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Proposed regulations: Section 958 (determining stock ownership) and section 951A (GILTI) (text of regulations)

The U.S. Treasury Department and IRS this afternoon released for publication in the Federal Register proposed regulations (REG-101828-19) concerning the rules under section 958 for determining stock ownership and section 951A with respect to the “global intangible low-taxed income” (GILTI) provisions added to the Code by the 2017 U.S. tax law (that is often referred to as the “Tax Cuts and Jobs Act”).

Read the [proposed regulations](#) [PDF 384 KB] (74 pages)

The proposed regulations address the treatment of domestic partnerships for purposes of determining amounts included in the gross income of their partners with respect to foreign corporations. This release also includes proposed regulations under the GILTI provisions regarding gross income that is subject to a high rate of foreign tax.

These proposed regulations concern United States persons that own stock of foreign corporations through domestic partnerships and United States shareholders of foreign corporations.

The proposed regulations are scheduled to appear in the Federal Register on June 21, 2019. The purpose of this report is to provide text of the proposed regulations.

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