

# Checklist for Centralized Area Field Closures Offshore Voluntary Disclosure Program Cases

Completed

SAA 03-17-2014

**AGENT:** \_\_\_\_\_

**REVIEWER:** \_\_\_\_\_

## Pre-906 Issuance Review - Review Time should be charged to 641. NAME CONTROL: \_\_\_\_\_

#1)   
Circle One:  
2009 OVDI  
2011 OVDI  
2012 OVDI

**Exam Certification Case File should include the following:**

- **Original or copies of original returns, amended returns and delinquent returns.**
  - Up to 8 years; 2003 – 2010; 2008/2009/2010 maybe filed correctly, so no 1040X.
  - For 2012 Disclosures- determine “floating” disclosure period per FAQ #9.
- **Originals of delinquent FBAR's should no longer be in the file.** If originals found, check with agent to resolve.
- **F5471's/F3520's/3520A's/F926's/F8865's – Originals should be kept in the case file until closing the certification case. When case is ready to close, the original forms 5471s, 3520-As and 3520s should be forwarded to the appropriate campus. Maintain copies of all Information returns in the case file.**
- **Ensure POA covers all disclosure years for Income, Civil Penalties, and FBAR. Have agent request new 2848 if deficient. Where fiduciary relationship exists, ensure Form 56 is complete.**
- **Where 2848 received prior to 3/2012 and unprocessed; be sure “OVDI” is noted in the “IRS only Box” and the actual date received as part of the OVDI program.**  
**Agent should provide via email: Activity Record, 4549-A, transcript analysis, 906, offshore penalty work paper and any other appropriate documents.**

#1a)

**Source Of Offshore Unreported Income:**

1. **Brief comment on background of funds/assets:**  
(Created, bought, inherited, sold or any unique or unusual fact patterns)
  
2. **All unreported income should match an asset in the HAB calculation:**

Bank Accounts	<input type="checkbox"/>	Foundation	<input type="checkbox"/>	Other (Write in)	<input type="checkbox"/>
Stock	<input type="checkbox"/>	Corporation	<input type="checkbox"/>		
Precious Metals	<input type="checkbox"/>	Partnership	<input type="checkbox"/>		
Foreign Real Estate	<input type="checkbox"/>	Estate / Trust	<input type="checkbox"/>		
Mutual Funds	<input type="checkbox"/>	Stiftung	<input type="checkbox"/>		

