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UBIT UBTI

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2023 UT Higher Education Taxation Institute

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Agenda





Section 512(a)(6)

Buckets & Silos

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Campus UBI Activities

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Section 512(a)(6)
Expense Allocations

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Foreign Reporting

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Section 512(a)(6) Buckets & Silos

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Section 512(a)(6): Buckets and Silos



- Final regulations effective 12/2/2020 (for the tax year that begins on or after)
- Commonly referred to as "silo-ing" or "basketing"
- 2 digit NAICS codes used to group activities
- Active trade or business vs. pass-through activities
- Key Terms
 - Qualifying partnership interest (QPI)
 - Look through rule
 - Significant participation

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Title search: UBIT and UBTI: Communication and Techniques to Manage Risks

Also available as part of the eCourse 2023 Higher Education Tax eConference

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