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Instructions for Form 4626

Alternative Minimum Tax—Corporation

Section references are to the Internal Revenue Code unless otherwise noted.

Future Developments

For the latest information about developments to Form 4626 and its instructions, such as legislation enacted after they were published, go to [IRS.gov/Form4626](https://www.irs.gov/Form4626).

What's New

New corporate alternative minimum tax. For tax years beginning after 2022, the Inflation Reduction Act of 2022 amended section 55 to impose a new corporate alternative minimum tax (CAMT) based on the adjusted financial statement income (AFSI) of an applicable corporation.

General Instructions

Purpose of Form

For tax years beginning after 2022, Form 4626 is used to determine whether a corporation is an applicable corporation under section 59(k) and to calculate CAMT under section 55 for applicable corporations.

Consolidated returns. For an affiliated group filing a consolidated return under the rules of section 1501, CAMT is calculated on a consolidated basis.

Who Must File

Unless a filing exclusion applies, a corporation must file Form 4626 to determine whether it is an applicable corporation and, if it is classified as an applicable corporation, to calculate CAMT.

Filing exclusions. A corporation is not required to file Form 4626 if the corporation is:

- An S corporation,
- A regulated investment company (RIC),
- A real estate investment trust (REIT), or
- A corporation that is not required to file Form 4626 for the first tax year beginning after 2022 because it is not an applicable corporation under the [simplified method](#) and chooses to apply that method.

When To File

Attach Form 4626 to the corporation's income tax return (or, if applicable, exempt organization business income tax return) and file by the due date (including extensions) for that return.

Interim Guidance

Certain rules described in these instructions are interim rules from notices published in the Internal Revenue Bulletin. Taxpayers are not required to apply such interim rules but may optionally rely on them for a limited period of time (including 2023). Taxpayers should complete Form 4626 in a manner that reflects the interim rules they have chosen to rely on.

References to interim guidance contained in these instructions are indicated with reference to the notice from which they originate.

The following notices contain interim rules related to CAMT:

- Notice 2023-7, 2023-3 I.R.B. 390, available at [IRS.gov/irb/2023-03_IRB#NOT-2023-7](https://www.irs.gov/irb/2023-03_IRB#NOT-2023-7).
- Notice 2023-20, 2023-10 I.R.B. 523, available at [IRS.gov/irb/2023-10_IRB#NOT-2023-20](https://www.irs.gov/irb/2023-10_IRB#NOT-2023-20).
- Notice 2023-42, 2023-26 I.R.B. 1085, available at [IRS.gov/irb/2023-26_IRB#NOT-2023-42](https://www.irs.gov/irb/2023-26_IRB#NOT-2023-42).
- Notice 2023-64, 2023-40 I.R.B. 974, available at [IRS.gov/irb/2023-40_IRB#NOT-2023-64](https://www.irs.gov/irb/2023-40_IRB#NOT-2023-64).
- Notice 2024-10, available at [IRS.gov/pub/irs-drop/n-24-10.pdf](https://www.irs.gov/pub/irs-drop/n-24-10.pdf).

Definitions

Applicable Corporation

An applicable corporation is, with respect to any tax year, any corporation (other than an S corporation, a RIC, or a REIT) that satisfies an average annual adjusted financial statement income test (the [AFSI Test](#)) for 1 or more tax years which are prior to such tax year and that end after December 31, 2021. See section 59(k)(1)(A). Also, see the instructions for [Part I—Applicable Corporation Determination](#).

Adjusted Financial Statement Income (AFSI)

AFSI is, with respect to any corporation for any tax year, the corporation's net income or loss on its applicable financial statement (AFS) (defined later) for that tax year with specific adjustments including those noted below. See sections 56A and 59(k) for more information. Also, see the instructions for [Part I—Applicable Corporation Determination](#), and [Part II—Corporate Alternative Minimum Tax \(CAMT\)](#).

- Appropriate adjustments to AFSI are made when the AFS reporting year covers a period other than the corporation's tax year.
- If the financial results of a corporation are reported on the AFS for a group of entities (AFS Group), rules similar to the rules in section 451(b)(5) that treat the AFS of the group as the AFS of the corporation apply.
- If the corporation is part of a tax consolidated group for any tax year, AFSI, for that group for that tax year, must consider items on the group's AFS that are properly allocable to the group's members.
- For any corporation that is not included on a consolidated return with the taxpayer corporation, the taxpayer corporation's AFSI with respect to the other corporation is determined by only taking into account the dividends received from that corporation and other amounts which are includible in gross income or deductible as a loss under Chapter 1 of the Internal Revenue Code (other than amounts required to be included under sections 951 and 951A) with respect to that corporation.
- If the corporation is a partner in a partnership, the corporation's AFSI with respect to that partnership is

adjusted to consider only the corporation's distributive share of that partnership's AFSI. A partnership's AFSI is the net income or loss on that partnership's AFS adjusted under rules similar to those in section 56A.

- A corporation's AFSI includes the AFSI of any disregarded entity owned by the corporation.
- If the corporation is a U.S. shareholder of one or more controlled foreign corporations (CFCs), its AFSI with respect to the CFCs is adjusted to take into account its pro-rata share (determined under rules similar to the rules in section 951(a)(2)) of items taken into account in calculating the net income or loss set forth on each CFC's AFS, as adjusted under rules similar to those that apply in determining AFSI. This is adjusted net income or loss of CFCs. Note that Notice 2023-64, section 7.02(5), provides that the CFC income or loss is not limited to effectively connected income. If the AFSI adjustment is negative, no adjustment is made for that tax year. However, any adjustment in a succeeding tax year is reduced by that negative amount.
- A foreign corporation's AFSI is determined under the principles of section 882, which subjects a foreign corporation to federal income tax on its taxable income that is effectively connected with the conduct of a trade or business in the United States.
- AFSI is adjusted to disregard federal income taxes, and income, war profits, and excess profits taxes (within the meaning of section 901), with respect to a foreign country or U.S. territory which are taken into account on the corporation's AFS.
- A section 1381 cooperative's AFSI excludes section 1382(b) cooperative patronage dividends and per-unit retain allocations not otherwise used in calculating AFSI.
- An Alaska native corporation's AFSI is adjusted to allow:

