

Treasury releases technical corrections for CAMT proposed regulations

December 23, 2024

In brief

What happened?

Treasury and the IRS on December 23 released <u>technical corrections</u> to the proposed regulations on the corporate alternative minimum tax (CAMT). Enacted in 2022, the Inflation Reduction Act (IRA) imposes a 15% minimum tax based on the adjusted financial statement income (AFSI) of an 'applicable corporation.' The CAMT is effective for tax years beginning after December 31, 2022. The <u>proposed regulations</u> were issued in September 2024.

Why is it relevant?

The technical corrections address depreciation methods, tax-exempt adjustments, and Section 351 transactions, and cover AFSI adjustments, entity classification, and basis recalculations. The technical corrections also include adjustments to pages and paragraphs (e.g., correcting numerical references and terminology) and effective dates (e.g., certain provisions are retroactively clarified to tax years ending after December 31, 2019).

Actions to consider

Comments on the technical corrections are due January 16, 2025.

See also

- Tax Readiness webcast: Proposed CAMT regulations Additional complexity and administrative burdens (October 8, 2024)
- Insight: Key highlights of the CAMT proposed regulations (September 20, 2024)



Let's talk

For a deeper discussion of how these technical corrections might affect your business, please contact:

Federal Tax Services

Christine Turgeon (973) 202-6615 christine.turgeon@pwc.com

International Tax Services

Nita Asher (202) 870-2462 nita.asher@pwc.com George Manousos (202) 302-0942 george.manousos@pwc.com

Aaron Junge (202) 739-1053 aaron.junge@pwc.com Jason Black (954) 895-8200 jason.m.black@pwc.com

Wade Sutton (202) 657-7461 wade.sutton@pwc.com

Mergers & Acquisitions – Sub C

Olivia Orobona (202) 549-5127 olivia.ley.orobona@pwc.com Matt Lamorena (202) 215-6478 matthew.lamorena@pwc.com Horacio Sobol (202) 281-8514 horacio.sobol@pwc.com

Mergers & Acquisitions – Sub K

Mike Hauswirth (202) 213-2729 michael.j.hauswirth@pwc.com Robert Honigman (301) 351-2867 robert.honigman@pwc.com Jennifer Wyatt (312) 953-5599 jennifer.a.wyatt@pwc.com

© 2024 PwC. All rights reserved. PwC refers to the US member firm or one of its subsidiaries or affiliates, and may sometimes refer to the PwC network. Each member firm is a separate legal entity. Please see www.pwc.com/structure for further details.

This content is for general information purposes only and should not be used as a substitute for consultation with professional advisors. Solicitation