



**Note:** *The draft you are looking for begins on the next page.*

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**SCHEDULE A  
(Form 8804)**

Department of the Treasury  
Internal Revenue Service

**Penalty for Underpayment of Estimated  
Section 1446 Tax by Partnerships**

Attach to Form 8804.

Go to [www.irs.gov/Form8804](http://www.irs.gov/Form8804) for instructions and the latest information.

OMB No. 1545-0123

**2024**

Name	Employer identification number
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**Note:** Generally, the partnership isn't required to file this Schedule A (see Part I below for exceptions) because the IRS will figure any penalty owed and bill the partnership. However, the partnership may still use this Schedule A to figure the penalty. If so, enter the amount from line 65 of this Schedule A on line 8 of Form 8804, but **don't** attach this Schedule A.

**Part I Reasons for Filing** — Check the boxes below that apply. If any boxes are checked, the partnership **must** file Schedule A (Form 8804) even if it doesn't owe a penalty. See instructions.

- The partnership is using the adjusted seasonal installment method.
- The partnership is using the annualized income installment method.

**Part II Current-Year and Prior-Year Safe Harbors**

<b>1</b>	Enter the total section 1446 tax shown on the partnership's 2024 Form 8804, line 5f. If less than \$500, don't complete or file this form. The partnership doesn't owe the penalty . . . . .	<b>1</b>	
<b>2</b>	Enter the total section 1446 tax that would have been due for 2023, without regard to reductions for certified foreign partner-level items, on the effectively connected taxable income (ECTI) allocable to foreign partners for 2023.		
	<b>Caution:</b> This line 2 amount only applies if certain conditions are met. See instructions . . . . .	<b>2</b>	
<b>3</b>	Enter the <b>smaller</b> of line 1 or line 2. If the partnership is required to skip line 2, enter the amount from line 1 . . . . .	<b>3</b>	

**Part III Figuring the Underpayment**

		(a)	(b)	(c)	(d)
<b>4</b> <b>Installment due dates.</b> Enter in columns (a) through (d) the 15th day of the 4th, 6th, 9th, and 12th months of the partnership's tax year . . . . .	<b>4</b>				
<b>5</b> <b>Required installments.</b> If the partnership uses the adjusted seasonal installment method and/or the annualized income installment method, enter the amounts from line 43. If neither of those methods is used, enter 25% (0.25) of line 3 above in each column . . . . .	<b>5</b>				
<b>6</b> Estimated section 1446 tax paid or credited for each period. See instructions. For column (a) only, enter the amount from line 6 on line 10 . . . . .	<b>6</b>				
<b>Complete lines 7 through 13 of one column before going to the next column.</b>					
<b>7</b> Enter amount, if any, from line 13 of the preceding column	<b>7</b>				
<b>8</b> Add lines 6 and 7 . . . . .	<b>8</b>				
<b>9</b> Add amounts on lines 11 and 12 of the preceding column	<b>9</b>				
<b>10</b> Subtract line 9 from line 8. If zero or less, enter -0- . . . . .	<b>10</b>				
<b>11</b> If the amount on line 10 is zero, subtract line 8 from line 9. Otherwise, enter -0- . . . . .	<b>11</b>				
<b>12</b> <b>Underpayment.</b> If line 10 is less than or equal to line 5, subtract line 10 from line 5. Then, go to line 7 of the next column. Otherwise, go to line 13 . . . . .	<b>12</b>				
<b>13</b> <b>Overpayment.</b> If line 5 is less than line 10, subtract line 5 from line 10. Then, go to line 7 of the next column . . . . .	<b>13</b>				

**Go to Part VII on page 5 to figure the penalty. Don't go to Part VII if there are no entries on line 12—no penalty is owed.**

**Part IV Adjusted Seasonal Installment Method** (Caution: Use this method only if the base period percentage for any 6 consecutive months is at least 70%. See instructions.)

