

Essential tax and wealth planning guide

2026 EDITION

Deloitte



Welcome

Dear Reader,

Staying up to date on the evolving tax landscape is a challenge at any time of year, especially when daily responsibilities demand your immediate attention. As we approach the end of 2025, this balancing act may become even more complex. That's why gaining fresh insights, such as those offered in the *2026 Essential tax and wealth planning guide*, can be invaluable—providing practical considerations to help you navigate your tax planning journey with confidence.

The **Tax policy section** of the guide explores what lies ahead as the law commonly referred to as the One Big Beautiful Bill Act (OBBBA, [P.L. 119-21](#)) is set to take effect in the coming year. It also examines the implications of the recent government shutdown on IRS operations. Given how quickly political agendas can shift, timely, reliable updates are essential. Deloitte's Tax Policy Group will continue to deliver these directly to your inbox—offering the news, analysis, and information you need to stay informed on the latest developments from Capitol Hill. For ongoing coverage, visit [Tax News & Views](#).

The **Creating a charitable legacy section** provides valuable guidance on how OBBBA could influence future charitable giving strategies. Families have a range of options when deciding how to support the causes that matter most to them. If you're considering funding a charitable legacy during your lifetime, your adviser can help you evaluate the

tax implications. Just as important is reflecting on how your philanthropic goals align with your broader financial objectives and estate plans—ensuring you can identify both opportunities and complexities along the way.

As 2026 approaches, Deloitte remains committed to providing new perspectives and actionable guidance on the road ahead. To connect with a member of our Private Wealth practice who specializes in your area of interest, please reach out to us at privatewealth@deloitte.com.

Regards,



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Post-OBBBA enactment: Focus shifts to government funding and OBBBA implementation; plus, what's next for tax legislation

With the enactment of the law commonly referred to as the One Big Beautiful Bill Act (OBBBA, [P.L. 119-21](#)) behind lawmakers, attention in Washington swiftly turned to the annual appropriations process for fiscal year 2026, which began on October 1.

An intractable disagreement between Republicans and Democrats centered primarily on the potential extension of pandemic-era enhancements to premium assistance tax credits that help qualifying individuals and families purchase coverage on the Affordable Care Act's Health Insurance Marketplace led to a historic 43-day government shutdown.

The appropriations impasse was resolved—at least temporarily—on November 12 when a handful of Democrats in both the House and Senate joined Republicans in passing a continuing resolution that provides full-year funding for a handful of agencies including the Departments of Agriculture and Veterans Affairs and the Food and Drug Administration, while keeping the remainder of the government open—at prior fiscal year spending levels—through January 30, 2026.

The deal is silent on the ACA credit enhancements, which expire at the end of 2025. (Senate Republican leaders have promised Democrats a December vote on the credits, however.)

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Budget impact and IRS operations

Under the contours of the November appropriations accord, the Treasury Department and the IRS are among the federal agencies that are funded at prior-year levels through January 2026. That means that negotiations will continue over a more durable spending bill covering tax administration.

To that end, the House Committee on Appropriations has advanced a bill that would allocate \$9.5 billion to the IRS—representing a roughly 23% cut relative to fiscal year 2025 and a proposed reduction that actually goes beyond

the 20% cut the Trump administration offered on May 30 when it released additional details supporting its fiscal 2026 spending plans.

Across the Capitol, meanwhile, the leaders of the Senate Appropriations Committee—Chairman Susan Collins (R-Maine) and ranking member Patty Murray (D-Wash.)—have been negotiating bipartisan fiscal 2026 funding bills that, in many cases, would exceed, at least slightly, spending levels from last year. However, the Senate panel has not yet considered its own Financial Services and General Government appropriations bill that would include IRS funding.

The IRS spending debate comes as the agency grapples with the operational consequences of the government shutdown and an IRS workforce that has shrunk significantly since the start of 2025.

On October 1, Treasury Secretary Scott Bessent announced that he was appointing current Commissioner of the Social Security Administration (SSA), Frank Bisignano, to serve in the newly created position of IRS “Chief Executive Officer.” It remains to be seen how Bisignano, who will remain in his leadership role at the SSA, and Bessent, who has been serving as Acting Commissioner of the IRS since the departure of former Commissioner Billy Long, will share power and what exactly Bisignano’s role will entail.

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OBBBA implementation

Treasury and the IRS have already released some initial guidance under the OBBBA, including proposed regulations on the “No Tax on Tips” provision, rules tightening the “beginning of construction” concept particularly as it relates to wind and solar projects, and new rules for rural opportunity zone investments.

These early actions mark the beginning of a much broader regulatory rollout. As implementation continues, additional guidance is anticipated in the coming months that would clarify other provisions of the law.

