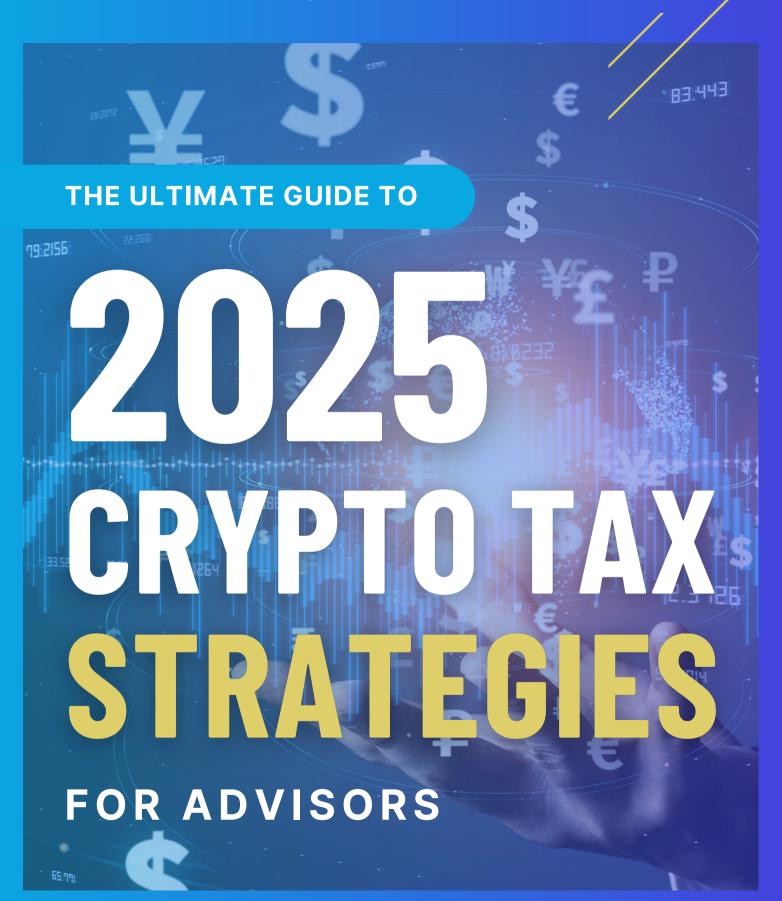
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INTRODUCTION

Cryptocurrency taxation is evolving fast, and advisors must stay ahead of the curve to ensure their clients remain compliant while optimizing their tax strategies. With new regulations, reporting requirements, and international considerations, 2025 presents unique opportunities and challenges for financial professionals. This guide provides a comprehensive overview of key tax strategies for crypto assets, including compliance with the IRS's new Form 1099-DA, tax planning methods, and emerging trends that could impact your clients' portfolios.

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Understanding New Reporting Requirements



Navigating the Form 1099-DA Implementation

The IRS took a major step forward in cryptocurrency taxation with the introduction of Form 1099-DA, which took effect on January 1, 2025.

This move aims to enhance transparency and ensure that crypto investors properly report taxable events. As an accountant, CPA, or advisor, understanding these changes is crucial to keeping your clients compliant and ahead of potential audits.

What You Need to Know About Form 1099-DA

Brokers, including cryptocurrency exchanges and digital asset platforms, will now be required to report gross proceeds from crypto sales. This includes essential transaction details such as:







Types of crypto assets involved

Fair market value at the time of sale

While this new requirement casts a wide net, there are some notable exemptions:



Stablecoin sales under \$10,000 are exempt from reporting.



NFT sales under \$600 fall outside the mandatory reporting threshold.

One of the biggest shifts comes in cost basis reporting. Starting in 2026 (for transactions occurring in 2025), brokers will be required to include cost basis information, a significant step toward greater tax compliance but also an added layer of complexity for tax professionals and investors alike.

