National Taxpayer Advocate's 2007 Objectives Report to Congress

Appendices

APPENDIX I: EVOLUTION OF THE OFFICE OF THE TAXPAYER ADVOCATE

The Office of the Taxpayer Ombudsman was created by the Internal Revenue Service in 1979 to serve as the *primary advocate*, within the IRS, for taxpayers. This position was codified in the Taxpayer Bill of Rights (TBOR 1), included in the Technical and Miscellaneous Revenue Act of 1988, (TAMRA), Pub. L. 100-647. In TBOR 1, Congress granted the Ombudsman the statutory authority to issue a Taxpayer Assistance Order (TAO) "if, in the determination of the Ombudsman, the taxpayer is suffering or about to suffer a significant hardship as a result of the manner in which the internal revenue laws are being administered by the Secretary." Further, the Taxpayer Ombudsman and the Assistant Commissioner (Taxpayer Services) were directed to jointly make an annual report to Congress about the quality of taxpayer services provided by the IRS. This report was made directly to the Senate Finance Committee and the House Committee on Ways and Means.²

Taxpayer Bill of Rights 2 (TBOR 2) replaced the Office of the Taxpayer Ombudsman with the Office of the Taxpayer Advocate.³ The Joint Committee on Taxation set forth the following reasons for change:

To date, the Taxpayer Ombudsman has been a career civil servant selected by and serving at the pleasure of the IRS Commissioner. Some may perceive that the Taxpayer Ombudsman is *not an independent advocate* for taxpayers. In order to ensure that the Taxpayer Ombudsman has the necessary stature within the IRS to represent fully the interests of taxpayers, Congress believed it appropriate to elevate the position to a position comparable to that of the Chief Counsel. In addition, in order to ensure that the Congress is systematically made aware of recurring and unresolved problems and difficulties taxpayers encounter in dealing with the IRS, the Taxpayer Ombudsman should have the authority and responsibility to make independent reports to the Congress in order to advise the tax-writing committees of those areas.⁴

In TBOR 2, Congress not only established the Office of the Taxpayer Advocate but also described its functions:

- 1. To assist taxpayers in resolving problems with the Internal Revenue Service;
- 2. To identify areas in which taxpayers have problems in dealings with the Internal Revenue Service:
- 3. To the extent possible, propose changes in the administrative practices of the IRS to mitigate those identified problems; and

¹ TAMRA, Pub. L. No. 100-647, Title VI, Sec. 6230, 102 Stat. 3342, 3733 (Nov. 10, 1988).

² TAMRA, Pub. L. No. 100-647, Title VI, Sec. 6235 (b), 102 Stat. 3342, 3737 (Nov. 10, 1988).

³ Pub. Law 104-168, Sec. 101, 110 Stat. 1452, 1453 (July 30, 1996).

⁴ Joint Committee on Taxation, *General Explanation of Tax Legislation Enacted in the 104th Congress* JCS-12-96, 20 (Dec. 18, 1996). (Emphasis added).

4. To identify potential legislative changes which may be appropriate to mitigate such problems.⁵

Congress did not provide the Taxpayer Advocate with direct line authority over the regional and local Problem Resolution Officers (PROs) who handled cases under the Problem Resolution Program. At the time of the enactment of TBOR 2, Congress believed that it was sufficient to require that "all PROs should take direction from the Taxpayer Advocate and that they should operate with sufficient independence to assure that taxpayer rights are not being subordinated to pressure from local revenue officers, district directors, etc."

TBOR 2 also replaced the joint Assistant Commissioner—Taxpayer Advocate report to Congress with two annual reports to Congress issued directly and independently by the Taxpayer Advocate. The first report is to contain the objectives of the Taxpayer Advocate for the fiscal year beginning in that calendar year. This report is to contain full and substantive analysis in addition to statistical information and is due not later than June 30 of each calendar year. The second report is on the activities of the Taxpayer Advocate during the fiscal year ending during that calendar year. The report must identify the initiatives the Taxpayer Advocate has taken to improve taxpayer services and IRS responsiveness, contain recommendations received from individuals who have the authority to issue a Taxpayer Assistance Order (TAO), describe in detail the progress made in implementing these recommendations, contain a summary of at least 20 of the most serious problems which taxpayers have in dealing with the IRS, include recommendations for such administrative and legislative action as may be appropriate to resolve such problems, describe the extent to which regional problem resolution officers participate in the selection and evaluation of local problem resolution officers, and include other such information as the Taxpayer Advocate may deem advisable The stated objective of these reports is "for Congress to receive an unfiltered and candid report of the problems taxpayers are experiencing and what can be done to address them. The reports by the Taxpaver Advocate are not official legislative recommendations of the Administration; providing official legislative recommendations remains the responsibility of the Department of Treasury."⁷

Finally, TBOR 2 extended the scope of the Taxpayer Assistance Order (TAO), by providing the Taxpayer Advocate with broader authority "to affirmatively take any action as permitted by law with respect to taxpayers who would otherwise suffer a significant hardship as a result of the manner in which the IRS is administering the tax laws." For the first time, the TAO could specify a time period within which the IRS must act on the TAO. The statute also provided that only the Taxpayer Advocate, the IRS Commissioner or the Deputy Commissioner could modify or rescind a TAO; and that

⁵ Pub. L. No. 104-168, Sec. 101, 110 Stat. 1452, 1453-54 (July 30, 1996).

⁶ Joint Committee on Taxation, *General Explanation of Tax Legislation Enacted in the 104th Congress* JCS-12-96 21 (Dec. 18, 1996).

⁷ Id.

⁸ *Id.* at 22.

any official who so modifies or rescinds a TAO must respond in writing to the Taxpayer Advocate with his or her reasons for such action.

Thus, as a result of TBOR 2 changes, the Taxpayer Advocate became a career position within the IRS. Problem Resolution Officers and field employees who worked Problem Resolution cases did not report to the Taxpayer Advocate. In 1997, The National Commission on Restructuring the Internal Revenue Service called the Taxpayer Advocate the "voice of the taxpayer." In its discussion of the office of the Taxpayer Advocate, the Commission noted:

Taxpayer Advocates play an important role and are essential for the protection of taxpayer rights and to promote taxpayer confidence in the integrity and accountability of the IRS. To succeed, the Advocate must be viewed, both in perception and reality, as an independent voice for the taxpayer within the IRS. Currently, the national Taxpayer Advocate is not viewed as independent by many in Congress. This view is based in part on the placement of the Advocate within the IRS and the fact that only career employees have been chosen to fill the position.⁹

In response to these concerns, in the IRS Restructuring and Reform Act of 1998, Pub. L. 105-206, Congress renamed the Taxpayer Advocate as the National Taxpayer Advocate and mandated that the NTA could not be an officer or an employee of the IRS for two years preceding or five years following his or her tenure as the NTA. (Service as an employee of the Office of the Taxpayer Advocate is not considered IRS employment under this provision) 10

The Restructuring and Reform Act provided for Local Taxpayer Advocates to be located in each state, and mandated a direct reporting structure for local taxpayer advocates to the National Taxpayer Advocate. As indicated in IRC § 7803(c)(4)(B), each Local Taxpayer Advocate must have a phone, facsimile, electronic communication, and mailing address separate from those of the IRS. The Local Taxpayer Advocate must advise taxpayers at their first meeting of the fact that "the taxpayer advocate offices operate independently of any other Internal Revenue Service office and report directly to Congress through the National Taxpayer Advocate." ¹¹ Congress also granted the Local Taxpayer Advocates discretion to not disclose the fact that the taxpayer contacted the Office of the Taxpayer Advocate or any information provided by the taxpayer to that office. ¹²

The definition of "significant hardship" in IRC § 7811 was expanded in 1998 to include four specific circumstances: (1) an immediate threat of adverse action; (2) a delay of more than 30 days in resolving taxpayer account problems; (3) the taxpayer's incurring

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⁹ Report of the Commission on Restructuring the Internal Revenue Service: *A Vision for a New IRS* 48 (June 25, 1997).

¹⁰ Pub. L. No. 105-206, sec. 1102, 112 Stat. 685, 697 (July 22, 1998).

¹¹ IRC § 7803(c)(4)(A)(iii).

¹² IRC § 7803(c)(4)(A)(iv).

of significant costs (including fees for professional representation) if relief is not granted; and (4) the taxpayer will suffer irreparable injury or a long-term adverse impact. The committee reports make clear that this list is a non-exclusive list of what constitutes significant hardship.¹³

IRC § 7803 authorizes the National Taxpayer Advocate to develop guidance for all IRS officers and employees outlining the criteria for referring taxpayer inquiries to TAS. ¹⁴ In April 2003, the National Taxpayer Advocate established a task force to study existing Taxpayer Advocate Service case acceptance criteria, including how the definition of significant hardship was applied and its affect on acceptance of cases in the Taxpayer Advocate Service. The National Taxpayer Advocate asked the task force to study whether the Office of the Taxpayer Advocate was assisting taxpayers as Congress intended, and whether the Taxpayer Advocate Service was properly exercising its authority in IRC §7811 to issue Taxpayer Assistance Orders.

On January 1, 2006, TAS implemented the clarified case acceptance criteria. Case acceptance criteria now fall into four main categories:

- Economic burden cases (Criteria 1-4) are those involving a financial difficulty to the taxpayer. An IRS action or inaction has caused or will cause financial hardship for the taxpayer.
- 2. Systemic burden cases are those in which an IRS process, system, or procedure has failed to operate as intended, and as a result, the IRS has failed to timely respond to and/or resolve a taxpayer issue.
- 3. Best Interest of the Taxpayer TAS acceptance of these cases will help ensure that taxpayers receive fair and equitable treatment, and that their rights as taxpayers are protected.
- 4. Public Policy Acceptance of cases into TAS under this category will be determined by the NTA, and will generally be based on a unique set of circumstances warranting special assistance to certain taxpayers.

¹⁴ IRC § 7803(c)(2)(C)(ii).

¹³ H.R. Conf. Rep. No. 105-599, at 215 (1998).

APPENDIX II: TAXPAYER ADVOCATE SERVICE SIGNIFICANT HARDSHIP CRITERIA

As an independent organization within the IRS, the Taxpayer Advocate Service helps taxpayers resolve problems with the IRS and recommends changes that will prevent the problems. TAS fulfills its statutory mission by working with taxpayers to resolve problems with the IRS.¹⁵ On January 1, 2006, TAS implemented clarified case acceptance criteria. Case acceptance criteria fall into four main categories:

1. Economic Burden

Economic burden cases are those involving a financial difficulty to the taxpayer. An IRS action or inaction has caused or will cause financial hardship for the taxpayer.

- **Criteria 1:** The taxpayer is experiencing economic harm or about to suffer economic harm.
- **Criteria 2:** The taxpayer is facing an immediate threat of adverse action.
- **Criteria 3:** The taxpayer will incur significant costs if relief is not granted (including fees for professional representation).
- **Criteria 4:** The taxpayer will suffer irreparable injury or long term adverse impact if relief is not granted.

2. Systemic Burden

Systemic burden cases are those in which an IRS process, system, or procedure has failed to operate as intended, and as a result, the IRS has failed to timely respond to and/or resolve a taxpayer issue.

- **Criteria 5:** The taxpayer has experienced a delay of more than 30 days to resolve a tax account problem.
- **Criteria 6:** The taxpayer has not received a response or resolution to their problem or inquiry by the date promised.
- **Criteria 7:** A system or procedure has either failed to operate as intended, or failed to resolve the taxpayer's problem or dispute within the IRS.

3. Best Interest of the Taxpayer

TAS acceptance of these cases will help ensure that taxpayers receive fair and equitable treatment, and that their rights as taxpayers are protected.

¹⁵ IRC § 7803(c)(2)(C)(ii).

• **Criteria 8:** The manner in which the tax laws are being administered raises considerations of equity, or have impaired or will impair the taxpayer's rights.

4. Public Policy

Acceptance of cases into TAS under this category will be determined by the NTA, and will generally be based on a unique set of circumstances warranting special assistance to certain taxpayers.

• **Criteria 9:** The NTA determines compelling public policy warrants special assistance to an individual or group of taxpayers.

