KPMG

TaxNewsFlash

United States

No. 2025-318
November 10, 2025

Rev. Proc. 2025-31: Safe harbor for investment and grantor trusts to stake digital assets

The IRS today released **Rev. Proc. 2025-31** that describes a safe harbor for trusts that otherwise qualify as investment trusts under Treas. Reg. § 301.7701-4(c) and as grantor trusts, to stake their digital assets without jeopardizing their tax status as investment trusts and grantor trusts for federal income tax purposes.

Rev. Proc. 2025-31 also provides a limited time period for an existing trust to amend its governing instrument to adopt the requirements of the safe harbor.

The revenue procedure is effective for tax years ending on or after November 10, 2025.

kpmg.com/socialmedia

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.