

Tax Insights | January 5, 2023
**Tracking Tax News,
You Need to Know**



Treasury Issues FATCA Guidance

The Treasury Department issued [guidance](#) to temporarily help foreign banks and residents to comply with the Foreign Account Tax Compliance Act (FATCA). The guidance eases foreign banks' obligation to report information to the U.S. on bank accounts held by U.S. citizens living abroad. Under the guidance, certain banks do not have to report the ID numbers of U.S. citizens who do not have social security or other taxpayer identification numbers. They are so-called "accidental Americans" who are born outside the U.S. to U.S. citizens.

IRS Releases Instructions for Partnerships To Report Foreign Income

The IRS released final [instructions](#) for forms on which partnerships report their foreign income for 2022. The final instructions include criteria for domestic filing exceptions. Partnerships are to fill out Schedules K-2 and K-3s to provide additional information on the foreign income of partnerships beyond what's reported on K-1s. The final instructions give partnerships more time to let partners know that they were filing a domestic exception.

IRS Issues Corporate AMT Guidance

The IRS issued a [notice](#) saying it intends to issue proposed regulations to address the application of the 15% corporate alternative minimum tax. Taxpayers may rely on the guidance until the issuance of the forthcoming proposed regulations. In addition, the IRS intends to issue additional interim guidance to address other alternative minimum tax issues prior to the issuance of the forthcoming proposed regulations, such as certain issues related to the treatment under the alternative minimum tax of items that are marked-to-market for financial statement purposes.



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