

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. 2021-5

This revenue ruling provides various prescribed rates for federal income tax purposes for March 2021 (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.

Applicable Federal Rates (AFR) for March 2021

	<u>Annual</u>	<u>Period for Compounding</u>		<u>Monthly</u>
		<u>Semiannual</u>	<u>Quarterly</u>	
<u>Short-term</u>				
AFR	0.11%	0.11%	0.11%	0.11%
110% AFR	0.12%	0.12%	0.12%	0.12%
120% AFR	0.13%	0.13%	0.13%	0.13%
130% AFR	0.14%	0.14%	0.14%	0.14%
<u>Mid-term</u>				
AFR	0.62%	0.62%	0.62%	0.62%
110% AFR	0.68%	0.68%	0.68%	0.68%
120% AFR	0.74%	0.74%	0.74%	0.74%
130% AFR	0.81%	0.81%	0.81%	0.81%
150% AFR	0.93%	0.93%	0.93%	0.93%
175% AFR	1.09%	1.09%	1.09%	1.09%
<u>Long-term</u>				
AFR	1.62%	1.61%	1.61%	1.60%
110% AFR	1.78%	1.77%	1.77%	1.76%
120% AFR	1.94%	1.93%	1.93%	1.92%
130% AFR	2.10%	2.09%	2.08%	2.08%

Adjusted AFR for March 2021

	<u>Period for Compounding</u>			
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>
Short-term adjusted AFR	0.08%	0.08%	0.08%	0.08%
Mid-term adjusted AFR	0.47%	0.47%	0.47%	0.47%
Long-term adjusted AFR	1.22%	1.22%	1.22%	1.22%

REV. RUL. 2021-5 TABLE 3

Rates Under Section 382 for March 2021

Adjusted federal long-term rate for the current month	1.22%
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.)	1.22%

REV. RUL. 2021-5 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for March 2021

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	7.26%
Appropriate percentage for the 30% present value low-income housing credit	3.11%

REV. RUL. 2021-5 TABLE 5

Rate Under Section 7520 for March 2021

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 .8%