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<p>#1b) <input type="checkbox"/></p>	<p><b>Certification Steps have been documented - RA decisions have been documented</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Unreported Income verified - Explain all differences between 1040X &amp; RAR</li> <li><input type="checkbox"/> Looked for Domestic adjustments - TA Involvement Required</li> <li><input type="checkbox"/> Foreign Taxes Paid verified and/or FTC adjusted as necessary</li> <li><input type="checkbox"/> PFIC verified or PFIC materiality considered</li> <li><input type="checkbox"/> HAB computation contains value of all assets with unreported income</li> <li><input type="checkbox"/> Compare FBARS &amp; Foreign Acct/Asset Stmt info to HAB Wkp</li> <li><input type="checkbox"/> Reduced MOP requests have been considered (document reasons to accept or deny)</li> </ul> <p><b>Comments:</b> (Notate in sufficient detail how income &amp; HAB was determined/accepted, especially in the absence of bank stmts.)</p>
<p>#2) <input type="checkbox"/></p>	<p>The agent should have provided you with transcript reconciliations. Please review:</p> <ul style="list-style-type: none"> <li>• Ensure that there are no variances between transcripts and 4549-A.</li> <li>• Determine if: (1) amended or delinquent returns were posted;(2) payments have posted to correct years, as applicable; (3) payments moved to excess collections have been re-established on the taxpayer's account.</li> <li>• Note: Amended Returns may or may not have been processed and assessed by the Campus. A thorough review of transcripts/TXMODs is necessary.</li> </ul>
<p>#3) <input type="checkbox"/></p>	<p>Review IDRS Documents to ensure all years are fully established on AIMS.</p> <ul style="list-style-type: none"> <li>• If not fully established on AIMS, have agent submit F5345-D.</li> <li>• Check AMDISA for PICF 5 Code - TEFRA Indicator - If present see #28 and start TEFRA procedures.</li> </ul>
<p>#4) <input type="checkbox"/></p>	<p>Review Statute of Limitation (SOL) for all case years involved.</p> <ul style="list-style-type: none"> <li>• For those tax years that are "barred", Alpha Statute of YY should be used.</li> <li>• For those tax years that are "live", the actual Statute Date should be used. <ul style="list-style-type: none"> <li>○ If less than 90 days remains, consent should be sought and if no reply, then process a quick assessment, if possible, and then the year should be put into YY. For quick assessments and consents, always consider any imminent 3- or 6-year statutes.</li> </ul> </li> <li>• For those tax years which were secured as an SFR and delinquent original returns were either sent to Austin or provided during the certification, the statute date should be 3 years from the stamped received date. Use F3177 to update the EE statute to the live ASER. [See Job Aid 1 on the National OVD SharePoint for instructions on delinquent returns.]</li> </ul>
<p>5) <input type="checkbox"/></p>	<p>Review 4549-A</p> <ul style="list-style-type: none"> <li>• If <u>Amended Returns (1040Xs) were never processed and assessed</u>, verify that Unreported Offshore Income Adjustments and other adjustment amounts were included on 4549-A.</li> <li>• If <u>Amended Returns (1040Xs) were Quick (Prompt) assessed</u>, follow the procedures "Quick Assessments Using RGS to update AGI and TI.doc" (REV 7.31.12) <ul style="list-style-type: none"> <li>○ Note: On processed 1040Xs, the accuracy penalty must be manually computed by the RA to include the OVDI assessment plus any additional 4549-A assessments.</li> </ul> </li> <li>• If the 4549-A shows a Refund for a "barred year", make sure the Agent noted this in the Other Information section of the 4549-A.</li> <li>• Verify the Return Related Penalties: <ul style="list-style-type: none"> <li>○ On <u>Timely Filed Returns</u> only the Accuracy Related Penalty, IRC 6662 is to be</li> </ul> </li> </ul>

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**\*\*ALERT\*\***

asserted.

- If the originally filed return was delinquent, FTF should be asserted in addition to the Accuracy Related Penalty, IRC 6662. (Do not assess accuracy on original returns submitted with OVDI documents)

**On all delinquent returns** - you must make sure that the starting point is \$0 for per return amounts. Need to verify that FTP is computed as of the date the full tax was paid by the taxpayer (usually the date of the initial payments submitted with the OVDI package). If no payment then penalty computed as of report date.

- Non-Filers (Original Delinquent Returns submitted during OVDI), assert the FTF and FTP penalties. DO NOT assert the accuracy related penalty or estimated tax penalty.
- If 1291 PFIC is present, the 1291 PFIC Interest (Line 10 Other Taxes on 4549-A) should not be penalized. Ensure this amount is backed out of the deficiency in the penalty calculation.
- If MTM PFIC RITCB penalty, calculate in carryback year(s) on full deficiency before carryback. – Be sure to include language in “Other Information” of RAR from MTM loss guide:

Ex.: 2007 reflects a \$20,000 OVDI alternative PFIC method Mark-to-Market reduction in tax carryback from tax year 2008.

## 906 Review

#6)

### Review the Closing Agreement (F906)

- Confirm that the appropriate version of the F906 is being used:

Circle One:    2009 OVDI                      2011 OVDI                      2012 OVDI

- Standard - Taxpayer full paid all tax, penalties, and interest.
- Standard - not full paid.
- Dissolution of foreign entity - full paid.
- Dissolution of foreign entity - not full paid.

