2022

YEAR-END TAX PLANNING LETTER

BMSS Advisors & CPAs

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As 2022 comes to a close, all eyes are on the midterm elections and potential year-end tax legislation and, as always, it is important to stay informed. Year-end tax planning does not occur in a vacuum and is certainly impacted by the changing tax environment. Regardless of the uncertainties, we want to outline some key planning tips and additional options that are available to help minimize your 2022 tax bill and plan for the coming years.

Overview and Objectives

Traditional tax planning focuses on the timing and character of income and deductions combined with taking advantage of any applicable tax incentives.

- **Timing matters** – Timing typically focuses on the deferral of income and acceleration of deductions. However, the goal can change depending on differences in your effective tax rate year over year, expected income or loss events, and any limitations imposed on deductions.
- **Character counts** – Properly characterizing income as “active” vs. “passive” and being mindful of property holding periods can have a meaningful tax impact. Planning should take advantage of preferential, lower tax rates as well as manage the additional taxes imposed on investment income and income that can be categorized as “passive” to you.
- **Incentives add-up** – Taking advantage of special incentive provisions (such as §179 expensing, bonus depreciation, and various credits) are critical.

INDIVIDUAL PLANNING

Tax Bracket Planning

Until the clock strikes midnight to ring in the new tax year, it is not too late to plan for 2022 taxes. By simply accelerating expenses, deferring income, or vice versa, you could significantly lower your tax bill. It is critical to be mindful of the tax brackets for 2022 and 2023. For example, if you are approaching a higher tax bracket as 2022 comes to a close , strategic timing regarding the closing of sales or other transactions might allow you to defer income until early next year in order to stay in a lower tax bracket this year. The same could be true of the reverse scenario, if you expect to be in a higher bracket next year, you may be able to accelerate income into 2022 in order to have that income subjected to a lower tax rate.

Income thresholds for marginal tax rates will rise in 2023

		Single Filers - Income Thresholds		Joint Filers - Income Thresholds	
Marginal Tax Rate		**2022**	**2023**	**2022**	**2023**
37%	Over	539,900	578,125	647,850	693,750
35%	Over	215,950	231,250	431,900	462,500
32%	Over	170,050	182,100	340,100	364,200
24%	Over	89,075	95,375	178,150	190,750
22%	Over	41,775	44,725	83,550	89,450
12%	Over	10,275	11,000	20,550	22,000
10%	Under	10,275	11,000	20,550	22,000

Estimated Tax Requirements

Avoid estimated tax penalties by ensuring that you have paid enough tax for the 2022 tax year. Generally, you must pay 90% of 2022 tax or 100% of prior year tax (or 110% for joint filers with AGI over $150,000) through quarterly estimated tax payments and/or withholdings. As year-end approaches, it is important for you to review your year-to-date tax payments. Often additional taxes can be withheld from year-end bonuses and other compensation. Withholdings are considered paid ratably through the year, which can minimize any penalties if estimated tax payments were not made earlier in the year.

Capital Gain (Loss) Harvesting

Gains from the sale of capital assets held for longer than one year benefit from the reduced tax rate of no greater than 20%. Although there has been a lot of talk about increasing the rates, they remain unchanged for 2022.

A common strategy nearing year-end is to harvest any losses in your investment portfolios. Consider selling loss positions to offset incurred or planned capital gains before year-end. However, be mindful of the "wash sale rules." Wash sales are sales of stock or securities in which losses are realized but not recognized for tax purposes because the seller acquires substantially identical stock or securities within 30 days before or after the sale. Non-recognition, however, applies only to losses; gains are recognized in full.

Qualified Opportunity Funds (QOFs)

If you have substantial capital gains, investments of eligible gains in QOFs remain a strategy. This approach temporarily defers taxable events until the earlier of an inclusion event or December 31, 2026. This is an effective approach if you do not have enough deductions or credits to offset your gains in the current year or you anticipate that the tax rates could decrease in a later year.

Net Investment Income Tax (NIIT) – Individuals

The NIIT is a 3.8% Medicare surtax imposed on net investment income (NII) for joint filers with income over $250,000 (reduced to $200,000 for single taxpayers). NII generally includes passive income such as interest, dividends, annuities, royalties, rents, sale of securities, and interests in pass-through entities in which you don't materially participate. It is not imposed on income derived from a trade or business in which you actively participate.

It is possible to do some personalized planning to avoid or minimize NIIT by keeping income below the thresholds, spreading income out over several years, or possibly using deductions to offset the income.

