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. 2020-9

This revenue ruling provides various prescribed rates for federal income tax purposes for April 2020 (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. 2020-9 TABLE 1

Applicable Federal Rates (AFR) for April 2020

	Period for Compounding					
	<u>Annual</u>	Semiannual	Quarterly	Monthly		
	Short-term					
AFR	0.91%	0.91%	0.91%	0.91%		
110% AFR	1.00%	1.00%	1.00%	1.00%		
120% AFR	1.09%	1.09%	1.09%	1.09%		
130% AFR	1.18%	1.18%	1.18%	1.18%		
	<u>Mid-term</u>					
AFR	0.99%	0.99%	0.99%	0.99%		
110% AFR	1.09%	1.09%	1.09%	1.09%		
120% AFR	1.19%	1.19%	1.19%	1.19%		
130% AFR	1.29%	1.29%	1.29%	1.29%		
150% AFR	1.50%	1.49%	1.49%	1.49%		
175% AFR	1.74%	1.73%	1.73%	1.72%		
	<u>Long-term</u>					
AFR 110% AFR	1.44% 1.58%	1.43% 1.57%	1.43% 1.57%	1.43% 1.56%		
120% AFR	1.73%	1.72%	1.72%	1.71%		
130% AFR	1.87%	1.86%	1.86%	1.85%		
100 /0 / 11 11	1.07 /0	1.00/0	1.00 /0	1.00/0		

REV. RUL. 2020-9 TABLE 2

Adjusted AFR for April 2020

	Period for Compounding				
	<u>Annual</u>	<u>Semiannual</u>	Quarterly	Monthly	
Short-term adjusted AFR	0.69%	0.69%	0.69%	0.69%	
Mid-term adjusted AFR	0.75%	0.75%	0.75%	0.75%	
Long-term adjusted AFR	1.09%	1.09%	1.09%	1.09%	

REV. RUL. 2020-9 TABLE 3

Rates Under Section 382 for April 2020

Adjusted federal long-term rate for the current month 1.09%

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.)

1.63%

REV. RUL. 2020-9 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for April 2020 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 7.28%

Appropriate percentage for the 30% present value low-income housing credit 3.12%

REV. RUL. 2020-9 TABLE 5

Rate Under Section 7520 for April 2020

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

1.2%