Future legislation?

As lawmakers approach year-end, there is at least some discussion about attempting to move a relatively narrow tax bill—or tax title attached to a larger budget measure—on a bipartisan basis. A handful of discrete provisions expiring after December 31 including the work opportunity tax credit, a measure relieving potential double-taxation between the US and Taiwan, and certain tax technical corrections with bipartisan support are among the policies seen as potential contenders.

These talks remain at a very early stage, however, and it remains unclear how the recently resolved government shutdown will impact cross-party negotiations heading into year-end and the next government funding deadline.





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Post-OBBBA enactment: Focus shifts to government funding and OBBBA implementation; plus, what's next for tax legislation

There is also speculation that Republicans could once again turn to the budget reconciliation process to advance additional filibuster-protected legislation in the months ahead while they continue to hold majorities in both the House and Senate. [A parliamentary tool increasingly used by both parties in recent decades most recently by congressional Republicans to send the OBBBA to President Trump's desk, the reconciliation process—provided certain rules are adhered to—can allow budgetary legislation to pass the Senate with a simple majority vote instead of the three-fifths margin usually required to clear procedural hurdles in that chamber.]

It remains unclear, however, how unified the GOP is on this approach and—if they did pursue reconciliation—which fiscal policies they would seek to enact.

Of course, the outcome of the November 2026 midterm elections will determine whether Republicans will continue to harness the power of budget reconciliation during the latter half of President Trump's second term. If control shifts, a return to divided government would likely require bipartisanship to move any major tax or spending legislation forward.



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Creating a charitable legacy



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Creating a charitable legacy under OBBBA

Tax planning can be a critical tool in building or preserving wealth and, if it is your intention, creating a charitable legacy either during your life or at death. As your financial picture becomes more complex from various sources of income, investments, or major life transitions, bringing the focus back to established personal goals remains the basis of effective tax planning. By letting your goals serve as guideposts, you can approach financial decisions with greater clarity and confidence, even as tax laws evolve. Your planning should remain purposeful and adaptable, supporting your long-term vision regardless of changes ahead.

On July 4, 2025, the President signed the law commonly referred to as the One Big Beautiful Bill Act (OBBBA, [P.L. 119-21](#)). While the new provisions introduced under OBBBA may influence certain elements of individual tax and wealth transfer

planning, your established objectives should remain central to conversations with your advisers. When analyzing specific measures that could affect your charitable legacy planning, consider that multi-year financial modeling is essential for understanding the potential implications on your individual circumstances. It's also important to recognize that non-tax factors—including impacts on cash flow, asset composition, business interests, and family dynamics—can be just as significant, if not more so, than tax-related concerns. Ongoing collaboration with a knowledgeable tax adviser can help you to navigate these complex decisions confidently.

For a discussion of OBBBA, please read [A closer look: Inside the new tax law](#) and for a discussion of the provisions specific to Private Wealth, please read [GOP's 'One Big Beautiful Bill Act' brings permanence to many tax provisions affecting private wealth taxpayers](#).



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Income tax considerations for lifetime charitable donations under OBBBA

Individual income tax planning, especially in light of the new OBBBA provisions, is multifaceted. Charitable contributions stand out as one of the more flexible itemized deductions, given your control on timing. While there are several provisions of OBBBA that may affect the tax efficiency of charitable donations made after December 31, 2025, we are going to concentrate on two in particular that may affect those who itemize their deductions:

1. *Charitable “floor”*: For tax years beginning after December 31, 2025, individuals can only deduct charitable donations that exceed 0.5% of the taxpayer’s “contribution base” before they can be claimed.
2. *Overall itemized deduction limitation*: Similarly, for tax years beginning after December 31, 2025, there are new rules that will cap the total amount of itemized deductions, reducing the tax benefit for larger donations made by individuals who itemize those deductions.

If you expect to be affected by either of these provisions, then you may wish to consult your tax adviser and consider whether it is beneficial to accelerate planned charitable giving and complete donations before these new rules become effective.





Charitable floor

To illustrate the impact of the charitable deduction floor, it's useful to compare the tax effect of spreading a charitable donation over several years versus making the entire donation in a single year.

Assumptions:

- The taxpayer is single and, for tax year 2026, has an annual contribution base of \$5 million—which means that the charitable deduction floor is \$25,000 per year.
- The individual is considering donating a total of \$1 million, either as \$100,000 each year over 10 years, or as a lump sum in a single year.

Scenario 1: Donating over 10 years

If the taxpayer donates \$100,000 annually, the \$25,000 floor will apply in each of the 10 years. This results in only \$75,000 of each annual gift being deductible, resulting in a cumulative reduction of \$250,000 over the decade. The total allowable deduction over the 10 years would be \$750,000.