Sale of Principal Residence

If you have sold or will sell your principal residence in 2022, an exclusion of up to $250,000 ($500,000 for married filing jointly taxpayers) applies to the gains from the sale of a principal residence. Generally, to be eligible for the exclusion, the residence must have been owned and occupied as your principal residence for at least two of the five years preceding the sale. If not, the exclusion is reduced on a pro-rata basis. Also, keep in mind that any depreciation is subject to recapture (taxed at 25%) if the property was previously rented or utilized as a home office.

Individual Retirement Account Planning

Remember to include your retirement accounts in your planning strategy. For specific planning unique to your situation, please contact your BMSS professional.

Contributing to your 401(k)

For 2022, the contribution limit is $20,500 ($27,000 for individuals aged 50 or older). Amounts you defer and pay into your 401(k) plan are generally pretax, meaning they are not subject to federal or state income tax. The exception to the pre-tax treatment is a contribution to a Roth 401(k) plan if available from your employer. For 2023, the limit increases to $22,500 ($30,000 for individuals aged 50 or older) so you should start planning now.

Solo 401(k) Plans

A "Solo 401(k)" is a one-participant 401(k) plan. It's a traditional 401(k) plan covering a business owner with no employees, or that person and his or her spouse. These plans have the same rules and requirements as any other 401(k) plan.

Converting a Traditional IRA to a Roth IRA

Converting your traditional IRA to a Roth IRA is a tax planning strategy that can allow future distributions from the Roth IRA to be tax free. The taxpayer will have to pay tax on the converted funds, but once the money is in the Roth, all future earnings are tax free. Present and future tax rates, as well as the remaining number of years before planned distributions, are key in your decision on whether a Roth conversion makes sense.

Simplified Employee Pension Plans

A Simplified Employee Pension (SEP) plan allows employers to contribute to traditional IRAs set up for employees. Employers can contribute up to 25% of the employee's annual salary up to a maximum of $61,000 for 2022. If you're self-employed, the contributions are generally limited to 20% of your self-employment income. The contribution must be made by the extended due date of the employer's return or the self-employed individual's return.

Qualified Business Income Deduction (QBID)

Taxpayers, other than corporations, may be entitled to a deduction of up to 20% of their qualified business income (QBI). QBI is the net amount of qualified items of income, gain, deduction and loss from your trade or business, including income from partnerships, S corporations, and sole proprietorships. This can materially decrease your tax rate if your QBI is significant. For example, individual taxpayers entitled to the full 20% deduction can decrease their highest marginal tax rate on the QBI from 37% to 29.6%.

For 2022, if taxable income exceeds $340,100 for joint filers ($170,050 for single), the QBID may be subject to certain limitations. Above these thresholds, the QBID is limited to a specified component of the business' wages and/or the basis of qualified property held by the business.

In addition, the deduction may be further limited if the QBI is related to a "specified service" trade or business (such as law, accounting, health, or consulting). If so, the deduction is phased out beginning with the same thresholds above and completely phased out at $440,100 for joint filers ($220,050 for single).

While these tax planning tips cover many areas, there may be other areas that can be addressed based on your unique situation. Please reach out to your BMSS professional to discuss your options.

Net Operating Loss (NOL) and Excess Business Losses (EBL)

NOLs can only be carried forward and can only offset 80% of the current year's taxable income. An NOL can no longer fully offset your income in the following year.

For 2022, an individual's net trade or business losses are limited to $540,000 for joint filers ($270,000 for single). The losses that exceed these thresholds are "excess business losses" (EBL) and are disallowed. Currently, EBLs that are disallowed are treated as an NOL carryover to the following taxable year.

A "trade or business" can include, but is not limited to, Schedule F and Schedule C activities and other business activities reported on Schedule E, including pass-through income and losses attributable to a trade or business as well as business gains and losses reported on Form 4797.

Maximizing Your Deductions by "Bunching" Your Itemized Deductions

For 2022, the standard deduction is $25,900 for married filing jointly, $19,400 for head of household, and $12,950 for single and those filing separately. The rising standard deduction is important for planning the timing of your itemized deductions. Your itemized deductions must exceed the standard deduction to take advantage of the tax value of the deductions. If your personal itemized deductions typically do not exceed the standard deduction each year, consider "bunching" certain deductions that would normally be paid over multiple years into a single tax year such as charitable contributions and planned medical expenses.

