Notice 2022-11, page 939.

The notice provides an indexing factor for the qualifying payment amount for items and services furnished in 2022 for purposes of sections 9816 and 9817 of the Internal Revenue Code, as added by the No Surprise Act, in the case of a group health plan or group or individual health insurance issuer that does not have sufficient information as of January 31, 2019 to calculate the median of the contracted rates or for new items and services.

INCOME TAX

Rev. Rul. 2022-8, page 936.

Federal rates; adjusted federal rates; adjusted federal long-term rate, and the long-term tax exempt rate. For purposes of sections 382, 1274, 1288, 7872 and other sections of the Code, tables set forth the rates for April 2022.

The IRS Mission

Provide America's taxpayers top-quality service by helping them understand and meet their tax responsibilities and enforce the law with integrity and fairness to all.

Introduction

The Internal Revenue Bulletin is the authoritative instrument of the Commissioner of Internal Revenue for announcing official rulings and procedures of the Internal Revenue Service and for publishing Treasury Decisions, Executive Orders, Tax Conventions, legislation, court decisions, and other items of general interest. It is published weekly.

It is the policy of the Service to publish in the Bulletin all substantive rulings necessary to promote a uniform application of the tax laws, including all rulings that supersede, revoke, modify, or amend any of those previously published in the Bulletin. All published rulings apply retroactively unless otherwise indicated. Procedures relating solely to matters of internal management are not published; however, statements of internal practices and procedures that affect the rights and duties of taxpayers are published.

Revenue rulings represent the conclusions of the Service on the application of the law to the pivotal facts stated in the revenue ruling. In those based on positions taken in rulings to taxpayers or technical advice to Service field offices, identifying details and information of a confidential nature are deleted to prevent unwarranted invasions of privacy and to comply with statutory requirements.

Rulings and procedures reported in the Bulletin do not have the force and effect of Treasury Department Regulations, but they may be used as precedents. Unpublished rulings will not be relied on, used, or cited as precedents by Service personnel in the disposition of other cases. In applying published rulings and procedures, the effect of subsequent legislation, regulations, court decisions, rulings, and procedures must be considered, and Service personnel and others concerned are cautioned

against reaching the same conclusions in other cases unless the facts and circumstances are substantially the same.

The Bulletin is divided into four parts as follows:

Part I.—1986 Code.

This part includes rulings and decisions based on provisions of the Internal Revenue Code of 1986.

Part II.—Treaties and Tax Legislation.

This part is divided into two subparts as follows: Subpart A, Tax Conventions and Other Related Items, and Subpart B, Legislation and Related Committee Reports.

Part III.—Administrative, Procedural, and Miscellaneous.

To the extent practicable, pertinent cross references to these subjects are contained in the other Parts and Subparts. Also included in this part are Bank Secrecy Act Administrative Rulings. Bank Secrecy Act Administrative Rulings are issued by the Department of the Treasury's Office of the Assistant Secretary (Enforcement).

Part IV.—Items of General Interest.

This part includes notices of proposed rulemakings, disbarment and suspension lists, and announcements.

The last Bulletin for each month includes a cumulative index for the matters published during the preceding months. These monthly indexes are cumulated on a semiannual basis, and are published in the last Bulletin of each semiannual period.

The contents of this publication are not copyrighted and may be reprinted freely. A citation of the Internal Revenue Bulletin as the source would be appropriate.

Part I

Section 6103.— Confidentiality and disclosure of returns and return information

26 CFR 301.6103: Confidentiality of returns.

Rev. Rul. 2022-7

ISSUE

Whether Federal, State, and local government officers or employees (government employees) are subject to the disclosure restrictions of section 6103(a) of the Internal Revenue Code (Code) with regard to returns or return information received as a result of disclosure under:

- section 6103(c) with the consent of the taxpayer (taxpayer consent exception),
- section 6103(e) as a person having a material interest, but not under section 6103(e)(1)(D)(iii) relating to disclosures to certain shareholders (material interest exception), or
- section 6103(k)(6) for investigative purposes (investigative disclosure exception).

FACTS

Situation 1. A requests the assistance of a friend, B, with respect to a Federal tax matter. A also requests that the Internal Revenue Service (IRS) provide A's returns and return information to B. B subsequently discloses to a third party return information obtained as a result of A's request.

Situation 2. Same as Situation 1, above, except that B happens to be an employee in the office of a State agency.

Situation 3. C is an attorney employed by a law firm. The firm has a policy of taking disciplinary action against any of its attorneys who do not properly fulfill their tax obligations. The IRS serves a notice of levy with respect to C's tax liability on the payroll department of the firm. D is a payroll department employee of the firm. D processes the notice of levy and informs

the firm's managing partners of C's tax delinquency to enable the firm to take appropriate action consistent with firm policy.

Situation 4. E is an employee of a State agency. The agency has a policy of taking disciplinary action against employees who do not properly fulfill their tax obligations. The IRS serves a notice of levy with respect to E's tax liability on the payroll department of the State agency. F is a payroll department employee of the State agency. F processes the notice of levy and informs the appropriate office of the State agency of E's tax delinquency to enable the agency to take appropriate action consistent with agency policy.

Situation 5. Same as Situation 4, above, except that E and F are employees of a Federal agency.

Situation 6. G is the father of 5-year-old film star H. H's mother signs H's return as parent for a minor child and dies shortly thereafter. G is the guardian of H's estate under applicable State law. G receives notice that H's return is under examination by the IRS. G does not have a copy of H's return, so G obtains the return and return information from the IRS. When subsequently asked by a news reporter how much income H reported on the return, G replies "three million dollars."

Situation 7. Same as Situation 6, above, except that G happens to be an employee of a Federal agency.

LAW

Generally, section 6103 provides that returns (as defined in section 6103(b)(1)) and return information (as defined in section 6103(b)(2)) are confidential and may not be disclosed except as expressly authorized by the Code. Specifically, "except as authorized by this title" (that is, the Code), section 6103(a) prohibits the disclosure by officers or employees of the United States, of any State, or of specified local government agencies, or by certain other specified persons, of returns and return information obtained in connection with their service as such an officer or employee or otherwise or under the provisions of section 6103 (disclosure restrictions). See *Girard v. Bentsen*, 94-2 U.S.T.C. ¶ 50,625

(N.D. Cal. 1994) ("or otherwise" modifies "in connection with his service," allowing the statute to cover those who are neither "officers" nor "employees," namely certain other persons specified in section 6103(a)). For purposes of section 6103(a), the term "officer or employee" includes a former officer or employee.