APPENDIX III: COLLABORATIVE EFFORTS BETWEEN TAS AND IRS

Collaborative	Members	Description	FY 2007 Goals
Agency-Wide FTD Penalty Task Force	SB/SE, TEGE, W&I, LMSB, TAS	In Fiscal Year 2005, the Servicewide Task Force on Systemic Assessment/ Abatement of Failure to Deposit Penalties released a report identifying problems that contribute to the high assessment rates of FTD and subsequent abatements and offering six recommendations to improve IRS processes, taxpayer education, notices, and forms. The Office of Systemic Advocacy played a vital role on this task Force because employment tax issues and FTD penalty problems continue to show up in TAS casework and advocacy referrals.	TAS, LMSB and SB/SE Office of Penalty and Interest Administration will monitor the implemented recommendations to determine impact on reducing the high volume of FTD penalty asses sments and subsequent abatements.
Appeals/ SB/SE Fast Track Settlement Initiative Team	SB/SE, Appeals, TAS	The overall purpose of this program is to enable taxpayers and the IRS to work together in resolving disputed issues while the case remains in SB/SE jurisdiction. The process generally involves an Appeals Official trained in mediation, the Taxpayer and an SB/SE Group Manager or their designee. Unlike Fast Track Mediation, Fast Track Settlement allows the parties to utilize Appeals settlement authority under Delegation Order 66, when needed, to effect a settlement based on the "hazards of litigation". The expected benefits include: resolving issues at the earliest possible opportunity, reducing overall case cycle time (filing date to issue resolution), and reducing taxpayer burden. This process will be tested in three cities: St. Paul, Chicago and Houston over the next few months. Cases can be brought into the	The team will determine the effectiveness of the program in the test cities by analyzing data based on business results and customer satisfaction measures. Interactive video training will be conducted along with a companion facilitator's guide. The team will evaluate the materials by observing classes during the test period. Update recommended

Collaborative Efforts	Members	Description	FY 2007 Goals
		process in those three cities as soon as the official announcement is released by IRS Counsel and after the Appeals and SB/SE employees receive training including a role play video the team developed for the test cities.	changes before nationwide training occurs.
CI Liaison	CI, W&I, TAS, SB/SE, MITS	See Integrating Advocacy: Criminal investigation Refund Freezes, supra	See Integrating Advocacy: Criminal investigation Refund Freezes, supra
Cash Economy	TAS Systemic Advocacy, TAS Research, SBSE Compliance	The Task Force is a joint effort between SBSE and TAS. The goal is to consider recommendations made in the 2005 ARC to improve compliance among small businesses that operate primarily on a cash basis. The task force will identify and rank alternatives to address the cash economy tax gap and develop and implement at least once of the top ranked approaches.	Identify and rank alternatives for addressing the cash economy tax gap. Develop and seek approval for at least one of the top ranked approaches.
Collection Statute Expiration Date (CSED)	W&I, SB/SE, TAS	The National Taxpayer Advocate raised the issue of incorrect collection statute expiration dates in her 2004 Annual Report to Congress. The IRS and TAS established a joint team that identified impacted taxpayers, developed additional guidance and training alerts, and submitted requests for systems improvements to eliminate the problem of incorrectly calculated CSEDs. These accounts problems were reflected in three major areas, Installment Agreements (IA), Substitute for Return, and Offer in Compromise (OIC). Internal Revenue Manuals have been updated, incorrect procedural guides have been removed, account extracts have been pulled to identify accounts needing correction, compliance training modules were	TAS will continue to work with the operating divisions to conclude the remaining Task group objectives: Identify campus contacts to assist TAS in resolving accounts with erroneous CSED calculations Complete the analysis of account extracts to ensure problem accounts are

Efforts		developed, and a comprehensive review was conducted of CSED calculation procedures on IDRS Programming fixes have been recommended. TAS is concerned with the delay in	fixed and monies incorrectly applied and send refunds, if applicable.
		implementing the requested system improvement to correct erroneous OIC account calculations that are currently resident in IDRS. Identified errors in OIC calculation and prepared a Request to Information Services (RIS) for their correction.	• Ensure the requested systemic improvement to correct IDRS CSED calculations on OIC accounts as promised by the January 2007 date or sooner. We will also validate system corrections.
Tool on Refund Anticipation Loans	Electronic Tax Administration W&I, FMS, IRS Chief Counsel, TAS	The FY 2006 IRS Appropriations Bill passed by Congress includes a directive to the IRS, in consultation with the National Taxpayer Advocate, to prepare a report by June 30, 2006, on the uses of the Debt Indicator Tool. The report should address the following issues: Whether the tool facilitates the use of refund anticipation loans (RALs) and the debt collection offset practice; Evaluations of RAL alternatives, including the use of debit cards; and Recommendations for delivering tax refunds more quickly.	This task will be complete prior to the beginning of FY 2007.
Tax Advisory L Group C	SBSE, W&I, LMSB, TEGE, Counsel, CI, Appeals, TAS	This is a working group of senior analysts and managers who are responsible for employment tax programs and processes. The group meets bi-monthly to discuss current events, share information, and make presentations. The Task group began in February	The group will continue to meet. No goals have been established at this time.

Collaborative Efforts	Members	Description	FY 2007 Goals
Collections File (XSF) Task Group	Divisions, TAS	2005 in response to recommendations made by TIGTA in their Audit Report entitled, "Enhancing Internal Controls for the Internal Revenue Service's Excess Collection File Could Improve Case Resolution". The Task Force submitted a final report on March 6, 2006. The report aimed at improving the processing of credit balance accounts before these accounts reach the Excess Collection File (XSF). The process developed and endorsed by the Task group demonstrated that a significant volume of large dollar credit balance accounts can be resolved by Customer Accounts Services (W&I) by doing additional research (IDRS and Internet) and making direct contact with the taxpayers when the problems are first identified (i.e. transcripts are generated). Unfortunately, the additional research will be limited to amounts above \$100,000, thus changes have limited practicality to ordinary taxpayers.	submission of the March 2006 report, the Task group met its intended objective and is no longer convening. The National Taxpayer Advocate does not believe that the task force completed all necessary tasks and will consider addressing problems with the Excess Collection File in the 2006 Annual Report to Congress.
Financial Literacy	W&I, SB/SE, TAS	TAS has established a team to develop a financial literacy toolkit. The toolkit, which will be available in both paper and electronic formats, will provide in-depth information on a number of topics including Individual Taxpayer Identification Numbers (ITINs), Refund Anticipation Loans (RALs), Earned Income Tax Credit (EITC), Low Income Taxpayer Clinics (LITCs), the process for securing banking services, available IRS resources, and TAS messages. The toolkit will be a companion collateral package that will complement and augment a Spanish-language LEP (limited English proficiency) DVD. The toolkit will be available in English and Spanish and will be available to individual taxpayers, TAS and IRS	TAS will engage in outreach efforts using the financial literacy toolkit. TAS will monitor usage of the toolkit to identify any necessary modifications or additions.

Collaborative Efforts	Members	Description	FY 2007 Goals
	W&I Compliance, EITC Program Office, Customer Accounts Services, TAS	personnel, and outside partners. The team is on track to develop the toolkit by the end of FY 2006. The W&I Compliance Director and the National Taxpayer Advocate agreed to revise the Form 886-H, Information Returns and to include the TAS and the Low Income Tax Clinics (LITC) in the process.	The goal of this group is to improve communication with taxpayers. Specifically, changes are needed to clarify
			Form 886-H Series to better define what documentation is needed from the taxpayer and how the IRS can best communicate what is needed so that taxpayers send in all the
			necessary documentation. A separate group will address identified communication issues in the new Publication 3498- A by making some minor enhancements to the language in the new Publication.

Collaborative Efforts	Members	Description	FY 2007 Goals
Form 94X Design	SB/SE, TEGE, W&I, LMSB, Counsel, TAS	Taxpayers and the IRS encounter significant challenges when a taxpayer corrects a reporting error on employment tax returns. Currently taxpayers file Form 941c, Supporting Statement to Correct Information or Form 843, Claim for Refund and Request for Abatement. The Form 941c is an attachment to a current quarter Form 941, Employer's Quarterly Tax Return.	The team will continue to design a form that will allow taxpayers to amend Form 941, Employer's Quarterly Tax Return for use in 2008. The team is also considering creating separate forms for all of the employment tax forms (943, 944, 945) to allow taxpayers to correct a reporting error.
Form 940 Redesign Team	Treasury, SB/SE Compliance Policy, LMSB Employment Tax, W&I Forms & Publications, MITS, Research, Chief Counsel, TAS	The team is responsible for designing a simpler Form 940, Employer's Annual Federal Unemployment (FUTA) Tax Return, and Instructions. Consolidate Form 940EZ and Form 940 into one form. The consolidated form is intended to reduce burden for current Form 940 filers. The 940 Redesign Team has completed the design phase of the new form and is working with software developers to ensure consistent formatting. The new Form 940 should be available to taxpayers in mid to late 2006 for the 2006 tax year, with returns being filed in 2007.	TAS will participate in the monitoring of the initial filing of the new Form 940, recommending any changes that may be needed and participate in any decision making that will affect taxpayers.
Form 944, Employer's Annual Federal Tax Return	TAS, SBSE Office of Taxpayer Burden Reduction, SBSE Collection, SBSE C&L, SBSE Campus Compliance, SBSE	The purpose of this program is to reduce burden on the smallest business taxpayers by establishing new rules and processes that will allow certain employers to file their employment tax returns annually and pay the employment tax due with their return. This program is designed for small business taxpayers who owe \$1,000 or less per year in total employment tax liability. The filing of a new tax form	TAS will monitor the initial phase of the program and recommend any changes needed and participate in any decision making that will affect taxpayers. An Immediate

Collaborative Efforts	Members	Description	FY 2007 Goals
	Examination, W&I Forms & Publications, W&I Customer Account Services, W&I CARE, MITS, TEGE, Chief Counsel, OPERA	known as, Form 944, Employers Annual Tax Return, will be required by the small business taxpayers that currently file Form 941 and new businesses that meet the eligibility criteria. This program was implemented on January 1, 2006 with the first filings due January 31, 2007. The NTA previously suggested that studies be conducted on the number of taxpayers impacted by changing filing requirements to the Form 944 and determine if taxpayer burden is actually reduced. Additionally, TAS recommended the IRS conduct a test on a statistically valid sample of taxpayers before making these changes mandatory for all taxpayers. This limited rollout to allow the IRS to address any taxpayer concerns or administrative problems. TAS also remains concerned that the taxpayers that straddle the \$1,000 threshold for annual employment tax liability will be put in a difficult situation. There is the potential of taxpayers being placed in and out of the Form 944 program when their total annual tax liability fluctuates above or below \$1,000. Additionally, taxpayers with a total tax liability exceeding \$2,500, will be responsible for making federal tax deposits (FTD) in accordance with current rules to avoid failure to deposit penalties. These taxpayers will still file Form 944 the current year and then begin filing quarterly the Form 941 during the next year. A small business employer who does not have certainty as to whether they must file employment tax returns quarterly or annually will not feel that burden has been reduced.	Intervention in process pertains to LMSB taxpayers are still filing quarterly and are experiencing tax processing problems.

