IRS Releases 2017-2018 Priority Guidance Plan

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The US Department of Treasury (Treasury) and Internal Revenue Service (IRS) issue Priority Guidance Plans each year to identify the tax issues they believe should be addressed through regulations, revenue rulings, revenue procedures, notice and other published administrative guidance. On October 20, 2017, the IRS and Treasury released the 2017-2018 Priority Guidance Plan.

- Part 1 focuses on the eight regulations from 2016 that were identified pursuant to Executive Order 13789 and the intended actions related to those regulations.

- Part 2 describes certain projects that Treasury and the IRS have identified as burden reducing and that they believe can be completed in the eight and a half months remaining in the plan year.

- Part 3 describes the various projects related to the implementation of the new statutory partnership audit regime.

- Part 4 describe specific projects by subject area that will the focus of the balance of Treasury’s and the IRS’s efforts for the plan year.

**Practice Point:** The Priority Guidance Plan is a useful tool for taxpayers in that it highlights areas in which Treasury and the IRS are focused, both in the short-term and the long-term. Although items in the Priority Guidance Plan are subject to modification, they provide a blueprint for issues that the government views as important. For example, the plan reports guidance projects relating to Internal Revenue Code Section 199, focused on the treatment of computer software and films. These issues have created substantial controversy for the IRS and taxpayers, as we have previously reported. See [here](https://www.natlawreview.com/article/irs-releases-2017-2018-priority-guidance-plan). Additional guidance would be welcomed.

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