

CHECKLIST FOR RETROACTIVE QEF RULING REQUESTS

User Fees

- ☐ A separate user fee for each PFIC for which the PFIC shareholder seeks consent to file a retroactive QEF election.

(a) General User Fee (Section 4.02(1)(a) of this revenue procedure, see also paragraph (A)(3)(c)(ii) of Appendix A to Rev. Proc. 2026-1)

(b) Reduced User Fees (Section 4.02(1)(b) of this revenue procedure)

(i) Substantially identical letter ruling requests (see also paragraph (A)(5)(a) of Appendix A to Rev. Proc. 2026-1)

(ii) Reduced user fees based on gross income (see also paragraph (A)(4)(a) and (b) of Appendix A to Rev. Proc. 2026-1)

(iii) Lowest available user fee (see also Appendix A to Rev. Proc. 2026-1)

- ☐ A ruling request must include a statement indicating the relevant user fees with respect to each PFIC on the first page of the submission, including, as applicable, a description of why the submission qualifies for reduced user fees.

Items to include with retroactive QEF election ruling submission

- ☐ A statement listing the dates on which the PFIC shareholder acquired each interest in the PFIC and the PFIC shareholder's ownership percentage of the PFIC after acquiring each interest (Section 4.02(2)(a) of this revenue procedure)
- ☐ PFIC Annual Information Statements (or Intermediary Statements or Combined

Statements) (Section 4.02(2)(b) of this revenue procedure)

☐ A detailed affidavit from the PFIC shareholder, or a person authorized to sign a Federal income tax return on behalf of the PFIC shareholder, meeting the requirements of Treas. Reg. § 1.1295-3(f)(4)(ii)

☐ Detailed affidavits from other persons (as described in Section 4.02(2)(d) of this revenue procedure)

☐ A statement of facts and supporting documentation (as described in Section 4.02(2)(e) of this revenue procedure)

☐ A representation that the PFIC status of the corporation has not been raised on audit (Section 4.02(2)(f) of this revenue procedure)