Itemized Deductions

- State and local taxes (SALT) (including personal property and real estate) continue to be limited to $10,000 ($5,000 if married filing separately).
- The floor for medical expenses in 2022 is 7.5% of AGI.
- For mortgages taken out after December 14, 2017, only interest on the first $750,000 of mortgage debt for a primary or secondary home is deductible for joint filers ($375,000 for single filers). For mortgages taken out earlier, the interest deduction is permitted on the first $1,000,000 of mortgage debt for joint filers ($500,000 for single).
- Interest on home equity loans is no longer deductible if it is not connected to home improvement expenses. If related, interest on home equity loans is subject to the same limitations as mortgage interest noted above.
- Personal casualty and theft losses are deductible only if they are attributable to a federally declared disaster, exceed a 10% AGI threshold, and you itemize your deductions.

Student Loan Interest Deduction

Taxpayers may deduct interest payments made on qualified education loans. The deduction is an above-the-line adjustment to income that can be claimed by all individuals, not just those who itemize. The maximum deduction of $2,500 is phased out for high-income taxpayers. Please be sure to keep any 1098-E forms you receive relating to this deduction.

Student Loan Forgiveness

This one-time debt relief is provided by the U.S. Department of Education as part of the Biden-Harris Administration student debt relief plan. It provides eligible borrowers with a tax-free discharge of loans up to $10,000 for most recipients ($20,000 to Federal Pell Grant recipients). It is not available to those with over $250,000 of income for joint filers ($125,000 for single). However, several lawsuits have developed related to the plan. Just last month, a U.S. appeals court ordered a temporary hold on student loan forgiveness. At this time, it is uncertain whether this case will be resolved or how long it will take.

Credit for Scholarship Granting Organization (SGO) Contributions

A credit is available against your Alabama personal income taxes for contributions made to an SGO. For 2022, individual taxpayers can claim a credit equal to 100% of the total contributions to SGOs made during the year, up to 100% of the Alabama tax liability of the taxpayer, with the credit not to exceed $100,000.

Charitable Giving Strategies

- Utilize a Donor Advised Fund (DAF) – A DAF is a charitable investment account for the sole purpose of supporting charitable organizations that you care about. It allows donors to make a charitable contribution, receive an immediate tax deduction, and then recommend grants from the fund over time. It is an effective vehicle for "bunching" your charitable deductions. You can contribute to your DAF as frequently as you like and then recommend grants to your favorite charitable organizations whenever it makes sense for them.

- Donate appreciated stock - Beyond claiming a deduction for the FMV of the stock, you can avoid the capital gains tax you would have otherwise incurred had you sold the asset and then donated the cash proceeds. This can mean even more going to charity and less to taxes.

- Make a Qualified Charitable Distribution (QCD) - Individuals age 70½ and older can direct up to $100,000 per year, tax-free, from their IRA to charities through QCDs. By reducing your IRA balance, a QCD may also reduce your required minimum distribution (RMD) in future years, lower your taxable estate, and limit your beneficiaries' tax liability.

Child and Education-Related Tax Benefits – Individuals

- Adoption Credit and Exclusions - Most taxpayers can claim a credit for qualified expenses incurred in connection with the adoption of an eligible child. Additionally, the amount received under an adoption assistance program may be excluded from gross income. However, both the credit and gross income exclusion are phased out for higher-income taxpayers and different rules apply based on the type of adoption. Examples of eligible adoption expenses include adoption fees, legal fees, court costs, and travel expenses. The adoption credit is available for eligible expenses that are paid out of pocket, less any reimbursed amounts.

- Child and Dependent Care Credit - Taxpayers who incur expenses to care for children under age 13 (or for an incapacitated dependent or spouse) to work or look for work can claim a credit for those expenses subject to income phase-outs. The credit is calculated as a percentage of the expenses incurred, up to a maximum of $1,050 for taxpayers with one qualifying child or dependent and $2,100 for taxpayers with two or more qualifying children or dependents.

Child and Education-Related Tax Benefits – Individuals (Continued)

- Child Tax Credit (CTC) - Currently, taxpayers are allowed an income tax credit of $2,000 for each qualifying child age 16 and younger at the end of the calendar year. The child tax credit is refundable, up to $1,500 for some taxpayers, but begins to phase out for higher-income taxpayers ($400,000 for joint filers and $200,000 for single). In cases of divorce or separation, the credit can be released by the custodial parent to the non-custodial parent in order to maximize the credit that otherwise could be lost due to income phase-outs.

- American Opportunity Tax Credit (AOTC) - The maximum credit that can be taken is $2,500 per eligible student for the first four years of higher education and up to $1,000 of that amount is refundable. The AOTC is subject to phase-outs (ranging from $80,000 to $90,000 for single and $160,000 to $180,000 for joint filers).