1. Cost recovery and depletion attributable to property with a basis determined by the Alaska Native Claims Settlement Act (the Act) (43 U.S.C. section 1602(c)); and
 2. Deductions for amounts payable under section 7(i) or 7(j) of the Act (43 U.S.C. section 1602(i) and (j)) only when the deductions are allowed for federal income tax purposes.
- AFSI excludes amounts treated as payments against a federal income tax pursuant to an election under section 48D(d) or section 6417 or, in the case of a corporation that relies on Notice 2023-7, certain amounts received from the transfer of an eligible credit, as defined in section 6418(f)(1)(A).
 - AFSI is adjusted to not include any item of income in connection with a mortgage servicing contract prior to the amount being included in income for federal income tax purposes. ("Federal income tax purposes" as used in these instructions excludes CAMT.)
 - AFSI adjustments for covered benefit plans include:
 1. Adjustments to disregard any income, cost, or expense that would otherwise be included on the AFS in connection with any covered benefit plan;
 2. Increases for any covered benefit plan income that is includable in the corporation's gross income for federal income tax purposes; and
 3. Decreases for any covered benefit plan deduction allowed to the corporation for federal income tax purposes.

A covered benefit plan under section 56A(c)(11)(B) is a defined benefit plan (other than a multiemployer plan described in section 414(f)) that is qualified under section 401(a) with a trust exempt under section 501(a), any qualified foreign plan as defined in section 404A(e), or any other

defined benefit plan which provides post-employment benefits other than pension benefits.

- The AFSI of a tax-exempt entity subject to the section 511 unrelated business income tax is adjusted to only take into account any AFSI:
 1. Of an unrelated trade or business (as defined in section 513) of the organization; or
 2. Derived from debt-financed property (as defined in section 514) to the extent that income from the property is treated as unrelated business taxable income.
- AFSI is reduced by section 167 depreciation deductions on section 168 property that are allowed in calculating taxable income for the tax year and adjusted to remove any depreciation expense included in the taxpayer's AFS for the section 168 property.
- AFSI is reduced by any qualified wireless spectrum amortization deductions allowed under section 197 in calculating taxable income for the tax year and adjusted to remove any qualified wireless spectrum related amortization expense included in the corporation's AFS. For AFSI purposes, qualified wireless spectrum is wireless spectrum that is used in the trade or business of a wireless telecommunications carrier and was acquired after December 31, 2007, and before August 16, 2022.
- Section 56A(c)(15) authorizes guidance providing for additional adjustments to AFSI, including those necessary to prevent the duplication or omission of an item. The Interim Guidance provided in Notice 2023-7, Notice 2023-20, and Notice 2023-64 provides for additional adjustments to AFSI available to taxpayers who rely on the Interim Guidance. See [Interim Guidance](#), earlier.

Applicable Financial Statement (AFS)

An AFS is a financial statement which is in descending order of priority, either a generally accepted accounting principles (GAAP) statement, an international financial reporting standards (IFRS) statement, or an "other statement". For a taxpayer that relies on Notice 2023-64, and does not have a statement described above, an AFS is an "unaudited external statement," or a federal income tax return or information return filed with the IRS. These statements are described in more detail below in descending order.

- A GAAP statement is a financial statement that is certified as being prepared in accordance with U.S. generally accepted accounting principles and is:
 1. A Form 10-K (or successor form), or annual statement to shareholders, filed with the U.S. Securities and Exchange Commission (SEC);
 2. An audited financial statement that is used for credit purposes; reporting to shareholders, partners, or other proprietors, or to beneficiaries; or any other substantial nontax purpose; or
 3. A financial statement, other than a tax return, filed with the federal government or any federal agency, other than the SEC or the IRS.
- An IFRS statement is a financial statement that is certified as being prepared in accordance with international financial reporting standards and is:
 1. Filed with an agency of a foreign government that is equivalent to the SEC, and has financial reporting standards not less stringent than the standards required by the SEC;
 2. An audited financial statement that is used for credit purposes; reporting to shareholders, partners, or other

proprietors, or to beneficiaries; or any other substantial nontax purpose; or

3. A financial statement, other than a tax return, filed with the federal government, any federal agency, a foreign government, or agency of a foreign government, other than the SEC, the IRS, or an agency that is equivalent to the SEC or the IRS.

- An “other statement” is a financial statement, other than a tax return, filed with the federal government or any federal agency, a state government or state agency, a foreign government or foreign agency, or a self-regulatory organization including, for example, a financial statement filed with a state agency that regulates insurance companies or the Financial Industry Regulatory Authority, or a comparable foreign self-regulatory organization.

If none of the above financial statements exist, the AFS can be an unaudited external statement. An unaudited external statement is a financial statement, other than a tax return or a financial statement described above, that is unaudited (or audited but not certified), prepared for an external non-tax purpose, and prepared using (i) GAAP; (ii) IFRS; or (iii) any other accepted accounting standards that are issued by an accounting standards board charged with developing accounting standards for one or more jurisdictions. If an unaudited external statement also does not exist, the AFS can be a federal income tax return or information return filed with the IRS. See Notice 2023-64, section 4, as modified and clarified by Notice 2024-10, section 4.

Special Rules

AFSI Test

General AFSI Test

For purposes of determining whether a corporation satisfies the general AFSI test for a tax year prior to the current tax year, the following apply.

- A corporation meets the general AFSI test for that tax year when the corporation’s average annual AFSI for the 3-tax-year period ending with the tax year exceeds \$1 billion.
- Solely for purposes of determining whether a corporation is an applicable corporation, all AFSI of members of a controlled group treated as a single employer with the corporation under section 52(a) or (b) (“controlled group”) is included in the corporation’s AFSI. For purposes of determining the AFSI of the corporation and all members of the controlled group under the general AFSI test, the AFSI adjustments for financial statement net operating losses under section 56(d), partnership distributive share and covered benefit plans do not apply.

AFSI Test Applicable to Foreign-Parented Multinational Group (FPMG) (FPMG AFSI Test)

FPMG means, for any tax year, two or more entities if at least one entity is a domestic corporation, and another is a foreign corporation, those entities are included in the same AFS for the tax year, and either the common parent of those entities is a foreign corporation or, if there is no common parent, those entities are treated as having a common parent which is a foreign corporation.

