



TaxNewsFlash

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IRS practice units: Interest expense limitations under sections 267(a)(3) and 163(j); dividend distribution with a debt issuance

The IRS Large Business and International (LB&I) division today publicly released three “practice units”—part of a series of IRS examiner “job aides” and training materials intended to describe for IRS agents leading practices about tax concepts in general and specific types of transactions.

The titles of the “concept” units (as referred to by the IRS) are:

- *Interest Expense Limitation on Related Foreign Party Loans Under IRC 267(a)(3)*
- *Interest Expense Limitation Under IRC 163(j) for Controlled Foreign Corporations Post-TCJA*
- *Dividend Distribution with a Debt Issuance*

Read the concept units on the [IRS practice unit webpage](#) (posting date of May 16, 2023).

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