Legal Watch

REVENUE MEMORANDUM CIRCULAR NO. 84-2026

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Agency Name

Bureau of Internal Revenue (BIR)

Issuance Title

Clarifying certain provisions of Revenue Regulations No. 004-2026, prescribing the guidelines and procedures for the availment of the one-time abatement of taxes and/or penalties for micro taxpayers

Issuance Date

23 July 2026

Link

https://bir-cdn.bir.gov.ph/BIR/pdf/RMC%20No.%2084-2026_Redacted.pdf

SUMMARY

The Circular was issued by the BIR to clarify certain provisions in Revenue Regulations (RR) No. 04-2026 prescribing the guidelines and procedures for the availment of the one-time abatement of taxes and/or penalties for Micro Taxpayers.

The Circular clarifies the documents needed to be submitted to avail of the One-Time Abatement Program for both individual and non-individual Micro Taxpayers. All applications for the One-Time Abatement Program and submission of complete documentary requirements, shall be manually filed with the RDO where the Micro Taxpayer is registered using the Application Form (BIR Form No. 2121). For Micro Taxpayers with multiple branches, the application shall be filed with the RDO having jurisdiction over the Taxpayer's Head Office.

Moreover, the Circular clarifies that the filing of the application for One-Time Abatement will not be considered as a withdrawal of any pending administrative appeal against the Preliminary Assessment Notice (PAN), Final Assessment Notice/Formal Letter of Demand (FAN/FLD), or Final Decision on Disputed Assessment (FDDA). The resolution of the pending administrative appeal shall be suspended while the application for the One-Time Abatement is pending.

Lastly, One-Time Transactions are covered by the One-Time Abatement Program as long as it satisfies the requirements for the abatement program. However, RATE and fraud cases are generally not covered by the program unless allowed by the Commissioner of Internal Revenue on meritorious grounds.