

UBIT UBTI

Communication &
techniques to manage risks

June 5, 2023

Hosted by:



TEXAS
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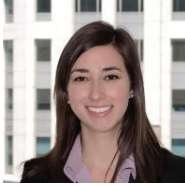
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Agenda

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**Section 512(a)(6)
*Buckets & Silos***

3

**Campus UBI
Activities**

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**Section 512(a)(6)
*Expense Allocations***

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**Foreign
Reporting**



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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First appeared as part of the conference materials for the
11th Annual Higher Education Taxation Institute session
"UBIT and UBTI: Communication and Techniques to Manage Risks"