- The dissolution F906 also requires a completed “Statement on Dissolved Entities” waiver attached.
- Dissolved entities need proof that they are actually dissolved; not only the “Statement on Dissolved Entities”.
- Any F906 containing the following special language items must be directed to the Technical Advisor for written approval of the special language:
  - 1291 PFIC/MTM PFIC/MTM PFIC with RITC
  - Foreign Tax Credit (FTC) and AMT FTC, if applicable
  - More than one F906 required for the same disclosure (See Item #7)
  - Note: TA approval required for 5% penalty cases, FAQ # 50 cases, and any other cases where a penalty rate other than 25% (2011 OVDI), 27.5% (2012 OVDI) or 12.5% is used; copy of printed approval e-mail should be present in case file
  - Co-ownership, if applicable
- If special language needed, forward these electronic files to the Tech Advisor :
  - F906 with special language included
  - 4549-A (Pages 1 and 2 for each year- up to 6 pages)
  - OVDI Transcript Analysis (loader)
  - Offshore Penalty computation

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- 1291 PFIC TA table, if applicable
- MTM PFIC TA table, if applicable
- FTC (and AMT FTC) TA table, if applicable

**When you e-mail the electronic files to the Technical Advisor for special language approval, please use this subject line “XXXX-F906 review”. (XXXX = TP Name Control)**

**Comments:**

#7)

**It is possible that more than one closing agreement may be required to resolve the case.**

- Identify the parties that made the voluntary disclosure from the CI Folder.
- Consider the Multiple Agreement Matrix:

If	And	Then
Both taxpayers made a voluntary disclosure	Filed joint returns for all years	Use 1 Form 906 naming both taxpayers as parties
	Did not file joint returns for all years	Use 1 Form 906 for the joint years naming both taxpayers as parties; use separate Forms 906 for each taxpayer who is disclosing an unreported account in a MFS year
Only 1 taxpayer made a voluntary disclosure	Filed joint returns for all years	Use 1 Form 906 for the taxpayer who made the voluntary disclosure
	Did not file joint returns for all years	Use 1 Form 906 for the taxpayer who made the voluntary disclosure

#7a)

**Who made the voluntary disclosure & who requires a closing agreement?**

**Consider everyone who came into OVDI ... co-owners, entities, estates**

- Taxpayer, spouse, children
- Related parties or Joint acct holders
- Entities (trusts, estates, corporations,)

**Comments:**

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#8)

**Identify the parties**

- Verify the full taxpayer name and current address, middle initial if applicable:
  - John Q. Public, 123-45-6789 and Mary Q. Public, 987-65-4321, 123 Main Street, Anytown, FL 34343.
- If the taxpayer and/or spouse is deceased refer to the "906 Decedent Name Line.xls" on the SAA SharePoint site
- Starting on page 2 of the F906, and each page thereafter, verify the taxpayer names in the header section.

#9)

**WHEREAS Clauses**

- Check if Agent edited the years. - Required Comment Below if edited
  - If taxpayer did not have a foreign account in a particular year and/or
  - If taxpayer was tax compliant (income tax & foreign info returns are accurate & timely filed) in particular years
- Second WHEREAS paragraph should be edited for proper pronoun.
  - (his/ her/its/their) ... delete the non-applicable pronouns

**Comments:**

If the 906 scope is less than 8 years, explain why?

No Foreign account:

**Compliant Year:** The taxpayer timely and accurately filed the required income tax return and all applicable foreign information returns (FBARS, F3520, F5471, etc...). (For FBARS, CBRS must be checked and the FBAR receipt date must be before 6/30. If you are unable to ascertain the filing date and the year in question is critical-potentially highest balance-contact your Technical Advisor.)

2012 OVDI-FAQ #9: Refer to FAQ #9 Job Aid for correct disclosure period.

#10)

**Special Language WHEREAS Clauses - Agents should insert the special language**

- MTM PFIC special language includes a WHEREAS clause
- FTC special language includes a WHEREAS clause

