

insights

TYPES NOT MAPPED YET March 12, 2025 | TTR not mapped yet | Steve B. Gorin

Steve Gorin Discusses Circular 230 on ACTEC Podcast

On a recent American College of Trust and Estate Counsel (ACTEC) podcast, Thompson Coburn partner [Steve Gorin](#) explored proposed changes to Circular 230, the IRS's rulebook for tax professionals.

He provided insights into the proposed regulations, audit risks, disclosure requirements, and best practices. He highlighted that the proposed regulations mandate practitioners inform clients about discovered errors and advise on corrective actions, while also assessing their own continued ability to ensure accuracy.

Steve said, "The Circuit of 230 also has some requirements for written tax advice. It's actually heavily regulated already. You need to base the written advice on (i) reasonable, factual, and legal assumptions; (ii) reasonably consider all relevant facts and circumstances that the practitioner knows or reasonably should know; (iii) use reasonable efforts to identify and ascertain the facts; (iv) not rely on any representations that are just obviously wrong."

[Click here](#) to listen to the full podcast.

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