If a foreign corporation is engaged in a trade or business within the United States, that trade or business is treated as a

separate domestic corporation that is wholly owned by the foreign corporation.

If a corporation is an FPMG member for any tax year, it meets the FPMG AFSI test if the FPMG \$1 billion AFSI test and the FPMG \$100 million AFSI test described below are satisfied.

FPMG \$1 billion AFSI test. If a corporation is an FPMG member for any taxable year, the general AFSI test applies, but for purposes of determining whether the corporation meets the general AFSI test, the AFSI of the corporation includes the AFSI of all members of the FPMG and the AFSI of members of the controlled group. See Notice 2023-64, section 13.03. For purposes of calculating the AFSI of a corporation that is an FPMG member (including the AFSI of other members of the FPMG and the controlled group for aggregation purposes) under the general AFSI test, the AFSI adjustments for financial statement net operating losses under section 56(d), partnership distributive share, certain items of foreign income, effectively connected income, and covered benefit plans do not apply.

FPMG \$100 million test. A corporation that is an FPMG member meets the FPMG \$100 million test if the corporation’s average annual AFSI, including the AFSI of the members of the controlled group, for the 3-tax-year period ending with that tax year is \$100 million or more. For purposes of calculating the AFSI of a corporation that is an FPMG member (including the AFSI of other members of the controlled group for aggregation purposes) under the FPMG \$100 million test, the AFSI adjustments for financial statement net operating losses under section 56(d), partnership distributive share, and covered benefit plans do not apply.

Additional Rules Applicable to the General AFSI Test and the FPMG AFSI Test

- If a corporation has been in existence for less than 3 tax years of the 3-tax-year period, the AFSI test is applied by averaging the tax years of the 3-tax-year period during which the corporation existed.
- AFSI for any tax year of less than 12 months shall be annualized by multiplying the AFSI for the short period by 12 and dividing the result by the number of months in the short period.

Simplified Method for Determining Applicable Corporation Status

For the first tax year beginning after 2022, a corporation may choose to apply the safe harbor method (simplified method) for purposes of determining whether it is an applicable corporation. See Notice 2023-7, section 5. Under the simplified method, a corporation determines whether it is an applicable corporation by applying the AFSI test with the following modifications.

- The general AFSI test and the FPMG \$1 billion AFSI test are applied by substituting “\$500 million” for “\$1 billion.”
- The FPMG, \$100 million AFSI test is applied by substituting “\$50 million” for “\$100 million.”
- AFSI is determined by considering only the following adjustments.

1. If the financial results of a corporation are reported on the AFS for a group of entities (AFS Group), rules similar to

the rules in section 451(b)(5) that treat the statement of the group as the statement of the corporation apply.

2. If the corporation is part of a tax consolidated group for any tax year, AFSI for that group for that tax year must consider items on the group's AFS that are properly allocable to members of that group.

3. Disregard federal income taxes, or income, war profits, and excess profits taxes (within the meaning of section 901), with respect to a foreign country or U.S. territory which are taken into account on the corporation's AFS.

4. In applying the FPMG \$100 million test, a foreign corporation's AFSI is calculated by considering only the income items that are effectively connected with the conduct of a U.S. trade or business. See section 882.

In the case of a taxpayer included in an AFS group, AFSI is calculated after considering the AFS consolidation entries, except those that eliminate transactions between persons that are not members of a controlled group. AFS consolidation entries are the financial accounting journal entries that are made for AFS purposes to present the financial results of an AFS Group as if all members of the AFS Group were a single company, including entries to eliminate transactions between group members.

- If a corporation has an AFS covering a period (AFS year) different from its tax year, the general AFSI test and the FPMG AFSI test are applied using the 3-AFS-year period ending during such tax year rather than the 3-tax-year period ending with such tax year.

The rules for new corporations and short years are applied using AFS years rather than tax years.

Calculating CAMT

For the tax year of an applicable corporation, a CAMT liability arises to the extent the tentative minimum tax for the year exceeds the sum of the regular income tax imposed for the tax year plus the base erosion minimum tax (imposed under section 59A). The tentative minimum tax is the excess of 15% of AFSI over the alternative minimum tax foreign tax credit (CAMT FTC). For any corporation that is not an applicable corporation, the tentative minimum tax for the tax year is zero.

Reduction for financial statement net operating loss (FSNOL). In calculating CAMT, AFSI is reduced by the lesser of:

1. The aggregate amount of FSNOL carryovers to the tax year, or
2. 80% of AFSI computed without regard to the FSNOL reduction allowed.

An FSNOL for any tax year is the amount of the net loss (if any) on the corporation's AFS determined with regard to AFSI general adjustments under section 56A(c), but without regard to an FSNOL reduction under section 56A(d), for tax years ending after 2019. An FSNOL for any tax year is an FSNOL carryover to the tax year following the tax year of the loss. The portion of such loss that is carried to subsequent years is determined by subtracting from the loss, for each preceding tax year, the lesser of the amount of the loss or 80% of AFSI for the tax year (determined without regard to the FSNOL adjustment), regardless of whether the corporation was an applicable corporation in any tax year.

Alternative minimum tax foreign tax credit (CAMT FTC). If an applicable corporation elects to take a section 901

foreign tax credit for regular tax for a tax year, the CAMT FTC is an amount equal to the sum of:

1. The lesser of:

a. The aggregate of the applicable corporation's pro-rata share (as determined under section 56A(c)(3)) of income, war profits, and excess profits taxes (within the meaning of section 901) imposed by any foreign country or U.S. territory that are taken into account on the AFS of each CFC with respect to which the applicable corporation is a U.S. shareholder and are paid or accrued (for federal income tax purposes) by each CFC, or

b. The applicable corporation's pro-rata share (determined under rules similar to the rules under section 951(a)(2)) of the adjusted net income or loss of CFCs, multiplied by 15%; plus

2. For an applicable corporation that is a domestic corporation, the income, war profits, and excess profits taxes (within the meaning of section 901) imposed by any foreign country or U.S. territory to the extent that such taxes are taken into account on the applicable corporation's AFS and are paid or accrued (for federal income tax purposes) by the applicable corporation.

