

# Debt Instrument Election and Accrual Method Update Instructions

## Debt Instrument Election and Accrual Method

Taxpayer rules surrounding elections are complex. Pershing strongly encourages clients to consult with their tax advisor before choosing to apply an alternative to the default.

### ***Election 1 - Bond Premium Amortization (Internal Revenue Code [IRC] section 171)***

In the past, Pershing had assumed the client made this election and amortized the bond premium by adjusting cost basis downward towards the par value of the bond. However, Pershing did not adjust the interest payment for this amortization. Under the new rules, Pershing will supply the IRS with the amount of amortized bond premium on purchases after January 1, 2014 unless the client elects not to amortize the bond premium.

**Default rule:** The IRS requires Pershing to assume that you HAVE made this election and will amortize the bond premiums on taxable debt instruments

**Alternative Election:** Pershing will not amortize the bond premium on taxable debt instruments.

### ***Election 2 - Market Discount Accrual Method (IRC section 1276[b][2])***

There are two different methods you can use to calculate accruals on market discount:

**Ratable (Straight line):** This method simply calculates accruals by dividing the discount by the number of years until the bond matures. As an example, a bond purchased at \$95.00 with a remaining maturity of five years would simply accrue \$1.00 of market discount per year.

**Constant Yield** is a more complex calculation which takes into consideration the value of money over time. For the same bond purchased at \$95.00 accruals would vary, weighted slightly heavier at the end of the life of the bond. Based on the yield, it may accrue \$.95 in year 1 and \$1.05 in the final year.

In the past, Pershing has assumed the client has made the constant yield election. For bonds purchased in 2015, the default will be the constant yield method.

**Default rule:** The IRS requires Pershing to assume that the client has made the election and will calculate accruals using a constant yield method as provided in IRC section 1276(b)(2).

**Alternative Election:** Pershing will compute accruals of market discount using a ratable method rather than a constant yield method as provided in IRC section 1276(b)(1).

### ***Election 3 - Include Market Discount as Income (IRC section 1278[b])***

The client has a choice of paying the accrued income annually or at the final disposal of the bond. In the past, Pershing adjusted the cost of the bond upwards towards par, assuming the accrued income was being paid annually. Beginning with new purchases in 2014, Pershing is no longer permitted to assume this election has been made and will no longer adjust the cost basis on discounted bonds covered under this election.

If this election is made, cost basis will show as adjusted and the accrued income will be reported to the IRS on an annual basis.

**Default rule:** The IRS requires Pershing to assume that the election has not been made to include market discount as income as it accrues and will not report the yearly accruals to the IRS as additional ordinary income.

**Alternative Election:** Pershing will be required to report accruals of market discount as additional ordinary income to the IRS on Forms 1099 each year the election is in effect.