How the IRS is Stepping Up Oversight

With these new reporting requirements comes enhanced IRS tracking capabilities, as the agency aims to prevent underreporting and tax evasion in the crypto space. The IRS will have access to multiple data points, including:



Know Your Customer (KYC) checks on major crypto exchanges.



Banking information linked to fiat-to-crypto transactions.



Withdrawal address tracking, ensuring that assets moved off exchanges can still be accounted for.

The scale of this effort is staggering. It is estimated that the IRS will process 8 billion new 1099-DA forms annually, bringing the total volume of IRS information returns to an unprecedented 13 billion. These numbers underscore the growing importance of tax professionals in helping clients navigate an increasingly complex reporting landscape.

What This Means for CPAs and Accountants

For tax professionals, these changes present both challenges and opportunities. Clients will rely on you not only to interpret these new rules but also to implement proactive tax strategies that keep them compliant while minimizing liabilities. Advisors who stay informed and integrate tools like TaxPlanIQ to streamline compliance will position themselves as indispensable resources in the evolving crypto taxation environment.

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Tax Planning Strategies



As new IRS regulations take effect, tax professionals must proactively guide clients through tax planning strategies that optimize reporting and minimize liabilities. The introduction of Form 1099-DA and enhanced compliance measures make it essential for advisors to stay informed on the most effective crypto tax strategies. Below, we break down the key provisions that impact 2025 tax planning.

Safe Harbor Provision: A Key Opportunity for Basis Allocation

To provide flexibility in tracking cost basis, the IRS has introduced a Safe Harbor provision under Revenue Procedure 2024–28. This provision allows taxpayers to allocate the basis of crypto assets across multiple wallets, giving them greater control over how gains and losses are reported. However, to take advantage of this opportunity, taxpayers must complete basis allocation by December 31, 2024, or before executing their first crypto trade in 2025.

What If a Client Has Already Made a Trade in 2025?

If a taxpayer executes their first crypto trade in 2025 before completing basis allocation, they will lose the ability to use the Safe Harbor provision for transactions made prior to allocation. In such cases, the IRS requires that cost basis be determined using standard accounting methods, such as FIFO (First-In-First-Out), unless specific identification has been properly maintained. This makes it imperative for advisors to ensure clients act promptly before engaging in any crypto transactions in 2025.



Temporary Relief Measures: Notice 2025-7

The IRS acknowledges that brokers may face challenges in implementing detailed tracking systems immediately. As a result, Notice 2025-7 provides temporary relief for the 2025 tax year, granting taxpayers some flexibility:



If brokers are unable to provide accurate cost basis tracking, taxpayers may rely on their own transaction records for reporting.



If proper identification of specific assets is not maintained, the IRS defaults to the FIFO (First-In-First-Out) method for computing taxable gains and losses.

Choosing the Right Accounting Method for Crypto Transactions

Accurate tax reporting hinges on selecting the most suitable accounting method for crypto transactions. Taxpayers have two primary options:



Specific Identification Method: Allows taxpayers to choose which assets to sell, optimizing gains and losses for tax efficiency.



FIFO (First-In-First-Out) Method: The default method when no specific identification is maintained, where the oldest acquired assets are considered sold first.

Recordkeeping Requirements

Given the IRS's increasing scrutiny, meticulous record keeping is more critical than ever. Taxpayers and their advisors must ensure that they maintain detailed records of:



Acquisition date of crypto assets.



Cost basis (purchase price, transaction fees, and adjustments).



Fair market value at the time of sale or disposition.

By implementing these tax planning strategies and maintaining detailed records, advisors can help clients reduce audit risks, ensure compliance, and maximize tax efficiency in 2025 and beyond.

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International Considerations



Global tax authorities are working toward greater transparency and uniformity in reporting requirements. For CPAs and tax advisors, understanding international frameworks is crucial to ensuring compliance and optimizing tax strategies for clients operating in multiple jurisdictions.

