Bond Case Briefs

Municipal Finance Law Since 1971

PLR 201726007 – Insights into the Facts & Circumstances Test for Private Business Use after Rev. Proc. 2017-13.

The IRS recently released PLR 201726007, the first private letter ruling to interpret the revised management contract safe harbor in Rev. Proc. 2017-13. On one level, the PLR is quite straightforward – it concludes that a teaching agreement between a hospital and a school to provide clinical practice for pharmacy students does not result in private business use. On another level, it's somewhat surprising that such a PLR was issued and the analysis takes some interesting turns. Read below for more information.

Continue Reading

The Public Finance Tax Blog

By Alexios Hadji on July 28, 2017

Squire Patton Boggs

Copyright © 2026 Bond Case Briefs | bondcasebriefs.com