

Based on the response from the taxpayers, the auditor may request other additional relevant and reasonable information or documents. Since part of the substantial economic effect tests involves the tax effect of the allocation at the partners' level, the auditor may want to obtain copies of the partners' individual returns from in house or from the partners.

**Law Application:**

- The allocation rules are discussed in PTM 1000. In general, an allocation is respected if it has substantial economic effect or is in accordance with the partner's interest in the partnership.
- The substantial economic effect consists of the economic effect tests and the substantiality test.
- For issues involving partner's interest in the partnership, see PTM 2950.

**The Economic Effect:** To test the economic effect of an allocation, the auditor should verify the following:

- Does the partnership agreement provide that the partners' capital accounts have to be maintained according to § 704(b) Regulations? Does the partnership actually maintain the partners' capital accounts? Ask the partnership for the schedule computing the partners' capital accounts. See PTM 1400 for the maintenance rules.
- Does the partnership agreement provide that distributions in liquidation of the partnership should be made in accordance with the partners' positive capital account balance? See PTM 1160 for discussion of the law. See PTM 2930 for discussion of audit issues.
- Does the partnership agreement require all partners to restore the deficit balances in their capital accounts? See PTM 1130 for discussion of the law. See PTM 2920 for discussion of audit issues.
- If the partnership agreement contains only the first two requirements but not the deficit capital account restoration obligation, does it meet the requirements under the Alternative economic effect test? See PTM 1140 for discussion of the law.

# California Franchise Tax Board Manual

**McNew**



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