

Tax law changes that should trigger referrals for your clients

The One Big Beautiful Bill Act (OBBBA) is the latest sweeping change to the tax code—and one that advisors can't afford to ignore. The OBBBA may bring both new opportunities and new risks for your clients. For trusted advisors, it's a clear reminder: when tax laws change, it's time to consider a referral to specialty tax experts.

1. R&D Expensing Returns (with caveats)

Recent changes restored immediate expensing for domestic R&D, while foreign R&D must still be amortized. This creates both opportunity and complexity for innovative businesses.

Referral trigger: Clients in technology, engineering, or software development investing heavily in new products or platforms.

Specialty Tax fit: Credits & Incentives (R&D credits and §174 expensing strategy).



2. Bigger Deductions for Business Investment

100% bonus depreciation and higher §179 expensing limits are back on the table, giving businesses more ways to recover costs quickly. Without planning, though, benefits can be left behind.

Referral trigger: Clients with affiliates abroad, cross-border transactions, or intercompany pricing arrangements.

Specialty Tax fit: Credits & Incentives / SALT (cost segregation, depreciation strategies, sales tax exemptions, state tax adjustments (decoupling), local credits/incentives, and state tax planning).



3. International Tax Reset

Shifts to rules governing U.S. taxation of foreign income—and foreign tax credits—require companies with global footprints to revisit their structures. The details are technical, but the risks are real.

Referral trigger: Clients with affiliates abroad, cross-border transactions, or intercompany pricing arrangements.

Specialty Tax fit: Transfer Pricing (documentation, compliance, and strategy); SALT (Inbound State Tax implications; State tax nexus issues; Sales tax consulting)



4. SALT CAP & Pass-Through Entity Elections

With a higher SALT deduction cap and the continued availability of the Pass-Through Entity Tax (PTET) election, new planning paths have opened for individuals and businesses.

Referral trigger: High-income individuals in high-tax states or businesses with multi-state operations.

Specialty Tax fit: SALT (Pass-through entity tax elections, tax projections and planning).



5. More IRS Attention on Compliance

Expanded deductions and adjusted reporting thresholds are expected to drive greater IRS enforcement. Proactive planning can help clients avoid costly disputes.

Referral trigger: Clients already receiving IRS or state notices, or those taking advantage of new deductions without a clear strategy.

Specialty Tax fit: Tax Controversy & IRS Resolution (Guiding clients through audits, notices, and disputes with confidence).



Why This Matters for Referrers

Tax law changes don't just impact returns. They can alter business strategies, affect valuations, and reshape client decisions. By spotting these referral triggers, you can:

- Help your clients act early and capture benefits
- Protect them from unexpected risk or penalties
- Reinforce your role as a proactive, trusted advisor