There are, however, exceptions to the general rule of confidentiality. First, the taxpayer consent exception permits the disclosure of returns and return information to a designee of the taxpayer, pursuant to the taxpayer's request or consent. To be valid, a consent must satisfy the requirements of section 6103(c) and § 301.6103(c)-1 of the Procedure and Administration Regulations. Second, the material interest exception permits the disclosure of returns and return information to specific persons with a material interest in the information. Third, the investigative disclosure exception, in conjunction with § 301.6103(k)(6)-1, authorizes the disclosure of return information (but not returns) to the extent that disclosure is necessary in obtaining information that is not otherwise reasonably available with respect to the correct determination of tax, liability for tax, or the amount to be collected, or with respect to the enforcement of any other provision of the Code.

Rev. Rul. 2004-53, 2004-1 C.B. 1026 (June 7, 2004) clarified the scope of section 6103(a) with respect to government employees and held that government employees who receive returns or return information pursuant to section 6103(c), (e), or (k)(6) are not subject to the disclosure restrictions of section 6103(a). Although not addressed by Rev. Rul. 2004-53, any shareholder of a corporation permitted to inspect or receive return information of the corporation or its subsidiaries under section 6103(e)(1)(D)(iii) is subject to the disclosure restrictions imposed by section 6103(a).

Section 2202 of the Taxpayer First Act (TFA), Public Law 116-25, 133 Stat. 981, 1012 (2019), amended section 6103(a) (3) and (c) to limit redisclosures and uses of return information received pursuant to the taxpayer consent exception. Section 6103(c), as amended by the TFA,

explicitly prohibits designees from using return information for any reason other than the express purpose for which the taxpayer grants consent and from redisclosing return information without the taxpayer's express permission or request. Section 6103(a)(3), as amended by the TFA, imposes disclosure restrictions on all recipients of return information under 6103(c). The TFA did not amend section 6103(e) or (k)(6), or section 6103(a) with respect to disclosures under section 6103(e) or (k)(6).

ANALYSIS

Under section 6103(c), as amended, the restrictions on redisclosure of returns or return information received pursuant to the taxpayer consent exception apply to all designees, including government employees. Therefore, in Situations 1 and 2, B is prohibited from redisclosing A's return information, because A did not authorize B to further disclose A's return information.

After the TFA, the analysis of the scope of disclosures under section 6103(e) and (k)(6) is materially unchanged from that in Rev. Rul. 2004-53. Section 6103(e) and (k)(6) contains no limitation or restriction on the redisclosure of returns or return information received pursuant to the material interest or investigative disclosure exceptions. Therefore, in Situations 3 and 6 there are no statutory or regulatory restrictions on the redisclosures of return information made by D or G.

In Situations 4, 5, and 7, however, the prohibition in section 6103(a) on redisclosure of returns or return information by government employees could be read to prohibit such redisclosures by F and G because they happen to be government employees. This reading would create a disparity in the application of section 6103(a) based on who the employer of the person receiving the disclosure of returns or return information happens to be.

By its terms, section 6103(a) does not regulate or control the use of returns and return information received under the material interest or investigative disclosure exceptions. Moreover, the requirements for accountings and safeguards that typically apply where redisclosure of returns or return information is limited do not apply to these exceptions.

There is no evidence that Congress intended to limit the redisclosure of return information received by government employees under section 6103(e) and (k)(6) merely because they happen to be government employees. On the contrary, there are compelling reasons for those government employees to be subject to the same rules as other recipients. For example, a private sector employer may take disciplinary action against employees who do not properly fulfill their tax obligations. If redisclosure of return information is not permitted because the employer happens to be the Federal government, the Federal employees who failed to fulfill their tax obligations would be in a significantly better position than their private sector counterparts. This inappropriate result only occurs if section 6103(a) is read to apply to individuals merely because they happen to be government employees.

Accordingly, persons are not barred because of their status as government employees from redisclosing returns and return information received pursuant to section 6103(e) or (k)(6). Therefore, in Situations 4, 5, and 7, there are no statutory or regulatory restrictions on the redisclosures of return information made by F or G.

HOLDING

Government employees who receive returns or return information pursuant to disclosures under section 6103(c), like all designees who receive returns or return information pursuant to taxpayer consent, are subject to the disclosure restrictions of section 6103(a). Government employees who receive returns or return information pursuant to disclosures under section 6103(k)(6) or (e), other than section 6103(e)(1)(D)(iii) (relating to certain shareholders), are not subject to the disclosure restrictions of section 6103(a) with regard to the returns or return information received.

EFFECT ON OTHER REVENUE RULINGS

Rev. Rul. 2004-53 is modified and superseded.

DRAFTING INFORMATION

The principal author of this revenue ruling is Andrew C. Keaton of the Office of the Associate Chief Counsel (Procedure & Administration). For further information regarding this revenue ruling, contact Mr. Keaton at (202) 317-5404 (not a toll-free number).

Section 1274.— Determination of Issue Price in the Case of Certain Debt Instruments Issued for Property

(Also Sections 42, 280G, 382, 467, 468, 482, 483, 1288, 7520, 7872.)

Rev. Rul. 2022-8

This revenue ruling provides various prescribed rates for federal income tax purposes for April 2022 (the current month). Table 1 contains the short-term, mid-term, and long-term applicable federal rates (AFR) for the current month for purposes of section 1274(d) of the Internal Revenue Code. Table 2 contains the short-term, mid-term, and long-term adjusted applicable federal rates (adjusted AFR) for the current month for purposes of section 1288(b). Table 3 sets forth the adjusted federal long-term rate and the long-term tax-exempt rate described in section 382(f). Table 4 contains the appropriate percentages for determining the low-income housing credit described in section 42(b)(1) for buildings placed in service during the current month. However, under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%. Finally, Table 5 contains the federal rate for determining the present value of an annuity, an interest for life or for a term of years, or a remainder or a reversionary interest for purposes of section 7520.