Check this box if the partnership has elected to attach a schedule that expands lines 15 and 22 through 25 to reflect Regulations section 1.1446-3(a)(2). See instructions

		(a)	(b)	(c)	(d)
		First 3 months	First 5 months	First 8 months	First 11 months
<b>14</b>	Enter ECTI allocable to all foreign partners for the following periods:				
<b>a</b>	Tax year beginning in 2021				
<b>b</b>	Tax year beginning in 2022				
<b>c</b>	Tax year beginning in 2023				
<b>15</b>	Enter ECTI allocable to all foreign partners for each period for the tax year beginning in 2024 (see instructions for the treatment of extraordinary items).				
		First 4 months	First 6 months	First 9 months	Entire year
<b>16</b>	Enter ECTI allocable to all foreign partners for the following periods:				
<b>a</b>	Tax year beginning in 2021				
<b>b</b>	Tax year beginning in 2022				
<b>c</b>	Tax year beginning in 2023				
<b>17</b>	Divide the amount in each column on line 14a by the amount in column (d) on line 16a.				
<b>18</b>	Divide the amount in each column on line 14b by the amount in column (d) on line 16b.				
<b>19</b>	Divide the amount in each column on line 14c by the amount in column (d) on line 16c.				
<b>20</b>	Add lines 17 through 19.				
<b>21</b>	Divide line 20 by 3.0.				
<b>22a</b>	Divide line 15 by line 21.				
<b>b</b>	Extraordinary items. See instructions.				
<b>c</b>	Combine lines 22a and 22b.				
<b>23</b>	Reduction to line 22c amount for state and local taxes under Regulations section 1.1446-6(c)(1)(iii) and for certified foreign partner-level items submitted using Form 8804-C. See instructions.				
<b>24</b>	Subtract line 23 from line 22c. If zero or less, enter -0-.				
<b>25a</b>	Multiply the ECTI on line 24 allocable to non-corporate partners by 37% (0.37).				
<b>b</b>	Multiply the ECTI on line 24 allocable to corporate partners by 21% (0.21).				
<b>c</b>	Combine lines 25a and 25b.				
<b>26a</b>	Divide the amount in columns (a) through (c) on line 16a by the amount in column (d) on line 16a.				
<b>b</b>	Divide the amount in columns (a) through (c) on line 16b by the amount in column (d) on line 16b.				
<b>c</b>	Divide the amount in columns (a) through (c) on line 16c by the amount in column (d) on line 16c.				
<b>27</b>	Add lines 26a through 26c.				
<b>28</b>	Divide line 27 by 3.0.				
<b>29</b>	Multiply the amount in columns (a) through (c) of line 25c by columns (a) through (c) of line 28. In column (d), enter the amount from line 25c, column (d).				