Collaborative Efforts	Members	Description	FY 2007 Goals
Form 1040 & Schedule O	All Operating Divisions, TAS	Create a new Form 1040, Schedule O to move certain line items from Form 1040 to Schedule O.	Develop a cost/benefit model that will help calculate and authenticate costs and quantify benefits. This data will be used to support a request for earmarked funds in FY 2008.
FTD Coupons	W&I, SBSE, Office of Taxpayer Burden Reduction	This is a sub group of the Mail-Out Strategy Task Force. The Task Force is looking at FTD Coupons and studying the possibility of mandatory EFTPS enrollment.	Addressing the cost/benefit and resource information to determine if EFTPS enrollment can be mandated.
IRS Joint W&I and TAS Injured Spouse Claim	W&I, TAS	W&I and TAS agreed to partner to investigate the current processes and procedures for handling Forms 8379, Injured Spouse Allocation, filed with Forms 1040 and separately to determine the factors that impede service to taxpayers and result in a high volume of referrals to TAS. The team is in the process of reviewing statistically valid samples of 600 W&I cases and 600 TAS cases for a variety of factors and will conduct an in-depth analysis of the data gathered to ultimately make and recommend changes to injured Spouse policies, processes and/or procedures to improve service to and reduce burden on taxpayers, IRS and TAS for processing the Form 8379 itself and all inquiries related to it. The team met by conference calls since April 26, 2005, agreed upon the sampling criteria, gathered the sample cases and corresponding IDRS research, created and tested the Data Collection Instrument (DCI), reviewed the majority of	Minimize referrals to TAS Identify processing improvement opportunities Complete case review Analyze findings Make recommended changes

Collaborative Efforts	Members	Description	FY 2007 Goals	
		cases using the DCI, and is currently posting the raw data from the DCIs to spreadsheets to conduct trend analyses.		
Mail Out Strategy	All Operating Divisions, TAS	W&I Media and Pubs is creating a consistent approach or policy on all mail outs that meet all stakeholders' needs and results in a more efficient operation.	Reduce printing and postage costs; eliminate unnecessary mail outs; stuffers; etc. by analyzing the input from stakeholders.	
Notice Stubs DPT	Notice Improvement Office, W&I, SBSE	This Task Force is looking at redesigning notice stubs.	Analyzing the Input from all OD's for to redesign Notice Stubs.	
Notice Communication & Advisory Group (NCAG)	Cross functional	The NCAG is the Council for SPOCs from all ODs. The objective is to continue to improve notices.	Continue to work the 5-year strategy and related action plans for improvement to notices.	
Notice Stub DPT	Notice Improvement Office, W&I, SBSE	This Task Force is looking at redesigning notice stubs.	Analyzing the Input from all OD's for to redesign Notice Stubs.	
OPM Levy Authorization	TAS, SSA, FMS	OPM requested that IRS identify a process for electronic transmission of levy proceeds. TAS and SB/SE Field Payment Compliance were working with OPM and FMS to resolve a disclosure problem with paper levy checks on OPM benefits. The SSN in the address field was visible through the window envelope. OPM requested that IRS work with them on an e-levy process once this issue was resolved and worked on the SSA interim e-levy process.	Engage SB/SE Field Payment Compliance, W&I Payment Compliance, Chief Financial Officer, and MITS to work with OPM and FMS in order to identify a mutually acceptable method for electronic transmission of levy proceeds and the detail information needed for IRS to	

Collaborative	Members	Description	FY 2007 Goals
Efforts			properly post those payments.
Private Debt Collection (PDC) Initiative	TAS, SB/SE Filing and Payment Compliance	TAS is continuing to engage the IRS as it moves forward with the implementation of the Private Debt Collection Initiative. Private Collectors are tentatively scheduled to begin work on IRS accounts in August 2006. TAS has engaged in discussions with the IRS on fundamental aspects of the design of the initiative which include: Training of Private Debt Collectors; The types of cases that private collectors will work; The amount of information about assistance that taxpayers will receive; and the referral of cases to the Taxpayer Advocate Service.	In FY 2007, TAS will continue to work with the IRS on the implementation of the Private Debt Collection Initiative. TAS will focus on: • Ensuring that taxpayers are referred to the Taxpayer Advocate Service when they either ask for TAS assistance or are experiencing a hardship that meets TAS criteria; • Contractor monitoring by the IRS; • Measuring the effectiveness of the established policies and procedures; and • Monitoring the cost of the PDC initiative
Simplification of the Extension to File Process	SB/SE Office of Taxpayer Burden Reduction, Research, LMSB, W&I, TAS	The recent changes to Treasury Regulation 1.6081 required IRS to study the effects that the changes have on taxpayer burden and filing patterns. This team is a follow on to the implementation of changes to the extension to file process and was charged with evaluating and reporting on these findings. The team is especially interested in the effects on flow-through entities and their owners.	The team will receive current filing data, which the research members of the team will evaluate with input from the other team members.
Taxpayer Assistance	W&I, TAS	TAS was actively involved in the development of the Taxpayer	TAS will continue its active role in

Collaborative Efforts	Members	Description	FY 2007 Goals
Blueprint (TAB II)		Assistance Blueprint (TAB), Phase 1 report, issued on April 24, 2006. TAS continues to work with the TAB team in Phase II of the project, which will build on the strategic improvement themes identified in Phase I and produce a five-year plan for taxpayer service.	the TAB Team as it assesses taxpayer needs and develops a five-year plan for taxpayer service.
Uniform Definition of a Qualifying Child (UDOC)	TAS, Department of the Treasury, Office of Chief Counsel	The Working Families Tax Relief Act of 2004 created a uniform definition of child (UDOC) in § 152(c) of the Internal Revenue Code (IRC). These provisions are effective beginning in the 2005 tax year and ease the administrative burden on hundreds of millions of taxpayers. For example, the UDOC rules eliminated the need for most taxpayers to provide proof of support for a dependent. The UDOC rules also eliminated the subjective and controversial "cares for" standard that plagued taxpayers, the IRS and the courts alike when determining if a taxpayer was entitled to the earned income tax credit (EITC).	The Taxpayer Advocate Service is working with the Office of Chief Counsel, Department of Treasury, and Congress to ensure that the implementation of UDOC is consistent with the stated intent to simplify the rules and reduce taxpayer burden. We will also try to eliminate any unintended consequences of the legislation.

APPENDIX IV: LIST OF LOW INCOME TAXPAYER CLINICS

Publication 4134 Low Income Taxpayer Clinic List

Low Income Taxpayer Clinics (LITCs) represent low income taxpayers before the Internal Revenue Service, assist taxpayers in audits, appeals and collection disputes and can help taxpayers respond to IRS notices and to correct account problems.

If you are a low income taxpayer who cannot afford professional tax assistance or if you speak English as a second language (ESL) and need help understanding your tax rights and responsibilities, you may qualify for help from a LITC that provides free or nominal cost assistance.

Although LITCs receive partial funding from the IRS, LITCs, their employees, and their volunteers are completely independent of, and are not associated with, the federal government. These clinics are operated by nonprofit organizations or academic institutions.

Clinics receiving federal funding for the 2006 calendar year are listed below. Each clinic independently decides if you meet the income guidelines and other criteria before it agrees to represent you.

Low income taxpayers also may be able to receive assistance from an attorney referral system operated by state bar associations, state or local societies of accountants and other nonprofit tax professional organizations.

This notice is not, and should not be understood to be, a recommendation by the IRS that you retain a Low Income Taxpayer Clinic or other similar organization to represent you before the IRS.

Size of Family Unit Income Ceiling (250% of Poverty Guidelines)

1 \$24,500

2 \$33,000

3 \$41,500

4 \$50,000

5 \$58,500 For family units with more than 5 members, add \$8,500 for each additional member. Note: HHS publishes separate poverty guidelines for Alaska and Hawaii. See http://aspe.hhs.gov/poverty.

Type of Clinic: C = Controversy Clinic E = ESL Clinic B = Both Controversy and ESL Clinic

State	City	Organization	Public Phone Numbers	Type of Clinic	Languages Served in Addition to English
AK	Anchorage	Alaska Business Development Center	907-562-0335 800-478-3474	В	Various
AL	Birmingham	Birmingham Birmingham Business Resource Center, Inc.		В	Spanish
	Birmingham	Lawson State Community College LITC	205-925-1039	E	Spanish
AR	West Memphis	Delta Economic Education Resource Service	870-733-1704 877-733-1704	В	Spanish
AIX	Little Rock	University of Arkansas at Little Rock School of Law	501-324-9441	В	
AZ	Phoenix	Community Legal Services, Inc.	602-258-3434 800-852-9075	В	Spanish
\\Z	Tucson	United Way of Tucson and Southern Arizona	520-388-9153	В	Spanish

The department of Health and Human Services (HHS) publishes poverty guidelines each year. A controversy clinic receiving federal funding must have at least 90% of the taxpayers served with incomes that do not exceed 250% of the poverty guidelines. For the 2006 calendar year, the income ceilings for low income representation are as follows:

State	City	Organization	Public Phone Numbers	Type of Clinic	Languages Served in Addition to English
	Fresno	The LITC of Central California Legal Services, Inc.	559-441-1611 800-675-8001	В	Spanish/Hmong
	Orange	Chapman University Tax Law Clinic	714-628-2535 877-242-7529	В	Spanish/Vietnamese
	San Francisco	Chinese Newcomers Service Center	415-421-2111 ext. 691	В	Cantonese/Mandarin/ Chinese
	Los Angeles	Filipino American Service Group (FASGI) LITC	213-487-9804 888-345-8683	E	Tagalog/llokano/ Visaya
CA	Los Angeles	HIV & AIDS Legal Services Alliance, Inc. (HALSA)	213-637-1690	В	Spanish
	Santa Ana	LITC of the Legal Aid Society of Orange County	714-571-5258	В	Farsi/Spanish Vietnamese
	San Diego	Legal Aid Society of San Diego, Inc HomeStart, Inc.	877-534-2524	В	Spanish/Russian/ French/German Farsi/Arabic/Tagalog/ Korean/Vietnamese/ Chinese/ Laotian
	San Diego	University of San Diego Legal Clinic	619-260-7470	В	Spanish
СО	Denver	University of Denver College of Law	303-871-6140	С	Oneviele
	New Haven Hamden	New Life Corporation	203-777-0313 203-582-3238	E B	Spanish Spanish
СТ		Quinnipiac University School of Law Low Income Taxpayer Clinic		_	'
	Hartford	University of Connecticut School of Law Tax Clinic	860-570-5165	С	Spanish
DC	Washington	American University WCL Janet R. Spragens Federal Tax Clinic	202-274-4144	С	Spanish
	Washington	Central American Resource Center	202-328-9799	E	Spanish
	Washington	UDC David A. Clarke School of Law LITC	202-274-7317	С	Spanish
DE	Wilmington	Delaware Community Reinvestment Action Council (DCRAC) LITC	302-654-5024 877-825-0750	E	Spanish
	Wilmington	Legal Services Corporation of Delaware	302-575-0408	С	Spanish
	Plant City	Bay Area Legal Services	813-752-1335	В	Spanish
	Daytona Beach	Community Legal Services of Mid-Florida (CLSMF) Low Income Taxpayer Clinic	386-255-6573 ext. 337 866-886-1799	В	Spanish
FL	St. Petersburg	Gulfcoast Legal Services	727-821-0726 800-230-5920	С	Spanish
'-	Plantation	Legal Aid Service of Broward County	954-736-2402	В	Spanish/Creole
	West Palm Beach	Legal Aid Society of Palm Beach County, Inc.	561-655-8944 800-403-9353	В	Spanish/Creole
	Miami	Legal Services of Greater Miami, Inc.	305-576-0080	В	Creole/Haitian/ Spanish
	Tallahassee	Legal Services of North Florida	850-385-9007	В	Spanish
	Atlanta	Federal Tax Clinic, College of Law Georgia State University	404-651-1412	С	Spanish
GA	Hinesville	JC Vision and Associates, Inc.	912-877-4243 912-877-4274	В	Spanish
	Carrollton	West Georgia Low Income Taxpayer Clinic	678-839-4813	С	
	Atlanta	Impuestos Ahora (Taxes Now) - Women's Economic Development Agency, Inc.	678-904-2201	E	Spanish
Н	Honolulu	Volunteer Legal Services Hawaii	808-522-0674	_	Chuukese/Filipino/ Italian/Hawaiian/ Japanese/Korean/ Marshallese/Samoan/V ietnamese
	Honolulu	Legal Aid Society of Hawaii	808-536-4302	В	Japanese/Filipino
IA	Des Moines	Iowa Legal Aid	515-243-2151 800-532-1275	В	Spanish Interpretation available for other languages

