



# Practical Guide to Federal Tax Practice Standards

*Arthur J. Dellinger, Jr.*

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Practical Guide to Federal Tax Practice Standards identifies and discusses the various rules governing the conduct of attorneys, certified public accountants and enrolled agents (EAs) in federal tax practice. Practice standards govern the conduct of the professional tax practitioner in return preparation, giving advice, and representation of a taxpayer before the authorities. There are many authorities whose rules and requirements make up the body of the tax practice standards that need to be followed to insure both professional license and reputation. Understanding and tracking the tax practice rules of the road is no simple matter, but the Practical Guide to Federal Tax Practice Standards serves as the definitive concise tax practice guide for the busy practitioner. Practical Guide to Federal Tax Practice Standards initially outlines the hierarchy of the rules and the authorities that are responsible for them. This introductory material provides a context for discussion that follows on the practice standards included in the Internal Revenue Code, Income Tax Regulations (Circular 230), the ABA Tax Section and AICPA Tax Practice standards. Timely discussion on tax shelters and tax malpractice is included. Substantial discussion that delves into the rules relating to income tax preparation, tax controversy representation and tax planning advice offers an integrated analysis that is peppered with the author's valuable comments based on his own practice experience. A discussion of the attorney-client privilege and work product rounds out the author's examination of the important issues. Helpful Practice Tools included at the end of the book provide important IRS forms and instructions, a sample engagement letter, the AICPA Statements on Tax Service, PCAOB rules relating to tax services performed by auditors of public companies, the author's own charts, practice checklists and other aids. A topical index is included and citations to cases, rulings, Internal Reve

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