Credit for Prior Year Minimum Tax

A corporation may take a credit against the regular tax for alternative minimum tax (including CAMT) incurred in prior years. See Form 8827, Credit for Prior Year Minimum Tax—Corporations, for details.

Specific Instructions

Item A

All AFSI of members of a controlled group (defined earlier) are included in the AFSI of the corporation for AFSI test purposes. If the corporation is a member of a controlled group, check the "Yes" box in Item A. Also, complete Part V. See the instructions for Part V.

Item B

If the corporation is a member of an [FPMG](#) (defined earlier), check the "Yes" box. Also, complete Part V. See the instructions for Part V.

Part I—Applicable Corporation Determination

Complete Part I to determine if the corporation is an [applicable corporation](#) for purposes of the CAMT. An applicable corporation is any corporation that satisfies the [AFSI Test](#) (defined earlier) for 1 or more tax years which are prior to the current tax year and which end after 2021. If the corporation is an FPMG member for any tax year, then, solely for purposes of determining whether such corporation meets the AFSI test for that tax year, certain adjustments are made to the AFSI test. See section 59(k) and [AFSI Test](#), earlier.

For the first tax year beginning after 2022, a corporation may choose to apply the safe harbor method ([simplified method](#)) for purposes of determining whether it is an applicable corporation. See the Instructions for Form 1120, Schedule K, question 29c, or the applicable question on the corporation's return.

If a corporation has been in existence for less than 3 tax years of the 3-tax-year period, the AFSI test is applied to that corporation by averaging the tax years of the 3-tax-year

period during which that corporation existed. For example, a corporation with a calendar tax year is formed on January 1, 2021. Only the calendar tax years ended December 31, 2021, and December 31, 2022, are included in the AFSI test in determining whether the corporation is an applicable corporation for the tax year ended December 31, 2023.

For a corporation with AFSI for any tax year of less than 12 months included in the 3-tax-year period, the AFSI of that corporation is annualized by multiplying the AFSI for the short period by 12 and dividing the result by the number of months in the short period. For example, a corporation with a calendar tax year is formed on July 1, 2020. The AFSI for the tax year ended December 31, 2020, is multiplied by 12 and then divided by 6 when computing the 3-year annual average AFSI on the applicable line. The resulting 3-year annual average AFSI with the AFSI for tax years ended December 31, 2021, and December 31, 2022, is used to determine whether the corporation is an applicable corporation for the tax year ended December 31, 2023.

If it has been determined in either the current or prior tax years that the corporation is an applicable corporation, skip Part I and continue to Part II.

In columns (a), (b), and (c), enter the required information for the 3-tax-year period ending prior to the current tax year. For example, when a corporation with a calendar tax year determines whether it is an applicable corporation for the tax year ending December 31, 2023, the 3-tax-year period includes the tax years ended December 31, 2020, December 31, 2021, and December 31, 2022.

Line 1a. Enter the net income or loss from the corporation's AFS. If the corporation's AFS is a consolidated AFS, enter the consolidated net income or loss which includes net income or loss attributable to noncontrolling interests. If the corporation has been in existence for less than 3 tax years of the 3-tax-year period, enter information for the period during which the corporation existed.

Line 1b. Enter the net income or loss of the other entities the AFSI of which is required to be aggregated with the AFSI of the corporation for purposes of determining if the corporation is an applicable corporation but that are not included in the corporation's AFS. Include net income or loss of members of the controlled group and corporate owned disregarded entities that were not included in the corporation's AFS. For example, if the corporation is an FPMG member, also include the net income of FPMG members that were not included already. If the other entity has been in existence for less than 3 tax years, enter information for the period during which the corporation existed.

Line 1c. For a corporation that is not a member of an FPMG, enter net income or loss from entities included in the AFS but that are not in the controlled group. Add net loss and subtract net income.

Line 1d. Enter any consolidation entry adjustments made under Notice 2023-64, section 5.02(3)(c) attributable to entities the net income of which is included on line 1a (but only to the extent such adjustments were not reflected in line 1c). See [Interim Guidance](#), earlier.

Line 1e. Reserved for future use.

Lines 2a through 2z. Compute the adjustments for each of the entities in the aggregation group and report the total amount for all entities on the form.

Line 2a. Appropriate adjustments to AFSI are made when the AFS reporting year covers a period other than the corporation's tax year.

Line 2b. In the case of any corporation which is not included on a consolidated return with the taxpayer corporation, enter the adjustment required by section 56A(c)(2)(C) with respect to each corporation in the aggregation group.

See Notice 2024-10 for purposes of determining the amount included in AFSI under section 56A(c)(2)(C) of a U.S. shareholder of a CFC resulting from certain dividends received by the U.S. shareholder with respect to stock of the CFC.

Line 2c. Pro-rata share of adjusted net income or loss of CFCs.

Corporation that is not a member of an FPMG. For a corporation that is not a member of an FPMG, if the corporation is a U.S. shareholder of one or more CFCs, enter the corporation's pro-rata share (determined under rules similar to the rules under section 951(a)(2)) of adjusted net income or loss of CFCs. See Notice 2024-10 for purposes of determining the adjusted net income or loss of a CFC for purposes of section 56A(c)(3) resulting from certain dividends received by the CFC with respect to stock of another CFC. If the pro-rata share of the adjusted net income or loss of CFCs is negative, enter zero.

Attach [Worksheet for Pro-Rata Share of Adjusted Net Income or Loss of CFCs Described in Section 56A\(c\)\(3\) for Each Preceding Year—Worksheet A](#). Add additional rows as necessary for each CFC for columns (a), (b), and (c) for the first, second, and third preceding years to the extent the adjusted net income or loss of a CFC has not already been captured on the Form 5471. Attach a separate worksheet for each column (a), (b), and (c).

Corporation that is a member of an FPMG. If the corporation is a member of an FPMG, enter zero.

Line 2d. Amounts that are not effectively connected to a U.S. trade or business.

Corporation that is not a member of an FPMG. Enter AFSI amounts from all foreign corporations that are not effectively connected with the conduct of a U.S. trade or business.

Corporation that is a member of an FPMG. If the corporation is a member of an FPMG, enter zero.

Line 2e. Certain taxes. Enter the amount of federal income taxes, and income, war profits, and excess profits taxes (within the meaning of section 901), with respect to any foreign country or U.S. territory which are taken into account on the corporation's AFS.

