

TaxNewsFlash

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Final regulations: Rules for supervisory approval of penalties

The U.S. Treasury Department and IRS today released [final regulations](#) (T.D. 10017) concerning the supervisory approval of certain penalties assessed by the IRS. These regulations address uncertainties that have emerged due to recent judicial decisions and affect both the IRS and individuals assessed with certain penalties.

In April 2023, Treasury and the IRS issued proposed regulations regarding supervisory approval of penalties under section 6751(b) of the Internal Revenue Code. The proposed regulations sought to clarify the application of section 6751(b) to ensure consistency with statutory text and promote uniformity and administrability. [Read TaxNewsFlash](#)

Following the proposed regulations, eight comments were received, and a public hearing was held. After reviewing the comments and testimony, the IRS has adopted the proposed regulations with minor modifications.

The final regulations are effective December 23, 2024.

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