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Chapter 2

Tax Research, Practice, and Procedure

SUMMARY OF CHAPTER

Tax practice involves the preparation of tax returns and representation of clients before the audit or appellate divisions of the Internal Revenue Service. To become a competent professional, skilled in these three functional areas of tax practice, it is necessary to be proficient in the art of tax research.

The tax specialist needs to understand the organizational structure of the IRS and its administrative procedures to provide fully informed tax consulting services to taxpayers involved in disputes with the IRS. Thus, this chapter includes a discussion of the internal organization of the IRS, the functions of the various administrative groups, the rules relating to practice before the IRS, and the procedures for examination of returns, including correspondence examinations, office examinations, and field examinations.

Tax Reference Materials

¶2001 Classification of Materials

Tax reference materials are usually classified as primary “authoritative” sources or secondary “reference” sources. Primary source materials include the Internal Revenue Code (Statutory Authority), Treasury Regulations and Internal Revenue Service Rulings (Administrative Authority), and the various decisions of the trial courts and the appellate courts (Judicial Authority).

Secondary reference materials consist primarily of the various loose-leaf tax reference services. Additional secondary materials include periodicals, textbooks and treatises, published papers from tax institutes and symposia, newsletters, and, more recently, the various computer-assisted research services.

Primary Source Materials

¶2021 Statutory Authority

The authority of the U.S. government to raise revenue through a federal income tax is derived from the Sixteenth Amendment to the Constitution, enacted in 1913. In subsequent years, with the growing complexity of the tax law, the multitude of revenue acts were codified into Title 26 of the United States Code, known as the Internal Revenue Code of

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Edward C. Foth



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Estate Planning: Principles and Problems , *Entrepreneurial Finance* Gary Gibbons, Robert D. Hisrich, Carlos M. DaSilva, 2014-10-29 A practical approach for entrepreneurs and investors *Entrepreneurial Finance* provides readers with the fundamental knowledge to finance start grow and value new ventures without the complex finance terms and calculations This comprehensive yet practical approach incorporates a global perspective that appeals to entrepreneurs investors and students with diverse backgrounds knowledge and experience From Facebook to Camera Gary Gibbons Robert D Hisrich and Carlos M DaSilva use real world examples and their professional experiences to bring concepts to life This text is one of the most readable books in the market without compromising high quality content and resources

Strategic Staffing Jean Phillips, 2019-01-15 Formerly published by Chicago Business Press now published by Sage *Strategic Staffing 4e* prepares all current and future managers to take a strategic and modern approach to the identification attraction selection deployment and retention of talent Organizations increasingly realize that their employees are the key to executing their business strategies and the current competition for talent has made the identification and attraction of high performing employees essential for companies to succeed in their marketplaces The right employees give their organization a competitive advantage that sets it apart and drives its performance In today s business environment a company s ability to execute its strategy and maintain its competitive edge depends even more on the quality of its employees And the quality of a company s employees is directly affected by the quality of its recruiting and staffing systems Because hiring managers are involved in the staffing process hiring managers and human resources HR professionals need to be familiar with strategic staffing techniques Over the past 10 years advancing technology and the increased application of data analytics have changed the practices of sourcing recruiting and staffing *Strategic Staffing 4e* is grounded in research communicates practical and modern staffing concepts and the role of staffing in organizational performance and is engaging to read The new edition contains updates to many sections on the roles of technology and analytics and adds more focus to the discussion of ethics that was added to the fourth edition New research findings were also incorporated and many company examples were updated The fifth edition of *Strategic Staffing* continues to present up to date staffing theories and practices in an interesting engaging and easy to read format

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U.S. Master Tax Guide CCH Editorial Staff Publication, 2012-11 The 2013 U S Master Tax Guide contains timely and precise explanations of federal income taxes for individuals partnerships corporations estates and trusts as well as new rules established by key court decisions and the IRS Significant new tax developments are conveniently highlighted and concisely explained for quick reference and understanding The Master Tax Guide's explanations are meticulously researched

and footnoted to provide tax practitioners with the most accurate and legally sound guidance to help them understand apply and comply with today s complex federal tax laws For added value the U S Master Tax Guide is also annotated to CCH s Federal Standard Tax Reporter for more advanced detailed historical and in depth research resources **CCH Federal Taxation** ,1995 CCH Federal Taxation Comprehensive Topics Ephrim P. Smith,Philip J. Harmelink,James R. Hasselback,2011-04 This is the Instructor s Manual that accompanies the textbook and provides professors with the answers and extra test questions It is a free product that comes in a binder *2019 CCH Federal Tax Study Manual* Edward C. Foth,2018 CCH s Federal Tax Study Manual is designed to enhance learning and improve comprehension for students of federal tax Clear and concise summaries along with hundreds of review questions and answers help students understand the complexities of today s tax laws Designed as an extra aid for students using CCH s industry leading tax textbooks the Study Manual highlights and reinforces the key tax concepts presented in CCH s Federal Taxation Comprehensive Topics CCH s Federal Taxation Basic Principles and CCH s Principles of Business Taxation The CCH Federal Tax Study Manual provides students with an approach that combines self study with programmed learning Throughout the Study Manual main concepts are presented in a concise yet thorough fashion allowing students to focus on and apply pertinent information Chapter by chapter summaries and easy to read outlines highlight the indepth textbook explanations Objective questions and problems with solutions provided are structured to help students master apply and later review materials presented in each chapter

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