

# 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  
**10:15 am** New Acknowledgement of Facts IDR; Recurring Audit Issues Affecting Large Corporate Taxpayers (2016); Recent Developments in Large Case Audits
  
- 10:15 am** Guest Speaker – (Department of the Treasury, Office of Tax Policy)  
**10:45 am** The Guidance Process at IRS and Treasury; How to Raise Issues for Guidance Projects and Provide Input on Substance with IRS and Treasury Personnel.
  
- 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; Should You Request an Advance Pricing Agreement (APA); Impact of APAs on Audits; Impact of OECD Base Erosion and Profit Shifting (BEPS) Action Items on APMA; Country-By-Country Reporting; Current Developments Regarding APAs and Competent Authority
  
- 12:00 Noon** Luncheon Guest Speaker –  
**2:00 pm** The Joint Committee on Taxation; Role in the Refund Process; Scoring of Legislation; Best Practices for Interacting with Staff

- 2:00 pm** Guest Speaker – (Delaware Department of State)  
**2:30 pm** Unclaimed Property Overview and Delaware Voluntary Disclosure Program
- 2:30 pm** Guest Speaker – (Multistate Tax Audits)  
**3:00 pm** State Transfer Pricing Issues and Interplay Between State, Federal, and International Audits, Including the OECD’s BEPS Initiative and the Multistate Tax Commission’s Transfer Pricing Initiative
- 3:00 pm** Guest Speaker –  
**3:45 pm** Legislative and Administrative Proposals Impacting the Exam and Appeals Processes
- 3:45 pm** Coffee Break  
**4:00 pm**
- 4:00 pm** Guest Speaker (Office of IRS Chief Counsel)  
**5:00 pm** 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** Coffee and Danish  
**9:00 am**
- 9:00 am** Recent Developments in the Law of Privilege and the Work Product Doctrine  
**9:45 am**
- 9:45 am** Recent Developments in Tax Accounting; Repair Regulations; Section 199; Approaches  
**10:30 am** to Accounting Method Issues at Appeals
- 10:30 am** Coffee Break  
**10:45 am**
- 10:45 am** Fast Track Settlement; Developments at IRS Appeals; Appeals Judicial Approach and  
**11:30 am** Culture in Practice

**11:30 am** When is a Favorable Tax Ruling Impermissible State Aid Under EU Law

**12:00 Noon**

**12:00 Noon-** Concluding Remarks

**12:15 pm**