#### Part I

# 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. 2021-21

This revenue ruling provides various prescribed rates for federal income tax purposes for November 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 appro-

priate 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. 2021-21 TABLE 1 Applicable Federal Rates (AFR) for November 2021  Period for Compounding							
	Annual	Semiannual	Quarterly	Monthly			
		Short-term					
AFR	0.22%	0.22%	0.22%	0.22%			
110% AFR	0.24%	0.24%	0.24%	0.24%			
120% AFR	0.26%	0.26%	0.26%	0.26%			
130% AFR	0.29%	0.29%	0.29%	0.29%			
		Mid-term					
AFR	1.08%	1.08%	1.08%	1.08%			
110% AFR	1.19%	1.19%	1.19%	1.19%			
120% AFR	1.30%	1.30%	1.30%	1.30%			
130% AFR	1.40%	1.40%	1.40%	1.40%			
150% AFR	1.63%	1.62%	1.62%	1.61%			
175% AFR	1.90%	1.89%	1.89%	1.88%			
		Long-term					
AFR	1.86%	1.85%	1.85%	1.84%			
110% AFR	2.05%	2.04%	2.03%	2.03%			
120% AFR	2.23%	2.22%	2.21%	2.21%			
130% AFR	2.42%	2.41%	2.40%	2.40%			

REV. RUL. 2021-21 TABLE 2 Adjusted AFR for November 2021 Period for Compounding							
	Annual	Semiannual	Quarterly	Monthly			
Short-term adjusted AFR	0.17%	0.17%	0.17%	0.17%			
Mid-term adjusted AFR	0.82%	0.82%	0.82%	0.82%			
Long-term adjusted AFR	1.40%	1.40%	1.40%	1.40%			

#### **REV. RUL. 2021-21 TABLE 3**

Rates Under Section 382 for November 2021

Adjusted federal long-term rate for the current month

1.40%

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.)

1.40%

#### **REV. RUL. 2021-21 TABLE 4**

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

7.34%

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

3.14%

#### **REV. RUL. 2021-21 TABLE 5**

Rate Under Section 7520 for November 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

1.4%

### Section 42.—Low-Income Housing Credit

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of November 2021. See Rev. Rul. 2021-21, page 704.

### Section 280G.—Golden Parachute Payments

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of November 2021. See Rev. Rul. 2021-21, page 704.

#### Section 382.—Limitation on Net Operating Loss Carryforwards and Certain Built-In Losses Following Ownership Change

The adjusted applicable federal long-term rate is set forth for the month of November 2021. See Rev. Rul. 2021-21, page 704.

# Section 467.—Certain Payments for the Use of Property or Services

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of November 2021. See Rev. Rul. 2021-21, page 704.

#### Section 468.—Special Rules for Mining and Solid Waste Reclamation and Closing Costs

The applicable federal short-term rates are set forth for the month of November 2021. See Rev. Rul. 2021-21, page 704.

# Section 482.—Allocation of Income and Deductions Among Taxpayers

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of November 2021. See Rev. Rul. 2021-21, page 704.

### Section 483.—Interest on Certain Deferred Payments

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of November 2021. See Rev. Rul. 2021-21, page 704.

# Section 1288.—Treatment of Original Issue Discount on Tax-Exempt Obligations

The adjusted applicable federal short-term, midterm, and long-term rates are set forth for the month of November 2021. See Rev. Rul. 2021-21, page 704.

### Section 7520.—Valuation Tables

The applicable federal mid-term rates are set forth for the month of November 2021. See Rev. Rul. 2021-21, page 704.

## Section 7872.—Treatment of Loans With Below-Market Interest Rates

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of November 2021. See Rev. Rul. 2021-21, page 704.