**Part V Annualized Income Installment Method**

		(a)	(b)	(c)	(d)
		First _____ months	First _____ months	First _____ months	First _____ months
<b>30</b>	Annualization periods. See instructions.	<b>30</b>			
<b>31</b>	Enter ECTI allocable to all foreign partners for each annualization period (see instructions for the treatment of extraordinary items):				
<b>a</b>	Total ECTI allocable to corporate partners.	<b>31a</b>			
<b>b</b>	Total ECTI allocable to non-corporate partners other than on lines 31c, 31d, and 31e.	<b>31b</b>			
<b>c</b>	28% rate gain (non-corporate partners only).	<b>31c</b>			
<b>d</b>	Unrecaptured section 1250 gain (non-corporate partners only).	<b>31d</b>			
<b>e</b>	Adjusted net capital gain (including qualified dividend income and net section 1231 gain) (non-corporate partners only).	<b>31e</b>			
<b>32</b>	Annualization amounts. See instructions.	<b>32</b>			
<b>33</b>	Annualized ECTI allocable to all foreign partners (see instructions for the treatment of extraordinary items):				
<b>a</b>	Total ECTI allocable to corporate partners (multiply line 31a by line 32).	<b>33a</b>			
<b>b</b>	Reduction to line 33a for state and local taxes under Regulations section 1.1446-6(c)(1)(iii). See instructions.	<b>33b</b>	( )	( )	( )
<b>c</b>	Reduction to line 33a for certified foreign partner-level items submitted using Form 8804-C. See instructions.	<b>33c</b>	( )	( )	( )
<b>d</b>	Combine lines 33a, 33b, and 33c.	<b>33d</b>			
<b>e</b>	Total ECTI allocable to non-corporate partners other than on lines 33i, 33m, and 33q (multiply line 31b by line 32).	<b>33e</b>			
<b>f</b>	Reduction to line 33e for state and local taxes under Regulations section 1.1446-6(c)(1)(iii). See instructions.	<b>33f</b>	( )	( )	( )
<b>g</b>	Reduction to line 33e for certified foreign partner-level items submitted using Form 8804-C. See instructions.	<b>33g</b>	( )	( )	( )
<b>h</b>	Combine lines 33e, 33f, and 33g.	<b>33h</b>			
<b>i</b>	28% rate gain allocable to non-corporate partners (multiply line 31c by line 32).	<b>33i</b>			
<b>j</b>	Reduction to line 33i for state and local taxes under Regulations section 1.1446-6(c)(1)(iii). See instructions.	<b>33j</b>	( )	( )	( )
<b>k</b>	Reduction to line 33i for certified foreign partner-level items submitted using Form 8804-C. See instructions.	<b>33k</b>	( )	( )	( )
<b>l</b>	Combine lines 33i, 33j, and 33k.	<b>33l</b>			
<b>m</b>	Unrecaptured section 1250 gain allocable to non-corporate partners (multiply line 31d by line 32).	<b>33m</b>			
<b>n</b>	Reduction to line 33m for state and local taxes under Regulations section 1.1446-6(c)(1)(iii). See instructions.	<b>33n</b>	( )	( )	( )
<b>o</b>	Reduction to line 33m for certified foreign partner-level items submitted using Form 8804-C. See instructions.	<b>33o</b>	( )	( )	( )
<b>p</b>	Combine lines 33m, 33n, and 33o.	<b>33p</b>			
<b>q</b>	Adjusted net capital gain (including qualified dividend income and net section 1231 gain) allocable to non-corporate partners (multiply line 31e by line 32).	<b>33q</b>			
<b>r</b>	Reduction to line 33q for state and local taxes under Regulations section 1.1446-6(c)(1)(iii). See instructions.	<b>33r</b>	( )	( )	( )
<b>s</b>	Reduction to line 33q for certified foreign partner-level items submitted using Form 8804-C. See instructions.	<b>33s</b>	( )	( )	( )
<b>t</b>	Combine lines 33q, 33r, and 33s.	<b>33t</b>			
<b>34</b>	Figure the tax on line 33 amounts as follows:				
<b>a</b>	Multiply line 33d by 21% (0.21).	<b>34a</b>			
<b>b</b>	Multiply line 33h by 37% (0.37).	<b>34b</b>			
<b>c</b>	Multiply line 33l by 28% (0.28).	<b>34c</b>			
<b>d</b>	Multiply line 33p by 25% (0.25).	<b>34d</b>			
<b>e</b>	Multiply line 33t by 20% (0.20).	<b>34e</b>			
<b>f</b>	Add lines 34a through 34e.	<b>34f</b>			

**Part V Annualized Income Installment Method** *(continued)*

		(a)	(b)	(c)	(d)	
<b>35</b>	Applicable percentage.	<b>35</b>	<b>25% (0.25)</b>	<b>50% (0.50)</b>	<b>75% (0.75)</b>	<b>100% (1.00)</b>
<b>36</b>	Multiply line 34f by line 35.	<b>36</b>				

**Part VI Required Installments**

**Note:** Complete lines 37 through 43 of one column before completing the next column.

		1st installment	2nd installment	3rd installment	4th installment
<b>37</b>	If only Part IV or Part V is completed, enter the amount in each column from line 29 or line 36. If both parts are completed, enter the <b>smaller</b> of the amounts in each column from line 29 or line 36.	<b>37</b>			
<b>38</b>	Add the amounts in all preceding columns of line 43. See instructions.	<b>38</b>			
<b>39</b>	<b>Adjusted seasonal or annualized income installments.</b> Subtract line 38 from line 37. If zero or less, enter -0-.	<b>39</b>			
<b>40</b>	Enter 25% (0.25) of line 1 in each column.	<b>40</b>			
<b>41</b>	Subtract line 43 of the preceding column from line 42 of the preceding column.	<b>41</b>			
<b>42</b>	Add lines 40 and 41.	<b>42</b>			
<b>43</b>	<b>Required installments.</b> Enter the <b>smaller</b> of line 39 or line 42 here and on line 5. See instructions.	<b>43</b>			