REV. RUL. 2022-8 TABLE 1
 Applicable Federal Rates (AFR) for April 2022
 Period for Compounding

	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
		<i>Short-term</i>		
AFR	1.26%	1.26%	1.26%	1.26%
110% AFR	1.39%	1.39%	1.39%	1.39%
120% AFR	1.52%	1.51%	1.51%	1.51%
130% AFR	1.65%	1.64%	1.64%	1.63%
		<i>Mid-term</i>		
AFR	1.87%	1.86%	1.86%	1.85%
110% AFR	2.06%	2.05%	2.04%	2.04%
120% AFR	2.24%	2.23%	2.22%	2.22%
130% AFR	2.43%	2.42%	2.41%	2.41%
150% AFR	2.81%	2.79%	2.78%	2.77%
175% AFR	3.29%	3.26%	3.25%	3.24%
		<i>Long-term</i>		
AFR	2.25%	2.24%	2.23%	2.23%
110% AFR	2.48%	2.46%	2.45%	2.45%
120% AFR	2.71%	2.69%	2.68%	2.68%
130% AFR	2.93%	2.91%	2.90%	2.89%

REV. RUL. 2022-8 TABLE 2
 Adjusted AFR for April 2022
 Period for Compounding

	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
Short-term adjusted AFR	0.96%	0.96%	0.96%	0.96%
Mid-term adjusted AFR	1.41%	1.41%	1.41%	1.41%
Long-term adjusted AFR	1.71%	1.70%	1.70%	1.69%

REV. RUL. 2022-8 TABLE 3
 Rates Under Section 382 for April 2022

Adjusted federal long-term rate for the current month	1.71%
Long-term tax-exempt rate for ownership changes during the current month (the highest of the adjusted federal long-term rates for the current month and the prior two months.)	1.71%

REV. RUL. 2022-8 TABLE 4
 Appropriate Percentages Under Section 42(b)(1) for April 2022

Note: Under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%.

Appropriate percentage for the 70% present value low-income housing credit	7.47%
Appropriate percentage for the 30% present value low-income housing credit	3.20%

REV. RUL. 2022-8 TABLE 5
Rate Under Section 7520 for April 2022

Applicable federal rate for determining the present value of an annuity, an interest for life or a term of years, or a remainder or reversionary interest	2.2%
---	------

Section 42.—Low-Income Housing Credit

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of April 2022. See Rev. Rul. 2022-8, page 936.

Section 280G.—Golden Parachute Payments

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of April 2022. See Rev. Rul. 2022-8 page 936.

Section 382.—Limitation on Net Operating Loss Carryforwards and Certain Built-In Losses Following Ownership Change

The adjusted applicable federal long-term rate is set forth for the month of April 2022. See Rev. Rul. 2022-8, page 936.

Section 467.—Certain Payments for the Use of Property or Services

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of April 2022. See Rev. Rul. 2022-8, page 936.

Section 468.—Special Rules for Mining and Solid Waste Reclamation and Closing Costs

The applicable federal short-term rates are set forth for the month of April 2022. See Rev. Rul. 2022-8, page 936.

Section 482.—Allocation of Income and Deductions Among Taxpayers

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of April 2022. See Rev. Rul. 2022-8, page 936.

Section 483.—Interest on Certain Deferred Payments

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of April 2022. See Rev. Rul. 2022-8, page 936.

Section 1288.—Treatment of Original Issue Discount on Tax-Exempt Obligations

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of April 2022. See Rev. Rul. 2022-8, page 936.

Section 7520.—Valuation Tables

The applicable federal mid-term rates are set forth for the month of April 2022. See Rev. Rul. 2022-8, page 936.

Section 7872.—Treatment of Loans With Below-Market Interest Rates

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of April 2022. See Rev. Rul. 2022-8, page 936.

Part III

26 CFR 54.9816-6T Methodology for calculating qualifying payment amount in 2022

NOTICE 2022-11

SECTION 1. PURPOSE AND SCOPE

This notice provides guidance for calculating the qualifying payment amount for items and services furnished in 2022 for purposes of sections 9816 and 9817 of the Internal Revenue Code (Code), sections 716 and 717 of the Employee Retirement Income Security Act of 1974 (ERISA), and sections 2799A-1 and 2799A-2 of the Public Health Service Act (PHS Act) in the case of a group health plan or group or individual health insurance issuer that does not have sufficient information to calculate the median of the contracted rates in 2019 (including for items and services not offered in 2019). This notice was drafted in consultation with the Departments of Labor and Health and Human Services.

SECTION 2. BACKGROUND

Under Treas. Reg. § 54.9816-6T(c), 29 CFR 2590.716-6(c), and 45 CFR 149.140(c),¹ for an item or service furnished during 2022, a group health plan or group or individual health insurance issuer² must calculate the qualifying payment amount by increasing the median contracted rate (as determined in accordance with § 54.9816-6T(b), 29 CFR 2590.716-6(b), and 45 CFR 149.140(b)) for the same or similar item or service under such plan or coverage, on January 31, 2019, by the combined percentage increase as published by the Department of the Treasury (Treasury Department) and the Internal Revenue Service (IRS) to reflect the percentage increase in the consumer price index for all urban consumers (U.S. city average) (CPI-U) over 2019, such percentage increase over 2020,

and such percentage increase over 2021. Per Rev. Proc. 2022-11, 2022-3 IRB 449, for items and services provided on or after January 1, 2022, and before January 1, 2023, the combined percentage increase to adjust the median contracted rate is 1.0648523983.

Pursuant to § 54.9816-6T(c)(3)(i), 29 CFR 2590.716-6(c)(3)(i), and 45 CFR 149.140(c)(3)(i), for an item or service furnished during 2022, a plan or issuer that does not have sufficient information to calculate the median of the contracted rates in 2019 for the same or similar item or service provided in a geographic region must calculate the qualifying payment amount by first identifying the rate that is equal to the median of the in-network allowed amounts for the same or similar item or service provided in the geographic region in 2021, determined by the plan or issuer through use of any eligible database, and then increasing that rate by the percentage increase in the CPI-U over 2021. Similarly, in the case of a newly covered item or service furnished during the first coverage year, when a plan or issuer does not have sufficient information to calculate the median of the contracted rates in the first coverage year for the item or service, the plan or issuer must calculate the qualifying payment amount by using an eligible database to determine the rate that is equal to the median of the in-network allowed amounts for the same or similar item or service provided in the geographic region in the year immediately preceding the first coverage year, and then increasing that rate by the percentage increase in the CPI-U over the preceding year.³

Under § 54.9816-6T(c)(3)(ii), 29 CFR 2590.716-6(c)(3)(ii), and 45 CFR 149.140(c)(3)(ii), for an item or service furnished in a subsequent year (before the first sufficient information year for the item or service with respect to the plan or coverage), the plan or issuer must calculate the qualifying payment amount by

increasing the qualifying payment amount determined for the item or service for the year immediately preceding the subsequent year, by the percentage increase in the CPI-U over the preceding year.

