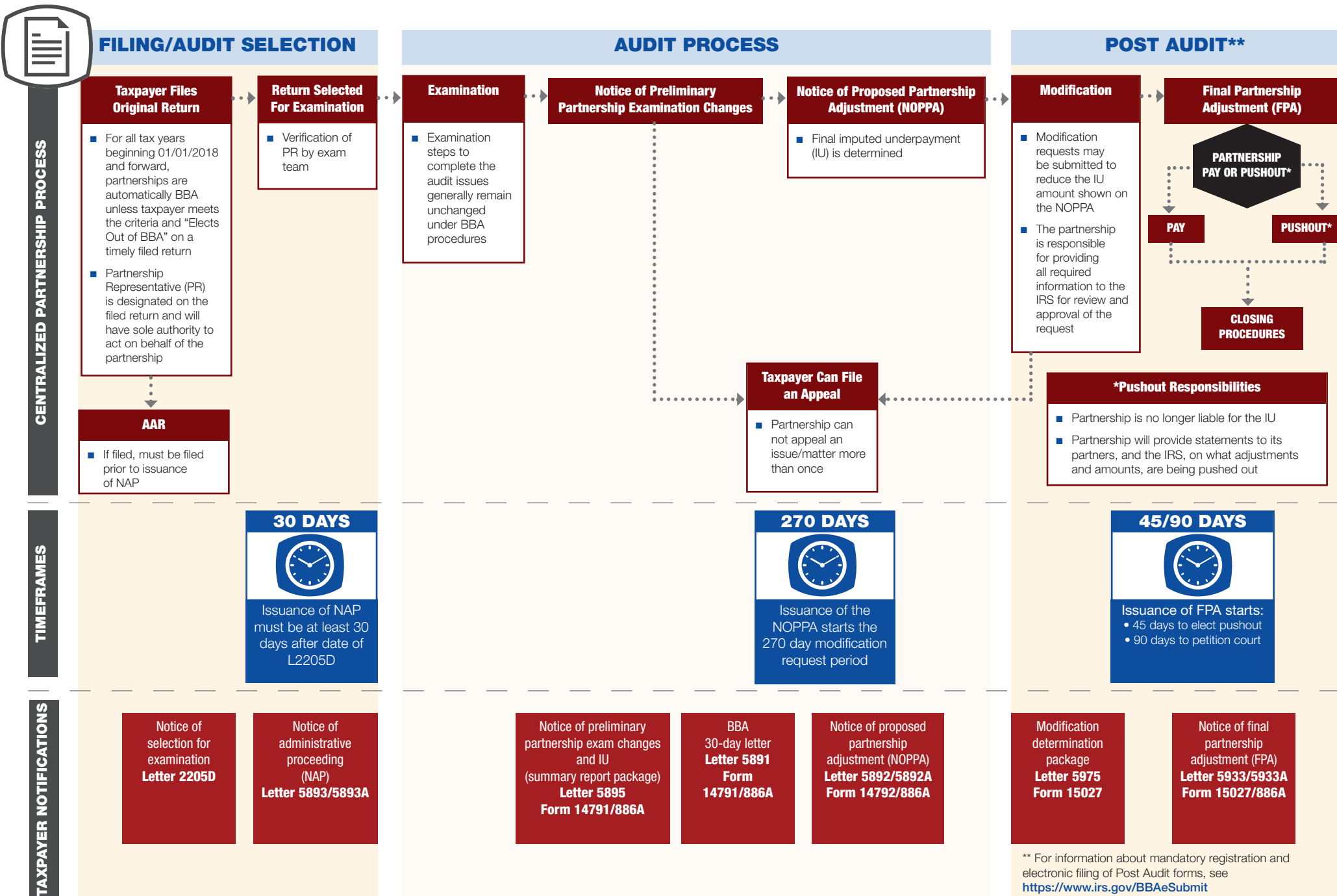


Bipartisan Budget Act (BBA) Roadmap for Taxpayers



CENTRALIZED PARTNERSHIP PROCESS

TIMEFRAMES

TAXPAYER NOTIFICATIONS

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

Return Selected For Examination

- Verification of PR by exam team

AAR

- If filed, must be filed prior to issuance of NAP

30 DAYS

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

AUDIT PROCESS

Examination

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

Notice of Preliminary Partnership Examination Changes

Notice of Proposed Partnership Adjustment (NOPPA)

- Final imputed underpayment (IU) is determined

Taxpayer Can File an Appeal

- Partnership can not appeal an issue/matter more than once

270 DAYS

Issuance of the NOPPA starts the 270 day modification request period

POST AUDIT**

Modification

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

Final Partnership Adjustment (FPA)

PARTNERSHIP PAY OR PUSHOUT*

PAY

PUSHOUT*

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

45/90 DAYS

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

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>