**ONLY DRAFT**  
**August 29, 2024**  
**DO NOT FILE**

**Part VII Figuring the Penalty**

	(a)	(b)	(c)	(d)
<b>44</b> Enter the date of payment or the 15th day of the 3rd month after the close of the tax year, whichever is earlier. See instructions. <b>Partnerships that keep their records and books of account outside the United States and Puerto Rico:</b> Use 6th month instead of 3rd month.				
<b>45</b> Number of days from due date of installment on line 4 to the date shown on line 44 . . . . .				
<b>46</b> Number of days on line 45 after 4/15/2024 and before 7/1/2024				
<b>47</b> Underpayment on line 12 $\times \frac{\text{Number of days on line 46}}{366} \times 8\% (0.08)$	\$	\$	\$	\$
<b>48</b> Number of days on line 45 after 6/30/2024 and before 10/1/2024				
<b>49</b> Underpayment on line 12 $\times \frac{\text{Number of days on line 48}}{366} \times 8\% (0.08)$	\$	\$	\$	\$
<b>50</b> Number of days on line 45 after 9/30/2024 and before 1/1/2025				
<b>51</b> Underpayment on line 12 $\times \frac{\text{Number of days on line 50}}{366} \times 8\% (0.08)$	\$	\$	\$	\$
<b>52</b> Number of days on line 45 after 12/31/2024 and before 4/1/2025				
<b>53</b> Underpayment on line 12 $\times \frac{\text{Number of days on line 52}}{365} \times *%$	\$	\$	\$	\$
<b>54</b> Number of days on line 45 after 3/31/2025 and before 7/1/2025				
<b>55</b> Underpayment on line 12 $\times \frac{\text{Number of days on line 54}}{365} \times *%$	\$	\$	\$	\$
<b>56</b> Number of days on line 45 after 6/30/2025 and before 10/1/2025				
<b>57</b> Underpayment on line 12 $\times \frac{\text{Number of days on line 56}}{365} \times *%$	\$	\$	\$	\$
<b>58</b> Number of days on line 45 after 9/30/2025 and before 1/1/2026				
<b>59</b> Underpayment on line 12 $\times \frac{\text{Number of days on line 58}}{365} \times *%$	\$	\$	\$	\$
<b>60</b> Number of days on line 45 after 12/31/2025 and before 4/1/2026				
<b>61</b> Underpayment on line 12 $\times \frac{\text{Number of days on line 60}}{365} \times *%$	\$	\$	\$	\$
<b>62</b> Number of days on line 45 after 3/31/2026 and before 5/16/2026				
<b>63</b> Underpayment on line 12 $\times \frac{\text{Number of days on line 62}}{365} \times *%$	\$	\$	\$	\$
<b>64</b> Add lines 47, 49, 51, 53, 55, 57, 59, 61, and 63 . . . . .	\$	\$	\$	\$
<b>65 Penalty.</b> Add columns (a) through (d) of line 64. Enter the total here and on Form 8804, line 8 . . . . .			<b>65</b>	\$

\* Use the penalty interest rate for each calendar quarter, which the IRS will determine during the first month in the preceding quarter. These rates are published quarterly in an IRS News Release and in a revenue ruling in the Internal Revenue Bulletin (IRB). Go to [www.irs.gov/IRB](http://www.irs.gov/IRB) for the IRBs. You can subscribe to IRS Newswire to receive news releases of the quarterly interest rates, and IRS GuideWire to receive emails with a link to the revenue rulings in which the quarterly interest rates are published by going to [www.irs.gov/UAC/IE-News-Subscriptions-2](http://www.irs.gov/UAC/IE-News-Subscriptions-2).