SECTION 3. GUIDANCE

The percentage increase in the CPI-U over a preceding year is calculated by dividing the average CPI-U for the preceding year by the average CPI-U for the year immediately prior to the preceding year. For this purpose, the average CPI-U for a year is the average of the monthly CPI-Us published by the Bureau of Labor Statistics of the Department of Labor for the 12-month period ending on August 31 of each year. The percentage increase in the CPI-U for items and services provided in 2022 over the preceding year is the average CPI-U for 2021 over the average CPI-U for 2020. Pursuant to this calculation, the percentage increase from 2021 to 2022 is 1.0299772040.

Therefore, for an item or service furnished in 2022 for which a plan or issuer does not have sufficient information to calculate the median of the contracted rates in 2019, the plan or issuer must calculate the qualifying payment amount by multiplying the median of the in-network allowed amounts for the same or similar item or service provided in the geographic region in 2021, drawn from any eligible database, by the percentage increase of 1.0299772040. Similarly, in the case of a newly covered item or service furnished in 2022, when 2022 is the first coverage year for the item or service with respect to the plan or coverage, the plan or issuer must calculate the qualifying payment amount by multiplying the median of the in-network allowed amounts for the same or similar item or service provided in the geographic region in 2021, drawn from any eligible database, by the percentage increase of 1.0299772040. Pursuant to

¹ These interim final rules were issued in July 2021 to implement sections 9816 and 9817 of the Code, sections 716 and 717 of ERISA, and sections 2799A-1 and 2799A-2 of the PHS Act. 86 FR 36872 (7/13/21).

² 5 CFR 890.114(b) provides that, for purposes of the No Surprises Act, “group health plan” means “a health benefits plan” offered by carriers under the Federal Employees Health Benefits (FEHB) Act. Accordingly, the guidance provided in this notice also applies to FEHB carriers. See 5 U.S.C. 8901(p).

³ In cases in which an eligible database is used to determine the qualifying payment amount with respect to an item or service furnished during a calendar year, the plan or issuer must use the same database for determining the qualifying payment amount for that item or service through the last day of the calendar year, and if a different database is selected for some items or services, the basis for that selection must be one or more factors not directly related to the rate of those items or services (such as sufficiency of data for those items or services).

this notice, plans and issuers may round any resulting qualifying payment amount to the nearest dollar.

The Treasury Department and the IRS anticipate issuing additional guidance regarding the calculation of the qualifying payment amount in these circumstances for subsequent years.

SECTION 4. EFFECTIVE DATE

The effective date of this notice is January 1, 2022.

SECTION 5. DRAFTING INFORMATION

The principal author of this notice is Kari DiCecco of the Office of Associate Chief Counsel (Employee Benefits, Exempt Organizations, and Employment Taxes). For further information regarding this notice, contact Kari DiCecco at 202-317-5500 (not a toll-free number).

Relief from Addition to Tax for Underpayment of Estimated Income Tax by Individual Farmers and Fishermen

Notice 2022-13

SECTION 1. PURPOSE

This notice provides a waiver of the addition to tax under section 6654 of the Internal Revenue Code (Code) for underpayment of estimated income tax by qualifying farmers and fishermen described in this notice.

SECTION 2. BACKGROUND

Generally, the Code requires taxpayers to pay federal income taxes as they earn income. To the extent these taxes are not withheld from wages or other sources, a taxpayer must pay estimated income tax on a quarterly basis.

Section 6654 provides that, in the case of an individual taxpayer, estimated income tax is required to be paid in

four installments, each of which is 25 percent of the required annual payment. With some exceptions, section 6654(l)(2) provides that the provisions of section 6654 generally apply to certain trusts and estates.

An individual taxpayer who fails to make a sufficient and timely payment of estimated income tax generally is liable for an addition to tax under section 6654(a). However, special rules may apply in the case of an individual taxpayer who is a farmer or fisherman and satisfies the requirements of section 6654(i) for a taxable year (qualifying farmer or fisherman). Under section 6654(i)(1), a qualifying farmer or fisherman has only one required installment payment instead of four quarterly payments due on January 15 of the year following the taxable year if at least two-thirds of the taxpayer's total gross income was from farming or fishing in either the taxable year or the preceding taxable year. For a qualifying farmer or fisherman who does not make the required estimated tax installment payment by January 15 of the year following the taxable year, section 6654(i)(1)(D) provides that the taxpayer is not subject to an addition to tax for failing to pay estimated income tax if the taxpayer files the return for the taxable year and pays the full amount of tax reported on the return by March 1 of the year following the taxable year.

The Secretary of the Treasury or her delegate is authorized under section 6654(e)(3)(A) to waive the section 6654 addition to tax for an underpayment of estimated tax in unusual circumstances to the extent its imposition would be against equity and good conscience.

The Department of the Treasury (Treasury Department) and the Internal Revenue Service (IRS) understand that, for the 2021 taxable year, some qualifying farmers and fishermen have been unable to electronically file Form 7203, *S Corporation Shareholder Stock and Debt Basis Limitations*, which may be required to be included in their federal income tax returns for taxable year 2021 (2021 tax returns). Due to this inability, farmers and fishermen may have had difficulty filing their 2021 tax returns electronically by the March 1, 2022, due date provided by section 6654(i)(1). Accordingly, the Treasury Department and the IRS have determined

it is appropriate to waive certain penalties for qualifying farmers and fishermen due to these unusual circumstances if the requirements set forth in section 3 of this notice are satisfied.

SECTION 3. WAIVER OF UNDERPAYMENT OF ESTIMATED INCOME TAX

Under the authority granted by section 6654(e)(3)(A), the addition to tax under section 6654 for failure to make an estimated tax payment for the 2021 taxable year is waived for any qualifying farmer or fisherman who files a 2021 tax return and pays in full any tax due on the return by April 18, 2022, or, for those taxpayers who live in Maine or Massachusetts, by April 19, 2022. The waiver will apply to any taxpayer who is a qualifying farmer or fisherman for the 2021 taxable year and fulfills the conditions stated in the previous sentence.

The waiver will apply automatically to any taxpayer who qualifies for the waiver and does not report an addition to tax under section 6654 on the 2021 tax return. Taxpayers who otherwise satisfy the criteria for relief under this notice, but already filed a return and reported an addition to tax under section 6654, may request an abatement of the addition to tax by filing Form 843, *Claim for Refund and Request for Abatement*, in accordance with the Instructions for Form 843 and as follows:

- Write "Request for Relief under Notice 2022-13" at the top of Form 843.
- Enter "6654" on line 4.
- Check the third box on line 5a.
- On line 5b, show the dates of any payment of tax liability and addition to tax under section 6654 for the tax period involved.
- On line 7, state why the taxpayer's circumstances satisfy the criteria for relief under this notice. Generally, this would include the status of the taxpayer as a qualifying farmer or fisherman, filing a 2021 tax return, and paying in full any tax due on the return by April 18, 2022, or, for those taxpayers who live in Maine or Massachusetts, by April 19, 2022.

