

MANAGING TAX AUDITS AND APPEALS – 2016*

Day 1: Thursday, September 29, 2016

Washington, DC

8:30 am	Registration
9:00 am	Coffee and Danish
9:00 am	Welcome and Introductory Remarks
9:30 am	
9:30 am	LB&I's New Issue-Focused Audit Paradigm; Impact of Changes on CAP; Handling the New Acknowledgement of Facts IDR; Recurring Audit Issues Affecting Large Corporate Taxpayers (2016); Recent Developments in Large Case Audits
10:45 am	
10:45 am	Coffee Break
11:00 am	
11:00 am	Guest Speaker (Advance Pricing and Mutual Agreement Program (APMA)) –
12:00 Noon	
	Impact of LB&I Changes on Transfer Pricing; Impact of OECD Base Erosion and Profit Shifting (BEPS) Action Items; Country-By-Country Reporting; New Releases of International Practice Service Units; Current Developments Regarding APAs and Competent Authority
12:00 Noon	Luncheon Guest Speaker –
2:00 pm	Evolution of IRS Audits and Appeals Over 30 Years

* Tentative agenda, subject to change

2:00 pm 3:00 pm	Current Developments in State Tax – State Transfer Pricing Issues and Interplay Between State, Federal, and International Audits, Including Competent Authority and the OECD’s BEPS Initiative; the Multistate Tax Commission’s Joint Audit Program; Special Issues in Multistate Audits
3:00 pm 3:45 pm	Recent Developments in the Law of Privilege and the Work Product Doctrine
3:45 pm 4:00 pm	Coffee Break
4:00 pm 5:00 pm	Guest Speaker (Office of IRS Chief Counsel) – Upcoming Changes to IRS Audits of Partnerships; Comparison to TEFRA Partnership Audits; Preparing for the Changes
5:00 pm	Adjournment
5:15 pm	Crowell & Moring LLP Reception

Day 2, Friday, September 30, 2016
Washington DC

8:30 am 9:00 am	Coffee and Danish
9:00 am 10:00 am	Guest Speaker – Legislative and Administrative Proposals Impacting the Exam and Appeals Processes
10:00 am 10:45 am	Recent Developments in Tax Accounting; Repair Regulations; Section 199; Changes in Appeals Approach to Accounting Method Issues
10:45 am 11:00 am	Coffee Break
11:00 am 11:30 am	Fast Track Settlement; Developments at IRS Appeals; Appeals Judicial Approach and Culture in Practice
11:30 am 12:00 Noon	Guest Speaker (Office of IRS Chief Counsel) – Developments from the Proposed Section 385 Regulations Including Documentation Requirements, Recharacterization Rules, Off-Ramps, and Exceptions
12:00 Noon- 12:15 pm	Concluding Remarks