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#11) <input type="checkbox"/>	<p><b>Determination Paragraph 1</b></p> <ul style="list-style-type: none"> <li>• Confirm that the correct range of years is stated.</li> <li>• All issues and adjustments should be listed separately in Table 1.</li> <li>• Only adjustments to taxable income should be reflected. <ul style="list-style-type: none"> <li>○ The understated income may be stated as Gross or Net Adjustments</li> <li>○ If a return year has been processed, Table 1 must contain those adjustments. ( Use the Reviewer Reconciliation Wkp to check the 906)</li> <li>○ If an accurate return was filed (no adjustments made) enter " -0-". Check to see if year was in full compliance; may need to be removed from F906.</li> </ul> </li> </ul>
#12) <input type="checkbox"/>	<p><b>Determination Paragraph 2</b></p> <ul style="list-style-type: none"> <li>• Confirm that the correct range of years is stated.</li> <li>• If only one penalty is shown on the 4549-A verify that the reference to the penalty not used is deleted. If both penalties apply, edit the brackets &amp; correct the font.</li> </ul> <p><b>Note:</b> Paragraph 2 and 3 may be shifted down if Special language is inserted. This will effect paragraph numbering.</p>
#13) <input type="checkbox"/>	<p><b>Determination Paragraph 3</b></p> <ul style="list-style-type: none"> <li>• If only one penalty is shown on the 4549-A verify that the reference to the penalty not used is deleted. If both penalties apply, edit the brackets &amp; correct the font.</li> <li>• Verify that the reference to "paragraph 2" is still numerically correct as paragraphs may shift.</li> <li>• Confirm that the amount of the offshore penalty is entered correctly. <ul style="list-style-type: none"> <li>○ Round to nearest dollar.</li> <li>○ 5%, 12.5% &amp; 25% or 27.5% are the only options. 5% requires Technical Advisor approval. <i>Note: Look for approval e-mail from Technical Advisor approving use of 5% rate.</i></li> </ul> </li> </ul>
#14) <input type="checkbox"/>	<p><b>Determination Paragraph 4</b></p> <p>Verify that the correct range of years is stated.</p>
#15) <input type="checkbox"/>	<p><b>Determination Paragraph 6</b></p> <ul style="list-style-type: none"> <li>• Verify that the correct range of years is stated.</li> <li>• Confirm that the reference to "this paragraph 6" is still numerically correct as paragraphs may shift.</li> </ul>
#16) <input type="checkbox"/>	<p><b>Determination Paragraph 7</b></p> <ul style="list-style-type: none"> <li>• Verify that the correct range of years is stated.</li> <li>• Draw a "Z" to fill in any open areas to complete the page.</li> </ul>
#17) <input type="checkbox"/>	<p><b>Execution Paragraph 8 with taxpayer signatures</b></p> <ul style="list-style-type: none"> <li>• This paragraph including the signature lines must appear on the <u>same</u> page.</li> </ul>

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- Verify that the paragraph has been edited for proper pronoun.
  - (his/ her/its/their) ... delete the non-applicable pronouns.

#18)

## Pre-Issue 906 Review Complete

- Upon completing review and receiving TA approval for special language F906, as necessary, return case to agent for issuance of report.
- Any changes made to the F906 after initial TA approval requires Re-approval email from the TA.
- Look for E-Trak comment in the F9984 - If no reference found; notify the RA
- Reviewer should leave this checklist loose in the file and can use for comments.
- Approval email should be included behind the 9984.

## Pre-Closing Review

#19)

If the Full Payment Closing Agreement was secured, Verify the following:

- That the taxpayer made full payment of all taxes, penalties and interest (this would include both the Income Tax and Offshore Penalty assessment).
- Ensure Transcript Analysis states "Match for all years" and negative taxable income amounts are completed.
- If necessary:
  - Review TXMOD/transcripts for posting of payments
  - Verify and reconcile payments (copies of checks) made by taxpayer.
  - Review Form 3244-A.
- All payments must be posted or pending before closing to GM, including MFT 55 payments.
- Note: There may be a slight variance in payment compared to report due to interest timing differences.

If the No Full Payment Closing Agreement was secured, Verify the following:

- Case was referred to Collection
- The RO returned the referral sheet with the Case Disposition section (Referral Sheet, Part B) completed by the RO.
- Annotation to case history, Form 9984, should have been done by Agent.
- If Collection was not involved, return the case to the Agent.

