

# **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 © 2024 Bond Case Briefs | [bondcasebriefs.com](http://bondcasebriefs.com)