Moscow	State	City	Organization	Public Phone Numbers	Type of Clinic	Languages Served in Addition to English
Twin Falls Sisters of Mercy Regional Community of Omaha East Dundee Administer Justice 847-84-1100 E Spanish Omaha East Dundee Administer Justice 312-908-904 B Spanish Spanish Progress 11 Chicago Midwest Tax Clinic - Center for Economic 312-803-0284 B Spanish Progress 11 Chicago - Kent College of Law LITC 312-906-5050 C Spanish 312-906-5061	ID	Moscow	University of Idaho Tax Clinic		В	Spanish
Chicago Midwest Tax Clinic - Center for Economic 312-630-0284 B Spanish Progress 1-888-827-8511 B Spanish Progress 1-888-827-8511 B Spanish Progress 1-888-827-8511 B Spanish Progress 1-898-827-8511 B Spanish Progress 1-898-827-8511 B Spanish Progress 1-898-827-8512 B Spanish Progress 1-898-827-8513 B Spanish Progress 1-898-828-828-828-828-828-828-828-828-828	ID	Twin Falls			В	Spanish
Chicago		East Dundee	Administer Justice	847-844-1100	E	Spanish
Chicago Korean American Resource & Cultural 877-360-6416 E Korean		Chicago	Progress	1-888-827-8511	В	Spanish
Chicago Loyola (Chicago) Federal Tax Clinic 312-915-7176 C Chicago Loyola (Chicago) Federal Tax Clinic 312-915-7176 C Chicago Loyola (Chicago) Federal Tax Clinic 312-915-7176 C Chinese/Korean/ Valparaiso University Law Clinic 888-729-1064 Russian/Spanish Valparaiso University Law Clinic 888-729-1064 Russian/Spanish R	IL	· ·		312-906-5041		•
Valparaiso Lutheran University Association dba 219-465-7903 C Chinesei/Korean/ Valparaiso University Law Clinic 888-729-1064 Russian/Spanish			Center (KRCC)			Korean
Valparaiso University Law Clinic 888-729-1064 Mandarin/Polish/ Russian/Spanish Indianapolis Neighborhood Christian Legal Clinic 317-415-5337 B Spanish Russian/Spanish Russian/Russian Russian/Spanish Russian/Russian Russi		Chicago	Loyola (Chicago) Federal Tax Clinic	312-915-7176	С	
Indianapolis Neighborhood Christian Legal Clinic 317-415-5337 B Spanish	IN		Valparaiso University Law Clinic		С	Mandarin/Polish/ Russian/Spanish
Kansas City El Centro, Inc. 913-281-1186 E Spanish					В	Spanish
Lawrence		Bloomington	Indiana Legal Services	800-822-4774	С	
Students		Kansas City	· ·	913-281-1186	Е	
Kansas Inc	KS		Students			
Clinic S00-292-1882 S9-572-6124 B Spanish			Kansas Inc	800-550-5804		
Northern Kentucky University LTIC 889-572-5781 B Spanish	KY		Clinic	800-292-1862		
LA Louisiana Legal Services 877-521-6242 Baton Rouge Southern University Law (Clinic) Center 225-771-3333 C Waltham Bentley College Low Income Taxpayer Clinic (BLITC) MA Boston Greater Boston Legal Services 617-371-1234 B Chinese/Creole/ Haitian/Spanish/Armenian Springfield Springfield Partners for Community Action, Inc. Baltimore East Harbor Community Development 410-534-6522 E Spanish/ Vietnamese Baltimore Maryland Volunteer Lawyers Service 800-510-0050 C 410-547-6537 ME Bangor Pine Tree Legal Assistance 207-942-8241 B Spanish East Lansing Michigan State University College of Law-Low Income Taxpayer Clinic 517-336-8084 B Arabic/Bahasa/ Chinese/French/Germa n/Greek/Hindl/ Indonesian/ Malay/Polish/Spanish/ Urdu/Thai/ Korean/Japanese/ Italian/Russian/ Vietnamese Flint Legal Services of Eastern Michigan - LITC 800-339-9513 B Spanish/German Minneapolis Mid-Minnesota Legal Assistance 612-332-1441 B Spanish/Somali/ Russian/Somali/ Russian/Somali/ Hmong/Oromo/ Amharic Somali/ Hmong/Spanish University of Minneapolis University of Minnesota Tax Clinic 612-625-5515 B Somali/ Hmong/Spanish Hmong/Spanish				859-572-5781		Spanish
Waltham Bentley College Low Income Taxpayer 781-891-2083 B Haitian/Creole/Arabic/ Italian/Russian/ Spanish/Armenian Spanish/Armenian Spanish/Armenian Spanish/Armenian Spanish/Armenian Spanish/Armenian Spanish/Branish Spanish/Spanish Haitian/Spanish Spanish/Immenian Spanish/Spanish Spanish/Spanish Haitian/Spanish Spanish/Spanish Haitian/Spanish Spanish/Spanish Haitian/Spanish Spanish/Immenian Spanish/Spanish Haitian/Spanish Spanish/Spanish Haitian/Spanish Spanish/Spanish Haitian/Creole/Arabic/ Italian/Russian/Spanish Haitian/Creole/Arabic/ Italian/Russian/ Haitian/Creole/Arabic/ Italian/Russian/ Spanish/Immenian Spanish/Immeni	LA		Louisiana Legal Services	877-521-6242		Spanish/Vietnamese
MA Boston Greater Boston Legal Services 617-371-1234 Boston Greater Boston Legal Services Finater Baltimore Finater Bangor Finater		Baton Rouge	Southern University Law (Clinic) Center	225-771-3333	С	
Boston Greater Boston Legal Services 617-371-1234 B Chinese/Creole/ Haltian/Spanish		Waltham		781-891-2083	В	Italian/Russian/
Inc. Baltimore East Harbor Community Development 410-534-6522 E Spanish	MA	Boston	Greater Boston Legal Services	617-371-1234	В	Chinese/Creole/
MD Baltimore Maryland Volunteer Lawyers Service 800-510-0050 410-547-6537 C ME Bangor Pine Tree Legal Assistance 207-942-8241 B Spanish East Lansing Michigan State University College of Law-Low Income Taxpayer Clinic 517-336-8084 B Arabic/Bahasa/Chinese/French/German/Greek/Hindi/Indonesian/Malay/Polish/Spanish/Urdu/Thai/Korean/Japanese/Italian/Russian/Vietnamese Flint Legal Services of Eastern Michigan - LITC 800-339-9513 810-234-2621 B Spanish/German Detroit Accounting Aid Society 313-647-9620 B Arabic/Spanish Minneapolis Mid-Minnesota Legal Assistance 612-332-1441 B Spanish/Somali/Russian/Arabic/Hmong/Oromo/Amharic MIN Minneapolis University of Minnesota Tax Clinic 612-625-5515 B Somali/Hmong/Spanish		Springfield		413-263-6500	Е	Spanish/ Vietnamese
ME Bangor Pine Tree Legal Assistance 207-942-8241 B Spanish East Lansing Michigan State University College of Law-Low Income Taxpayer Clinic 517-336-8084 B Arabic/Bahasa/ Chinese/French/German n/Greek/Hindi/ Indonesian/ Malay/Polish/Spanish/ Urdu/Thai/ Korean/Japanese/ Italian/Russian/ Vietnamese Flint Legal Services of Eastern Michigan - LITC 800-339-9513 B Spanish/German Detroit Accounting Aid Society 313-647-9620 B Arabic/Spanish Minneapolis Mid-Minnesota Legal Assistance 612-332-1441 B Spanish/Somali/ Russian/Arabic/ Hmong/Oromo/ Amharic Minneapolis University of Minnesota Tax Clinic 612-625-5515 B Somali/ Hmong/Spanish		Baltimore	East Harbor Community Development	410-534-6522	Е	Spanish
MI MI East Lansing Michigan State University College of Law-Low Income Taxpayer Clinic MI MI MI MI MI MI MI MI MI M	MD		,	410-547-6537		
MI MI Low Income Taxpayer Clinic Low Income Taxpayer Clinic Chinese/French/German n/Greek/Hindi/ Indonesian/ Malay/Polish/Spanish/ Urdu/Thai/ Korean/Japanese/ Italian/Russian/ Vietnamese Flint Legal Services of Eastern Michigan - LITC Boo-339-9513 B Spanish/German Bou-234-2621 Detroit Accounting Aid Society Minneapolis Mid-Minnesota Legal Assistance Mid-Minnesota Legal Assistance Minneapolis University of Minnesota Tax Clinic Minneapolis Low Income Taxpayer Clinic Bou-339-9513 B Spanish/German Minneapolis Minneapolis Minneapolis Minneapolis Minneapolis University of Minnesota Tax Clinic Bou-339-9513 B Spanish/German Bou-339-9513 B B Spanish/German	ME	•				
Detroit Accounting Aid Society 313-647-9620 B Arabic/Spanish Minneapolis Mid-Minnesota Legal Assistance 612-332-1441 B Spanish/Somali/Russian/Arabic/Hmong/Oromo/Amharic Minneapolis University of Minnesota Tax Clinic 612-625-5515 B Somali/Hmong/Spanish	MI	East Lansing		517-336-8084	В	Chinese/French/Germa n/Greek/Hindi/ Indonesian/ Malay/Polish/Spanish/ Urdu/Thai/ Korean/Japanese/ Italian/Russian/
MIN Minneapolis Mid-Minnesota Legal Assistance 612-332-1441 B Spanish/Somali/ Russian/Arabic/ Hmong/Oromo/ Amharic Minneapolis University of Minnesota Tax Clinic 612-625-5515 B Somali/ Hmong/Spanish		Flint	Legal Services of Eastern Michigan - LITC	810-234-2621		Spanish/German
MIN Minneapolis University of Minnesota Tax Clinic Russian/Arabic/ Hmong/Oromo/ Amharic B Somali/ Hmong/Spanish						
Hmong/Spanish	MN	Minneapolis	Mid-Minnesota Legal Assistance	612-332-1441	В	Russian/Arabic/ Hmong/Oromo/
		Minneapolis		612-625-5515	В	
	MO	Kansas City	BFMA Tax Clinic	816-221-2034	В	Spanish

State	City	Organization	Public Phone Numbers	Type of Clinic	Languages Served in Addition to English
	Springfield	Missouri State University LITC	417-836-5414	В	Chinese/Korean/ Spanish/Thai/ Vietnamese
	Kansas City	Kansas City Tax Clinic - UMKC Law School	816-235-6201	С	
MS	Oxford	North Mississippi Rural Legal Services	662-234-8731 800-898-8731	С	
MT	Missoula	Montana Legal Services LITC	800-666-6899 406-543-8343	С	
	Durham	Duke Law School Low Income Taxpayer Clinic	919-613-7169 888-600-7274	С	Spanish
NC	Greenville	Legal Aid of North Carolina, Inc.	252-758-0113 800-682-4592	В	Spanish
140	Charlotte	Western North Carolina LITC (Legal Services of Southern Piedmont)	704-971-2622 800-438-1254	В	Spanish
	Camden	Northeastern Community Development Corporation	252-338-5466	В	Spanish
ND	New Town	Legal Services of North Dakota	877-639-8695	В	Arikara/Hidatsa/ Mandan
NE	Omaha	Legal Aid of Nebraska Low Income Taxpayer Clinic	402-435-2161 877-250-2016	В	Spanish
	Omaha	Greater Omaha Community Action	402-453-5656	С	Spanish
NH	Concord	Legal Advice & Referral Center	603-224-3333 800-639-5290	E	Spanish
	Concord	NH Pro Bono Referral Program	603-228-6028	С	
NJ	Newark	Rutgers Law School Federal Tax Clinic	973-353-1685	С	Spanish
INO	Camden	South Jersey Legal Services, Inc.	800-510-2492	Е	Spanish
	Albuquerque	University of New Mexico School of Law	505-277-5265	В	Spanish
NM	Farmington	DNA-People's Legal Services, Inc.	800 789 -7287 505-325-8886	В	Navajo/Hopi
NV	Las Vegas	Nevada Legal Services LITC	800-657-5482	В	Spanish
	Albany	Albany Law School	518-445-2328	С	-
	Brooklyn	Bedford-Stuyvesant Community Legal Services Corp.	718-636-1155	С	Spanish
	Buffalo	Volunteer Lawyers Project - Erie County Bar Assoc.	716-847-0662 Ext 13	В	
	New York	Fordham University	212-636-7353	С	
	New York	Legal Aid Society LITC (NY)	212-426-3013	В	Spanish/Chinese
	Bronx	Legal Services for New York City-Bronx LITC (LSNY Bronx)	718-928-3700	С	Spanish/ 150 other languages
NY	Jamaica	Queens Legal Services Corporation	718-657-8611	В	Chinese/Creole/Hindi/ Korean/Russian/ Spanish/Urdu
	Bayside	Queensborough Taxpayer Outreach Program (Q-TOP)	718-281-5446	E	Korean/Chinese/ Spanish
	Rochester	Rural Opportunities, Inc.	585-340-3342 800-888-6770	В	Spanish
	Brooklyn	South Brooklyn Legal Services - Brooklyn Low Income Taxpayer Clinic	718-237-5528	В	Russian/Spanish
	Syracuse	Syracuse University College of Law	315-443-4582	С	
	Elmsford	Taxpayer Education Services - Westchester Community Opportunity Program, Inc.	914-592-5600 Ext 150	E	Spanish
	Flushing	Young Korean American Service & Education Center	718-460-5600 866-901-5600	E	Korean
OH	Toledo	Advocates for Basic Legal Equality, Inc.	419-255-0814 888-534-1432	В	Spanish
	Akron	Community Legal Aid Services LITC	1-800-998-9454	В	

