

Form 8981 (March 2019)	Department of the Treasury - Internal Revenue Service	Audit control number
	Waiver of the Period Under IRC Section 6231(b)(2)(A) and Expiration of the Period for Modification Submissions Under IRC Section 6225(c)(7)	

Partnership Information

1. Name		2. Taxpayer ID Number (TIN)	
3. Street address (including apartment no.)		4. City or town	
5. State or province	6. Country code	7. ZIP or foreign postal code	
7. Tax year ended (mm/dd/yyyy)	8. Date of Notice of Proposed Partnership Adjustment (NOPPA) (mm/dd/yyyy)		

Partnership Representative (PR) Information

9. Name			10. TIN
11. Street address (including apartment no.)	12. City or town	13. State	14. ZIP code

Designated Individual (DI) Information (if PR is an entity)

15. First name	16. Middle name	17. Last name	18. TIN
19. Street address (including apartment no.)	20. City or town	21. State	22. ZIP code

The undersigned partnership representative, having sole authority to act on behalf of the partnership under the provisions of Internal Revenue Code (IRC) section 6223, hereby waives the restriction on mailing the notice of final partnership adjustment (FPA) described in section 6231(b)(2)(A). The partnership representative and the partnership understand that, by waiving this restriction, the Service may issue the FPA earlier than 270 days after the date the notice of proposed partnership adjustment (NOPPA) was mailed.

The partnership representative and the partnership further understand that by executing this waiver and agreement, the 270-day period for modification submissions under section 6225(c)(7) will expire as of the date this waiver becomes effective. The partnership thereby waives its right to make any modification submissions after such date. Any modification submissions that have already been made, if approved by the Service pursuant to section 6225(c)(8), will be reflected in the FPA and assessment of any imputed underpayment provided the FPA is not waived.

Form 8981 will only become effective or final when the form is countersigned by the IRS. If Form 8981 is approved, the IRS will send you an executed copy.

Signature of individual partnership representative or designated individual (see instructions)		Date	Telephone number
Name of the person signing the form		Name of entity partnership representative (if applicable)	

Internal Revenue Service Signature and Title

IRS Official's name	IRS Official's title
IRS Official's signature	Date

Instructions for Form 8981, Waiver of the Period Under IRC Section 6231(b)(2)(A) and Expiration of the Period for Modification Submissions Under IRC Section 6225(c)(7)

General Instructions

Section references are to the Internal Revenue Code (IRC) unless otherwise noted.

This waiver form only applies to partnerships that have received a notice of proposed partnership adjustment (NOPPA) as a result of an examination under the centralized partnership audit regime enacted by the Bipartisan Budget Act of 2015 (BBA). It does not apply to partnerships examined under TEFRA or other examination provisions.

Purpose of Form

Form 8981 should be used by a partnership to request to waive the 270-Day restriction period under IRC section 6231(b)(2)(A) on the mailing the notice of final partnership adjustment (FPA), as well as waive its right to make any modification submissions on or after the date the waiver becomes effective. If the IRS agrees and countersigns Form 8981, the waiver will be effective and allow the IRS to issue the FPA earlier than 270 calendar days after the date the NOPPA was mailed. In addition, the waiver will end the modification submission period under IRC section 6225(c)(7) and the partnership will not be able to submit modification requests beginning on the effective date of the waiver. Form 8981 will only become effective or final if the IRS approves it by countersigning it. If the IRS approves Form 8981, we will send you a signed copy.

When to File

Form 8981 must be submitted within the unexpired modification submission period. The unexpired modification submission period is the original modification submission period of 270 calendar days from the issuance date of the NOPPA, plus any additional days which were approved by the IRS under a previously submitted Form 8984 extension. A Form 8981 request cannot be approved by the IRS if it is submitted after the expiration of the modification submission period.

Who Must Sign

The partnership representative must properly sign Form 8981 in order for the IRS to consider the waiver request.

Where to File

Form 8981 should be submitted by email or fax to the IRS as follows:

Email: TBD

OR

FAX: 888-981-6983

Definitions

Imputed Underpayment is an amount determined, in accordance with section 6225 and the regulations thereunder. In this context, a proposed imputed underpayment is reported to the partnership in a NOPPA.

Modification, for this purpose, refers to the process of the partnership requesting and obtaining revision to an imputed underpayment set forth in a NOPPA pursuant to the provisions in section 6225(c) and regulations thereunder.

270-Day Modification Submission Period Expiration Date refers to the end of the period defined in section 6225(c)(7) during which an audited partnership may request modification of an imputed underpayment (including the submission of all required supporting documents). This period is 270 calendar days from the date of the issuance of the NOPPA, and may be extended, if requested by the partnership (by using Form 8984) and approved by the IRS. The 270-Day Modification Submission Period Expiration Date is included on the top right section of the NOPPA Letter 5892/5892-A received by the partnership/partnership representative.

Reviewed year is the partnership's taxable year to which a partnership adjustment relates.

Specific Instructions

Complete Lines 1 through 22, and the signature block information (Partnership Representative/Designated Individual information and signature). *Once completed, submit this form to the IRS. If Form 8981 is approved, the IRS will notify you of the approval by sending you a signed copy.*

Enter all dates in the following format: **MM/DD/YYYY**

Audit control number. Enter the partnership's XX-digit audit control number. This number is located on the Form 14792 provided to the partnership and partnership representative.

Partnership Information

Name. Include the full name of the partnership.

Taxpayer ID Number (TIN). Enter the partnership's Taxpayer Identification Number.

Street address, City or town, State or province, Country code, ZIP or foreign postal code. Include the full address of the partnership submitting the waiver.

Tax year ended. Enter the date that is the last day of the partnership's tax year for the reviewed year. Enter the date in the following format: MM/DD/YYYY.

Date of Notice of Proposed Partnership Adjustment (NOPPA). Enter the issuance date of the NOPPA Letter 5892/5892-A that was received by the partnership/partnership representative. This is the cover letter that was received with Form 14792. The partnership representative would have received the equivalent Letter 5892-A with the same date. Enter the date in the following format: MM/DD/YYYY.

Partnership Representative (PR) Information

Name. Enter the full name of the partnership representative. If the partnership representative is an entity, be sure complete lines 15 through 22 for the designated individual.

Street address, City or town, State, and ZIP code. Include the full address of the partnership representative.

Designated Individual (DI) Information (if PR is an entity)

Name. Enter the full name of the designated individual through whom the entity partnership representative acts.

Street address, City or town, State, and ZIP code. Include the full address of the designated individual.

Instructions for Signing Form 8981

This form must be signed by the partnership representative who has the sole authority to act on behalf of the partnership.

If you are an individual partnership representative, sign the form and enter the information as requested:

- Your name, date, and telephone number.

If you are a designated individual, sign the form and enter the information as requested:

- Your name, date, and telephone number.
- Name of entity partnership representative.