Line 2f. For section 1381 cooperatives, enter an adjustment to reduce AFSI by the amounts referred to in section 1382(b) relating to patronage dividends and per-unit retain allocations to the extent such amounts were not otherwise taken into account in determining AFSI.

Line 2g. Alaska native corporations. Enter an adjustment to allow cost recovery and depletion attributable to property with a basis determined by the Alaska Native Claims Settlement Act (the Act) and deductions for amounts payable under section 7(i) or 7(j) of the Act which are allowed for federal income tax purposes.

Line 2h. Certain credits. Enter an adjustment to disregard any amounts treated as federal income tax credits under section 48D(d) or section 6417 or certain amounts received

from the transfer of an eligible credit, as defined in section 6418(f)(1)(A), to the extent that these amounts were not otherwise taken into account on line 2e. See Notice 2023-7, section 6.

Line 2i. Mortgage servicing income. Enter any adjustments to defer items of income in connection with mortgage servicing contracts so that they are not included in AFSI prior to being included in income for federal income tax purposes.

Line 2j. Tax-exempt entities. Enter adjustments to AFSI so that only items from the corporation's unrelated trade or business activities and its section 514 debt financed unrelated business taxable income are included in AFSI.

Line 2k. Depreciation. Enter an adjustment which is the difference between the section 167 depreciation deductions on section 168 property and the depreciation expense included in the corporation's AFS for such property. The adjustment is negative if the section 167 depreciation deductions on section 168 property exceeds the depreciation expense included in the corporation's AFS for such property. The adjustment is positive if the depreciation expense included in the corporation's AFS for section 168 property exceeds the section 167 depreciation deductions on such property. Also enter any additional adjustments made under Notice 2023-7, section 4 (as modified by Notice 2023-64, section 9) and Notice 2023-64, section 9, including those to account for the disposition of property. See [Interim Guidance](#), earlier.

Line 2l. Qualified wireless spectrum. Enter an adjustment which is the difference between the qualified wireless spectrum section 197 amortization allowed in calculating taxable income and the related amortization expense included in the corporation's AFS. The adjustment is negative if the section 197 amortization deductions on qualified wireless spectrum exceeds the related amortization expense included in the corporation's AFS for such property. The adjustment is positive if the amortization expense included in the corporation's AFS for qualified wireless spectrum property exceeds the section 197 amortization deductions on such property. Also enter any additional adjustments made under Notice 2023-64, section 10, including those to account for the disposition of property. See [Interim Guidance](#), earlier.

Line 2m. Covered transactions. If the corporation is relying on the guidance in Notice 2023-7, section 3, regarding covered transactions, enter any AFSI adjustments that result from the application of such guidance.

Line 2n. Adjustments related to bankruptcy and insolvency. If the corporation is relying on the guidance in Notice 2023-7, section 3, regarding bankrupt or insolvent corporations, enter any AFSI adjustments that result from the application of such guidance.

Line 2o. Certain insurance company adjustments. If the corporation is relying on the guidance in Notice 2023-20, regarding certain insurance company adjustments and other industry specific adjustments, enter any AFSI adjustments that result from the application of such guidance.

Lines 2p through 2s. Reserved for future use.

Line 2z. Other. Enter any other AFSI adjustments provided in guidance issued in the Internal Revenue Bulletin (to the extent applicable), including adjustments to prevent omissions or duplications of any items. For example,

adjustments described in Notice 2023-64, section 11 or 13.04(2).

Line 3. Reserved for future use.

Line 7. 3-year average annual AFSI. Calculate the 3-year average annual AFSI by dividing the amount on line 6 by the number of tax years included on line 6. The average is calculated using the period during which the corporation existed. However, if the amount on line 6 includes AFSI for any tax year of less than 12 months, annualize the amount for each short period by multiplying the short-period AFSI shown on line 5 by 12 and dividing the result by the number of months in the short period. Then add the other amounts on line 5 to the annualized amount and divide that total by the number of tax years of the 3-tax-year period during which the corporation existed.

Line 8. If line 7 exceeds \$1 billion, check the "Yes" box on line 8, and continue to line 9. If line 7 is \$1 billion or less, check "No." Stop here. Attach the completed Form 4626 to the corporation's income tax return for the current tax year.

Line 9. If the corporation is a member of an FPMG, check "Yes," and continue to line 10. If the corporation is not an FPMG member, check "No," and continue to Part II.

Line 10a. Enter the amount of AFSI from line 5.

Line 10b. Enter the AFSI amount of FPMG members that are not members of the corporation's controlled group.

Line 10c. Subtract line 10b from line 10a. Enter that amount on line 10c.

Line 11a. Enter the AFSI amount of members of the controlled group that is not effectively connected with the conduct of a U.S. trade or business. Enter AFSI income as a negative number and AFSI losses as a positive number.

Line 11b. Enter the U.S. shareholder corporation's pro-rata share (determined under rules similar to the rules under section 951(a)(2)) of adjusted net income or loss of a CFC. If the pro-rata share of adjusted net income or loss of the CFCs is negative, enter zero.

Attach [Worksheet for Pro-Rata Share of Adjusted Net Income or Loss of CFCs Described in Section 56A\(c\)\(3\) for Each Preceding Year—Worksheet A](#). Add additional rows as necessary for each CFC for columns (a), (b), and (c) for the first, second, and third preceding years to the extent the adjusted net income or loss of a CFC has not already been captured according to the instructions for Form 5471. Attach a separate worksheet for each column (a), (b), and (c).

Lines 11c and 11d. Reserved for future use.

Line 13. Subtract line 12 from line 10c and enter that number in line 13.

Line 15. 3-year average annual AFSI for purposes of the \$100 million test. Calculate the 3-year average annual AFSI by dividing the amount on line 14 by the number of tax years of the 3-tax-year period during which the corporation existed. However, if the amount on line 14 includes AFSI for any tax year of less than 12 months, annualize the amount for each short period by multiplying the short-period AFSI shown on line 13 by 12 and dividing the result by the number of months in the short period. Then add the other amounts on line 13 to the annualized amount and divide that total by the number of tax years of the 3-tax-year period during which the corporation existed.

