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IRS practice unit: French levies eligible for U.S. foreign tax credits

The IRS Large Business and International (LB&I) division publicly released a "practice unit"—part of a series of IRS examiner "job aides" and training materials intended to describe for IRS agents leading practices about tax concepts in general and specific types of transactions.

The title of the practice unit is: *French foreign tax credits*

Read the practice unit on the **IRS practice unit webpage** (posting date of September 6, 2019).

The updated practice unit reflects a change in the IRS's position regarding the creditability of the French *Contribution Sociale Generalisee* (CSG) and *Contribution au Remboursement de la Dette Sociate* (CRDS) for U.S. foreign tax credit purposes. An IRS directive—**LB&I-04-0819-007** (August 2019)—announced the change in the IRS policy, specifically that the IRS no longer maintains a position that the CSG and CRDS are ineligible for a foreign tax credit under section 901. Read ***TaxNewsFlash***

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