UBIT
UBTI

Communication &
techniques to manage risks

June 5, 2023

Hosted by:

TEXAS
The University of Texas at Austin

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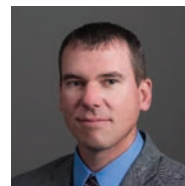
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Presenters

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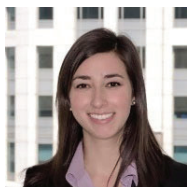
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Agenda

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

3 Campus UBI
Activities

2 Section 512(a)(6)
Expense Allocations

4 Foreign
Reporting

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Section 512(a)(6)
Buckets & Silos

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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Also available as part of the eCourse
[2023 Higher Education Tax eConference](https://utcle.org/elibrary)

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