Line 16. If Part I, line 15 is \$100 million or more, check “Yes,” and continue to Part II. If line 15 is less than \$100 million, check “No.” Attach the completed Form 4626 to the corporation’s income tax return for the current tax year.

Part II—Corporate Alternative Minimum Tax (CAMT)

CAMT applies if the tentative minimum tax for the tax year exceeds the sum of the regular income tax plus the base erosion minimum tax. The tentative minimum tax for the tax year is the excess of 15% of AFSI for the tax year, over the CAMT FTC for the tax year.

Line 1a. Net income or loss per AFS or consolidated net income or loss per AFS (as appropriate). If the corporation’s AFS is a consolidated AFS, enter consolidated net income or loss set forth on the consolidated AFS for the current tax year, which includes net income or loss attributable to noncontrolling interests. Otherwise, enter the net income or loss set forth on the corporation’s AFS for the current tax year.

Line 1b. AFS net income or loss of other includible entities. Enter the net income or loss of other includible entities not included in the corporation’s AFS. For example, include net income or loss reported on the corporation’s AFS as discontinued operations for any entity that is a member of the affiliated group of corporations filing a consolidated tax return. Add net income and subtract net loss.

Line 1c. Enter the net income or loss of excludible entities (including corporations that are not part of the affiliated group of corporations filing a consolidated tax return with the applicable corporation) included in the corporation’s AFS. Add net loss and subtract net income.

Line 1d. Enter any consolidation entry adjustments made under Notice 2023-64, section 5.02(3)(c), attributable to entities the net income of which is included on line 1a (but only to the extent such adjustments were not reflected in line 1c). See [Interim Guidance](#), earlier.

Line 1e. Reserved for future use.

Line 2a. Financial statements covering different tax years. Appropriate adjustments to AFSI are made when the AFS reporting year covers a period other than the corporation’s tax year.

Line 2b. Reserved for future use.

Line 2c. Corporations not included on the taxpayer’s consolidated return. In the case of any corporation which is not included on a consolidated return with the taxpayer corporation, enter the adjustment required by section 56A(c)(2)(C) with respect to such corporation.

See Notice 2024-10 for purposes of determining the amount included in AFSI under section 56A(c)(2)(C) of a U.S. shareholder of a CFC resulting from certain distributions received with respect to stock of the CFC.

Line 2d. Enter the adjustment(s) needed to include the corporation’s distributive share of all partnership investment AFSI.

Line 2e. If the corporation is a U.S. shareholder of one or more CFCs, enter the corporation’s pro-rata share (determined under rules similar to the rules under section 951(a)(2)) of the adjusted net income or loss of CFCs. If the

pro-rata share of adjusted net income or loss of CFCs is negative, enter zero.

Note. Line 2e should equal Part IV, Section I, line 3e.

Line 2f. Enter AFSI amounts, from all foreign corporations, that are not effectively connected with the conduct of a U.S. trade or business.

Line 2h. For section 1381 cooperatives, enter an adjustment to reduce AFSI by the amounts referred to in section 1382(b) (relating to patronage dividends and per-unit retain allocations) to the extent such amounts were not otherwise taken into account in determining AFSI.

Line 2i. Alaska native corporations. Enter an adjustment to allow cost recovery and depletion attributable to property with a basis determined by the Alaska Native Claims Settlement Act (the Act) and deductions for amounts payable under section 7(i) or 7(j) of the Act which are allowed for federal income tax purposes.

Line 2j. Certain credits. Enter an adjustment to disregard any amounts treated as federal income tax credits under section 48D(d) or section 6417 or certain amounts received from the transfer of an eligible credit, as defined in section 6418(f)(1)(A), to the extent that these amounts were not otherwise taken into account on line 2g. See Notice 2023-7, section 6.

Line 2k. Enter any adjustments to defer items of income in connection with mortgage servicing contracts so that they are not included in AFSI prior to being included in income for federal income tax purposes.

Line 2l. Enter adjustments needed to adjust AFSI to disregard any income, cost, or expense that would otherwise be included on the AFS in connection with any covered benefit plan. Enter adjustments required to increase AFSI by any covered benefit plan income and to reduce AFSI by any covered benefit plan deductions, as allowed under the applicable provision of the Internal Revenue Code. See section 56A(c)(11)(A)(i) — (iii).

Line 2m. Tax-exempt entities. Enter adjustments to AFSI so that only items from the corporation’s unrelated trade or business activities and its section 514 debt financed unrelated business taxable income are included in AFSI.

Line 2n. Depreciation. Enter an adjustment which is the difference between the section 167 depreciation deductions on section 168 property and the depreciation expense included in the corporation’s AFS for such property. The adjustment is negative if the section 167 depreciation deductions on section 168 property exceeds the depreciation expense included in the corporation’s AFS for such property. The adjustment is positive if the depreciation expense included in the corporation’s AFS for section 168 property exceeds the section 167 depreciation deductions on such property. Also enter any additional adjustments made under Notice 2023-7, section 4 (as modified by Notice 2023-64, section 9), and Notice 2023-64, section 9, including those to account for the disposition of property. See [Interim Guidance](#), earlier.

Line 2o. Qualified wireless spectrum. Enter an adjustment which is the difference between the qualified wireless spectrum section 197 amortization allowed in calculating taxable income and the related amortization expense included in the corporation’s AFS. The adjustment is negative if the section 197 amortization deductions on

qualified wireless spectrum exceeds the related amortization expense included in the corporation's AFS for such property. The adjustment is positive if the amortization expense included in the corporation's AFS for qualified wireless spectrum property exceeds the section 197 amortization deductions on such property. Also enter any additional adjustments made under Notice 2023-64, section 10, including those to account for the disposition of property. See [Interim Guidance](#), earlier.

Line 2p. Covered transactions. If the corporation is relying on the guidance in Notice 2023-7, section 3, regarding covered transactions, enter any AFSI adjustments that result from the application of such guidance.

Line 2q. Adjustments related to bankruptcy and insolvency. If the corporation is relying on the guidance in Notice 2023-7, section 3, regarding bankrupt or insolvent corporations, enter any AFSI adjustments that result from the application of such guidance.

Line 2r. Certain insurance company adjustments. If the corporation is relying on the guidance in Notice 2023-20 regarding certain insurance company adjustments and other industry specific adjustments, enter any AFSI adjustments that result from the application of such guidance.

