

Tax Insights | November 9, 2022

## Tracking Tax News, You Need to Know



### IRS to Finalize Consolidated Group Rules

The IRS plans to finalize consolidated group rules in eight to nine months before they expire in 2023, an IRS official said. The temporary [rules](#) issued in July 2020 for consolidated groups that look to waive their ability to carry back losses after acquisitions of new members would expire in July 2023. The IRS would also release guidance on the tax-and-climate law as well as guidance on Section 382(h) loss acquisitions soon.

### Rule on Access to Ownership Information Under Review

Proposed rules on granting access to newly disclosed information on companies' beneficial ownership and how to secure the information have been sent to the White House for regulatory review, according to the White House [website](#). The Treasury Department finalized the rules in September to have US and foreign companies disclose to the department's Financial Crimes Enforcement Network the identities of their owners and other basic information about them. The rules would help governments to crack down on money laundering and drug trafficking. The new disclosure requirement will take effect in 2024.

### Philadelphia DOR Announces NOL Carryforward

The Philadelphia Department of Revenue has [announced](#) that all Philadelphia businesses can now carry forward net operating losses (NOLs) incurred in 2022 and thereafter for 20 years for purposes of the business and income receipts tax. The city council passed the bill in 2018 but could implement the change only after the state of Pennsylvania's authorization. Therefore, the 20-year carryforward applies to losses incurred in the tax year 2022 and beyond, while the NOLs incurred before 2022 would be carried over for only three years. No application for this carryforward extension is required.



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