

## IRS modifies procedural guidance for section 174 method changes

The Treasury Department and the Internal Revenue Service on December 17 issued Rev. Proc. 2025-08, which modifies the automatic consent procedures for accounting method changes for section 174 specified research or experimental expenditures. Specifically, it expands the waiver of eligibility rules in Rev. Proc. 2015-13 to include changes made for taxable years beginning in 2022, 2023, or 2024, and permits taxpayers to use the automatic consent procedures regardless of whether the taxpayer made a change for the same item for any other taxable year beginning in 2022, 2023, or 2024.

**URL:** <https://www.irs.gov/pub/irs-drop/rp-25-08.pdf>

**URL:** <https://www.irs.gov/pub/irs-drop/rp-15-13.pdf>

This revenue procedure is effective for Forms 3115, Application for Change in Accounting Method, filed on or after December 17, 2024.

### Find out more

Details on the revenue procedure are available in a new alert from Deloitte Tax LLP.

**URL:** [https://dhub.deloitte.com/Newsletters/Tax/2024/TNV/241220\\_4\\_supplA.pdf](https://dhub.deloitte.com/Newsletters/Tax/2024/TNV/241220_4_supplA.pdf)

— Michael DeHoff  
Tax Policy Group  
Deloitte Tax LLP

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms or their related entities (collectively, the “Deloitte organization”) is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.

#### **About Deloitte**

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms, and their related entities (collectively, the “Deloitte organization”). DTTL (also referred to as “Deloitte Global”) and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see [www.deloitte.com/about](http://www.deloitte.com/about) to learn more.

Deloitte provides industry-leading audit and assurance, tax and legal, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our professionals deliver measurable and lasting results that help reinforce public trust in capital markets, enable clients to transform and thrive, and lead the way toward a stronger economy, a more equitable society and a sustainable world. Building on its 175-plus year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte’s approximately 415,000 people worldwide make an impact that matters at [www.deloitte.com](http://www.deloitte.com).