Scenario 2: Donating in a single year ("bunching")

If the entire \$1 million is donated in one year, the \$25,000 floor applies just once. In this case, the allowable deduction is \$975,000, which is \$225,000 more than spreading the deduction over 10 years.

	Scenario 1: Annual \$100,000 donation for 10 years	Scenario 2: \$1,000,000 donation in one year
Cumulative amount paid to charity	\$1,000,000	\$1,000,000
Cumulative reduction for charitable floor (0.5% annually)	<\$250,000>	<\$25,000>
Cumulative amount allowed as a charitable deduction on Sch. A	\$750,000	\$975,000

Additional allowable charitable contributions because of "bunching"

\$225,000*

*Ignore the time value of money

This example demonstrates that bunching charitable contributions into a single tax year may significantly reduce the impact of the deduction floor, thereby increasing the net deduction. Additionally, by timing the bunched contribution in a year with income taxed at a higher rate, you may further enhance the tax efficiency of the deduction. Note that these calculations are not meant to demonstrate actual deductibility, but simply to illustrate the effect of the charitable floor.



Overall itemized deduction limitation

Next, you may need to consider the overall itemized deduction limitation. For affected taxpayers, otherwise allowable itemized deductions will be reduced by an amount equal to $\frac{2}{37}$ ths of the lesser of: (1) the taxpayer's total itemized deductions or (2) the amount by which the taxpayer's taxable income (increased by the amount of itemized deductions) exceeds where the 37% income tax bracket begins. You potentially can reduce the impact of this provision over multiple years as strategic timing of deductions generally may increase the tax efficiency of the payment more effectively than simply spreading payments out evenly. Therefore, running a multi-year projection may help individuals considering a substantial charitable contribution—or other deductions—to evaluate the impact of timing their payments.

Putting it all together

Tax modeling is a valuable tool for illustrating how various tax provisions come together and apply to an individual's financial situation. These two provisions introduced by OBBBA may affect the amount of a potential deduction, but tax modeling may still be necessary to demonstrate the overall tax efficiency. While a larger potential deduction may seem beneficial, tax efficiency also depends on the character of the income being offset. For example, a deduction in 2025 that is not subject to the charitable floor or the

overall itemized deduction limitation may deliver less benefit if it offsets income taxed at the favorable long-term capital gains rate compared to a deduction that is subject to those limitations in 2026 but which offsets income tax at the higher ordinary income tax rate. Sources of income and the rate at which they are taxed may vary from year to year, particularly as investments or business holdings change. Systematically modeling these factors can help to support more informed decision-making over time. Additionally, it can help you to plan for cash flow needs in order to fund potential bunching of charitable contributions or other deductible payments.

For individuals considering leaving a significant charitable bequest at their death, it may be worth evaluating the benefits of fulfilling that gift during lifetime rather than at death. While a charitable estate tax deduction is available for bequests made at death, these bequests in many instances do not qualify for an income tax deduction against the income generated by the estate. In contrast, completing charitable gifts during one's lifetime can offer several advantages: the donor's overall estate—subject to future estate tax—is reduced, and an immediate income tax deduction may be available to offset current taxes, and giving during life may allow the donor to witness the charity's use of their gift, creating the opportunity for direct engagement and the personal satisfaction of seeing their generosity make an impact.

Selected observations for deduction planning

Given the January 1, 2026, effective date, consider accelerating deductions into 2025

Consider ways to reduce itemized deductions post-2025

The 2/37th phase-out will apply each year a taxpayer itemizes, unless taxable income is less than where the 37% bracket begins

A deduction in 2025 that isn't subject to the 2/37th phase-out may still be less valuable than a deduction in 2026 that is subject to the phase-out

Conclusion

Tax planning for a charitable legacy—whether during your lifetime or as part of your estate planning—is often much more than a financial exercise. It can be an opportunity to create a lasting impact that reflects your personal values and family aspirations. Effective planning for your charitable legacy typically involves more than simply evaluating the tax efficiency of your contributions. With both personal and business assets, changing tax laws, and shifting priorities, it's important to consider multi-year tax planning and have ongoing conversations with your tax adviser. While staying current with legislation is vital, tax considerations are just one part of building a meaningful legacy. Equally important is reflecting on the enduring difference your decisions may have—on your family's future and, if you choose, on your community as well. Whether you're just beginning or revisiting your strategy, aligning your philanthropic plans with your personal goals can help you to move forward with confidence. By intentionally shaping your charitable legacy, it can resonate with generations to come.

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Resources



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RESOURCES

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