FILING/AUDIT SELECTION

Taxpayer Files Original Return

- For all tax years beginning 01/01/2018 and forward. partnerships are automatically BBA unless taxpayer meets the criteria and "Elects Out of BBA" on a timely filed return
- Partnership Representative (PR) is designated on the filed return and will have sole authority to act on behalf of the partnership

AAR

 If filed, must be filed prior to issuance of NAP

Return Selected For Examination

 Verification of PR by exam

AUDIT PROCESS

Notice of Preliminary Partnership Examination Changes

Examination steps to complete the audit issues generally remain unchanged under BBA procedures

Examination

Notice of Proposed Partnership Adjustment (NOPPA)

 Final imputed underpayment (IU) is determined

for providing all required

POST AUDIT**

Modification

- Modification requests may be submitted to reduce the IU amount shown on the NOPPA
- The partnership is responsible information to the IRS for review and approval of the request

Final Partnership Adjustment (FPA) PARTNERSHIP PAY OR PUSHOUT* PAY CLOSING **PROCEDURES**

*Pushout Responsibilities

- Partnership is no longer liable for the IU
- Partnership will provide statements to its partners, and the IRS, on what adjustments and amounts, are being pushed out



Issuance of NAP must be at least 30 days after date of L2205D

270 DAYS



Taxpayer Can File

an Appeal

issue/matter more

 Partnership can not appeal an

than once

Issuance of the NOPPA starts the 270 day modification request period

45/90 DAYS



- Issuance of FPA starts:
- 45 days to elect pushout
- 90 days to petition court

Notice of selection for examination Letter 2205D

KPAYER NOTIFICATIONS

Notice of administrative proceeding (NAP) Letter 5893/5893A

Notice of preliminary partnership exam changes and IU (summary report package) Letter 5895 Form 14791/886A

BBA 30-day letter Letter 5891 Form 14791/886A

Notice of proposed partnership adjustment (NOPPA) Letter 5892/5892A

Modification determination package Letter 5975 Form 15027

Notice of final partnership adjustment (FPA) Letter 5933/5933A Form 15027/886A

** For information about mandatory registration and electronic filing of Post Audit forms, see https://www.irs.gov/BBAeSubmit



Form 14792/886A

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