Lines 2s through 2u. Reserved for future use.

Line 2z. Other. Enter any other AFSI adjustments, provided in guidance issued in the Internal Revenue Bulletin (to the extent applicable) including adjustments to prevent omissions or duplications of any AFSI items. For example, include adjustments described in Notice 2023-64, section 11.

Line 5. The amount of the FSNOL adjustment for the tax year is limited to the lesser of:

1. The aggregate amount of FSNOL carryovers to the tax year, or
2. 80% of AFSI computed without regard to the FSNOL deduction allowed.

Maintain adequate records documenting both the amount of FSNOL generated in the tax year and used in subsequent tax years.

Line 10. Enter the corporation's regular tax liability (as defined in section 26(b)) minus any foreign tax credit, if any (Form 1120, Schedule J, line 1 minus any foreign tax credit entered on Schedule J, line 5a or the applicable lines on the corporation's tax return).

Line 11. Base erosion minimum tax. Enter the base erosion minimum tax amount, if any, from Form 1120, Schedule J, line 2, or the applicable line of the corporation's tax return. See section 59A and Form 8991.

Part III—Adjustment for Certain Taxes Under Section 56A(c)(5)

Federal income taxes, and income, war profits, and excess profits taxes (within the meaning of section 901) with respect to any foreign country or U.S. territory which are taken into account on the corporation's AFS are disregarded for AFSI purposes. Complete Part III to adjust for taxes described in section 56A(c)(5).

Line 1. Enter any income, war profits, and excess profits taxes (within the meaning of section 901) with respect to any foreign country or U.S. territory which are taken into account on the corporation's AFS in the current income tax provision.

Exclude any CFC income, war profits, and excess profits taxes (within the meaning of section 901) with respect to a foreign country or U.S. territory which are taken into account on the CFC's AFS in the current income tax provision.

Line 2. Enter federal income taxes which are taken into account on the corporation's AFS in the current income tax provision.

Line 3. Enter any income, war profits, and excess profits taxes (within the meaning of section 901) with respect to any foreign country or U.S. territory which are taken into account on the corporation's AFS in the deferred income tax provision. Exclude any CFC income, war profits, and excess profits taxes (within the meaning of section 901) with respect to a foreign country or U.S. territory which are taken into account on the CFC's AFS in the deferred income tax provision.

Line 4. Federal deferred tax provision. Enter federal income taxes which are taken into account on the corporation's AFS in the deferred income tax provision.

Line 5. Enter the federal income taxes and income, war profits, and excess profits taxes (within the meaning of section 901) with respect to a foreign country or U.S. territory taken into account on the corporation's AFS as part of equity method investment income. Exclude any CFC income, war profits, and excess profits taxes (within the meaning of section 901) with respect to a foreign country or U.S. territory which are taken into account on the CFC's AFS as part of equity method investment income.

Lines 6a through 6h. Reserved for future use.

Line 6z. Income taxes in other places. Enter other federal income taxes and income, war profits, and excess profits taxes (within the meaning of section 901) with respect to a foreign country or U.S. territory taken into account on the AFS in determining net income in other places. Exclude any CFC income, war profits, and excess profits taxes (within the meaning of section 901) with respect to a foreign country or U.S. territory which are taken into account on the CFC's AFS in determining net income in other places.

Part IV—Alternative Minimum Tax—Corporations Foreign Tax Credit

Complete Part IV if an applicable corporation elects to take the section 901 foreign tax credit for regular tax. See section 59(l).

A foreign income tax is eligible to be claimed as a CAMT FTC (eligible tax) in the taxable year in which it is paid or accrued for federal income tax purposes by either an applicable corporation or a CFC with respect to which the applicable corporation is a U.S. shareholder, provided the foreign income tax has been taken into account on the AFS of such applicable corporation or CFC. See Notice 2023-64, section 14.02(1). In the case of a foreign tax redetermination, an eligible tax may be claimed as a CAMT FTC only in the relation-back year, even if the tax is reflected in a journal entry on an AFS within a taxable year that is later than the relation-back year. See Notice 2023-64, section 14.02(3).

A foreign income tax is considered taken into account on an AFS of a taxpayer if any journal entry has been recorded in the journal used to determine the amounts on the AFS of the taxpayer for any year, or another AFS that includes the taxpayer, to reflect the income tax, even if the income tax does not increase or decrease the taxpayer's FSI at the time

of the journal entry. An income tax that is taken into account on a partnership's AFS is also considered taken into account on any AFS of its partners. See Notice 2023-64, section 8.02(2).

Note. Report all items in Part IV in U.S. dollars.

Section I—AMT Foreign Tax Credit

Use Section I to compute the total domestic corporation AMT foreign income taxes.

Line 1a. Enter total foreign taxes paid or accrued as reported on Form 1118, Schedule B, Part I, column 2(j).

Lines 1b through 1g. Enter the description and amounts for adjustments to the line 1a amount listed above. On line 1b, enter any other foreign income taxes not included on line 1a. Enter any other adjustments to line 1a on lines 1c through 1g.

Line 3a. Pro-rata share of CFC AMT foreign income taxes. Enter the amount from Part IV, Section II, line 11, column (n).

Line 3b. Enter the section 59(l)(2) carryover of excess foreign taxes from Part IV, Section III, line 4, column (vii).

Line 3d. The percentage specified in section 55(b)(2)(A)(i) is 15%.

Line 3e. Enter the pro-rata share of items taken into account in computing the adjusted net income or loss of a CFC (attach Worksheet B). See [Note](#) below. In determining the adjusted net income or loss of a CFC, disregard CFC federal income taxes, and income, war profits, and excess profits taxes (within the meaning of section 901) with respect to a foreign country or U.S. territory taken into account in income on the CFC's AFS.

See Notice 2024-10 for purposes of determining the adjusted net income or loss of a CFC for purposes of section 56A(c)(3) resulting from certain distributions received with respect to stock of another CFC.

If the pro-rata share of aggregate adjusted net income or loss of the CFCs is negative, enter zero.

Note. The amount on line 3e should be the same as the pro-rata share of adjusted net income or loss of a CFC from Part II, line 2e.