SECTION 4. CONTACT INFORMATION

The principal author of this notice is Alexander Wu of the Office of the Associate Chief Counsel (Procedure and Administration). For further information, please contact Mr. Wu at (202) 317-6845 (not a toll-free number).

Update for Weighted Average Interest Rates, Yield Curves, and Segment Rates

Notice 2022-14

This notice provides guidance on the corporate bond monthly yield curve, the corresponding spot segment rates used under § 417(e)(3), and the 24-month average segment rates under § 430(h)(2) of the Internal Revenue Code. In addition, this notice provides guidance as to the interest rate on 30-year Treasury securities under § 417(e)(3)(A)(ii)(II) as in effect for plan years beginning before 2008 and the 30-year

Treasury weighted average rate under § 431(c)(6)(E)(ii)(I).

YIELD CURVE AND SEGMENT RATES

Section 430 specifies the minimum funding requirements that apply to single-employer plans (except for CSEC plans under § 414(y)) pursuant to § 412. Section 430(h)(2) specifies the interest rates that must be used to determine a plan's target normal cost and funding target. Under this provision, present value is generally determined using three 24-month average interest rates ("segment rates"), each of which applies to cash flows during specified periods. To the extent provided under § 430(h)(2)(C)(iv), these segment rates are adjusted by the applicable percentage of the 25-year average segment rates for the period ending September 30 of the year preceding the calendar year in which the plan year begins.¹ However, an election may be made under § 430(h)(2)(D)(ii) to use the monthly yield curve in place of the segment rates.

Notice 2007-81, 2007-44 I.R.B. 899, provides guidelines for determining the monthly corporate bond yield curve, and

the 24-month average corporate bond segment rates used to compute the target normal cost and the funding target. Consistent with the methodology specified in Notice 2007-81, the monthly corporate bond yield curve derived from February 2022 data is in Table 2022-2 at the end of this notice. The spot first, second, and third segment rates for the month of February 2022 are, respectively, 1.88, 3.35, and 3.70.

The 24-month average segment rates determined under § 430(h)(2)(C)(i) through (iii) must be adjusted pursuant to § 430(h)(2)(C)(iv) to be within the applicable minimum and maximum percentages of the corresponding 25-year average segment rates. The 25-year average segment rates for plan years beginning in 2021 and 2022 were published in Notice 2020-72, 2020-40 I.R.B. 789, and Notice 2021-54, 2021-41 I.R.B. 457, respectively.

24-MONTH AVERAGE CORPORATE BOND SEGMENT RATES

The three 24-month average corporate bond segment rates applicable for March 2022 without adjustment for the 25-year average segment rate limits are as follows:

<i>24-Month Average Segment Rates Without 25-Year Average Adjustment</i>			
Applicable Month	First Segment	Second Segment	Third Segment
March 2022	0.87	2.64	3.28

25-YEAR AVERAGE SEGMENT RATES

Section 9706(a) of the American Rescue Plan Act of 2021, Pub. L. No. 117-2 (the ARP), which was enacted on March 11, 2021, changes the 25-year average segment rates and the applicable minimum and maximum percentages used under § 430(h)(3)(C)(iv) of the Code to adjust the 24-month average segment rates.² Prior to this change, the applicable

minimum and maximum percentages were 85% and 115% for a plan year beginning in 2021, and 80% and 120% for plan year beginning in 2022, respectively. After this change, the applicable minimum and maximum percentages are 95% and 105% for a plan year beginning in 2021 or 2022. In addition, pursuant to this change, any 25-year average segment rate that is less than 5% is deemed to be 5%.³

Pursuant to § 9706(c)(1) of the ARP, these changes apply with respect to plan

years beginning on or after January 1, 2020. However, § 9706(c)(2) of the ARP provides that a plan sponsor may elect not to have these changes apply to any plan year beginning before January 1, 2022.⁴

The adjusted 24-month average segment rates set forth in the chart below reflect § 430(h)(2)(C)(iv) of the Code as amended by § 9706(a) of the ARP. These adjusted 24-month average segment rates apply only for plan years for which an election under § 9706(c)(2) of

¹ Pursuant to § 433(h)(3)(A), the third segment rate determined under § 430(h)(2)(C) is used to determine the current liability of a CSEC plan (which is used to calculate the minimum amount of the full funding limitation under § 433(c)(7)(C)).

² Section 80602 of the Infrastructure Investment and Jobs Act, Pub. L. 117-58, makes further changes to the time periods for which specified applicable minimum and maximum percentages apply.

³ Pursuant to this change, the 25-year averages of the first segment rate for 2021 and 2022 are increased to 5.00% because those 25-year averages as originally published are below 5.00%.

⁴ This election may be made either for all purposes for which the amendments under § 9706 of the ARP apply or solely for purposes of determining the adjusted funding target attainment percentage under § 436 of the Code for the plan year.

the ARP is not in effect. For a plan year for which such an election does not apply, the 24-month averages applicable

for March 2022, adjusted to be within the applicable minimum and maximum percentages of the corresponding 25-year

average segment rates in accordance with § 430(h)(2)(C)(iv) of the Code, are as follows:

<i>Adjusted 24-Month Average Segment Rates</i>				
For Plan Years Beginning In	Applicable Month	First Segment	Second Segment	Third Segment
2021	March 2022	4.75	5.36	6.11
2022	March 2022	4.75	5.18	5.92

The adjusted 24-month average segment rates set forth in the chart below do not reflect the changes to § 430(h)(2)(C)(iv) of the Code made by § 9706(a) of the ARP. These adjusted 24-month average

segment rates apply only for plan years for which an election under § 9706(c)(2) of the ARP is in effect. For a plan year for which such an election applies, the 24-month averages applicable for March

2022, adjusted to be within the applicable minimum and maximum percentages of the corresponding 25-year average segment rates in accordance with § 430(h)(2)(C)(iv) of the Code, are as follows:

<i>Pre-ARP Adjusted 24-Month Average Segment Rates</i>				
For Plan Years Beginning In	Applicable Month	First Segment	Second Segment	Third Segment
2021	March 2022	3.32	4.79	5.47

