

Session Objective

This panel will discuss how the Operating Divisions will communicate with one another, coordinate substantive issue positions, and interact with the IRS functional and support divisions.

Moderator and Panelists

Moderator:

Michael E. Mares, Witt, Mares & Company, PLC, Newport News, VA; Immediate Past Chair, Tax Executive Committee, AICPA; Member, IRS Advisory Council

Panelists:

<i>Claudia Hill</i>	<i>EA, Tax Mam, Inc., Cupertino, CA; Chair Government Relations Committee National Association of Enrolled Agents</i>
<i>Bob Wenzel</i>	<i>Deputy Commissioner Operations, Internal Revenue Service</i>
<i>Stuart Brown</i>	<i>Chief Counsel, Internal Revenue Service</i>

Discussion Points

- The IRS will provide service through a number of contact points, including 400 taxpayer assistance centers; the 1-800 phone number, which will be unchanged and routed to customer service representatives based on subject matter; the new Taxpayer Advocate Service Office; and current Appeals avenues, which are being expanded.
- Once operational, most taxpayers will interact with only one operating division. All decisions related to a taxpayer case will be handled within that division by a dedicated IRS management team. A greater proportion of IRS resources will be allocated to pre-filing activities, such as education and outreach and early intervention to help taxpayers comply with the tax laws. Post filing activities will be geared to problem prevention and risk based analysis with targeted enforcement activities for the intentionally non-compliant.

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- The number of major units with responsibility for administering tax decisions with taxpayers will be reduced from 43 districts and service centers to four operating divisions, greatly reducing the likelihood of inconsistency in treatment of taxpayers. In addition, the work of the nine Assistant Commissioners in charge of functional areas in the National Office and regional offices have been combined into three major areas in each operating division: pre-filing, filing and post-filing.
 - Many tax issues do not affect all operating divisions. For example, approximately 80% of the tax code does not apply to taxpayers in the Wage and Investment Division. For those tax issues that overlap the divisions, tax treatment will be coordinated to ensure consistency.
 - All programs in the National Office, including collection and exam programs, have been assigned to a single program responsibility area in one of the operating divisions. This responsibility area will have responsibility for coordination of any program changes with other affected operating divisions. The overall coordination will be overseen by the Deputy Commissioner for Operations.
 - The Chief Counsel technical staff will remain organized around technical tax areas in the National Office in order to ensure consistent legal interpretations in all operating divisions. There will be close coordination among the Chief Counsel components (Division Counsel and the National Office) to ensure correct, uniform interpretations of the internal revenue laws.
 - Nationwide, 100 Territory Managers and Area Managers will assume responsibility for practitioner liaison relationships and resolution of systematic issues in the field.

Session Objective

The panel will address how the modernized IRS Operating Divisions, the Office of the Chief Counsel, and the Department of the Treasury, will identify emerging issues, develop published guidance and maintain consistency and uniformity in tax law interpretations across Divisional lines.

Moderator and Panelists

Moderator:

Kenneth W. Gideon, Wilmer, Cutler, & Pickering, Washington, DC; former Assistant Secretary for Tax Policy, Department of the Treasury

Panelists:

<i>Robert Ashby</i>	<i>Vice President of Taxation (U.S.) Tax Executives Institute</i>
<i>Douglas P. Stives</i>	<i>Partner, Curchin & Company</i>
<i>Jonathan Talisman</i>	<i>Acting Assistant Secretary for Tax Policy, Department of the Treasury</i>
<i>Larry Langdon</i>	<i>Commissioner, Large & Mid Size Business Division, Internal Revenue Service</i>
<i>Stuart Brown</i>	<i>Chief Counsel, Internal Revenue Service</i>
<i>Judith Dunn</i>	<i>Associate Chief Counsel (Domestic), Internal Revenue Service</i>

Discussion Points

- The IRS and Treasury are committed to greater use both of published guidance and of other pre-filing issue resolution techniques to improve tax administration.
- The published guidance process will have increased participation by the IRS Operating Divisions and a close working partnership among these Operating Divisions, the Office of Chief Counsel, and the Office of Tax Policy.

- The Office of Chief Counsel will continue to provide impartial legal interpretation of the tax law in various forms of case-specific guidance, such as PLRs, TAMs APAs and FSAs. There will be close coordination among the Counsel components (Division Counsel and National Office) to ensure correct, uniform interpretation of the internal revenue laws.
- New pre-filing strategies are being developed by the Operating Divisions, like Large and Mid-Size Business, to address the need for more up-front issue resolution. New processes for pre-filing agreements and pre-filing advice will be pilot tested and announced formally prior to implementation.