

Tax Insights | May 24, 2023
**Tracking Tax News,
You Need to Know**



AICPA Asks IRS To Prioritize Inflation Reduction Act Guidance

The American Institute of CPAs (AICPA) sent a [letter](#) to the IRS, asking the agency to prioritize issuing guidance on provisions in the Inflation Reduction Act in the agency's priority guidance plan. AICPA named guidance under the corporate alternative minimum tax (CAMT) and the stock buyback tax as the top two priorities. The industry group specifically looks for guidance on key definitions related to the application of the CAMT, including a clarification of the term "applicable corporation" under Section 59(k).

IRS Clarifies Treatment of Foreign Partners in Partnership Sales Gains

The IRS [said](#) that a foreign partner in a partnership must treat the partnership sales gain as effectively connected income under certain circumstances. In a real estate company, either the partnership's stake in the company or the foreign partner's effective stake in the company can be high enough to require that a gain on the partnership's disposition of the stake must be treated as effectively connected income.

IRS Can Seek Bank Records Without Notice

The U.S. Supreme Court [ruled](#) in favor of the IRS's power to demand bank account holders' records without giving notice. The ruling endorsed a broad reading of the IRS's power, which exempts the agency from giving notice when a summons is issued to help collect a tax assessment against a taxpayer. The ruling resolves a long-standing circuit court split on the issue.



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