- The Lifetime Learning Credit for Education - The lifetime learning credit is a nonrefundable credit for qualified students and is available for all years of post-secondary education. The maximum credit is $2,000 and has the same phase-outs as the AOTC.

- Coverdell Education Savings Accounts (ESAs) - ESAs are trust or custodial accounts created exclusively to pay the qualified elementary, secondary, and higher education expenses of a single named beneficiary. The contributions are not tax deductible, but the designated beneficiary can receive tax-free distributions to pay qualified education expenses. Annual contributions are limited to $2,000 per beneficiary, but this limit is subject to phase-outs (ranging from $95,000 to $110,000 for single and $190,000 to $220,000 for joint filers). Contributions may be made to an ESA up to the original due date of the return.

- Qualified Tuition Programs (QTP) - A QTP, also referred to as a Section 529 plan, is an education savings program designed to help families set aside funds for future college costs. Generally, contributions to a QTP are not deductible; however, the earnings in the plan grow tax free, provided they are used for qualified expenses (e.g. tuition, fees, room and board, books, supplies, computers, and software) while enrolled at an eligible educational institution. In addition, 529 plans can be used for qualified K-12 tuition up to $10,000 per year. For Alabama residents, contributions to an Alabama plan are deductible up to $5,000 per Alabama taxpayer (or $10,000 for married filers).

- Scholarship Programs - Any amount received as a qualified scholarship and used for qualified tuition and related expenses can be excluded from income. The exclusion does not apply to any portion of the amount received which represents payment for teaching, research, or other services by the student required as a condition for receiving the qualified scholarship (with limited exceptions). Also, amounts used for incidental expenses, such as room and board, travel, and optional equipment, must be included in gross income.

ESTATE, TRUST AND GIFT PLANNING

Key Figures

The 2022 estate, gift, and generation skipping transfer (GST) tax exemption is $12,060,000 per person ($24,120,000 for a married couple). After 2025, these figures are scheduled to go back to the prior law's cap of $5 million and $10 million (indexed for inflation), respectively; however, these limits may be reduced by legislation. The maximum federal unified estate and gift tax rate is 40%. A more robust gifting strategy for 2022 may be appropriate, especially for assets with potential for material appreciation. Prior IRS regulations have indicated that gifts under the gift tax exemption (at the date of the gift) will not be "clawed back" upon a taxpayer's death, even if the taxpayer made gifts in excess of the estate tax exemption ultimately in effect at the taxpayer's death.

Annual Gifting Exclusions

The annual gift tax exclusion allows taxpayers to give up to $16,000 during 2022 to any individual ($32,000 for married couples who split the gifts), gift-tax free and without counting the amount of the gift toward the lifetime exclusion. The annual exclusion for gifts made to non-citizen spouses in 2022 is $164,000.

Year-End Trust Distribution Planning

For certain trusts that are not required to make distributions, distribution planning is important in order to minimize the overall tax due on the trust's income. In general, a trust not otherwise required to make distributions is liable for the tax on all of its income if no distributions are made to beneficiaries. If distributions are made, the beneficiary is taxed on the portion of the income distributed, not the trust. Since trusts quickly hit the top tax rate of 37%, distributions to beneficiaries often result in a lower overall tax burden. For 2022, ordinary income in excess of $13,450 will be taxed at the highest rate. Of course, all factors should be considered as to whether a distribution is appropriate, not only for income tax planning. If a trustee determines that distributions are appropriate, the distributions should be paid to the beneficiaries by the end of the calendar year. However, the trustee may make an election to treat any distributions paid within 65 days after year end (before March 6, 2023) as a distribution for the 2022 tax year.

Reviewing Retirement Plan Beneficiaries

For future planning purposes, avoid unintended consequences by updating beneficiary designations of your 401(k) or 403(b) plans, annuities, pensions, and IRAs to account for life changes such as marriage, divorce, or the death of a spouse or other beneficiary listed. Also, be sure to review the beneficiaries listed in your will and taxable accounts. If you do not have a will, consider having one drafted sooner rather than later.

