

Tax Insights | August 2, 2023  
**Tracking Tax News,  
You Need to Know**



### **IRS Continues Modified Fast-Track Program for Private Letter Rulings**

The IRS will adopt an ongoing program to fast-track private letter rulings (PLRs). Under the new [program](#), taxpayers can request expedited service for their PLRs if they submit certain information, such as the reason for the request and the review time they request. PLRs are requests for individual guidance from the IRS on a taxpayer's specific tax situation. Under the new program, taxpayers are not required to demonstrate a business need for fast-track treatment unless they request a ruling is provided in fewer than 12 weeks.

### **Lawmaker Proposes Permanent 20% Pass-Through Deduction Bill**

A GOP lawmaker, Rep. Lloyd Smucker, [proposed](#) to make a 20% deduction of qualified income for pass-through businesses permanent. The deduction provides a write-off for some businesses based on total W-2 wages under Section 199A. A Senate version of the bill has also been introduced.

### **GAO Says IRS Should Focus on Auditing Large Partnerships**

The Government Accountability Office (GAO) released a [report](#) that called for the IRS to focus on large and complex partnerships during audits as the number of partnerships continues to rise. The GAO recommended that the IRS develop guidance to define large and complex partnerships and ways to track noncompliance in audits. According to the report, the number of large partnerships with over \$100 million in assets and more than 100 partners increased by almost 600% between 2002 and 2019.



**[Christopher C. Scarpa](#)**  
215.564.8106 | [cscarpa@stradley.com](mailto:cscarpa@stradley.com)



**[Jin Park](#)**  
212.812.4140 | [jpark@stradley.com](mailto:jpark@stradley.com)