State	City	Organization	Public Phone Numbers	Type of Clinic	Languages Served in Addition to English
	Cleveland	Friendship Foundation of American- Vietnamese, Inc.	216-961-6005	E	Cambodian/Lao/ Spanish/Arabic/ Vietnamese
	Painesville	Lake Erie College - Low Income Taxpayer Clinic	440-375-7000	E	
	Piketon	Community Action Committee of Pike County	740-289-2371	С	
	Cleveland	Legal Aid Society of Cleveland	216-687-1900 866-529-6446	С	
	Columbus	Legal Aid Society of Columbus	614-241-2001 888-246-4420	С	Spanish
	Newark	Ohio State Legal Services Association	866-529-6446	С	Spanish
OK	Oklahoma City	Low Income Taxpayer Clinic at Oklahoma Indian Legal Services Inc	405-943-6457 800-658-1497	В	
	Gresham	Catholic Charities - El Programa Hispano	503-669-8350	В	Spanish
OR	Portland	Legal Aid Services of Oregon	503-648-7163	В	Spanish
	Portland	Lewis & Clark Legal Clinic	503-768-6500	С	
	Pittsburgh	Duquesne University School of Law - LITC	412-396-5877	С	
	Pittsburgh	Jewish Family & Children's Service of Pittsburgh	412-422-7200	E	Russian/Spanish/ Serbo-Croatian/ Chinese
PA	Philadelphia	Philadelphia Legal Assistance Center	215-981-3800 888-541-1544	В	Spanish
	Pittsburgh	University of Pittsburgh School of Law LITC	412-648-1300	С	
	Philadelphia	Villanova Law School Federal Tax Clinic	610-519-4123 888-829-2546	С	Spanish
	Adjuntas	Rural Opportunities Puerto Rico	800-888-6770	В	Spanish
PR	Arecibo	Educacion al Contribuyente en la Region Arecibo -Oficina para la Promocion y el Desarrollo Humano, Inc.	787-817-6951 787-817-6954 787-817-6955	E	Spanish
RI	Providence	Rhode Island Legal Services Low Income Tax Clinic	401-274-2652 800-637-4529	В	Spanish/Portuguese
	Providence	Rhode Island Tax Clinic, Inc.	401-421-1040	В	Spanish
SC	Greenville	Low Income Taxpayer Clinic - South Carolina Centers for Equal Justice, Inc.	864-679-3242 888-364-5592	В	Various
30	Columbia	South Carolina Association of Community Action Partnerships	803-771-9404	Е	Spanish
SD	Nisland	Technology for the Rural Enhancement of Communities Taxpayer Assistance Program	605-390-4391	В	
OD	Rapid City, SD	Rural Alliance, Inc.	866-370-7293	С	
	Nashville	Conexion Americas	615-269-6900	E	Spanish
TN	Oak Ridge	Legal Aid Society of Middle Tennessee and the Cumberlands	865-483-8454 866-481-3669	В	Spanish
TX	Sugarland	Centro Familiar Cristiano, Inc. LITC	281-340-2400	Е	Spanish/German
	San Antonio	Federal Tax Clinic	210-732-2688 432-687-1175	В	Spanish
	San Antonio	Our Lady of the Lake University	210-433-5800	Е	
	Houston	Houston Volunteer Lawyers Program	713-228-0732	В	Bosnia/Hungarian/ Spanish
	San Juan	La Union del Pueblo Entero	956-787-5557	Е	Spanish
	Corpus Christi	Latino Education Project Inc.	361-980-0361	E	Spanish
	Ft. Worth	Legal Aid of Northwest Texas	817-336-3943 800-955-3959	В	Spanish
	Austin	Texas Taxpayer Assistance Project at Texas Rio Grande Legal Aid	888-988-9996	В	Spanish/French

State	City	Organization	Public Phone Numbers	Type of Clinic	Languages Served in Addition to English
	Lubbock	Texas Tech University School of Law Low Income Taxpayer Clinic	806-742-4312 800-420-8037	В	
UT	Provo	Action Contra La Probeza Inc Centro Hispano	801-655-0258	В	Spanish
UI	Salt Lake City	University of Utah Low Income Taxpayer Clinic	801-587-7206 801-587-7221	В	Spanish
	Richmond	Community Tax Law Project	804-358-5855	В	Spanish
VA	Charlottesville	Legal Aid Justice Center	804-643-1086 434-977-0553 800-763-7323	В	Spanish
	Falls Church	Legal Services of Northern Virginia, Inc.	703-778-6800	В	Spanish/ Vietnamese
VT	Barre	Central Vermont Low Income Taxpayer Clinic	802-479-1053 800-639-1053	В	Bosnian/Spanish/ French/Russian
VI	Burlington	Vermont Low Income Taxpayer Project (Vermont Legal Aid, Inc.)	800-747-5022	В	All languages
	Spokane	Gonzaga University: University Legal Assistance	509-323-5791	В	Spanish/Russian
WA	Seattle	University of Washington Low Income Taxpayer Clinic	206-685-6805 866-866-0158	В	Spanish/Russian/ Somali/Chinese/ Japanese
	Vancouver	National Youth Support & Development	360-253-3001	В	Russian/Ukrainian
	Milwaukee	University of Wisconsin - Milwaukee	414-229-3232	В	Spanish
WI	Milwaukee	Legal Aid Society of Milwaukee Inc.	414-727-5300	С	Spanish
•••	Wausau	Wisconsin Judicare, Inc.	715-842-1681	С	
WV	Morgantown	Clinical Law Program - West Virginia University	304-293-7249	С	
	Jackson	Latino Resource Center	307-734-0333	Е	Spanish
WY	Lander	Wyoming Legal Services LITC - Wind River Legal Services	307-332-6626 800-442-6170	В	Spanish
	Rapid City, SD	Rural Alliance, Inc. (serving Wyoming)	866-370-7293	С	

APPENDIX V: TAXPAYER ADVOCATE SERVICE OPERATIONAL PRIORITIES

Systemic Advocacy FY 2007 Operational Priorities

In FY 2006, the Office of Systemic Advocacy (SA) developed a suite of key performance measures and diagnostic indicators to effectively improve performance in resolving systemic problems causing increased taxpayer burden. The office realigned into Immediate Interventions and Advocacy Projects, as discussed previously in this report. Portfolio Managers regularly perform in-process reviews on advocacy projects and provide technical guidance to SA analysts working the projects. All projects will be reviewed before closure using Quality Standards. During FY 2007, SA will utilize baselines to establish targets and implement process improvements where indicated. In addition to performance measures in all major programs, SA is exploring ways to measure its effectiveness in collaborating with the operating divisions in resolving issues that do not reach the level of a Most Serious Problem (MSP).

In FY 2007, SA will develop an internal customer satisfaction survey and will use the findings to design improvements to the services and programs provided to internal customers. An external customer satisfaction survey will also be developed if funding becomes available.

During FY 2006, SA enhanced the process for identifying the Most Serious Problems (MSPs) impacting taxpayers by effectively utilizing data generated from the TAMIS and SAMS and by soliciting stakeholder input. The identified MSPs will be considered for inclusion in the FY 2006 National Taxpayer Advocate's Annual Report to Congress (ARC). The office completed an analysis of initiatives, reports, and studies convened by the IRS and others that addressed recommendations made in past MSPs reported in the 2001 - 2004 Annual Reports to Congress. This analysis enabled us to track issues on which insufficient progress is made.

IRS employees and external stakeholders submit advocacy issues via the Systemic Advocacy Management System (SAMS) to SA for review, analysis, and potential development as advocacy projects. SAMS also provides TAS with a means of creating, working, and monitoring these projects and immediate interventions. SAMS became available to IRS employees in FY 2003 and was upgraded in FY 2004 by delivery of a web-based public portal, including a pre-screening process. These improvements enable the public, including taxpayers and their representatives, to submit perceived systemic problems directly to the Office of Systemic Advocacy. During FY 2007, SA will implement a strategy to assist internal customers in the recognition of systemic issues or issues impacting numerous taxpayers negatively that should be elevated via SAMS. The office will coordinate with the IRS to define programming requirements that will enable SAMS to link related issue submissions to open projects. SAMS could then recognize when a systemic issue reaches "critical mass." Currently, SAMS reviewers

must manually cross-reference any open issues. SA will also coordinate with the IRS to implement the critical program needs and system enhancements necessary to improve SAMS usability and to ensure the system is compliant with Section 508 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 794(d).

The office began efforts in FY 2005 to integrate its advocacy with case advocacy and in FY 2007 will expand its efforts. It will utilize standard criteria in the operational review process to identify strengths and opportunities for improvement. SA also plans to design and present workshops in the TAS Symposium to all employees to communicate objectives of integration and personal responsibility to elevate systemic issues negatively impacting taxpayers. It will also present a workshop to Portfolio Advisors on "best practices" in carrying out their role, including identifying issues proactively.

SA has adopted an aligning operational priority to positively impact the FY 2007 TAS Major Strategy, "Ensure the Human Resource (HR) component of TAS is adequate to meet its workload demand." It will complete a comprehensive workload study and utilize the findings to adjust or prioritize organizational resources. Additionally, SA will utilize the skills self-assessments administered to its analysts in FY 2006 to identify skill gaps and provide opportunities to address these gaps. To enhance opportunities for skill sharing and employee engagement, peer training and skill sharing initiatives will be pursued. SA analysts collectively have technical expertise in all IRS programs and sharing this expertise will enhance Systemic Advocacy's effectiveness in resolving issues. During FY 2007, the office will explore incorporating problem solving and systems management approaches demonstrated by Malcolm Baldrige "best practice organizations" to positively impact effective resolutions to systemic issues.

Confidentiality

TAS's statutory discretion to keep taxpayer contact and taxpayer-provided information confidential promotes confidence in TAS's independence and encourages taxpayers to freely communicate with TAS in order to resolve their problems. ¹⁶ TAS has developed special procedures for determining whether taxpayer contact or taxpayer-provided information should be disclosed to the IRS in certain cases (called "nonstandard" cases). In nonstandard cases, Case Advocates and Local Taxpayer Advocates fill out questionnaires to facilitate the analysis. The questionnaires then go through a review process that includes review by the TAS Area Director and the National Taxpayer Advocate.

A confidentiality chapter for the Internal Revenue Manual, which discusses these procedures, is under review, and will be published by October 1, 2006. As we gain experience from processing the nonstandard cases, TAS will continue to refine its confidentiality policies and procedures. TAS will also revise the confidentiality questionnaires as needed to ensure all factors are considered in making confidentiality recommendations to the NTA.

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¹⁶ See IRC § 7803(c)(4)(A)(iv).

Delegated Authorities

In FY 2003, the National Taxpayer Advocate chartered a team of Taxpayer Advocate Service employees to study the authorities delegated to TAS in a memorandum from the Commissioner dated January 17, 2001. These authorities allow TAS to take routine actions necessary to resolve taxpayers' problems. The team completed its evaluation of TAS's current authorities and presented its recommendations. Their recommendations addressed authorities TAS may want to consider obtaining and those TAS may want to consider relinquishing. The recommendations considered both the impact of our current authorities on TAS' mission to provide an independent, impartial and confidential voice for taxpayers within the IRS, and if by acquiring additional authorities, TAS would enhance its ability to advocate for taxpayers.

The NTA briefed the commissioners of W&I and SB/SE and asked for their feedback regarding the impact adopting the recommendations would have on their workload and work processes. Both operating division commissioners requested an opportunity to work with TAS to review our existing authorities.

The NTA obtained the Commissioner's agreement to convene a short-term task force of representatives from TAS, W&I, SB/SE, the Office of Appeals and the Office of Chief Counsel to review and evaluate our current authorities as a whole and consider the research and recommendations of the Delegated Authorities Team.