30-YEAR TREASURY SECURITIES INTEREST RATES

Section 431 specifies the minimum funding requirements that apply to multi-employer plans pursuant to § 412. Section 431(c)(6)(B) specifies a minimum amount for the full-funding limitation described in § 431(c)(6)(A), based on the plan's current liability. Section 431(c)(6)(E)(ii) (I) provides that the interest rate used to

calculate current liability for this purpose must be no more than 5 percent above and no more than 10 percent below the weighted average of the rates of interest on 30-year Treasury securities during the four-year period ending on the last day before the beginning of the plan year. Notice 88-73, 1988-2 C.B. 383, provides guidelines for determining the weighted average interest rate. The rate of interest on 30-year Treasury securities for February

2022 is 2.25 percent. The Service determined this rate as the average of the daily determinations of yield on the 30-year Treasury bond maturing in February 2052. For plan years beginning in March 2022, the weighted average of the rates of interest on 30-year Treasury securities and the permissible range of rates used to calculate current liability are as follows:

<i>Treasury Weighted Average Rates</i>		
For Plan Years Beginning In	30-Year Treasury Weighted Average	Permissible Range 90% to 105%
March 2022	2.09	1.89 to 2.20

MINIMUM PRESENT VALUE SEGMENT RATES

In general, the applicable interest rates

under § 417(e)(3)(D) are segment rates computed without regard to a 24-month average. Notice 2007-81 provides guidelines for determining the minimum present

value segment rates. Pursuant to that notice, the minimum present value segment rates determined for February 2022 are as follows:

<i>Minimum Present Value Segment Rates</i>			
Month	First Segment	Second Segment	Third Segment
February 2022	1.88	3.35	3.70

DRAFTING INFORMATION

The principal author of this notice is Tom Morgan of the Office of the Associate

Chief Counsel (Employee Benefits, Exempt Organizations, and Employment Taxes). However, other personnel from the IRS participated in the development

of this guidance. For further information regarding this notice, contact Mr. Morgan at 202-317-6700 or Osmundo Bernabe at 626-927-1344 (not toll-free numbers).

Table 2022-2
 Monthly Yield Curve for February 2022
 Derived from February 2022 Data

<i>Maturity</i>	<i>Yield</i>	<i>Maturity</i>	<i>Yield</i>	<i>Maturity</i>	<i>Yield</i>	<i>Maturity</i>	<i>Yield</i>	<i>Maturity</i>	<i>Yield</i>
0.5	0.79	20.5	3.70	40.5	3.70	60.5	3.72	80.5	3.72
1.0	1.22	21.0	3.69	41.0	3.70	61.0	3.72	81.0	3.72
1.5	1.59	21.5	3.69	41.5	3.71	61.5	3.72	81.5	3.72
2.0	1.86	22.0	3.69	42.0	3.71	62.0	3.72	82.0	3.72
2.5	2.03	22.5	3.69	42.5	3.71	62.5	3.72	82.5	3.72
3.0	2.14	23.0	3.69	43.0	3.71	63.0	3.72	83.0	3.72
3.5	2.21	23.5	3.69	43.5	3.71	63.5	3.72	83.5	3.72
4.0	2.27	24.0	3.69	44.0	3.71	64.0	3.72	84.0	3.72
4.5	2.32	24.5	3.69	44.5	3.71	64.5	3.72	84.5	3.72
5.0	2.39	25.0	3.69	45.0	3.71	65.0	3.72	85.0	3.72
5.5	2.46	25.5	3.69	45.5	3.71	65.5	3.72	85.5	3.72
6.0	2.54	26.0	3.69	46.0	3.71	66.0	3.72	86.0	3.72
6.5	2.63	26.5	3.69	46.5	3.71	66.5	3.72	86.5	3.72
7.0	2.73	27.0	3.69	47.0	3.71	67.0	3.72	87.0	3.72
7.5	2.82	27.5	3.69	47.5	3.71	67.5	3.72	87.5	3.72
8.0	2.91	28.0	3.69	48.0	3.71	68.0	3.72	88.0	3.72
8.5	3.00	28.5	3.69	48.5	3.71	68.5	3.72	88.5	3.72
9.0	3.09	29.0	3.69	49.0	3.71	69.0	3.72	89.0	3.72
9.5	3.17	29.5	3.69	49.5	3.71	69.5	3.72	89.5	3.72
10.0	3.24	30.0	3.69	50.0	3.71	70.0	3.72	90.0	3.72
10.5	3.31	30.5	3.69	50.5	3.71	70.5	3.72	90.5	3.72
11.0	3.37	31.0	3.69	51.0	3.71	71.0	3.72	91.0	3.72
11.5	3.43	31.5	3.69	51.5	3.71	71.5	3.72	91.5	3.72
12.0	3.48	32.0	3.70	52.0	3.71	72.0	3.72	92.0	3.72
12.5	3.52	32.5	3.70	52.5	3.71	72.5	3.72	92.5	3.72
13.0	3.55	33.0	3.70	53.0	3.71	73.0	3.72	93.0	3.72
13.5	3.58	33.5	3.70	53.5	3.71	73.5	3.72	93.5	3.72
14.0	3.61	34.0	3.70	54.0	3.71	74.0	3.72	94.0	3.72
14.5	3.63	34.5	3.70	54.5	3.71	74.5	3.72	94.5	3.72
15.0	3.65	35.0	3.70	55.0	3.71	75.0	3.72	95.0	3.72
15.5	3.66	35.5	3.70	55.5	3.71	75.5	3.72	95.5	3.72
16.0	3.67	36.0	3.70	56.0	3.71	76.0	3.72	96.0	3.72
16.5	3.68	36.5	3.70	56.5	3.71	76.5	3.72	96.5	3.72
17.0	3.68	37.0	3.70	57.0	3.71	77.0	3.72	97.0	3.72
17.5	3.69	37.5	3.70	57.5	3.71	77.5	3.72	97.5	3.72
18.0	3.69	38.0	3.70	58.0	3.71	78.0	3.72	98.0	3.72
18.5	3.69	38.5	3.70	58.5	3.71	78.5	3.72	98.5	3.72
19.0	3.70	39.0	3.70	59.0	3.71	79.0	3.72	99.0	3.72
19.5	3.70	39.5	3.70	59.5	3.72	79.5	3.72	99.5	3.72
20.0	3.70	40.0	3.70	60.0	3.72	80.0	3.72	100.0	3.72

Rev. Proc. 2022-20

SECTION 1. PURPOSE

This revenue procedure provides guidance regarding the public approval requirement under § 147(f) of the Internal Revenue Code for tax-exempt qualified private activity bonds. Specifically, this revenue procedure provides that hearings held by teleconference as described in section 4 of this revenue procedure will be treated as held in a location that, based on the facts and circumstances, is convenient for residents of the approving governmental unit for the purpose of § 1.147(f)-1(d)(2) of the Income Tax Regulations.