OECD Crypto-Asset Reporting Framework (CARF)

The OECD Crypto-Asset Reporting Framework (CARF) represents a significant step toward consistent cross-border crypto tax reporting. This initiative is designed to prevent tax evasion by ensuring that tax authorities worldwide have access to critical crypto transaction data. Key aspects of the framework include:



1. Standardized Information Sharing:

CARF establishes a uniform set of rules requiring digital asset service providers (such as exchanges and wallet providers) to report transactions to local tax authorities, which will then share the data globally.



2. Alignment with Existing Financial Reporting:

The CARF follows similar principles to the Common Reporting Standard (CRS), which governs financial institution disclosures for traditional assets.



3. EU Adoption via DAC7 and DAC8:

The European Union has implemented CARF through DAC7 (covering digital platforms) and DAC8 (expanding coverage to crypto-assets). These directives mandate extensive reporting requirements for crypto transactions within EU member states.

State-Level Reporting Variability

Crypto tax reporting in the U.S. does not stop at the federal level—state-level reporting obligations are also evolving. The IRS Form 1099-DA, introduced to enhance tracking of digital asset transactions, now includes fields for state-specific reporting. Advisors must be aware of:



State Income Tax Withholding:

Some states may require crypto transactions to be reported similarly to traditional financial transactions, potentially leading to automatic withholding of state income taxes.



Jurisdictional Differences:

Unlike federal regulations, state-level crypto tax rules can vary widely. Some states have already implemented their own crypto-specific tax laws, while others are still developing guidance.

CPAs should be particularly aware of the following states regarding crypto-specific tax laws and regulations:

1. Wyoming:

This state has established itself as one of the most crypto-friendly jurisdictions:

- Has no personal or corporate income tax
- Passed a charter for banks dealing primarily with digital assets
- Recognizes DAOs as legal entities
- Offers sales tax exemptions for crypto mining equipment (with conditions)

2. Florida:

- Has no state income tax
- Exempts crypto businesses from money transmission licenses
- Allows businesses to pay state fees using cryptocurrency

3. Texas:

- Has no personal income tax
- Offers competitive corporate franchise tax rates
- Provides incentives for crypto mining operations, including tax abatements and exemptions

4. New Hampshire:

- Exempts cryptocurrency businesses from money transmission regulations
- Only taxes interest and dividends, not capital gains
- Has a relatively low corporate tax rate of 7.5%

5. Colorado:

- Allows taxpayers to pay state taxes using cryptocurrency
- Has a flat state income tax rate of 4.4%
- Aims to become a center of crypto innovation

6. Arizona:

- First state to declare receiving an airdrop as exempt from state-level taxation
- Has a low flat state income tax rate of 2.5%

7. New York:

While not crypto-friendly, it's important for CPAs to be aware of its strict regulations, including the BitLicense requirement for crypto businesses.

8. California:

Similar to New York, California has more stringent regulations and higher tax rates, which CPAs should be mindful of when advising clients.

CPAs should also note that some states, like Florida, Texas, and Wyoming, have no capital gains tax at all, which can significantly impact crypto tax strategies for residents of these states.

CHAPTER 4

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Key Numbers for 2025



Understanding the latest tax thresholds and rates is crucial for effective crypto tax planning. The IRS continues to treat cryptocurrency as property, meaning tax obligations can vary depending on holding periods, income levels, and deductions available to taxpayers. Below are the key numbers for 2025 that CPAs and tax advisors need to keep top of mind when working with crypto clients.

Tax Brackets for Short-Term Crypto Gains

Cryptocurrency held for less than 12 months is subject to short-term capital gains tax, which aligns with ordinary income tax rates. The 2025 tax brackets range from 10% to 37%, depending on taxable income levels. Advisors should ensure clients understand the implications of selling assets before the long-term threshold to avoid higher tax liabilities.

Qualified Business Income (QBI) Deduction Thresholds

For crypto traders who qualify for Trader Tax Status (TTS) and other self-employed individuals or business owners engaged in crypto-related activities (such as mining operations, crypto consulting, or development), the QBI deduction provides a potential tax benefit. In 2025, the income thresholds for claiming this deduction are:



Married Filing Jointly (MFJ): \$394,600



Single Filers: \$197,300

If a taxpayer's income falls below these limits, they may qualify for the full 20% deduction on qualified business income, reducing their taxable income.

