

Section 1274.--Determination of Issue Price in the Case of Certain Debt Instruments Issued for Property

(Also Sections 42, 280G, 382, 467, 468, 482, 483, 1288, 7520, 7872.)

Rev. Rul. 2022-20

This revenue ruling provides various prescribed rates for federal income tax purposes for November 2022 (the current month). Table 1 contains the short-term, mid-term, and long-term applicable federal rates (AFR) for the current month for purposes of section 1274(d) of the Internal Revenue Code. Table 2 contains the short-term, mid-term, and long-term adjusted applicable federal rates (adjusted AFR) for the current month for purposes of section 1288(b). Table 3 sets forth the adjusted federal long-term rate and the long-term tax-exempt rate described in section 382(f). Table 4 contains the appropriate percentages for determining the low-income housing credit described in section 42(b)(1) for buildings placed in service during the current month. However, under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%. Finally, Table 5 contains the federal rate for determining the present value of an annuity, an interest for life or for a term of years, or a remainder or a reversionary interest for purposes of section 7520.

REV. RUL. 2022-20 TABLE 1

Applicable Federal Rates (AFR) for November 2022

	Period for Compounding			
	Annual	Semiannual	Quarterly	Monthly
	Short-term			
AFR	4.10%	4.06%	4.04%	4.03%
110% AFR	4.52%	4.47%	4.45%	4.43%
120% AFR	4.93%	4.87%	4.84%	4.82%
130% AFR	5.35%	5.28%	5.25%	5.22%
	Mid-term			
AFR	3.97%	3.93%	3.91%	3.90%
110% AFR	4.37%	4.32%	4.30%	4.28%
120% AFR	4.78%	4.72%	4.69%	4.67%
130% AFR	5.18%	5.11%	5.08%	5.06%
150% AFR	5.99%	5.90%	5.86%	5.83%
175% AFR	7.00%	6.88%	6.82%	6.78%
	Long-term			
AFR	3.92%	3.88%	3.86%	3.85%
110% AFR	4.32%	4.27%	4.25%	4.23%
120% AFR	4.71%	4.66%	4.63%	4.62%
130% AFR	5.10%	5.04%	5.01%	4.99%

REV. RUL. 2022-20 TABLE 2

Adjusted AFR for November 2022

	Period for Compounding			
	Annual	Semiannual	Quarterly	Monthly
Short-term adjusted AFR	3.10%	3.08%	3.07%	3.06%
Mid-term adjusted AFR	3.00%	2.98%	2.97%	2.96%
Long-term adjusted AFR	2.97%	2.95%	2.94%	2.93%

REV. RUL. 2022-20 TABLE 3

Rates Under Section 382 for November 2022

Adjusted federal long-term rate for the current month	2.97%
Long-term tax-exempt rate for ownership changes during the current month (the highest of the adjusted federal long-term rates for the current month and the prior two months.)	2.97%

REV. RUL. 2022-20 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for November 2022

Note: Under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%.

Appropriate percentage for the 70% present value low-income housing credit	7.91%
Appropriate percentage for the 30% present value low-income housing credit	3.39%

REV. RUL. 2022-20 TABLE 5

Rate Under Section 7520 for November 2022

Applicable federal rate for determining the present value of an annuity, an interest for life or a term of years, or a remainder or reversionary interest	4.80%
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