Portability of the Estate and Gift Tax Exemption

Although the estate and gift tax exemption is set to decrease in 2026, portability may provide relief for surviving spouses of deceased individuals that were not able to fully utilize their lifetime exemption before their death. Portability allows an estate's executor to transfer ("port") the deceased spouse's unused exclusion (DSUE) amount to their surviving spouse. This allows the surviving spouse to utilize the remainder of their deceased spouse's exclusion, in addition to their own exclusion, for gift and estate tax purposes. If the surviving spouse does not utilize the remainder through gifting during their lifetime, it will be available to offset their gross estate value at their death. During the past summer, the IRS released simplified procedures to make a late portability election within five years of the decedent's date of death. Previously, this required a private letter ruling if Form 706, including the DSUE calculation, was not timely filed. As with gifting, prior IRS regulation has indicated that ported DSUE amounts will not be "clawed back" following the sunset in 2026. Finally, it is important to note that portability is NOT available for the lifetime GST tax exemption.

Exclusion for Educational and Medical Expenses

In addition to the annual exclusion amount, nontaxable gifts or transfers may be made for certain educational and medical expenses. The exclusion for educational and medical expenses is unlimited in amount and can be made on behalf of anyone you choose, regardless of relationship. To take advantage of these exclusions, the payments must be made directly to the educational institution or health care provider.

BUSINESS PLANNING

C corporations continue to face double taxation, with taxes paid once at the entity level and again when dividends are paid to shareholders. Many businesses, however, are not taxed at the entity level as corporations; instead, taxable profits and losses are passed through to their owners. With the highest individual tax rate at 37% and additional surtaxes on passive income by way of the 3.8% NIIT, minimizing tax remains a challenge in 2022.

Bonus Depreciation

100% first-year bonus depreciation is available for qualifying property placed in service in the 2022 tax year. The deduction is scheduled to decrease beginning in 2023 to 80% and will continue to decrease incrementally to 60% for 2024, 40% for 2025, and 20% after 2025. For 2022, buyers of heavy SUVs (gross weight over 6,000 pounds) used solely for business can write off the full cost, thanks to bonus depreciation.

Section 179 Expensing

Section 179 property includes new or used tangible personal property that is purchased to use in an active trade or business. Under the enhanced expensing for 2022, businesses can expense up to $1,080,000 in qualifying expenditures, with no reduction unless expenditures exceed $2,700,000. Note that the amount expensed cannot exceed the business' taxable income. Bonus depreciation does not have this rule. Furthermore, Section 179 and bonus depreciation cannot be used on the same asset.

Tangible Personal Property Regulations

The IRS previously simplified the rules for expensing tangible personal property, including the de minimis safe harbor. For 2022, the safe harbor enables taxpayers to routinely deduct items which cost below $5,000 for taxpayers with an applicable financial statement (AFS) and $2,500 for taxpayers without an AFS.

Like-Kind Exchanges

Taxpayers can defer the gain (or portion of that gain) on the exchange of like-kind property. Both the relinquished property and the acquired property must be held for business or investment purposes. Currently, like-kind exchanges are limited to exchanges of real property that are held for use in a trade or business or for investment. Real property includes land and generally anything built on or attached to it. Exchanges of personal property no longer qualify for deferral.

Limitation on the Deduction of Business Interest

In general, the deduction is limited to the sum of:

- The taxpayer's business interest income (not including investment income);
- 30 percent of the taxpayer's adjusted taxable income (for 2022, depreciation and amortization are no longer added back); and
- The taxpayer's floor plan financing interest.

The 2022 limitation applies to all taxpayers except a small business with average annual gross receipts for the three prior tax years of $27 million or less. The small business exception does not apply to tax shelters, including syndicates, which remain subject to the limitation. Syndicates are defined as pass-through entities with more than 35% of losses allocated to passive owners. The limitation also does not apply to certain excepted businesses, including an electing real property business, an electing farming business, and certain regulated utility businesses. BMSS is equipped to assist you in determining the application of the limitation to your business.

Meals - 100% Deduction for Restaurant Meals

For 2022, businesses can generally deduct 100% of business-related food and beverages purchased from a restaurant. Otherwise, the limit is usually 50% of the cost of the meal. This 100% deduction only applies for 2022 and is not scheduled to continue for 2023. It is important to distinguish these meals from other expenses when communicating with BMSS so your business can take full advantage of the increased deduction.

