

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, 7702, 7872.)

Rev. Rul. 2026-3

This revenue ruling provides various prescribed rates for federal income tax purposes for February 2026 (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. 2026-3 TABLE 1

Applicable Federal Rates (AFR) for February 2026

	<u>Annual</u>	<u>Period for Compounding</u>		
		<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>
		<u>Short-term</u>		
AFR	3.56%	3.53%	3.51%	3.50%
110% AFR	3.92%	3.88%	3.86%	3.85%
120% AFR	4.28%	4.24%	4.22%	4.20%
130% AFR	4.64%	4.59%	4.56%	4.55%
		<u>Mid-term</u>		
AFR	3.86%	3.82%	3.80%	3.79%
110% AFR	4.24%	4.20%	4.18%	4.16%
120% AFR	4.63%	4.58%	4.55%	4.54%
130% AFR	5.03%	4.97%	4.94%	4.92%
150% AFR	5.81%	5.73%	5.69%	5.66%
175% AFR	6.80%	6.69%	6.63%	6.60%
		<u>Long-term</u>		
AFR	4.70%	4.65%	4.62%	4.61%
110% AFR	5.19%	5.12%	5.09%	5.07%
120% AFR	5.66%	5.58%	5.54%	5.52%
130% AFR	6.14%	6.05%	6.00%	5.98%

REV. RUL. 2026-3 TABLE 2

Adjusted AFR for February 2026

	<u>Period for Compounding</u>			
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>
Short-term adjusted AFR	2.70%	2.68%	2.67%	2.67%
Mid-term adjusted AFR	2.92%	2.90%	2.89%	2.88%
Long-term adjusted AFR	3.56%	3.53%	3.51%	3.50%

REV. RUL. 2026-3 TABLE 3

Rates Under Section 382 for February 2026

Adjusted federal long-term rate for the current month	3.56%
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.)	3.56%

REV. RUL. 2026-3 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for February 2026

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	7.99%
Appropriate percentage for the 30% present value low-income housing credit	3.43%

REV. RUL. 2026-3 TABLE 5

Rate Under Section 7520 for February 2026

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	4.6%
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