TAS has established a working group of representatives from each of the functions to conduct the review. A Steering Committee comprised of the NTA and executives representing the functions will oversee the effort and make final recommendations to the Commissioner by the end of FY 2006. TAS's current authorities will be modified in FY 2007. The implementation strategy will include developing a communication and training package for TAS and IRS employees.

Significant Hardship (IRC § 7811) Determination

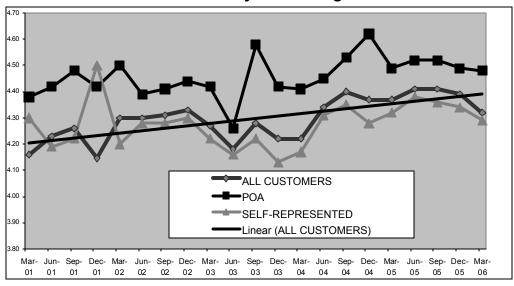
The FY 2006 Objectives Report described the expectation to have Case Advocates determine and document a Significant Hardship determination on each case. TAMIS has been modified, providing a dedicated screen to allow for a consistent method to document this significant hardship determination. The screen changes are scheduled for field implementation July 2006. The TAMIS screen will have fields to document the IRC § 7811 determination, provide an explanation, identify the case advocate who input the determination, and the date a Taxpayer Assistance Order (TAO) was issued, if applicable. Training addressing the TAMIS screen changes will be provided to all TAMIS users prior to implementation.

1

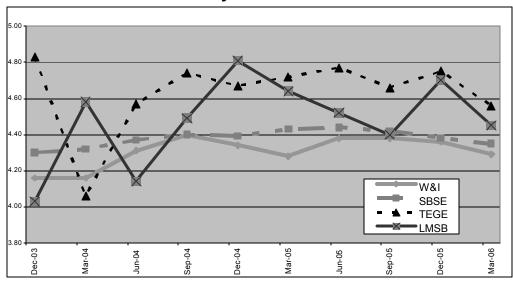
¹⁷ Del. Order 267, *Authority of the National Taxpayer Advocate to Perform Certain Tax Administration Functions* (Jan. 17, 2001).

Customer Satisfaction

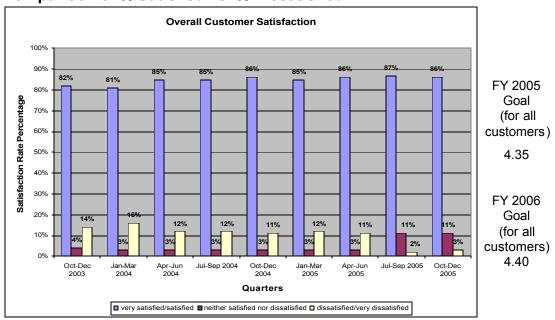
Customer Satisfaction Scores By Market Segment



TAS Customer Satisfaction by BOD



TAS Customer Satisfaction
Comparison of % Satisfied vs. % Dissatisfied:



Trends in Customer Satisfaction Mean Score

During FY 2005, TAS achieved an aggregate customer satisfaction score of 4.39, exceeding its goal of 4.35 on a five-point scale where five represents "very satisfied." Seventy-four percent of all TAS offices met or significantly exceeded their assigned goal, while 26 percent failed to meet their goal. In March 2001, 16 percent of TAS customers reported that they were either dissatisfied or very dissatisfied overall with the service they received from TAS, while 79 percent were satisfied or very satisfied. In the most recent quarter (ending December 2005), these figures were 11 percent and 86 percent, respectively, which reflects achievement of TAS' incremental improvement strategy.

In FY 2006, TAS conducted an anonymous, voluntary, and confidential survey of front-line employees and managers to self-assess how effectively our employee engagement strategy is working. Based on the survey results, we have taken stronger management accountability measures to ensure that all TAS employees with customer service responsibilities are provided with feedback from their customers that empowers them in terms of their personal development and enhances their ability to contribute to their office plans for improvement.

The National Taxpayer Advocate's FY 2005 Objectives Report to Congress committed TAS to achieving incremental improvements in customer satisfaction each year through fiscal year 2010, when the goal will be 4.58.

Fiscal Year	Actual Measure	Proposed Goal
2004	4.30	
2005	4.37	4.39
2006 ¹⁸	4.39	4.40
2007		4.44
2008		4.49
2009		4.53
2010		4.58

As shown in the above table, the FY 2006 goal is 4.40 and during the first guarter of FY 2006, TAS's score was 4.39. We have developed a methodology for assigning goals to individual offices, which integrates their FY 2005 scores, their contribution to TAS's total workload and comparisons of their scores with that of their peer group (viz., other TAS offices that are similar in size and/or function). This methodology is designed to ensure that TAS as a whole achieves its annual objectives and each office is accountable for contributing to the higher goal.

In FY 2007, management focus will be concentrated on identifying systemic opportunities for improving TAS processes using customer survey feedback. We will also work with offices to identify and address the barriers they face in improving customer service.

Service Level Agreements (SLAs)

TAS has established a Service Level Agreement (SLA) with each of the IRS operating divisions and functions to outline procedures and responsibilities for processing TAS casework when TAS does not have the statutory or delegated authority to take direct action on a case and needs assistance from the IRS to resolve the taxpayer's problem. TAS issues an Operations Assistance Request (OAR) to the operating division or function with the authority and responsibility to take the necessary action.

The SLAs require TAS and each OD/function to appoint liaisons who are responsible for managing the workflow of assistance requests between TAS and the OD/functions. The liaisons are also responsible for identifying, resolving and elevating issues related to the SLAs and the OAR process.

Each SLA requires quarterly meetings between the TAS Area Directors or their designees and the OD/function liaisons to identify and discuss issues and opportunities for improving the OAR process. The TAS FY 2006 program letter established a uniform process for conducting these meetings to ensure they are effective, and that taxpayers'

¹⁸ Data for FY 2006 is for the period from October 2005 through December 2005.

cases are resolved timely and accurately. Issues that cannot be resolved locally are elevated to the Area Director or National Office level for further negotiation and resolution. Results of each meeting are shared with the National Office for problem identification and trend analysis, and to track and monitor issues through resolution.

The SLAs with the four IRS operating divisions have been in effect since September 2002. TAS is in negotiations with the Wage & Investment (W&I), Small Business/Self-Employed (SB/SE), Large and Mid-Sized (LMSB) Business Operating Divisions and Tax Exempt & Government Entities (TE/GE) to update the agreements. Proposed modifications include changes reflecting new case processing guidelines within TAS resulting from the clarification of TAS case acceptance criteria, and opportunities to improve and enhance the current agreements identified by both TAS and the Operating Divisions.

TAS and the IRS are working to improve timely delivery and flow of OARs between TAS and the OD/function. One such improvement is the development of an interactive routing guide for OARs issued to W&I. The guides provide TAS employees with an overview of the types of issues each function within W&I is responsible for working, the documentation W&I requires to take action on an issue, and the location of and contact information for the function with responsibility for taking the action. TAS is negotiating with SB/SE to develop a similar tool for OARs under their jurisdiction.

TAS and the Criminal Investigation (CI) Division are working together to address issues discussed in the National Taxpayer Advocate's 2005 Annual Report to Congress which identified CI refund freezes as one of the most serious problems affecting taxpayers. The NTA and executives from TAS and CI meet regularly to address the issues identified in the report including procedures to notify taxpayers that their refunds have been frozen, providing taxpayers with an opportunity to submit documentation, and bringing cases to a quicker resolution.

Bilingual/Multilingual Initiatives

The Bilingual Study Team (BCAST) is preparing a class to enhance written and oral communications skills of Bilingual Case Advocates. The course will focus on assisting native Spanish speakers with writing letters using formal Spanish and technical terms. Throughout the bilingual study, the team recognized the limited opportunities native Spanish speakers have had to receive instruction in formal Spanish and technical terms before applying these skills on the job. The initial offering of the class is planned for the

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¹⁹ See The National Taxpayer Advocate's 2005 Annual Report to Congress, Most Serious Problem: Criminal Investigation Freezes. The CI Division, through its Questionable Refund Program (QRP), holds taxpayers' refunds pending a review to determine whether the claim is fraudulent. Taxpayers were not notified that their claims were under review or given an opportunity to present documentation supporting their positions. In reviewing a sample of TAS cases involving QRP freezes, CI ultimately agreed to issue the full amount of the refund claimed (or more) in 66 percent of decided cases and to issue a partial refund in an additional 14 percent of the decided cases.

TAS Symposium in the summer of 2006. Additional sessions will be offered virtually in concert with the four-year training plan.

TAS will explore reaching other audiences beyond the current scope of its initiatives including, at a minimum, taxpayers with limited English proficiency (LEP) or literacy levels. TAS will develop several companion pieces to complement a TAS/Multilingual Initiative LEP DVD project on financial literacy. In partnership with subject matter experts from the operating division, TAS will prepare a financial literacy toolkit in both English and Spanish, consisting of written material and CD-ROMs/DVDs providing indepth information and guidance on concepts discussed in the LEP DVD.

While the products will be published in both Spanish and English initially, they may be translated into other languages in the future. The topics will be chosen to aid taxpayers in becoming and remaining compliant with their tax filing and payment obligations by discussing such concepts as record keeping for tax purposes; IRS Individual Taxpayer Identification Number (ITIN); EITC and other family credits; opening a bank account; starting a small business; choosing a tax return preparer; refund delivery options; Refund Anticipation Loans (RALs); collection alternatives/payment alternatives; Low Income Taxpayer Clinics (LITC); TAS and IRS.

TAS will expand its outreach to multilingual communities by providing additional TAS assistance in four languages: Chinese, Korean, Russian and Vietnamese. TAS currently provides written information in these languages via Publication 1546, How to Get Help with Unresolved Tax Problems. In FY 2007, these taxpayers will be able to request TAS telephonically through a voice response messaging system on 1-877-ASKTAS1. In FY 2007, TAS will conduct a pilot study to determine if it TAS has adequate resources and personnel to provide additional bilingual assistance to taxpayers. During the pilot, a bilingual TAS case advocate will return the call within one business day and stay with the taxpayer until the problem is resolved. To publicize this service, a six-language poster featuring the 1-877-ASKTAS1 number will be sent to community organizations, religious institutions, and local marketplaces serving these populations.

Financial Literacy Toolkit

Taxpayers who are financially illiterate make up a disproportionate share of the unbanked population, which is estimated to include more than ten million households in the United States. ²⁰ These taxpayers rely on services provided by sub-prime lenders and "fringe banking" institutions (e.g., check cashers, car-title loan places, payday loan shops) that function outside of the federal regulatory system set up to protect consumers from predatory practices. ²¹ In many instances, these "fringe banking"

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²⁰ The Appleseed Foundation, *Financial Security in the Latino Community: Improving Latino Immigrants' Access to Mainstream Financial Institutions* (June 2003).

²¹ Using the Tax Code to Support Family Economic Success, a Strategy paper for the Annie E. Casey Foundation's Making Connections Initiative (March 2002).

institutions are the only convenient sources of lending and financial transactions for unbanked taxpayers.

Financial literacy plays an important role in tax compliance because taxpayers who do not understand basic financial transactions are unlikely to understand the difference between employee and independent contractor status or the complex eligibility rules for the Earned Income Tax Credit (EITC) These taxpayers are also less likely to be able to prepare their own returns, select a qualified return preparer, or determine what a sham offer shop is.

The Taxpayer Advocate Service has taken a strong role in promoting financial literacy. For the past three fiscal years, promoting financial literacy has been one of TAS' objectives.²² In furtherance of this objective, in fiscal year 2005 TAS partnered with the IRS Multilingual Strategy Initiative (MLI) office to explore the possibility of creating products for the LEP communities. As part of this partnership, TAS and MLI have taken the lead in creating a Spanish language LEP DVD. TAS recognized the potential of this project as a means to communicate key messages about IRS and TAS programs to help them understand and comply with tax responsibilities.

TAS's FY 2007 objective is to produce a comprehensive financial literacy toolkit (in both paper and electronic formats) that will provide in-depth information on a number of topics including ITINs, RALs, the EITC, Low Income Taxpayer Clinics (LITCs), the process for securing banking services, available IRS resources, and TAS messages. The toolkit will be a companion collateral package to complement and augment a Spanish-language LEP (limited English proficiency) DVD.