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#20)

**Final F906 review:**

- If only one original signed F906 in file and no copies make note for GM.
- Should have original signatures of Taxpayer(s) and dated. If signed by POA, original signature, dated, and Form 2848 (not CFINK) attached to each Closing Agreement.
- If F906 is executed by a fiduciary, administrator, personal rep, etc., a properly completed F56 and letters testamentary must be attached to F906.
- Faxed signatures on F906 may be accepted if total income tax, income tax penalties, interest, and the offshore penalty total \$250,000 or less.
- Check F906's for alterations, errors, and erasures. If any modifications are identified and not documented by Field Agent, inquire with agent.
- Check F906 for Date Stamp on reverse side of every page with the date received by Field Group. If missing, date stamp with received date.
- If a Dissolved Entity F906, then the properly completed "Dissolved Entity Statement(s)" should be attached to the F906
- Verify that the Revenue Agent signed, dated and added Title, on each F906 as "Receiving Officer".
- Reviewer must sign, preferably in blue ink, as "Reviewing Officer", date, and add title to section for Reviewing Officer (including the copy in the Offshore Penalty folder.)
- Note: If Offshore Penalty is other than 25% (2011 OVDI), 27.5% (2012 OVDI) or 12.5%, verify that case file contains written approval from Technical Advisor concurring to the lesser amount.
- 5% penalty approval should be included in the Offshore Penalty folder as well as with the activity record of the regular case file.

#21)

Reviewer must write in "blue ink" on the top margin of the front page of the tax return or 1040X (whichever is latest), "agreement under IRC 7121, years affected \_\_\_\_\_. Closing agreement attached to the return for the taxable period ended \_\_\_\_\_ (latest return in file). "

**Note:** There is no problem in using pre-printed labels for this statement.

#22)

Letter 1595-E should have been prepared by the Agent with their contact information and included in case file. Reflect "Technical Services Manager" for Title of manager signing the letter. If the Letter is not in the case file, obtain from SharePoint and complete with Agent's information as contact.

- If L 1595-E is to go to Rep, ensure that L 937 (with Agent's contact info and signed by the Agent) is associated with L1595-E/F906.
- If perfected F2848 not available, ensure that copy does not go to Rep.
- Associate L 1595-E with each 906 to be signed.
- Prepare envelopes with the correct address for each 906 to be mailed. Note: Rep will not get copy if no full coverage F2848.

**For DC12 closures, L4565 should be prepared and mailed to the TP. A copy should be placed in the file.**



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#23)

Ensure the F8278 is properly prepared in the offshore penalty file. The year stated on the offshore penalty paragraph of the F906 should be 2009 for 2011 OVDI and should be 2010 for 2012 OVDI.

- Only page 4 of F8278 is required.
- Ensure the most current version of F8278 is used. (Check the “Catalog”/Forms Repository.)
- Ensure that the TXP is not a joint name. (Name should be typed as Last Name, First Name, Middle Initial.)
- Statute date should state “NO STATUTE” & check the "No ASED" box.
- Check the correct penalty percentage line in Section 9.H.
- If MFT 30 overpayments are being used to offset the Offshore Penalty, include in the remarks “INPUT HOLD CODE 1-Using MFT 30 overpayments to pay MFT 55”. Otherwise, (cases without overpayment offset) include "INPUT HOLD CODE 3" in the remarks.
- Ensure that the RA has signed the form
- Flag for GM signature.

#24)

Form 3198 (all files).

- Verify Form 3198 has been properly completed by Agent on both Income Tax and Offshore Penalty case files. Related case files should be clearly indicated, including “DC 12” related cases/years.
- Income Tax case file - Make sure "Offshore Voluntary Disclosure Initiative" has been highlighted on Form.
- Income Tax and Offshore Penalty case files-Notate when overpayments on the MFT 30 module are being transferred with F5344 to pay MFT 30 and/or MFT 55 deficiencies.
- Income Tax case file - Barred Refund – If agent did not note to transfer barred refund to excess collection, please note for them.
- Offshore Penalty case file – if agent did not note that this is an “OVDI Offshore Penalty” case file, please note for them.
- Ensure 3198 is marked for Technical Services Status 21.
- Ensure OVDI coversheet is on both case folders to flag.

