

**Solutions Manual for CCH Federal Taxation Comprehensive Topics 2013
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Chapter 2

Tax Research, Practice, and Procedure

SUMMARY OF CHAPTER

Tax practice involves the preparation of tax returns and representation of clients before the audit or appellate divisions of the Internal Revenue Service. To become a competent professional, skilled in these three functional areas of tax practice, it is necessary to be proficient in the art of tax research.

The tax specialist needs to understand the organizational structure of the IRS and its administrative procedures to provide fully informed tax consulting services to taxpayers involved in disputes with the IRS. Thus, this chapter includes a discussion of the internal organization of the IRS, the functions of the various administrative groups, the rules relating to practice before the IRS, and the procedures for examination of returns, including correspondence examinations, office examinations, and field examinations.

Tax Reference Materials

***2001 Classification of Materials**

Tax reference materials are usually classified as primary "authoritative" sources or secondary "reference" sources. Primary source materials include the Internal Revenue Code (Statutory Authority), Treasury Regulations and Internal Revenue Service Rulings (Administrative Authority), and the various decisions of the trial courts and the appellate courts (Judicial Authority).

Secondary reference materials consist primarily of the various loose-leaf tax reference services. Additional secondary materials include periodicals, textbooks and treatises, published papers from tax institutes and symposia, newsletters, and, more recently, the various computer-assisted research services.

Primary Source Materials

***2021 Statutory Authority**

The authority of the U.S. government to raise revenue through a federal income tax is derived from the Sixteenth Amendment to the Constitution, enacted in 1913. In subsequent years, with the growing complexity of the tax law, the multitude of revenue acts were codified into Title 26 of the United States Code, known as the Internal Revenue Code of

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Table of Contents Cch Federal Taxation Answer Guide

1. Understanding the eBook Cch Federal Taxation Answer Guide
 - The Rise of Digital Reading Cch Federal Taxation Answer Guide
 - Advantages of eBooks Over Traditional Books
2. Identifying Cch Federal Taxation Answer Guide
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an Cch Federal Taxation Answer Guide
 - User-Friendly Interface
4. Exploring eBook Recommendations from Cch Federal Taxation Answer Guide

- Personalized Recommendations
- Cch Federal Taxation Answer Guide User Reviews and Ratings
- Cch Federal Taxation Answer Guide and Bestseller Lists
- 5. Accessing Cch Federal Taxation Answer Guide Free and Paid eBooks
 - Cch Federal Taxation Answer Guide Public Domain eBooks
 - Cch Federal Taxation Answer Guide eBook Subscription Services
 - Cch Federal Taxation Answer Guide Budget-Friendly Options
- 6. Navigating Cch Federal Taxation Answer Guide eBook Formats
 - ePub, PDF, MOBI, and More
 - Cch Federal Taxation Answer Guide Compatibility with Devices
 - Cch Federal Taxation Answer Guide Enhanced eBook Features
- 7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of Cch Federal Taxation Answer Guide
 - Highlighting and Note-Taking Cch Federal Taxation Answer Guide
 - Interactive Elements Cch Federal Taxation Answer Guide
- 8. Staying Engaged with Cch Federal Taxation Answer Guide
 - Joining Online Reading Communities
 - Participating in Virtual Book Clubs
 - Following Authors and Publishers Cch Federal Taxation Answer Guide
- 9. Balancing eBooks and Physical Books Cch Federal Taxation Answer Guide
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection Cch Federal Taxation Answer Guide
- 10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
- 11. Cultivating a Reading Routine Cch Federal Taxation Answer Guide
 - Setting Reading Goals Cch Federal Taxation Answer Guide
 - Carving Out Dedicated Reading Time
- 12. Sourcing Reliable Information of Cch Federal Taxation Answer Guide

- Fact-Checking eBook Content of Cch Federal Taxation Answer Guide
 - Distinguishing Credible Sources
13. Promoting Lifelong Learning
- Utilizing eBooks for Skill Development
 - Exploring Educational eBooks
14. Embracing eBook Trends
- Integration of Multimedia Elements
 - Interactive and Gamified eBooks

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