Is Your Business Ready for the 2025 Tax Shift?



Planning Priorities for CFOs and Tax Executives

Evaluate where your organization stands and determine critical next steps across key risk and opportunity areas changed by the 2025 tax shift.

R&D Expensing (Section 174 Changes)

With the return of immediate expensing for domestic R&D in 2025, it's critical to reassess tax strategies and capitalize on transition-year elections.

Key Questions:

Have you modeled the impact of immediate expensing for 2025 and beyond?

Yes No Unsure

Have you considered amending 2022–2024 returns to accelerate deductions or take advantage of small-business elections?

Yes No Unsure

Action Tip: Tax teams should collaborate with R&D, finance, and legal departments to quantify the opportunity and properly document elections.

ERC Risk and IRS Enforcement Preparedness

The IRS is expanding enforcement related to Employee Retention Credit (ERC) claims — particularly those filed after Jan. 31, 2024, for Q3 2021. Be audit ready.

Key Questions:

Have you reviewed all ERC claims, especially high-risk quarters like Q3 2021?

Yes No In Progress

Are you prepared to respond to an IRS audit with proper documentation and eligibility justification?

Yes No Unsure

Action Tip: Even if a third-party prepared your claim, your company is liable. Conduct a post-claim risk review and update your audit file.

Clean Energy Tax Credit Strategy

With the accelerated rollback of key credits, your energy strategy should be fully aligned with placed-in-service and construction start deadlines.

Key Questions:

Are your EV, charging station, wind, and solar investments scheduled to be placed in service before 2025/2026 deadlines?

Yes No N/A

Clean Energy Tax Credit Strategy (continued)

Are your wind and solar project construction timelines aligned with new accelerated placed-inservice requirements for §48E and §45Y?

Yes No In Review

Have you reviewed vendors and contracts for exposure to prohibited foreign entity (PFE) restrictions and material assistance restrictions?

Yes No N/A

Action Tip: Engage with facilities and procurement teams now. Small shifts in delivery or installation timelines could cost you valuable credits.

Documentation, Tracking, and Strategy Alignment

Tax changes in 2025 impact federal, state, payroll, and business interest provisions. Cross-functional visibility is essential.

Key Questions:

Is your tax or compliance team actively checking weekly developments around the 2025 Reconciliation Act and related guidance?

Yes No Starting Soon

Action Tip: Set up a recurring cadence with your finance and legal teams to track changes, interpret IRS guidance, and adjust positions as needed.

Turning Insight into Action

The 2025 tax shift isn't just a compliance exercise — it's a strategic inflection point. The decisions you make in the next two quarters will directly affect your organization's tax liability, cash flow, and ability to access valuable credits and deductions.

What's next:

- Prioritize internal discussions now.
- Revisit timelines, elections, and documentation protocols.
- Find where your organization is exposed or under-leveraging opportunities.

For many mid-market CFOs and tax leaders, the biggest risk right now is inaction. Use this checklist as a starting point to guide focused conversations across finance, legal, and operations teams.

Need Guidance?

If you'd like to walk through this checklist together or explore a deeper diagnostic of your current readiness, reach out to our Tax Credits and Incentives team today. A quick strategic session can help prioritize your next steps and uncover overlooked opportunities.

