

# UBIT UBTI

Communication &  
techniques to manage risks

June 5, 2023

Hosted by:



**TEXAS**  
The University of Texas at Austin

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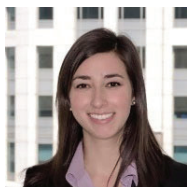
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## Presenters

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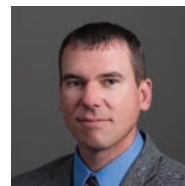
**Jackie Daniels**  
Tax Manager

MIT  
+1 617-253-0776  
[danielsj@mit.edu](mailto:danielsj@mit.edu)



**Amy Bellanca, CPA**  
Senior Manager

Crowe LLP  
+1 214 777 5298  
[amy.bellanca@crowe.com](mailto:amy.bellanca@crowe.com)



**Matt Shade**  
Director of Tax

Penn State  
+1 814 865 0953  
[mqs6929@psu.edu](mailto:mqs6929@psu.edu)

## Agenda

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

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**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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