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#25)

Form 5344

## DISPOSAL CODES:

- Generally, Disposal Code 08 should be used on all years in package that were certified (on the 906). (Non-certified years should use Disposal Code 12. Close both DC8 & DC12 years together to Technical Services.)
- Related TPs: Disposal Code 12 should be used for the key year only (if no F906 issued.) DC12 cases (no F906 issued for any year) should be closed with the related case (F906 issued case) to Technical Services. Both case files should be documented as to the disposition and reason in each F9984 and on this Checklist.
- Related TPs: Disposal Code 33 should be used in all years (except the key year) that were opened in error. DC 33 years should be separately closed to SAA OVDI AIMS/ERCS Analyst. The separate case files should indicate the disposition and reason
- DC12 year(s) require input of \$1 in Item 35 on F5344
- DC08 where no tax/(refund), input \$1 TC 300 (Item 12) on 5344
- Technical Advisor approval is required in South Atlantic Area for Disposal Code 12 and Disposal Code 33 cases. Print the approval e-mails and place in the case file with the activity record.
- For Quick Assessment year(s), follow the procedures "Quick Assessments Using RGS to update AGI and TI.doc" (REV 7.31.12) [it's on the SAA SharePoint site]
- Barred Refund Years– Ensure agent entered Hold Code "2" to prevent money from being refunded. **CAUTION: Payments expire after 2 years and CANNOT be REFUNDED or TRANSFERRED.**
- If MFT 30 refunds (ie: overassessment on line 14 of the 4549) are being used to offset MFT 30 deficiencies, ensure that the refund year F5344s have Posting Delay Code "1" (Item 43) and ensure the deficiency years have Hold Code "1" (Item 7). **\*\* Reminder \*\* – This doesn't apply to barred refund years and payments.**
- If MFT 30 overpayments are being used to offset MFT 30 deficiencies, ensure that the overpayment year F5344s have a Posting delay code of "3" (Item 43) and ensure the deficiency years have Hold Code "1" (Item 7). **IMPORTANT: If the overpayment year is also a barred refund year, do not enter Hold Code 2. Do ensure that the barred refund amount is noted on F4549A and on F3198.**
- When there is a delinquent return, whether tax is due or not, you must make sure that the delinquent return box is checked in RGS, even when no delinquency penalties are being asserted.
  - Check AMDISA for a delinquent return indicator and if present,
  - Look for the TC160 on the F5344 (TC 160 may be \$0)
- MTM PFIC RITC carryback tax years should have a TC 309, TC 301 or blank (NOT TC 308) in Item 12 and an interest computation date in Item 11 referring to date of loss year.
- Manual penalty years need to have a Ref 680 in Item 15.

\*\* ALERT\*\*

\*\* ALERT\*\*

NOTE: If you do not have access to the file on RGS, you will need to inform agent to make correction and provide new F5344. Fixes must be in RGS for proper automated closing.

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#26)

## Update Statutes

- Prepare F5348(s) and place in file for Tech Services to update YY ASEDs to AB.
- If less than 120 days remains on a live statute and F906 is ready for execution, update the live statute to YY and include it on the above F5348 to update ASED to AB (i.e. 04/AB/2013).
- Attach blanket YY Memo to F895
- 895s should be on top of 3198s
- Statute “AB” updates on AIMS will be made by Technical Services.

#27)

## Final pre-closing Notes:

- Make sure the following are included in the file:
  - F5471's/F3520's/3520A's/F926's/F8865's – make sure F5471s, 3520-As and F3520s are mailed to campus at this time. Copies of all Information returns should be maintained in case file. Also, keep copies of F3210s used to transmit forms.
  - For DC12 closures, L4565 should have been mailed to the TP. A copy should be in the file.
  - Ensure a copy of the dissolution statement is attached to the 906, if applicable
  - Approval Email – Ensure attached to Activity Record
  - Ensure all folders are marked with TP name, SSN, etc.
  - The OVDI Checklist
  - Any Reviewer's notes, notate the 9984 or this Checklist.

Make reference to any pertinent workpapers that contain critical certification steps and decisions

  - Transcripts and/or IDRS information
  - Reviewer Reconciliation workpaper
  - FBAR Information sheet
- Remember that the case cannot close to the GM until all payments are pending.
- Flag F3198 Technical Services for Restricted Interest Computations
- Close RGS to Fileserver Suspended (not Fileserver)
- Close to GM.

