



# TaxNewsFlash

United States



No. 2020-227  
April 15, 2020

## LB&I activities that are temporarily suspended, continued (COVID-19)

The Commissioner of the IRS Large Business and International (LB&I) Division issued a memorandum addressing which LB&I compliance activities would be postponed and which would be allowed through July 15, 2020, as a result of the coronavirus (COVID-19) pandemic.

Read the memorandum: [LB&I-04-0420-0009](#) [PDF 34 KB]

### **LB&I activity postponed through July 15, 2020**

- LB&I will not start an examination of any new return unless it falls within a continuing activity, as defined in the memorandum.
- LB&I managers have discretion with respect to examinations of prior, subsequent, and related returns associated with an existing examination.

### **Approval of continuing activities by LB&I**

- Compliance assurance process, large corporate compliance, FATCA, qualified intermediary programs and current open examinations—to proceed as usual, but without in-person contact.
- New examinations arising from Voluntary Disclosure Practice cases, claims, and other pre-refund verification programs—to proceed as usual, but without in-person contact.
- Work is to continue on the following cases: Syndicated conservation easements campaign cases, micro-captive insurance campaign cases, IRC section 965 campaign cases, and any future campaign-related cases involving the “Tax Cuts and Jobs Act” (TCJA), but without in-person contact. Existing and any new campaigns will be assessed for purposes of categorizing as postponed or allowed with clear communications to follow on which are allowed.
- Workload reviews of existing inventory will continue.
- Examiners can charge time to new cases (e.g., audit planning) when taxpayer contact will not be made until after the emergency declaration is lifted.
- Prior time limits on classification activities are suspended.

- Other consensual work initiated by taxpayers to proceed as usual, but without in-person contact, for example, pre-filing agreements, refund claims.

The memorandum concludes that while guidelines cannot be anticipated or provided for every possible situation, LB&I employees are directed to be sensitive to the individual circumstances of taxpayers and provide them with the appropriate tax administrative actions commensurate with the taxpayer's situation.

The information contained in TaxNewsFlash is not intended to be "written advice concerning one or more Federal tax matters" subject to the requirements of section 10.37(a)(2) of Treasury Department Circular 230, as the content of this document is issued for general informational purposes only, is intended to enhance the reader's knowledge on the matters addressed therein, and is not intended to be applied to any specific reader's particular set of facts. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. Applicability of the information to specific situations should be determined through consultation with your tax adviser.

KPMG International is a Swiss cooperative that serves as a coordinating entity for a network of independent member firms. KPMG International provides no audit or other client services. Such services are provided solely by member firms in their respective geographic areas. KPMG International and its member firms are legally distinct and separate entities. They are not and nothing contained herein shall be construed to place these entities in the relationship of parents, subsidiaries, agents, partners, or joint venturers. No member firm has any authority (actual, apparent, implied or otherwise) to obligate or bind KPMG International or any member firm in any manner whatsoever.

Direct comments, including requests for subscriptions, to [Washington National Tax](#). For more information, contact KPMG's Federal Tax Legislative and Regulatory Services Group at + 1 202.533.4366, 1801 K Street NW, Washington, DC 20006-1301.

To unsubscribe from TaxNewsFlash-United States, reply to [Washington National Tax](#).

[Privacy](#) | [Legal](#)