The toolkit will be available in English and Spanish and must be suitable for use by both TAS and IRS personnel in efforts to reach Spanish-language LEP taxpavers. The toolkit will also be available for outreach by outside partners and stakeholders. This toolkit may be distributed in hard copy or CDRom/DVD format in conjunction with the viewing of the LEP DVD or independent of the DVD, at seminars, presentations and outreach events; and through the TAS Electronic Press Kit (EPK) and Advocate Toolkit (ATK). The TAS messages will remain consistent with IRS overall communications goals to protect individual taxpayer rights and to reduce taxpayer burden. The LEP DVD will highlight:

- The benefits of filing and paying taxes as they relate to obeying the law, establishing residency to qualify for other federal benefits, and providing a foundation for improving financial status;
- How to participate in each phase of the tax process (pre-filing, filing, post-filing) including how to obtain an ITIN; how to determine whether a taxpayer is an employee, independent contractor or self-employed for the purposes of

²² National Taxpayer Advocate Fiscal Year 2006 Objectives Report to Congress 34; National Taxpayer Advocate Fiscal Year 2005 Objectives Report to Congress 35; National Taxpayer Advocate Fiscal Year 2004 Objectives Report to Congress 19.

withholding and paying taxes and recordkeeping; what tax credits are available to individuals who have social security numbers (SSNs) or ITINs; how individual or self-employed/small business filers should properly document work status; and

 The consequences of not complying with the tax laws, including how improperly documenting work status can adversely impact the taxpayer when it comes to meeting tax obligations.

A communication and marketing plan for the LEP DVD will ensure widespread distribution by the IRS and external stakeholder groups. Measures will be developed to determine the effectiveness of the LEP DVD messages received by the targeted audience through surveys, focus groups, and the circulation of the product.

Overall, there is a need for increased communications directed at this under-served audience to help overcome their lack of awareness of how to prepare for and timely file federal tax returns in compliance with applicable tax laws and regulations. While the LEP DVD is one part of this effort towards increased communications, it is only one part of the overall effort. The accompanying financial literacy toolkit will build on the information presented in the LEP DVD and provide additional information as well as a list of available resources.

Case Complexity

In FY 2005, the National Taxpayer Advocate formed a Case Complexity Team to explore the hypothesis that although the number of TAS cases nationwide was decreasing, the complexity of those cases had significantly increased, causing case advocates to spend more time resolving issues that require a multitude of skill sets. The mission of the team is to determine the different degrees of complexity of TAS casework by defining the elements of complexity and designing a process to accurately capture levels of complexity.

TAS conducted a 90-day pilot in five offices to gather more detailed information on the complexity of cases currently in inventory. The pilot was designed to capture how cases "morph," or become more complex, from the time they are opened through closure. Data on the 22 identified complexity factors was captured on approximately 5,000 closed cases. This data enabled the team to develop formulas, based upon regression analysis, that provide an indication of the degrees of complexity of TAS cases.

The team has identified 22 complexity factors for capturing the degree of complexity of cases. In FY 2007, pending NTA approval, the team will submit a Request for Information Services (RIS) to create a complexity screen on TAMIS that will capture this information. This will lead to a more effective way of distributing inventory, and identifying staffing and training needs.

Case Reviews

TAS will continue using case review initiatives introduced in FY 2004 to minimize timeframes for resolving taxpayer inquiries.²³ These initiatives include 100-day and early intervention case reviews. In FY 2006, TAS introduced Case Review Panels in each of TAS's seven geographic areas. The primary purpose of the panels is to periodically review a representative cross-section of Area wide casework to assess the quality of customer service with respect to specific types of issues (missing payments, audit reconsiderations etc). In addition, the reviews will measure the effective ness of critical case processes (Operational Assistance Requests, Initial Plan of Action etc), and identify potential advocacy issues.

On-Line Integrated Data Retrieval System (IDRS) Review Process

An opportunity identified through the annual self-assessment of TAS internal management controls²⁴ led TAS to undertake a review of the online IDRS (Integrated Data Retrieval System) Review process.²⁵ In accordance with IRM 1.4.17.2.3.3, Compliance IDRS Adjustment Reviews, managers will review a random sample of IDRS adjustment actions to ensure accuracy, proper documentation, and that adjustments fall within the delegated authorities of the employee.

During a 90-day period, TAS reviewed the input of all IDRS adjustments. The test results indicated a 92 percent accuracy rate. 26 TAS plans to enhance this process to ensure that customer accounts are accurately adjusted and transactions are within prescribed TAS authorities. Data will be evaluated for national improvement opportunities and appropriate training or systemic guidance.

TAS Toll-Free Telephone Numbers

TAS's toll-free telephone applications provide invaluable service to taxpayer seeking assistance. Over the past few years, the toll-free program has expanded to further address the needs of customers suffering from hardships. The chart below provides information related to the three telephone applications now in place:²⁷

²³ The 100-day and early intervention reviews were established in response to TIGTA Audit 2004-10-166, The Taxpayer Advocate Service Needs to Improve Case Management to Ensure Taxpayer Problems are Resolved Timely.

IRM 1.4.2.1 provides direction on the process of annual internal management control reviews. Additionally, TIGTA recommended the NTA require TAS managers to conduct on-line reviews of proposed adjustments and ensure the TAS closed case quality assurance program includes steps for identifying adjustments made without proper authorization. Treasury Inspector General For Tax Administration, Ref. No. 2001-10-040, Taxpayer Advocate Service Employees Made Adjustments to

Taxpayer Accounts Without Proper Authorization (2004).
²⁶ 19,515 adjustments were reviewed of which 1,573 were rejected for varying reasons. The overall error rate was 8.06 percent.
²⁷ The National Taxpayer Advocate Fiscal Year 2006 Objectives Report V-10 – V-11.

Applications/ Product Lines	Use
877-777-4778	The most widely advertised number used by taxpayers seeking assistance from TAS. This number is advertised in IRS publications and is the primary number used for TAS' marketing.
877-ASK-TAS1	The primary number used by the National Taxpayer Advocate during tax forums, radio engagements, and strategically designed outreach campaigns. Data generated from these types of events are captured and analyzed to determine the effectiveness of specific marketing strategies.
Case Advocate Toll-Free Numbers	More than 1,300 unique toll-free numbers are issued to case advocates in the TAS organization. These numbers are not published, but case advocate provide their unique number during first contact. These numbers are especially useful for taxpayers suffering economic burden or hardships when toll calls impeded their ability to be compliant.

In FY 2007, TAS will:

- Change the NTA Toll-free Hotline Script to ensure explanations of TAS case acceptance criteria are easily understood.
- Incorporate parts of the new script on the 1-877-ASKTAS1 toll free number to see if improvement of initial script clarifies purpose of TAS.²⁸
- Establish a team with TAS and W&I to address training deficiencies and outreach efforts of the toll-free assistors.
- On-going monitoring of calls by TAS on the NTA Toll-free Hotline to identify trends, and improvement opportunities.
- Consider the immediate transfer of calls that meet criteria to TAS intake sites based on the taxpayer's location.

Desktop Integration

Desktop Integration provides multiple systems interfaces using only one computer terminal, moving the operating/functional divisions within the IRS towards an integrated desktop. DI is owned by W&I, and currently used by W&I, SB/SE, and TAS. Functionality includes inventory management, next case delivery, nationwide history and follow-ups, immediate print capabilities to fax to taxpayer, generations of electronic referrals, and inventory management.²⁹ The Desktop Integration (DI) system was fully

 $^{^{28}}$ The TAS case acceptance rate on the ASKTAS1 is currently 25 percent.

²⁹Description of Desktop Integration, IRS As-Built Architecture.

deployed to all TAS offices in November 2005. TAS receives cases from the W&I tollfree and walk-in sites using the electronic Form 911 Application for Taxpayer Assistance Order (e-911) on DI.

In FY 2006, TAS submitted DI enhancement requests including:

- Implementation of a TAS Super User to give TAS the ability to re-route inventory from one location to another:
- Electronic routing of the Form 12412 Operations Assistance Request (OAR); and
- Automatic re-routing of inventory from the Puerto Rico office based on clarified case criteria.

The TAS Super User functionality will be granted by September 2006. TAS has been advised that due to the complexity of the programming a Reguest for Information Services (RIS) will be required to make modifications concerning the electronic routing of Form 12412, Operations Assistance Request, and automatic rerouting of inventory from Puerto Rico.

Technical Advisor Program

TAS Technical Advisors (TA) are responsible for resolving the most technically complex or sensitive issues using effective research, communication, coordination, and negotiation skills.³⁰ TAS currently employs three types of technical advisors: Revenue Agent, Revenue Officer, and Campus Processing.

In FY 2004, TAS conducted a study of the technical advisor program³¹, and in FY 2005, created the Campus Processing Technical Advisors (CPTA). CPTAs provide TAS with subject matter experts in the campus processing arena, and case advocates with an in house consultant on issues intrinsic to campus processes such as Scrambled SSNs, Entity, Adjustments, Accounting Data Conversion, Statute, Refund, and Automated Under Reporter Units. Additionally, CPTAs support the TAS Campus OAR Requirements and Routing Guide team.³²

The study also made recommendations regarding the management structure for the Technical Advisors, classification review of the Revenue Officer position, and educational opportunities for the TAs to remain proficient with their counter parts in the operating divisions. TAS will have completed and submitted a business case for the classification review of the Revenue Officer TA position by September 2006.

³⁰ IRM §13.1.12.2(1).

The Technical Advisor Program Study, issued May 13, 2004.
The TAS Campus OAR Requirements and Routing Guide team develops and updates intranet guides that provide OAR instructions on major campus functions including local procedures within individual campuses to Case Advocates.

In FY 2006, TAS issued guidelines to ensure the optimum efficiency of the TA program and to provide national guidance on how to utilize TAs.³³ Technical Advisors will act as consultants on projects, for portfolio managers, and as needed for the Systemic Advocacy and Campus Consistency Program efforts. In FY 2007, TAS will expand its intranet site to include a webpage where TAs will share information relative to new tax law and policy. This will help to ensure consistent taxpayer treatment, and strengthen uniformity and information sharing among TAs.

³³ Christopher Wagner, Deputy National Taxpayer Advocate, *Memorandum: Guidelines for Technical* Advisor Program Attachment, (May 5, 2006).

APPENDIX VI: LIST OF ADVOCACY PORTFOLIOS

Abusive Schemes	Portfolio	LTA Name	State/Office	Phone Number
Appeals: Nondocketed Inventory Logan, A WY 307-633-0800 Appeals: Nondocketed Inventory (Campus) Safrey, E BSC 631-654-6686 (Campus) Appeals: Nondocketed Inventory (Field) Trudeau, M ID 208-387-2927 Audit Reconsiderations (Audit Reconsiderations (Audit Recon/ASFR/6020B (620) Carey, W ATC 770-936-4500 Recon/ASFR/6020B (620) Boucher, D ME 207-622-8528 Backup Withholding Adams, M KS 316-352-7506 Bankruptcy Processing Issues Mettlen, A PA Pittsburg 412-395-5987 Campus Consistency Wess, D MSC 901-395-1900 Carryback/Carryforward Claims Blair, C OSC 801-620-7168 CAWR/FUTA Keating-Jones, J OR 503-326-7816 Centralized Lien Filing and Releases Diehl, M CSC 859-669-5316 Criminal Investigation Cases (Cl) & Sawyer, M FSC 559-442-6400 Criminal Investigation Freezes Sherwood, T CO 303-446-1012 EITC: Certification/Precertification Mings, L KCC 81	Abusive Schemes		MO	314-612-4610
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Federal Payment Levy Program (FPLP) Morris, R WI 414-297-3046				
FPLP Communication O'Shaughnessy, NH 603-433-0571		O'Shaughnessy,		
Filing Season Readiness/SPEC Douts, K AK 907-271-6877	Filing Season Readiness/SPEC		AK	907-271-6877
Frontline Leader Readiness Program Kitson, A NY Brooklyn 718-488-2080 (FLRP)	Frontline Leader Readiness Program			
Government Entities: Indian Tribal Wirth, B NY Buffalo 716-686-4850		Wirth B	NV Buffalo	716-686 4850
Government Issues	Government Issues	VVIIIII, D		710-080-4650
Health Care Tax Credit (HCTC) Cummings, L TX Dallas 214-413-6500				
Identity Theft Safrey, E BSC 631-654-6686				
Injured Spouse Post, T WV 304-420-6616				
Innocent Spouse Relief: IRC § 6015 Adams, C CA Laguna 949-389-4804 Nigel	Innocent Spouse Relief: IRC § 6015	Adams, C	_	949-389-4804
Installment Agreements: Allowable Moore, L FL Ft. 954-423-7677 Expenses (High Cost) Lauderdale		Moore, L	FL Ft.	954-423-7677
Installment Agreements: Allowable Washington, J MS 601-292-4800		Washington, J		601-292-4800