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#28)

## TEFRA Related

- PICF 5 code will be present on taxpayer's tax module.
- Exam case file must be separated into 2 case files (i.e. TEFRA year is 2006)
  - Non-TEFRA years prior to TEFRA Year (2003-2005)
  - TEFRA Year and subsequent years (2006-2010)
- Double check transcripts to determine TEFRA report has not been issued and/or assessed.

Note: TEFRA OVDI procedures are posted to OVDI SharePoint for Field Agent to follow. If procedures were not followed, case may need to be returned.

Note: After F906 is executed, case files needs to be forwarded to TEFRA Coordinator for review and completion of Form 3198 before sending case files to CCP.

## GM Procedures Review

#29)

The Group Manager is responsible for:

- Final quality review of the Case Files before sending to Technical Services.
- Sign F8278 for the Offshore penalty assessment.
- Reassigning Case in RGS to Q2 (Technical Services)
  - The Review/Close feature should not be used in RGS to move the case. Instead the case should be reassigned. Any cases with an R Hold Code will need the code removed so the cases can be reassigned to Q2.
- Verify that the E-Trak database entry is complete and accurate.

COMMENTS:

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## Secretary Actions

#30)

The Secretary will prepare the OVDI case for closing to Jacksonville Technical Services.

- Update ERCS to status 21, TSC 164 Jacksonville Technical Services.
- Mail to:

IRS/Technical Services  
South Atlantic Area - GRP 15  
Attn: Technical Services - OVDI  
Technical Services Group Manager  
400 West Bay Street, Stop 4041  
Jacksonville, FL 32202

- Disposal Code 33 years (Related TPs with years that were created in error - not the KEY yr) should be closed separately to the OVDI AIMS/ERCS Analyst. File must contain an approval e-mail for DC 33 from Technical Advisor. Put any case related info & a copy of the DC33 approval in the Key Year Case file that is closing to Technical Services.

## Technical Services-Manager

#31)

The Technical Services Manager is responsible for:

- Final quality review of the Case Files.
- The Area OVDI Program Manager (TM) will review all F3990's before a case is returned to the field.
- Signing and Executing the Closing Agreement, may only have one original.
- Signing Letter 1595-E.
- Sign F5348 to update statute to AB.
  - This is for live statute under 90 days and YY

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## Technical Services- Review Staff

#32)

After the Closing Agreement is executed by the TS Manager, Technical Services is responsible for:

- Attach original executed F906 to most current tax return (i.e. 2008).
- Include one executed F906 with work papers in case file.
- Leave third executed copy ready and available for TS group.
- If less than 3 original F906s, TP will get back copy of fully executed F906.
- Update statutes to AB on ERCS/AIMS per F5348.
- Make a copy of executed F906 to include in Offshore Penalty Case File or FBAR Case File.
- Send, via regular mail, Letter 1595-E and one original executed F906 to Taxpayer(s).
- Send copies to POA if applicable.
- Complete any remaining administrative actions needed for closing such as updating RGS to Memphis Campus Y4 and AIMS to status 51.

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Form 3210

- Offshore Voluntary Disclosure Program is written on 3210 in red and highlighted in yellow.
- Both case files, Exam Certification and Offshore Penalty are sent to:  
Memphis Centralized Case Processing  
5333 Getwell Road Stop 803  
Memphis, TN 38118
- Should the case include FBAR Penalty Case File instead of Offshore Penalty Case File: Send FBAR (separate of income file) to the following address:  
  
Internal Revenue Service  
P.O. Box 33113  
Detroit, MI 48232-0113
- Note: Monitor the receipt of the Acknowledgment Copy of Form 3210 from Campus. Should Acknowledgement Copy not be returned within a reasonable time frame, consider contacting CCP as a follow-up.

**Checklist for Centralized Area Field Closures  
Offshore Voluntary Disclosure Program Cases**

Completed

SAA 03-17-2014

#34)

COMMENTS: