

LB&I Process Unit Knowledge Base – International

Library Level	Number	Title
Shelf	N/A	Crossover
Book	18	Foreign Currency
Chapter	18.3	Determination of/changes to a functional currency
Section	18.3.2	Determination of a functional currency (including DASTM)
Subsection	N/A	N/A

Unit Name	Functional Currency of a QBU	
Primary UIL Code	9470.03-02	Determination of a functional currency (including DASTM)

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Process Overview

Functional Currency of a QBU

Multinational businesses that file federal income tax returns in the United States must report any income subject to U.S. federal income tax in U.S. dollars. However, when these businesses operate in different countries, they must adhere to the laws and regulations of each country. Therefore, these taxpayers structure their worldwide operations to operate legally and efficiently for both global accounting and tax purposes.

One challenge of reporting total income subject to U.S. federal income tax is the computation of income earned in non-U.S. locations. Since the U.S. federal income tax system is based on worldwide income of a business enterprise conducting business in the United States, often the books and records of the business enterprise are recorded in multiple currencies and locations. Because it is not possible to combine, add, or subtract measurements expressed in different currencies, it is necessary to translate into a single reporting currency those financial measurements that are measured or denominated in different currencies.

In order to translate the multiple currencies into a single currency, two concepts must be reviewed:

- How is a Qualified Business Unit (“QBU”) identified?
- How is a functional currency determined?

Both of these concepts are the subject of two separate Practice units. Once both of these concepts are understood, then a functional currency of a QBU can be reviewed to determine the correct application.

Two different circumstances can occur during an examination that requires an auditor to review whether the functional currency of a QBU is correct:

- The first year that a QBU establishes its business (which may differ from when the QBU is actually established); and
- Any year that a QBU changes its functional currency (utilizing Form 3115) from the currency previously utilized.

Process Applicability

Functional Currency of a QBU

In order to review either a new QBU's stated functional currency or review a QBU's change of accounting method related to a change in functional currency, the following concepts must be understood, reviewed, and applied to the specific circumstance being reviewed.

Criteria	Resources
<ul style="list-style-type: none"> ▪ Is there a QBU? 	<ul style="list-style-type: none"> ▪ Practice Unit, <i>Overview of Qualified Business Units (QBUs)</i> ▪ IDR - Foreign Currency Proforma IDR #1
<ul style="list-style-type: none"> ▪ How is a QBU determined? 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.989(a)-1 ▪ Practice Unit, <i>Overview of Qualified Business Units (QBUs)</i> ▪ IDR - Foreign Currency Proforma IDR #1
<ul style="list-style-type: none"> ▪ How is a functional currency of the QBU determined under general circumstances? 	<ul style="list-style-type: none"> ▪ ASC 830 - <i>Foreign Currency Matters</i> ▪ IRC 985 - Functional Currency General Rules ▪ Treas. Reg. 1.985-1 ▪ Practice Unit, <i>Functional Currency Determination</i> ▪ IDR - Foreign Currency Proforma IDR #1

Process Applicability (cont'd)

Functional Currency of a QBU	
Criteria	Resources
<ul style="list-style-type: none"> ▪ When is DASTM (Dollar Approximate Separate Transaction Method) a required method of accounting for a QBU? <ul style="list-style-type: none"> – ASC 830-10-45-11 discusses accounting for a foreign entity in a highly inflationary economy under Generally Accepted Accounting Principles (GAAP). 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.985-1 ▪ Treas. Reg. 1.985-3 ▪ Treas. Reg. 1.985-6 ▪ Treas. Reg. 1.985-7
<ul style="list-style-type: none"> ▪ Why did the QBU file a Form 3115 (Change of Accounting Method) to change from one functional currency to another functional currency? <ul style="list-style-type: none"> – Form 3115 and attached narrative should provide the taxpayer's position regarding the QBU's functional currency change. – Information Document Request (IDR) responses and/or discussions with taxpayer may provide additional information. 	<ul style="list-style-type: none"> ▪ Form 3115 – <i>Application for Change in Accounting Method</i> ▪ IDR - Foreign Currency Proforma IDR #2

Summary of Process Steps

Functional Currency of a QBU

Process Steps

Below are the steps needed to make a determination concerning the functional currency of a QBU.

Step 1	Is Use of US Dollar as Its Functional Currency Required?
Step 2	If No, What is the Economic Environment of the QBU?
Step 3	Facts and Circumstances Review of QBU
Step 4	Residency of the QBU

Summary of Process Steps (cont'd)

Functional Currency of a QBU

Process Steps

Below are the steps needed to make a determination concerning the functional currency of a QBU.

Step 5	Currency of QBU's Books and Records
Step 6	Currencies Generating Revenue / Incurring Expenses
Step 7	Significance / Volume of QBU's Independent Activities

Step 1: Is Use of US Dollar as Functional Currency Required?

Functional Currency of a QBU

Step 1

The regulations require a QBU to use the U.S. dollar as its functional currency in certain instances. Those instances are listed below.

Considerations	Resources
<ul style="list-style-type: none"> ▪ Is the taxpayer a QBU? If the taxpayer is not a QBU, it must use the U.S. dollar as its functional currency. ▪ Does the QBU conduct its activities primarily in U.S. dollars? If so, it must use the U.S. dollar as its functional currency. ▪ Is the QBU a resident of the U.S.? If so, it must use the U.S. dollar as its functional currency. ▪ Does the QBU keep books and records in the currency of its significant economic environment? If not, it must use the U.S. dollar as its functional currency. ▪ Does the QBU produce income that is effectively connected with a trade or business within the U.S.? If it does, it must use the U.S. dollar as its functional currency. ▪ Does the QBU operate in a hyperinflationary economy? If yes, with limited exceptions, the QBU's functional currency is the U.S. dollar (or the functional currency of its direct owner) and should be translated under the DASTM rules. 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.985-1(b)(1)(i) ▪ Treas. Reg. 1.985-1(b)(1)(ii) ▪ Treas. Reg. 1.985-1(b)(1)(iii) ▪ Treas. Reg. 1.985-1(b)(1)(iv) ▪ Treas. Reg. 1.985-1(b)(1)(v) ▪ Treas. Reg. 1.985-1(b)(2)

Step 2: If No, What is the Economic Environment of the QBU?

Functional Currency of a QBU

Step 2

The economic environment of a QBU is based on where a significant part of a QBU's activities are conducted. A taxpayer must apply the facts and circumstances utilized to determine its economic environment while evaluating all of its QBU that engage in the same or similar trades or businesses.

Considerations	Resources
<ul style="list-style-type: none">▪ The definition of an economic environment is described in the Treasury Regulations.▪ The books and records presumption and limitation is a factor in the facts and circumstances determination.▪ A QBU that has more than one currency that satisfies the facts and circumstances tests limitation is a factor in the facts and circumstances determination.▪ A single functional currency for a foreign corporation election must be considered in the facts and circumstances determination.	<ul style="list-style-type: none">▪ Treas. Reg. 1.985-1(c)(2)▪ Treas. Reg. 1.985-1(c)(3)▪ Treas. Reg. 1.985-1(c)(4)▪ Treas. Reg. 1.985-1(d)

Step 3: Facts and Circumstances Review of QBU

Functional Currency of a QBU

Step 3

The facts and circumstances that a taxpayer can consider to determine the functional currency of its QBU is defined and limited as noted in the considerations below.

Considerations	Resources
<ul style="list-style-type: none"> ▪ The facts and circumstances test must be applied per the Treasury Regulations. These facts and circumstances are noted in Treas. Reg. 1.985-1(c)(2)(i)(A) – (H). The residency (Treas. Reg. 1.985-1(c)(2)(i)(A)) of the QBU is the focus of slides 12 – 13, while other facts and circumstances in determining the functional currency are reflected on slides 14 – 20. ▪ The rate of inflation cannot be considered in the facts and circumstances. ▪ The facts and circumstances tests must be applied consistently by the taxpayer to its QBUs in the same or similar trades or businesses. ▪ If the facts and circumstances of a QBU change, the taxpayer can only change the QBU's functional currency if it complies with the Treasury Regulations or if the Commissioner's consent has been granted. 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.985-1(c)(2)(i) ▪ Treas. Reg. 1.985-1(c)(2)(ii) ▪ Treas. Reg. 1.985-1(c)(2)(iii) ▪ Treas. Reg. 1.985-1(c)(6) ▪ Treas. Reg. 1.985-4

Step 4: Residency of the QBU

Functional Currency of a QBU

Step 4

The residency of a QBU is one indicator to help determine the functional currency of a QBU. This can often be determined during the pre-audit analysis by reviewing the pertinent foreign information returns for Controlled Foreign Corporations (CFC), Foreign Disregarded Entities (FDE), and Controlled Foreign Partnerships (CFP) listed below.

Considerations	Resources
<ul style="list-style-type: none"> ▪ CFC: Lines 1a, 1e, and 1h of page 1 of Form 5471 indicate the address utilized for tax purposes, the principal place of business, and the taxpayer’s reported functional currency of the CFC, respectively. ▪ FDE: Lines 1a, 1c, 1g, and 1i on page 1 of Form 8858 indicate the address utilized for tax purposes, the country(ies) where the FDE is organized, the country in which the principal business activity is conducted, and the taxpayer’s reported functional currency for the FDE, respectively. <ul style="list-style-type: none"> – NOTE: A Form 8858 is not required to be filed for true branches that can qualify as a QBU. Also, there is no penalty for failure to file for certain foreign disregarded entities (e.g., a first-tier US owned FDE). ▪ CFP: Lines G1, G3, G5 and G8b (lines F1, F3, F5, and F8a on 2014 and prior forms) on page 1 of Form 8865 indicate the address utilized for tax purposes, the country under whose laws the CFP was organized, the principal place of business, and the taxpayer’s reported functional currency for the CFP, respectively. 	<ul style="list-style-type: none"> ▪ Form 5471 - <i>Information Return of U.S. Persons With Respect to Certain Foreign Corporations</i> ▪ Form 8858 - <i>Information Return of U.S. Persons With Respect to Disregarded Entities</i> ▪ Form 8865 - <i>Return of U.S. Persons With Respect to Certain Foreign Partnerships</i>

Step 4: Residency of the QBU (cont'd)

Functional Currency of a QBU

[Step 4](#)

Considerations	Resources
<p><u>Determination of Residence</u></p> <ul style="list-style-type: none"> ▪ Individual: <ul style="list-style-type: none"> - Country in which such individual's tax home is located. - If no tax home, residence is U.S. if U.S. citizen or resident alien. ▪ Corporation, Partnership, Trust or Estate: <ul style="list-style-type: none"> - If U.S. person, the U.S. - If not a U.S. person, country other than U.S. ▪ QBU: <ul style="list-style-type: none"> - Country in which principal place of business is located <p>Special rule for partner in a partnership not engaged in a U.S. trade or business under section 864(b)(2). The residence determination is made at the partner level (without regard to whether the partnership is a QBU).</p>	<ul style="list-style-type: none"> ▪ IRC 988(a)(3)(B)(i) ▪ Treas. Reg. 1.988-4(d)(1) ▪ IRC 988(a)(3)(B)(i) ▪ Treas. Reg. 1.988-4(d)(1) ▪ IRC 988(a)(3)(B)(ii) ▪ Treas. Reg. 1.988-4(d)(2) ▪ IRC 988(a)(3)(B)(iii) ▪ Treas. Reg. 1.988-4(d)(3)

Step 5: Currency of QBU's Books and Records

Functional Currency of a QBU

Step 5

An evaluation of a QBU's residence does not provide a complete analysis of an appropriate functional currency for a QBU. The residence might have been established for tax beneficial purposes; therefore additional analysis is necessary to verify that a taxpayer is correctly reporting a QBU's functional currency.

Considerations	Resources
<ul style="list-style-type: none">▪ The currency in which the taxpayer keeps a QBU's books and records is usually presumed to be the QBU's functional currency; however, a multinational company cannot simply keep books and records in a specific currency in order to establish a beneficial tax functional currency.<ul style="list-style-type: none">– Review IDR responses for the documents maintained by the taxpayer. ▪ Review the taxpayer's trial balance to determine the currency in which the QBU keeps its books and records. Please note that the taxpayer may provide a trial balance in both U.S. dollars for consolidation purposes as well as a trial balance in a foreign currency where the journal entries are made. Requesting the information in both currencies should provide an understanding as to the books and records as well as their method of translation.<ul style="list-style-type: none">– Also review IDR responses for the documents maintained by the taxpayer.	

Step 5: Currency of QBU's Books and Records (cont'd)

Functional Currency of a QBU

[Step 5](#)

Considerations	Resources
<ul style="list-style-type: none">▪ A taxpayer is presumed to keep a QBU's books and records in the currency of the economic environment in which a significant part of its activities are conducted. The taxpayer can only overcome this presumption if it can demonstrate that it has a substantial nontax reason for not keeping the QBU's books in this currency. A taxpayer cannot use this presumption affirmatively in determining the QBU's functional currency. A taxpayer cannot attempt to choose the QBU's functional currency by keeping its books in a functional currency that is not the currency of its economic environment.	<ul style="list-style-type: none">▪ Treas. Reg. 1.985-1(c)(3)

Step 6: Currencies Generating Revenue/Incurring Expenses

Functional Currency of a QBU

Step 6

While a QBU's jurisdictional residence and the currency in which it keeps its books and records could be highly indicative of a QBU's functional currency, an examination of a QBU should consider all pertinent economic factors when determining a QBU's functional currency, especially if the QBU is located in a tax haven or is utilizing a tax haven's currency to establish a functional currency.

Considerations	Resources
<ul style="list-style-type: none"> ▪ Who are the QBU's primary customers? <ul style="list-style-type: none"> – Determine whether the QBU is dependent on one or more primary customers in another jurisdiction for its business activity. If yes, the transactions in the other jurisdiction could be substantial enough to support an argument for the determination of the QBU's functional currency to be in that jurisdiction. <ul style="list-style-type: none"> ▪ Review IDR responses and/or information from discussions with taxpayer. ▪ Who are the QBU's primary suppliers? <ul style="list-style-type: none"> – Determine whether the QBU is dependent on one or more primary suppliers in another jurisdiction for its business activity. If yes, the transactions in the other jurisdiction could be substantial enough to support an argument for the determination of the QBU's functional currency to be in that jurisdiction. <ul style="list-style-type: none"> ▪ Review IDR responses and/or information from discussions with taxpayer. 	

Step 6: Currencies Generating Revenue/Incurring Expenses (cont'd)

Functional Currency of a QBU

[Step 6](#)

Considerations	Resources
<ul style="list-style-type: none"> ▪ Is the QBU dependent on a related party located in another jurisdiction for a significant portion of its sales or supplies? <ul style="list-style-type: none"> – If the QBU is highly dependent on a related party in another jurisdiction and does not have a strong business reason for locating in its present jurisdiction, this could be an indicator that the QBU was located in a particular jurisdiction for tax favorable reasons (for either U.S. or foreign tax planning purposes). Additional fact gathering may be necessary to make an informed functional currency determination under these circumstances. Related party information is found as a schedule on each foreign QBU's return for both domestic and non-US related parties as listed below. <ul style="list-style-type: none"> ▪ For CFC, see Form 5471, Schedule M. ▪ For FDE, see Form 8858 Schedule M. ▪ For CFP, see Form 8865 Schedule N. – Additional IDRs may need to be issued to document these relationships and provide a breakdown of activity by related party. 	<ul style="list-style-type: none"> ▪ Form 5471, Schedule M - <i>Transactions Between Controlled Foreign Corporation and Shareholders or Other Related Persons</i> ▪ Form 8858, Schedule M - <i>Transactions Between Foreign Disregarded Entity Owned by a Controlled Foreign Corporation and Filer or Other Related Entities</i> ▪ Form 8865, Schedule N - <i>Transactions Between Controlled Foreign Partnership and Partners or Other Related Entities</i>

Step 7: Significance / Volume of QBU's Independent Activities

Functional Currency of a QBU

Step 7

If a QBU has significant independent business activities separate from a related party, the economic factors in the first three steps generally determine a QBU's functional currency. However, if the QBU's primary business activity is a holding company or has other interdependent activities with a related party, this factor can impact the determination of a QBU's functional currency.

Considerations	Resources
<ul style="list-style-type: none"> ▪ What is the principal business activity of the QBU? <ul style="list-style-type: none"> - If a QBU lists a passive type of business activity in the pertinent box of its foreign information return, the location and currency of books may not indicate its true functional currency. For instance, if the QBU's principal business activity is a partner in a foreign partnership, the functional currency of the partnership may actually be the functional currency of the QBU. However, if the partner does not have its own trade or business, it might not qualify as a QBU. Please note when reviewing the Form 8865, only a partnership that is not a Section 987 aggregate partnership is a QBU (Treas. Reg. 1.989(a)-1(b)(2)(i)(C)). <ul style="list-style-type: none"> ▪ For CFC, see Form 5471, Page 1, line 1g. ▪ For FDE, see Form 8858, Page 1, line 1h. ▪ For CFP, see Form 8865, Page 1, line F7. 	<ul style="list-style-type: none"> ▪ Form 5471 - <i>Information Return of U.S. Persons With Respect to Certain Foreign Corporations</i> ▪ Form 8858 - <i>Information Return of U.S. Persons With Respect to Disregarded Entities</i> ▪ Form 8865 - <i>Return of U.S. Persons With Respect to Certain Foreign Partnerships</i> ▪ Treas. Reg. 1.989(a)-1(b)(2)(i)(C)

Step 7: Significance / Volume of QBU's Independent Activities (cont'd)

Functional Currency of a QBU

[Step 7](#)

Considerations	Resources
<ul style="list-style-type: none"> ▪ Who is making the business decisions of the QBU? <ul style="list-style-type: none"> – If a QBU does not report any salaries and wages expense on the income statement of its foreign information return, it is likely that the business decisions are being made by a related party. If that related party is not in the same jurisdiction, the jurisdiction of the decision makers may determine that QBU's functional currency. <ul style="list-style-type: none"> ▪ For CFC, see Form 5471, Page 2, Schedule C. ▪ For FDE, see Form 8858, Page 2, Schedule C. ▪ For CFP, see Form 8865, Page 2, Schedule B. ▪ Also review IDR responses and/or information from discussions with taxpayer. 	<ul style="list-style-type: none"> ▪ Form 5471 - <i>Information Return of U.S. Persons With Respect to Certain Foreign Corporations</i> ▪ Form 8858 - <i>Information Return of U.S. Persons With Respect to Disregarded Entities</i> ▪ Form 8865 - <i>Return of U.S. Persons With Respect to Certain Foreign Partnerships</i>

Step 7: Significance / Volume of QBU's Independent Activities (cont'd)

Functional Currency of a QBU

[Step 7](#)

Considerations	Resources
<ul style="list-style-type: none"> ▪ How much of the QBU's sales or supplies is dependent on a related party? <ul style="list-style-type: none"> – As previously mentioned, if the QBU is highly dependent on a related party in another jurisdiction and does not have a strong business reason for locating in its present jurisdiction, this could be an indicator that the QBU was located in a particular jurisdiction for tax favorable reasons (for either U.S. or foreign tax planning purposes). Additional fact gathering may be necessary to make an informed functional currency determination under these circumstances. – Related party information is found as a schedule on each foreign QBU's returns for both domestic and non-US related parties: <ul style="list-style-type: none"> ▪ For CFC, see Form 5471, Schedule M; ▪ For FDE, see Form 8858, Schedule M; ▪ For CFP, see Form 8865, Schedule N. – Additional IDRs may need to be issued to document these relationships and provide a breakdown of activity by related party. 	<ul style="list-style-type: none"> ▪ Form 5471, Schedule M - <i>Transactions Between Controlled Foreign Corporation and Shareholders or Other Related Persons</i> ▪ Form 8858, Schedule M - <i>Transactions Between Foreign Disregarded Entity Owned by a Controlled Foreign Corporation and Filer or Other Related Entities</i> ▪ Form 8865, Schedule N - <i>Transactions Between Controlled Foreign Partnership and Partners or Other Related Entities</i>

Other Considerations / Impact to Audit

Functional Currency of a QBU	
Considerations	Resources
<ul style="list-style-type: none"> ▪ The currencies of the QBU's cash flows. 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.985-1(c)(2)(i)(B)
<ul style="list-style-type: none"> ▪ The currencies in which the QBU borrows and lends. 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.985-1(c)(2)(i)(D)
<ul style="list-style-type: none"> ▪ The currencies of the QBU's sales markets. 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.985-1(c)(2)(i)(E)
<ul style="list-style-type: none"> ▪ The currencies in which pricing and other financial decisions are made. 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.985-1(c)(2)(i)(F)
<ul style="list-style-type: none"> ▪ The duration of the QBU's business operations. 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.985-1(c)(2)(i)(G)
<ul style="list-style-type: none"> ▪ Multiple currencies: if more than one currency satisfies the economic environment requirement, the QBU can choose among the qualifying currencies for its functional currency. 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.985-1(c)(4)
<ul style="list-style-type: none"> ▪ Foreign corps with more than one QBU can choose a single functional currency. 	<ul style="list-style-type: none"> ▪ Treas. Reg. 1.985-1(d)

Index of Referenced Resources

Functional Currency of a QBU
IRC 985
IRC 988(a)(3)(B)
Treas. Reg. 1.985-1
Treas. Reg. 1.985-3
Treas. Reg. 1.985-6
Treas. Reg. 1.985-7
Treas. Reg. 1.988-4(d)
Treas. Reg. 1.989(a)-1
ASC 830 - <i>Foreign Currency Matters</i>
Form 3115 - <i>Application for Change in Accounting Method</i>
Form 5471 - <i>Information Return of U.S. Persons With Respect to Certain Foreign Corporations</i>
Form 5471, Schedule M - <i>Transactions Between Controlled Foreign Corporation and Shareholders or Other Related Persons</i>
Form 8858 - <i>Information Return of U.S. Persons With Respect to Disregarded Entities</i>
Form 8858, Schedule M - <i>Transactions Between Foreign Disregarded Entity Owned by a Controlled Foreign Corporation and Filer or Other Related Entities</i>
Form 8865 - <i>Return of U.S. Persons With Respect to Certain Foreign Partnerships</i>
Form 8865, Schedule N - <i>Transactions Between Controlled Foreign Partnership and Partners or Other Related Entities</i>

Index of Referenced Resources (cont'd)

Functional Currency of a QBU
IDR - Foreign Currency Proforma IDR #1
IDR - Foreign Currency Proforma IDR #2

Training and Additional Resources

Functional Currency of a QBU	
Type of Resource	Description(s)
Saba Meeting Sessions	<ul style="list-style-type: none"> ▪ <i>FC1 Sec 985 - 2015 Saba Meeting</i> ▪ <i>FC2 986 Transition Rules - 2015 Saba Meeting</i> ▪ <i>FC3 987 Branch Rules & CTB - 2015 Saba Meeting</i> ▪ <i>FC4 Sec 988 Transactions - 2015 Saba Meeting</i> ▪ <i>FC5 Foreign Currency Hedging - 2015 Saba Meeting</i> ▪ <i>Financial Products Basics - 2015 Saba Meeting</i> ▪ <i>IBC Intro to Rules Applic to Recog of Certain Foreign Curre - 2014 Saba Meeting</i>
White Papers / Guidance	<ul style="list-style-type: none"> ▪ <i>IAS 21 - The Effects of Changes in Foreign Exchange Rates</i>
Reference Materials – Treaties	<ul style="list-style-type: none"> ▪ <i>Bittker & Lokken - Fundamentals of International Taxation, Chapter 74</i> ▪ <i>BNA Tax Management Int'l Portfolio 921-2nd (Tax Aspects of Foreign Currency)</i> ▪ <i>Keyes - Federal Taxation of Financial Instruments and Transactions, Chapter 15</i>

Glossary of Terms and Acronyms

Term/Acronym	Definition
ASC	Accounting Standard Codification
CFC	Controlled Foreign Corporation
CFP	Controlled Foreign Partnership
DASTM	Dollar Approximate Separate Transaction Method
FDE	Foreign Disregarded Entity
GAAP	Generally Accepted Accounting Principles
IAS	International Accounting Standards
IDR	Information Document Request
QBU	Qualified Business Unit

Index of Related Practice Units

Associated UIL(s)	Related Practice Unit	DCN
9470.02	<i>How to Assess Penalties for Failure to file Form 8886 Disclosing Section 988 Losses</i>	FCU/P/18_02_01-04
9470.02	<i>Disposition of a Portion of an Integrated Hedge</i>	FCU/T/18_02_03-01
9470.03	<i>Overview of Qualified Business Units (QBUs)</i>	FCU/C/18_03_01-01
9470.03-02	<i>Functional Currency Determination</i>	FCU/C/18_03_02-01
9412.00	<i>Subpart F Overview</i>	DPL/C/02-01