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IRS practice unit: Receipt of dividends or interest from a related CFC

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 this “transaction unit” (as referred to by the IRS) is: *Receipt of dividends or interest from a related CFC*

Read this transaction unit on the [IRS practice unit webpage](#) (posting date of March 29, 2021).

The practice unit was revised to include the extension of Code section 954(c)(6) look-through rule for controlled foreign corporations (CFCs) with tax years beginning before January 1, 2026. This extension was part of the “Consolidated Appropriations Act, 2021.” The practice unit supersedes two prior practice units (January 2016 and January 2020) with the same title.

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