Bipartisan Budget Act (BBA) Roadmap for Taxpayers

**FILING/AUDIT SELECTION**
- Taxpayer Files Original Return
  - For all tax years beginning 01/01/2018 and forward, partnerships are automatically BBA unless taxpayer meets the criteria and "Elects Out of BBA" on a timely filed return
  - Partnership Representative (PR) is designated on the filed return and will have sole authority to act on behalf of the partnership
- Return Selected For Examination
  - Verification of PR by exam team

**AUDIT PROCESS**
- Examination
  - Examination steps to complete the audit issues generally remain unchanged under BBA procedures
- Notice of Preliminary Partnership Examination Changes
- Notice of Proposed Partnership Adjustment (NOPPA)
  - Final imputed underpayment (IU) is determined

**POST AUDIT**
- Modification
  - Modification requests may be submitted to reduce the IU amount shown on the NOPPA
  - The partnership is responsible for providing all required information to the IRS for review and approval of the request
- Final Partnership Adjustment (FPA)
  - Partnership is no longer liable for the IU
  - Partnership will provide statements to its partners, and the IRS, on what adjustments and amounts, are being pushed out

**TIMEFRAMES**
- 30 DAYS
  - Issuance of NAP must be at least 30 days after date of L2205D
- 270 DAYS
  - Issuance of the NOPPA starts the 270 day modification request period
- 45/90 DAYS
  - Pushout Responsibilities
    - Partnership is no longer liable for the IU
    - Partnership will provide statements to its partners, and the IRS, on what adjustments and amounts, are being pushed out

**TAXPAYER NOTIFICATIONS**
- Notice of selection for examination Letter 2205D
- Notice of administrative proceeding (NAP) Letter 5893/5893A
- Notice of preliminary partnership exam changes and IU (summary report package) Letter 5895 Form 14791/886A
- BBA 30-day letter Letter 5891 Form 14791/886A
- Notice of proposed partnership adjustment (NOPPA) Letter 5892/5892A Form 14792/886A
- Taxpayer Can File an Appeal
  - Partnership can not appeal an issue/matter more than once
- Modification determination package Letter 5975 Form 15027
- Notice of final partnership adjustment (FPA) Letter 5933/5933A Form 15027/886A

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