



TaxNewsFlash

United States

No. 2025-287
October 1, 2025

IRS Priority Guidance Plan for 2025-2026

The U.S. Treasury Department and IRS yesterday released the [2025-2026 Priority Guidance Plan](#).

The Priority Guidance Plan is used each year to identify and prioritize tax issues to be addressed through regulations, revenue rulings, revenue procedures, notices, and other published administrative guidance.

The 2025-2026 Priority Guidance Plan contains 105 guidance projects that are priorities for allocating Treasury and IRS resources during the 12-month period from July 1, 2024, through June 30, 2025. Of these projects, 11 have been released or published as of August 31, 2025.

The 2025-2026 plan reflects the Treasury Department's and IRS's focus on five key areas:

- Implementation of the "One, Big, Beautiful Bill Act" (OBBA)
- Deregulation and burden reduction
- Tribal tax issues
- Digital assets
- Guidance on the SECURE 2.0 Act

The Treasury Department and IRS explain that some projects that were on the 2024-2025 plan are not included on the 2025-2026 plan because they do not belong to one of these priority categories for purposes of allocating resources during the 2025-2026 plan year, although some of those projects may be considered for inclusion on a future priority guidance plan.

The Treasury Department and IRS intend to update the 2025-2026 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. In particular, the Treasury Department and IRS expect to add additional deregulatory items to the plan as they continue to evaluate comments received from taxpayers and tax practitioners, and they invite the public to continue to provide comments and suggestions throughout the plan year.

KPMG observation

The 2025-2026 plan, with only 105 guidance projects, appears to include items of guidance that the Treasury Department and IRS actually intend to release before June 30, 2026. This is unlike the 2024-2025 plan, which included 231 guidance projects, as well as prior plans that often included guidance items that appeared to be more aspirational.

In addition, it is notable that although Notices 2025-46 and 2025-49 announced the Treasury Department's and IRS' intend to issue revised proposed regulations on the application of the corporate alternative minimum tax (CAMT), the 2025-2026 plan does not include those proposed regulations. So, the Treasury Department and IRS presumably intend to issue those proposed regulations after June 30, 2026.

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