Attach [Worksheet for Pro-Rata Share of Adjusted Net Income or Loss of CFCs Described in Section 56A\(c\)\(3\)—Worksheet B](#). Add additional rows as necessary for each CFC.

Lines 4 and 5. Reserved for future use.

Section II—Allowable CFC AMT Foreign Income Taxes

Column (b). Enter the CFC's employer identification number (EIN) or other reference identification number.

Column (c). Enter the adjusted net income or loss of CFCs.

Column (d). Enter the income, war profits, and excess profits taxes (within the meaning of section 901) imposed by a foreign country or U.S. territory which are taken into account on the CFC's AFS with respect to which the applicable corporation is a U.S. shareholder and paid or accrued (for federal income tax purposes) by the CFC. See section 59(l)(1).

Columns (e) through (k). Adjustments to column (d). Enter the description at the top of each adjustment column. Enter the adjustment amount on each line for each CFC that may have such adjustment with respect to the amount included in column (d).

Column (m). Enter the taxpayer's pro-rata share (determined under rules similar to the rules under section 951(a)(2)) of the CFC's net income or loss included in column (c).

Column (n). Pro-rata share of CFC AMT foreign taxes. Multiply column (l) by column (m). Enter this amount on Part IV, Section I, line 3a.

Section III—AMT Foreign Tax Credit Carryover for CFCs

Line 1. Foreign tax carryover from the prior tax year. If applicable, enter amounts from the appropriate columns of line 8 of the prior year Form 4626, Part IV, Section III.

Note. For tax years beginning before 2023, the relevant preceding tax year columns should be left blank.

Lines 2a through 2g. Adjustments to line 1. Enter the description and amounts of adjustments to the line 1 amount listed above.

Line 5. Line 5 is completed only if the applicable corporation has excess CFC AMT foreign tax credit limitation. Excess CFC AMT foreign tax credit limitation exists when the applicable corporation's CFC AMT foreign tax credit limitation (Part IV, Section I, line 3f) exceeds its allowable controlled CFC AMT foreign income taxes (Part IV, Section I, line 3a).

Enter in each column the foreign tax carryover utilized in the current tax year. Starting with column (i), the amount to be entered on line 5 of a given column will be the amount on line 4 of that column, but only to the extent that it does not exceed:

- The amount of excess CFC AMT foreign tax credit limitation (defined above), less
- The sum of all amounts entered in all previous columns of line 5.

The line 5, column (vii) total cannot exceed the amount of the excess CFC AMT foreign tax credit limitation.

Line 6. Complete line 6 only with respect to the fifth preceding tax year (and the "Total" column). For the fifth preceding tax year (column (i)), combine lines 4 and 5 and enter the result on line 6, column (i).

Line 7. Enter the section 59(l)(2) foreign tax carryover generated in the current tax year. The line 7, column (vi) foreign tax carryover generated in the current tax year is the difference between the allowable controlled CFC AMT foreign income taxes (Part IV, Section I, line 3a) and the CFC AMT foreign tax credit limitation (Part IV, Section I, line 3f).

Part V—Members of a Controlled Group Treated as a Single Employer and FPMG Members Taken Into Account in "Applicable Corporation" Determination

If the corporation answers "Yes" to either Line A or Line B at the top of page 1, then the corporation must complete Part V. Enter the requested information for the entities included in the taxpayer's applicable corporation determination.



Incomplete or nonspecific responses, including phrases such as “available upon request” are not sufficient response.

Column (a). Enter the name of the member of a controlled group and/or FPMG member included in the corporation’s applicable corporation determination.

Column (b). Enter the EIN of the member of a controlled group and/or FPMG member included in the corporation’s applicable corporation determination.

Column (c). Member of a controlled group. Check the box on the appropriate line if the entity is a member of a controlled group. See section 59(k)(1)(D) and the [AFSI Test](#) section, earlier.

Column (d). FPMG members. Check the box on the appropriate line if the entity is a member of an FPMG. See section 59(k)(2) and the [AFSI Test](#) section, earlier.

Column (f). Enter each included member’s net income or loss reported on its AFS for the current tax year.

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December 20, 2023

Worksheet for Pro-Rata Share of Adjusted Net Income or Loss of CFCs Described in Section 56A(c)(3) for Each Preceding Year—Worksheet A

Note. Attach this worksheet for each preceding year referenced on Form 4626, Part I, line 2c or Part I, line 11b. Attach a separate worksheet for each column (a), (b), and (c).

	a. Name of CFC	b. EIN or Reference ID Number of the CFC	c. Country of Incorporation (enter country code)	d. Current Year Net Income or (Loss) Per CFC's AFS (in functional currency)	e. Section 56A(c)(3) Adjustments (in functional currency)	f. Add column d and column e	g. Exchange Rate Used	h. Enter amount from column f (in U.S. dollars)	i. Pro-Rata Share of Adjusted Net Income or Loss of a CFC, Described in Section 56A(c)(3) (in U.S. dollars)
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	Totals								

Worksheet for Pro-Rata Share of Adjusted Net Income or Loss of CFCs Described in Section 56A(c)(3)—Worksheet B

Note. Attach this worksheet for pro-rata share of adjusted net income or loss of a CFC, described in section 56A(c)(3) on Form 4626, Part IV, Section I, line 3e.

	a. Name of CFC	b. EIN or Reference ID Number of the CFC	c. Country of Incorporation (enter country code)	d. Pro-Rata Share of CFC Net Income Described in Section 56A(c)(3) (in U.S. dollars)
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	Totals			

Paperwork Reduction Act Notice. We ask for the information on this form to carry out the Internal Revenue laws of the United States. You are required to give us the information. We need it to ensure that you are complying with these laws and to allow us to figure and collect the right amount of tax.

You are not required to provide the information requested on a form that is subject to the Paperwork Reduction Act unless the form displays a valid OMB control number. Books or records relating to a form or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law. Generally, tax returns and return information are confidential, as required by section 6103.

The time needed to complete and file this form will vary depending on individual circumstances. The estimated burden for business taxpayers filing this form is approved under OMB control number 1545-0123 and is included in the estimates shown in the instructions for their business income tax return.

If you have comments concerning the accuracy of these time estimates or suggestions for making this form simpler, we would be happy to hear from you. See the instructions for the tax return with which this form is filed.

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December 20, 2023