FEDERAL SCHOLARSHIP TAX CREDIT COALITION

A 50-State Group Committed to Successful Implementation of the New FSTC

Important Dates through 2028 for Section 25F (Education Freedom Tax Credit or "EFTC")

Date	Significance
October 2, 2026	Proposed EFTC Rule is published. Sixty-day comment period begins as next step toward developing a Final Rule.
October 2, 2026	Temporary EFTC Rule is also published and will be in effect through at least 2027, although language in the Temporary Rule allows it to stay in effect until October 2029 in case the Final Rule has not yet been published.
ASAP No update on SGO Portal State Portal opened October 22, 2026.	IRS will open two web portals: 1) the IRS 25F SGO (scholarship granting organization) Portal, where any organization intending to get on a State SGO List must register; and 2) the IRS 25F State Portal, where States will, among other things, submit their State SGO Lists.
October 22, 2026 (IRS launch of 25F State Portal)	Governors and States can begin submitting their State SGO Lists. At the same time, they may submit their written procedures for verifying compliance of SGOs, including the due process they will use if they reject an SGO's application.
ASAP (awaiting IRS launch of 25F SGO Portal)	Organizations interested in becoming an SGO must register their intent to be included in each State SGO List through the 25F SGO portal.
To be determined by State	States will determine their own processes for certifying SGOs. Many will open state-focused portals were interested SGO can submit applications, copies of governing documents, and written descriptions of their processes for accepting and vetting applications and awarding scholarships.
ASAP (awaiting IRS notification)	Treasury will submit guidance on IRC § 530 (Coverdell education savings trust accounts), addressing questions regarding § 25F that will have implications for which students can benefit from, and which independent education providers can participate in, the EFTC.

Date	Significance
December 1, 2026	Official deadline for public comments on Proposed Rule. Treasury has signaled it will review substantive comments submitted after this date. Also, this is the deadline to request a slot for 10-minute testimony at the December 15th hearing.
December 15, 2026	Treasury hearing on Proposed Rule starts at 10 a.m. EST. (Requests to attend must be received by 5 p.m. EST on December 10, 2026.)
January 1, 2027	State-certified SGOs can start receiving § 25F contributions. When taxpayers contribute up to $1,700 of their federal tax liability (up to $3,400 for joint filers) to certified SGOs, they will receive a dollar-for-dollar credit. A taxpayer must indicate that the donation is made under § 25F.
January 1, 2027	Last date when States can submit an "advance election" (that is, indicate the intention to opt in) for 2027. Governors should use IRS Form 15714.
January 2, 2027	First date when States can opt in for 2028 by submitting the advance-election paperwork.
February 15, 2027	Last date for States to submit their State SGO Lists for 2027 to the IRS 25F State Portal.
September 30, 2027	Last date for States to advance-elect for 2028. After this date, States must opt in or elect to participate (as opposed to advance elect) when they submit their SGO Lists by January 1, 2028.
December 31, 2027	Last date that donors may make § 25F contributions to get the credit against their 2027 tax filings. Starting January 1, 2028, contributions will be credited against 2028 taxes.
By January 1, 2028	Last date for States to opt in (elect) for 2028 and for States that submitted an advance election to add to their State SGO List through the IRS State 25F Portal.
By January 31, 2028	SGOs must provide to each of their § 25F donors the Form 8525 to document for 2027 tax filings the aggregate amount of 2027 donations and the unique donor number (UDN).
By February 28, 2028	SGOs must report to the IRS through the IRS SGO Portal each § 25F donor's name, address, UDN, and total donations for 2027.

Date	Significance
To be announced through IRS guidance	A n SGO must also confirm annually that it, for example, is a 501(c)(3) organization, has opened a segregated account(s) for each state where it operates, does not comingle § 25F contributions, has commissioned the required financial and programmatic audit, and has met the law's operational requirements by state. SGOs eligible for the "85% activities test" safe harbor must certify eligibility by state. Finally, SGOs must report descriptive information annually, including the number of students who applied and were awarded scholarships, as well as the minimum, maximum, and average scholarship amounts.
By the 15th of the 5th calendar month after the deadline for submitting the information in the prior line	A few organizations that are excused under IRC § 6033(a)(3) from Form 990 information filings, often due to their small total receipts, must provide the same certifications and operational information as those organizations that are required to file Form 990s.
September 30, 2028	Last date for States to advance-elect for 2029. After this date, States can opt in when they submit their SGO Lists by January 1, 2029.
By December 31, 2028	SGO must have spent 90% of receipts from 2027 on scholarships to families.
December 31, 2028	Last date that donors may make § 25F contributions to get the credit against their 2028 tax filings.
2032	5-year taxpayer carryforward for tax year 2027 ends. Any contributions above a taxpayer's federal tax liability from 2027 can no longer be carried forward and will expire.