Important Note:

Not all crypto traders qualify for this deduction. To be eligible, traders must first meet the IRS criteria for Trader Tax Status (TTS), which includes substantial trading activity (generally 720+ trades per year), short holding periods, significant time commitment (500+ hours annually), and treating trading as a primary business activity. Most casual crypto traders will be classified as investors, not businesses, and therefore would not qualify for QBI deductions.

QBI Deduction Upper Limits

For taxpayers with higher earnings, phase-outs and limitations apply once income exceeds the following levels:



Married Filing Jointly (MFJ): \$483,900



Single Filers: \$241,950

At or above these income levels, eligibility for the deduction is subject to industry-specific restrictions and additional calculations, requiring careful tax planning.

General Strategic Takeaways for Advisors



Encourage long-term holding where possible to benefit from lower capital gains rates.



Assess QBI eligibility for self-employed crypto traders, miners, and business owners to maximize deductions.



Monitor taxable income carefully to ensure clients remain within favorable tax brackets and deduction thresholds.



If a taxpayer is able to be in the bottom two tax brackets the same year of trading, they can recognize up to about 45k or approximately 90k (MFJ) of capital gains tax free.

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Emerging Trends in Crypto Taxation



Potential classification changes could significantly alter how cryptocurrencies are taxed. The shifting regulatory landscape includes executive actions and legislative proposals that could redefine tax obligations for crypto investors and businesses.

Executive Orders and Crypto Reclassification

Recent executive orders indicate that some cryptocurrencies may be reclassified as currency instead of property. This shift would have major tax implications, including:



1. Reduced tax reporting burden:

If crypto were treated as currency, capital gains tax on routine transactions could be eliminated, similar to how foreign currencies are taxed.



2. Changes in cost basis tracking:

Property classification requires strict cost basis tracking for every transaction, whereas currency classification could simplify tax compliance.



3. Potential for broader regulatory oversight:

A currency designation may place cryptocurrencies under different financial regulations, potentially aligning them more closely with banking laws.

Congressional Action: Legislative Proposals and Adjustments

Congress is actively considering proposed adjustments to existing crypto tax laws, aiming to provide greater clarity and flexibility. Key legislative efforts include:



Potential revocation of DeFi platform reporting requirements:

Current IRS regulations require decentralized finance (DeFi) platforms to report user transactions. Proposed changes could eliminate or modify these requirements, reducing compliance burdens for both platforms and users.



Efforts to create more flexible tax laws for crypto assets:

Legislators are exploring updates that would address common concerns, such as:



Many stakeholders advocate for taxing staking rewards only when sold, rather than when earned.

Reducing taxable events for small crypto transactions:

A microtransaction exemption could prevent minor purchases from triggering taxable events.

Refining wash sale rules for digital assets:

Proposed adjustments could align crypto taxation with traditional securities regulations.

With potential classification changes on the horizon, advisors should keep monitoring regulatory developments closely this year to anticipate changes that could impact tax planning strategies.

Leveraging TaxPlanlo for Crypto Tax Planning

TaxPlanIQ is your ultimate tool for managing cryptocurrency tax complexities. With its robust features, TaxPlanIQ enables your firm to:

- Access curated strategies for crypto tax optimization, including tax-loss harvesting and charitable donations.
 - Create professional reports highlighting potential tax savings and compliance measures.
 - Receive IRS-compliant guidance for applying tax strategies effectively.

What Next?

By leveraging tax planning tools like TaxPlanIQ and understanding the latest regulations, you can help your clients navigate compliance challenges while minimizing their tax liabilities. This guide serves as a roadmap to mastering crypto tax strategies and positioning yourself as a leading tax advisor in the digital asset space.

Get Started Today! Request a demo of TaxPlanIQ and discover how it can revolutionize your tax advisory services.

Request a demo