

New Partnership Representative Final Regulations Under Section 6223 Centralized Audit Regime

Speaking Engagement
Strafford; Webcast
October 25, 2018

In August, the IRS finalized regulations governing designation of partnership representatives for centralized audit rules. Mark G. Kmiecik and Thomas L. Smitha of Berkowitz Pollack Brant Advisors and Accountants discussed key strategies and mechanics of electing out of the centralized partnership audit rules in their presentation. The new regulations provides a guide for tax professionals to properly advise partnership clients on how to mitigate potential tax issues.

Specifically, Mark and Thomas addressed:

- What changes do the final regulations make to the “capacity to act” provision in the proposed regs?
- How to change a partnership representative after the IRS has contacted a partnership about a possible audit
- Rules governing the use of DREs as partnership entities
- Changes to the provision allowing the IRS to designate a representative if the partnership has not made an eligible selection

PROFESSIONALS

Mark G. Kmiecik
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