SECTION 2. BACKGROUND

.01 Pursuant to § 147(f), tax-exempt qualified private activity bonds are subject to a public approval requirement. Except for refunding bonds described in § 147(f)(2)(D), a bond issue must be approved by the governmental unit issuing the bonds (or on behalf of which such bonds are issued) and by the governmental unit having jurisdiction over the area in which any facility to be financed by the issue is located. Under § 147(f)(2)(B), an issue will be treated as having been approved by any governmental unit if the issue is approved by the applicable elected representative of the governmental unit after a public hearing following reasonable public notice, or by voter referendum of the governmental unit.

.02 Section 1.147(f)-1(d)(1) provides that “public hearing” means a forum providing a reasonable opportunity for interested individuals to express their views, orally or in writing, on the proposed issue of bonds and the location and nature of the proposed project to be financed. Section 1.147(f)-1(d)(2) provides that the public hearing must be held in a location that, based on the facts and circumstances, is convenient for residents of the approving governmental unit. The location is presumed convenient for residents of the approving governmental unit if the public hearing is located in the approving governmental unit’s capital or seat of government. Further, if more than one

governmental unit is required to hold a public hearing, the hearings may be combined as long as the combined hearing affords the residents of all of the participating governmental units a reasonable opportunity to be heard. The location of any combined hearing is presumed convenient for residents of each participating governmental unit if it is no farther than 100 miles from the seat of government of each participating governmental unit beyond whose geographic jurisdiction the hearing is conducted.

.03 In light of the Coronavirus Disease 2019 (COVID-19) pandemic, state and local governmental units sought alternatives to in-person hearings held to meet the public approval requirement. In response to these concerns, Rev. Proc. 2020-21, 2020-22 I.R.B. 872, provides temporary guidance regarding the public approval requirement under § 147(f). Rev. Proc. 2020-21 provides that for the period beginning May 4, 2020, and ending on December 31, 2020 (time period limitation), hearings held by teleconference that are accessible to the residents of the approving governmental unit by calling a toll-free telephone number will be treated as held in a location that, based on the facts and circumstances, is convenient for residents of the approving governmental unit for purposes of § 1.147(f)-1(d)(2). Rev. Proc. 2020-49, 2020-48 I.R.B. 1121, modified section 4.02 of Rev. Proc. 2020-21 by extending the time period limitation until September 30, 2021, and the time period limitation was further extended until March 31, 2022, by Rev. Proc. 2021-39, 2021-38 I.R.B. 426, modifying sec. 4.02 of Rev. Proc. 2020-21, and modifying and superseding Rev. Proc. 2020-49.

.04 The Department of the Treasury (Treasury Department) and the Internal Revenue Service (IRS) have received requests to permanently allow public hearings for qualified private activity bonds to be held telephonically. In the past, the Treasury Department and the IRS rejected suggestions that an effective public hearing for qualified private activity bonds may be held by teleconference or webinar. See TD 9845 (83 FR 67687 (Dec. 31, 2018)). The experience using telephonic hearings during the COVID-19 pandemic has shown that telephonic access has in fact made it easier for the public to express

its views regarding a proposed private activity bond issue and thus furthers the purpose of the public approval requirement in § 147(f). Accordingly, this revenue procedure provides the requested guidance by eliminating the time period limitation on holding public hearings telephonically.

SECTION 3. SCOPE

This revenue procedure applies to hearings held telephonically for the purpose of satisfying the public approval requirement under § 147(f).

SECTION 4. APPLICATION

A hearing that is held by teleconference accessible to the residents of the approving governmental unit by calling a toll-free telephone number will be treated as held in a location that, based on the facts and circumstances, is convenient for residents of the approving governmental unit for the purpose of § 1.147(f)-1(d)(2). Provided the requirements of the preceding sentence are satisfied, governmental units are not precluded from offering additional access to the hearing by other telephone numbers, internet-based meeting technology, or in-person attendance.

SECTION 5. EFFECT ON OTHER DOCUMENTS

This revenue procedure modifies and supersedes Rev. Proc. 2020-21 and Rev. Proc. 2021-39.

SECTION 6. DATE OF APPLICABILITY

This revenue procedure applies to public hearings held on or after March 18, 2022.

SECTION 7. DRAFTING INFORMATION

The principal authors of this revenue procedure are Johanna Som de Cerff and David White of the Office of Associate Chief Counsel (Financial Institutions & Products). For further information regarding this revenue procedure, contact Ms. Som de Cerff or Mr. White on (202) 317-6980 (not a toll-free number).

Definition of Terms

Revenue rulings and revenue procedures (hereinafter referred to as "rulings") that have an effect on previous rulings use the following defined terms to describe the effect:

Amplified describes a situation where no change is being made in a prior published position, but the prior position is being extended to apply to a variation of the fact situation set forth therein. Thus, if an earlier ruling held that a principle applied to A, and the new ruling holds that the same principle also applies to B, the earlier ruling is amplified. (Compare with *modified*, below).

Clarified is used in those instances where the language in a prior ruling is being made clear because the language has caused, or may cause, some confusion. It is not used where a position in a prior ruling is being changed.

Distinguished describes a situation where a ruling mentions a previously published ruling and points out an essential difference between them.

Modified is used where the substance of a previously published position is being changed. Thus, if a prior ruling held that a principle applied to A but not to B, and the

new ruling holds that it applies to both A and B, the prior ruling is modified because it corrects a published position. (Compare with *amplified* and *clarified*, above).

Obsoleted describes a previously published ruling that is not considered determinative with respect to future transactions. This term is most commonly used in a ruling that lists previously published rulings that are obsoleted because of changes in laws or regulations. A ruling may also be obsoleted because the substance has been included in regulations subsequently adopted.

Revoked describes situations where the position in the previously published ruling is not correct and the correct position is being stated in a new ruling.

Superseded describes a situation where the new ruling does nothing more than restate the substance and situation of a previously published ruling (or rulings). Thus, the term is used to republish under the 1986 Code and regulations the same position published under the 1939 Code and regulations. The term is also used when it is desired to republish in a single ruling a series of situations, names, etc., that were previously published over a period of time in separate rulings. If the

new ruling does more than restate the substance of a prior ruling, a combination of terms is used. For example, *modified* and *superseded* describes a situation where the substance of a previously published ruling is being changed in part and is continued without change in part and it is desired to restate the valid portion of the previously published ruling in a new ruling that is self contained. In this case, the previously published ruling is first modified and then, as modified, is superseded.

