

**DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220**

November 4, 2022  
Department of the Treasury  
2022-2023 Priority Guidance Plan

Joint Statement by:

Lily Batchelder  
Assistant Secretary for Tax Policy  
US. Department of the Treasury

Charles P. Rettig  
Commissioner  
Internal Revenue Service

William M. Paul  
Principal Deputy Chief Counsel and Deputy Chief Counsel (Technical)  
Internal Revenue Service

We are pleased to announce the release of the 2022–2023 Priority Guidance Plan.

In Notice 2022-21, the Department of the Treasury (Treasury Department) and the Internal Revenue Service (Service) solicited recommendations for items to be included in the plan from all interested parties, including taxpayers, tax practitioners, and industry groups. The Treasury Department and the Service recognize the importance of public input in formulating a Priority Guidance Plan that focuses resources on guidance items that are most important to taxpayers and tax administration. Solicitation of input on, and issuance of, this plan reflects an emphasis on taxpayer engagement with the Treasury Department and the Service through a variety of channels, consistent with the directive of the Taxpayer First Act, Pub. L. 116-25, 133 Stat. 981.

The 2022–2023 Priority Guidance Plan contains 205 guidance projects that are priorities for allocating Treasury Department and Service resources during the 12-month period from July 1, 2022 through June 30, 2023 (the plan year). The projects on the plan will be the focus of our

efforts during the plan year. However, the plan does not provide any deadline for completing the projects.

Some projects that were on the 2021-2022 Priority Guidance Plan are not included on the 2022-2023 plan because they are no longer considered priorities for purposes of allocating resources during the 2022- 2023 plan year. Some of those projects may be considered for inclusion on a future priority guidance plan.

In addition to the items on the 2022–2023 plan, the Appendix lists the more routine guidance that is generally published each year.

We intend to update the 2022–2023 plan during the plan year to reflect additional items that become priorities, guidance that is published during the plan year, and projects that may result from legislative developments. The periodic updates allow us flexibility throughout the plan year to consider comments received from taxpayers and tax practitioners relating to additional projects and to respond to developments arising during the plan year.

The published guidance process can be fully successful only if we have the benefit of the insight and experience of taxpayers and practitioners who must apply the rules. Therefore, we invite the public to continue to provide us with their comments and suggestions throughout the plan year.

Additional copies of the 2022–2023 Priority Guidance Plan can be obtained from the IRS website at <http://www.irs.gov/uac/Priority-Guidance-Plan>.

**OFFICE OF TAX POLICY  
AND  
INTERNAL REVENUE SERVICE**

**2022-2023 PRIORITY GUIDANCE PLAN**

**UPDATED AS OF September 30, 2022**

**RELEASED November 4, 2022**

**CONSOLIDATED RETURNS**

1. Regulations under §1502 removing obsolete rules and updating regulations to reflect statutory changes.
2. Regulations regarding life-nonlife consolidated groups under §1.1502-47.
3. Final regulations regarding split waiver elections under §1.1502-21(b)(3). Proposed and temporary regulations were published on July 8, 2020.

**CORPORATIONS AND THEIR SHAREHOLDERS**

1. Guidance under the provisions of Part 2 of Subtitle A of the Inflation Reduction Act regarding computation and reporting of the excise tax under §4501 on the repurchase of corporate stock.
2. Guidance regarding procedures for submitting private letter ruling requests under §355.
3. Regulations relating to the requirements under §355, including the active trade or business requirement and the prohibition on device for the distribution of earnings and profits.
4. Regulations and other guidance under §382(h)(6). Proposed regulations were published on September 10, 2019 and January 14, 2020.
5. Regulations and other guidance regarding the application of §382 to Controlled Foreign Corporations and related issues.

Also available as part of the eCourse

[2023 Nonprofit Organizations eConference](#)

First appeared as part of the conference materials for the  
40<sup>th</sup> Annual Nonprofit Organizations Institute session

"Demystifying the IRS and Treasury: Practical Guidance and Considerations"