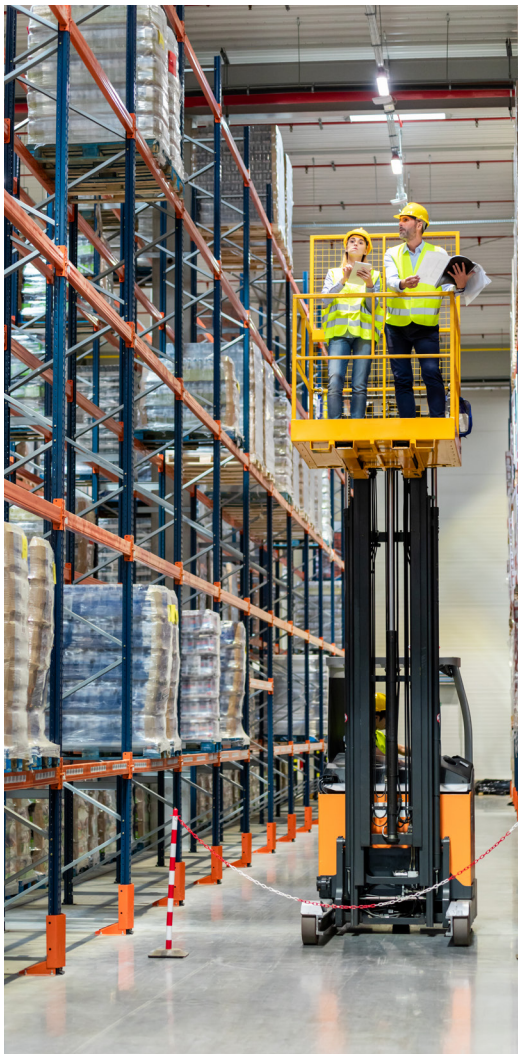
Research and Development (R&D)

Beginning in 2022, current law stipulates that costs associated with R&D activities will have to be capitalized and amortized over five or 15 years. However, there is strong bipartisan support to modify or eliminate the effect of this tax provision that could gain steam at year-end.

In addition to the deduction, the R&D Credit provides a credit for 20% of qualified research expenses over a base amount. The credit applies to any amounts paid or incurred for qualified research and experimentation. BMSS has an R&D team that is ready to discuss the impact of these changes and the potential credit available to your business.

Write-off Bad Debts and Worthless Stock

Businesses should evaluate whether losses may be claimed on their 2022 returns related to worthless assets such as receivables, property, or other investments. Business bad debts can be wholly or partially written off for tax purposes. A partial write-off requires a conforming reduction of the debt on the books of the taxpayer; a complete write-off requires demonstration that the debt is wholly uncollectible as of the end of the year.



Net Operating Loss (NOL)

NOLs can only be carried forward and can only offset 80% of the current year's taxable income. An NOL can no longer fully offset your income in the following year.

Talk with your BMSS professional to discuss your options for inventory methods.

Inventory Methods and Last-In-First-Out (LIFO)

Due to the current inflationary environment, there may be an opportunity to defer income by electing LIFO for inventory valuation purposes. If your business carries material inventory, BMSS can discuss the potential tax-deferral benefits of a LIFO election.

Credit for Scholarship Granting Organization (SGO) Contributions

A credit is available against a C corporation's Alabama income tax for contributions made to an SGO. For 2022, the credit is equal to 100% of the total contributions made, up to 100% of the tax liability of the corporation, without a cap on the tax liability that may be offset. Under certain circumstances, business entities may receive an ordinary business expense rather than a charitable deduction.

The credit is also available to the owners, shareholders, and partners of pass-through entities and S corporations. The credit would be passed through on the entity's Schedule K-1. For 2022, individual taxpayers can claim a credit equal to 100% of their share of contributions, up to 100% of their individual Alabama tax liability, with the credit not to exceed $100,000.

Pass-Through Entity Taxes

Alabama joined other states by enacting its own version of an elective pass-through entity ("PTE") tax, which allows eligible PTEs (i.e., S corporations and partnerships) to elect to be taxed at the entity level. The Act and others like it around the country are a response to the $10,000 cap placed on the state and local tax deduction. Pursuant to IRS guidance, PTEs may claim entity-level deductions for state income tax paid under state laws that shift the tax burden from individual owners to the business entity. Pass-through entities should continue to monitor developments in this area. Most states have enacted a type of PTE tax, but each state's tax has different nuances that need to be understood.

WE'RE HERE TO HELP YOU

BMSS understands the complexity of the tax laws and the stress of year-end tax planning. However, year-end tax planning is vital to protecting the financial well-being of you, your family and your business. This letter only hits the high points so there may be other strategies that could reduce your tax liability.

Please contact BMSS at (833) CPA-BMSS if you have any questions regarding your tax planning opportunities whether or not addressed in this letter. BMSS is ready to help you with your unique tax planning circumstances and can set up an appointment to discuss your situation.

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