Supplemented is used in situations in which a list, such as a list of the names of countries, is published in a ruling and that list is expanded by adding further names in subsequent rulings. After the original ruling has been supplemented several times, a new ruling may be published that includes the list in the original ruling and the additions, and supersedes all prior rulings in the series.

Suspended is used in rare situations to show that the previous published rulings will not be applied pending some future action such as the issuance of new or amended regulations, the outcome of cases in litigation, or the outcome of a Service study.

Abbreviations

The following abbreviations in current use and formerly used will appear in material published in the Bulletin.

A—Individual.
Acq.—Acquiescence.
B—Individual.
BE—Beneficiary.
BK—Bank.
B.T.A.—Board of Tax Appeals.
C—Individual.
C.B.—Cumulative Bulletin.
CFR—Code of Federal Regulations.
CI—City.
COOP—Cooperative.
Ct.D.—Court Decision.
CY—County.
D—Decedent.
DC—Dummy Corporation.
DE—Donee.
Del. Order—Delegation Order.
DISC—Domestic International Sales Corporation.
DR—Donor.
E—Estate.
EE—Employee.
E.O.—Executive Order.
ER—Employer.

ERISA—Employee Retirement Income Security Act.
EX—Executor.
F—Fiduciary.
FC—Foreign Country.
FICA—Federal Insurance Contributions Act.
FISC—Foreign International Sales Company.
FPH—Foreign Personal Holding Company.
FR.—Federal Register.
FUTA—Federal Unemployment Tax Act.
FX—Foreign corporation.
G.C.M.—Chief Counsel's Memorandum.
GE—Grantee.
GP—General Partner.
GR—Grantor.
IC—Insurance Company.
I.R.B.—Internal Revenue Bulletin.
LE—Lessee.
LP—Limited Partner.
LR—Lessor.
M—Minor.
Nonacq.—Nonacquiescence.
O—Organization.
P—Parent Corporation.
PHC—Personal Holding Company.
PO—Possession of the U.S.
PR—Partner.
PRS—Partnership.

PTE—Prohibited Transaction Exemption.
Pub. L.—Public Law.
REIT—Real Estate Investment Trust.
Rev. Proc.—Revenue Procedure.
Rev. Rul.—Revenue Ruling.
S—Subsidiary.
S.P.R.—Statement of Procedural Rules.
Stat.—Statutes at Large.
T—Target Corporation.
T.C.—Tax Court.
T.D.—Treasury Decision.
TFE—Transferee.
TFR—Transferor.
T.I.R.—Technical Information Release.
TP—Taxpayer.
TR—Trust.
TT—Trustee.
U.S.C.—United States Code.
X—Corporation.
Y—Corporation.
Z—Corporation.

Numerical Finding List¹

Bulletin 2022–14

Announcements:

2022-3, 2022-8 I.R.B. 788
2022-4, 2022-9 I.R.B. 789
2022-5, 2022-11 I.R.B. 825
2022-6, 2022-13 I.R.B. 934

AOD:

2022-1, 2022-06 I.R.B. 466
2022-2, 2022-12 I.R.B. 903

Notices:

2022-1, 2022-02 I.R.B. 304
2022-2, 2022-02 I.R.B. 304
2022-3, 2022-02 I.R.B. 308
2022-4, 2022-02 I.R.B. 309
2022-5, 2022-05 I.R.B. 457
2022-6, 2022-05 I.R.B. 460
2022-7, 2022-06 I.R.B. 469
2022-8, 2022-07 I.R.B. 491
2022-9, 2022-10 I.R.B. 811
2022-10, 2022-10 I.R.B. 815
2022-12, 2022-12 I.R.B. 906
2022-11, 2022-14 I.R.B. 939
2022-13, 2022-14 I.R.B. 940
2022-14, 2022-14 I.R.B. 941

Proposed Regulations:

REG-118250-20, 2022-07 I.R.B. 753
REG-105954-20, 2022-11 I.R.B. 828
REG-114209-21, 2022-11 I.R.B. 898

Revenue Procedures:

2022-1, 2022-01 I.R.B. 1
2022-2, 2022-01 I.R.B. 120
2022-3, 2022-01 I.R.B. 144
2022-4, 2022-01 I.R.B. 161
2022-5, 2022-01 I.R.B. 256
2022-7, 2022-01 I.R.B. 297
2022-9, 2022-02 I.R.B. 310
2022-11, 2022-03 I.R.B. 449
2022-8, 2022-04 I.R.B. 451
2022-10, 2022-06 I.R.B. 473
2022-13, 2022-06 I.R.B. 477
2022-12, 2022-07 I.R.B. 494
2022-14, 2022-07 I.R.B. 502
2022-15, 2022-13 I.R.B. 908
2022-17, 2022-13 I.R.B. 930
2022-17, 2022-13 I.R.B. 933
2022-20, 2022-14 I.R.B. 945

Revenue Rulings:

2022-1, 2022-02 I.R.B. 301

Revenue Rulings:—Continued

2022-2, 2022-04 I.R.B. 451
2022-3, 2022-06 I.R.B. 467
2022-4, 2022-10 I.R.B. 790
2022-5, 2022-10 I.R.B. 792
2022-6, 2022-12 I.R.B. 904
2022-7, 2022-14 I.R.B. 935
2022-8, 2022-14 I.R.B. 936

Treasury Decisions:

9959, 2022-03 I.R.B. 328
9961, 2022-03 I.R.B. 430
9960, 2022-07 I.R.B. 481
9962, 2022-11 I.R.B. 823

¹ A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 2020–27 through 2020–52 is in Internal Revenue Bulletin 2020–52, dated December 27, 2021.

Finding List of Current Actions on Previously Published Items¹

Bulletin 2022–14

¹ A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 2020–27 through 2020–52 is in Internal Revenue Bulletin 2020–52, dated December 27, 2021.

Internal Revenue Service

Washington, DC 20224

Official Business
Penalty for Private Use, \$300

INTERNAL REVENUE BULLETIN

The Introduction at the beginning of this issue describes the purpose and content of this publication. The weekly Internal Revenue Bulletins are available at www.irs.gov/irb/.

We Welcome Comments About the Internal Revenue Bulletin

If you have comments concerning the format or production of the Internal Revenue Bulletin or suggestions for improving it, we would be pleased to hear from you. You can email us your suggestions or comments through the IRS Internet Home Page (www.irs.gov) or write to the Internal Revenue Service, Publishing Division, IRB Publishing Program Desk, 1111 Constitution Ave. NW, IR-6230 Washington, DC 20224.