Portfolio	LTA Name	State/Office	Phone Number
Expenses (Low Cost)			
Installment Agreements: Processing	Tam, T	CA Oakland	510-637-2703
Interest Computations, Abatement of	Romano, F	СТ	860-756-4555
Interest	,		
International Taxpayers	Puig, JC	PR	787-622-8930 (S)
			787-622-8940 (E)
IRS Training on Taxpayers Rights	Hickey, M	NE	402-221-4181
ITIN Outreach	Blount, P	MI	313-628-3670
ITIN Processing	Dowd, L	PSC	215-516-2499
Levy (710) [Hardship determination	Polson, R	IA	515-284-4780
linked to release of levy]			
Lien Release, Lien Withdrawal, Lien	Lauterbach, L	NJ	973-921-4043
Subordination, Lien Discharge			
LITC	Lewis, C	LA	504-558-3001
Manual Refunds	Strayer, C	OH Cleveland	216-522-7134
Mentoring	Coss, V	ANC	978-474-5549
Mixed and Scrambled TINs	Murphy, M	AZ	602-207-8240
(Multiple/Mixed TINS (410))			
Multilingual Initiative	Glass, D	TX Austin	512-499-5875
Navigating the IRS	Gray, P	AR	501-324-6269
Nonfiler Strategy	Warren Joe	MN	651-312-7874
Notice Clarity	Smith, G	NY Albany	518-427-5413
Notice Clarity (Account/Notice Inquiry	Egan, C	RI	401-525-4200
Transfer Criteria (110)			
OIC (Field, COIC)	Burns, L	KY	502-582-6030
OIC (Field, ETA, COIC)	Sonnack, B	TX Houston	713-209-3660
Outreach to ESL Taxpayers (including	Puig, JC	PR	787-622-8930 (S)
ITINs)			787-622-8940 (E)
Outreach and Marketing to Low income	Grant, D	NV	702-455-1241
TPs (Marketing too)			
Penalties: e.g. failure to pay,	Sherwood, T	CO	303-446-1012
abatements, adjustments, estimated			
Position Management	Wirth, B	NY Buffalo	716-686-4850
Practitioner Priority Services	Beck, J	WA	206-220-6037
Preparer Penalties	Votta, P	MD	410-962-2082
Returned/Stopped Refunds (40)	Gilchrist, M	AL	205-912-5631
Schedule K-1 Matching	Sheely, K	IN	317-226-6332
Seizure and Sale (730)	Beck, J	WA	206-220-6037
TACs-Rural	Foard, L	ND	701-239-5141
TACs-Urban and Communications	VanHorn, C	OH Cincinnati	513-263-3260
Tax Exempt Entities: EP Penalties	Blair, C	OSC	801-620-7168
Tax Exempt Entities: EP returns (Forms 5500)	Blair, C	OSC	801-620-7168
Entities: Tribal Government Issues	Wirth, B	NY Buffalo	716-686-4850
Tax Forums	Allen, B	GA	404-338-8099
TIGTA/GAO	Thompson, T	MT	406-441-1022
Tip Reporting	Grant, D	NV	702-455-1241
Transcript Delivery System (Copies of	Cooper-Aquilar,	UT	801-799-6958
returns, transcripts, reports, FOI (150)	S		
Transition of SB Work	Keleman, L	CA Los Angeles	213-576-3140
Trust Fund Recovery Penalty	Campbell, M	VA	804-916-3501

GLOSSARY OF ACRONYMS

ACRONYM	DEFINITION
ACDS	Appeals Centralized Database System
ACH	Automated Clearing House
ACS	Automated Collection System
ACDS	Appeals Centralized Database System
ACTC	Advance Child Tax Credit
AEITC	Advanced Earned Income Tax Credit
AGI	Adjusted Gross Income
AICPA	American Institute of Certified Public Accountants
AIS	Automated Insolvency System
AJCA	American Jobs Creation Act of 2004
AIMS	Audit Information Management System
ALE	Allowable Living Expenses
ALS	Automated Lien System
AMT	Alternative Minimum Tax
ANMF	Automated Non Master File
AOIC	Automated Offer In Compromise
ARC	Annual Report to Congress
AQMS	Appeals Quality Measurement System
ASED	Assessment Statute Expiration Date
ASFR	Automated Substitute for Return
ATAO	Application for Taxpayer Assistance Order
AUR	Automated Underreporter
AWSS	Agency Wide Shared Services
BMF	Business Master File
CADE	Customer Account Data Engine
CARE	Customer Assistance, Relationships & Education
CAS	Customer Account Services
CAWR	Combined Annual Wage Reporting Program
CCISO	Cincinnati Campus Innocent Spouse Operations
CCR	Central Contractor Registration
CDP	Collection Due Process
CDPTS	Collection Due Process Tracking System
CEX	Consumer Expenditure Survey
CFF	Collection Field Function
CERCA	Council for Electronic Revenue Communication Advancement
CID	Criminal Investigation Division
CIDS	Centralized Inventory Distribution System
CIP	Compliance Initiative Projects
CNC	Currently Not Collectible

ACRONYM	DEFINITION
COIC	Centralized Offer In Compromise Program
COTR	Contract Officer Technical Representative
CONOPS	Concept of Operations
CPE	Continuing Professional Education
CQMS	Collection Quality Management System
CRIS	Compliance Research Information System
CSED	Collection Statute Expiration Date
CSR	Customer Service Representative
CTC	Child Tax Credit
DA	Disclosure Authorization
DATC	Doubt As To Collectibility
DATL	Doubt As To Liability
DDP	Daily Delinquency Penalty
DI	Desktop Integration or Debt Indicator
DIF	Discriminant Inventory Function
DPT	Dynamic Project Team
EAR	Electronic Account Resolution
EBT	Electronic Benefits Transfer
EDS	Exempt Determinations System
EFIN	Electronic Filing Identification Number
EFTPS	Electronic Federal Tax Payment System
EGTRRA	Economic Growth and Tax Relief Reconciliation Act
EIN	Employer Identification Number
EITC	Earned Income Tax Credit
ELS	Electronic Lodgment Service
EO	Exempt Organization
EP	Employee Plans
EQRS	Embedded Quality Review System
ERCS	Examination Return Control System
ERIS	Enforcement Revenue Information System
ERO	Electronic Return Originator
ERSA	Employee Retirement Savings Account
ES	Estimated Tax Payments
ESA	Educational Savings Account
ESL	English as a Second Language
ETA	Electronic Tax Administration
ETACC	Electronic Tax Administration Advisory Committee
ETLA	Electronic Tax Law Assistance
FA	Field Assistance
FDC	Fraud Detection Center
FDCPA	Fair Debt Collection Practices Act

ACRONYM	DEFINITION
FICA	Federal Insurance Contribution Act
FMS	Financial Management Service
FOIA	Freedom Of Information Act
FPDC	Federal Procurement Data Center
FPDS	Federal Procurement Data System
FMV	Fair Market Value
FPLP	Federal Payment Levy Program
FTC	Federal Trade Commission
FTD	Federal Tax Deposit or Failure To Deposit
FTE	Full Time Equivalent
FTF	Failure To File
FTI	Federal Tax Information
FTP	Failure To Pay
FY	Fiscal Year
GAO	Government Accountability Office or General Accounting Office
GO	Government Entities
ICM	Intelligent Call Management
ICP	Integrated Case Processing
ICS	Integrated Collection System
IDFP	IRS Directory for Practitioners
IDRS	Integrated Data Retrieval System
IDS	Inventory Delivery System
IMF	Individual Master File
IPIA	Improper Payments Improvement Act
IRC	Internal Revenue Code
IRI	Incomplete Return Item
IRM	Internal Revenue Manual
IRS	Internal Revenue Service
IRSAC	Internal Revenue Service Advisory Council
IRSAC	Internal Revenue Service Advisory Committee
ISP	Industry Specialization Program
ISRP	Integrated Submission and Remittance Processing
ISTS	Innocent Spouse Tracking System
ITIN	Individual Taxpayer Identification Number
LEP	Limited English Proficiency
LITC	Low Income Taxpayer Clinic
LLC	Lifetime Learning Credit
LMSB	Large & Mid-Size Business Operating Division
LOS	Level of Service
LRF	Last Return Filed
LSA	Lifetime Savings Account

ACRONYM	DEFINITION
LTA	Local Taxpayer Advocate
MAGI	Modified Adjusted Gross Income
MFT	Master File Transaction Code
MITS	Modernization and Information Technology Services
NFTL	Notice of Federal Tax Lien
NMF	Non-Master File
NPIIT	Notice Process Improvement Initiative Team
NRP	National Research Program
NSG	Notice Support Group
NTA	National Taxpayer Advocate
NUMIDENT	Numeric Identification Database
OAR	Operations Assistance Request
OASDI	Old-Age, Survivors, and Disability Insurance
OBRA	Omnibus Budget Reconciliation Act of 1989
OIC	Offer in Compromise
OMB	Office of Management and Budget
OPR	Office of Professional Responsibility
OPERA	Office of Program Evaluation, Research, & Analysis
OPI	Office of Penalty and Interest Administration
PAF	Payer Account File
PDC	Private Debt Collection
POA	Power Of Attorney
PTIN	Preparer Tax Identification Number
QRP	Questionable Refund Program
RAC	Refund Anticipation Check
RACS	Revenue Accounting Control System
RAL	Refund Anticipation Loan
RCA	Reasonable Cause Assistant
RCP	Reasonable Collection Potential
RFQ	Request For Quotations
RGS	Report Generation System
ROFT	Record of Federal Tax Liability
RRA 98	Internal Revenue Service Reform and Restructuring Act of 1998
RPS	Revenue Protection Strategy
RPP	Return Preparer Program
SAMS	Systemic Advocacy Management System
SAR	Strategic Assessment Report
SB/SE	Small Business/Self Employed Operating Division
SBJPA	Small Business Job Protection Act
SERP	Servicewide Electronic Research Program
SFR	Substitute for Return

ACRONYM	DEFINITION
SPEC	Stakeholder Partnerships, Education & Communication
SPOC	Single Point of Contact
SSA	Social Security Administration
SSI	Supplemental Security Income
SSN	Social Security Number
STARS	Scheme Tracking and Referral System
TAC	Taxpayer Assistance Center
TAMIS	Taxpayer Advocate Management Information System
TANF	Temporary Assistance to Needy Families
TAP	Taxpayer Advocacy Panel
TAS	Taxpayer Advocate Service
TCE	Tax Counseling for the Elderly
TCMP	Taxpayer Compliance Measurement Program
TDA	Taxpayer Delinquent Account
TDRA	Tip Rate Determination Agreement
TDI	Taxpayer Delinquent Investigation
TDQAS	Training Development Quality Assurance System
TDS	Transcript Delivery System
TEC	Taxpayer Education and Communication
TE/GE	Tax Exempt & Government Entities Operating Division
TFRP	Trust Fund Recovery Penalty
TIGTA	Treasury Inspector General for Tax Administration
TIN	Taxpayer Identification Number
TOP	Treasury Offset Program
TPDS	Third Party Data Store
TPI	Total Positive Income
TPNCs	Taxpayer Notice Codes
TRA 97	Taxpayer Relief Act of 1997
TRAC	Tip Reporting Alternative Commitment
TRIS	Telephone Routing Interactive System
UCH	Universal Case History
UI-DIF	Unreported Income Discriminant Function
VITA	Volunteer Income Tax Assistance
W & I	Wage and Investment Operating Division
WFTRA	Working Families Tax Relief Act
WIC	Women, Infants and Children