Internal Revenue Service
Office of Federal, State and Local Governments

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FSLG Newsletter – January 2007

This is the semiannual newsletter of the office of Federal, State and Local Governments (FSLG) of the Internal Revenue Service. Our mission is to ensure compliance by federal, state, and local governmental entities with federal employment and other tax laws through review as well as through educational programs.

For more information, visit our web site at www.irs.gov/govt. For account-related assistance, contact Customer Account Services at 1-877-829-5500. To identify a local FSLG Specialist, see the directory at the end of this newsletter.

The explanations and examples in this publication reflect the interpretation by the IRS of tax laws, regulations, and court decisions. The articles are intended for general guidance only, and are not intended to provide a specific legal determination with respect to a particular set of circumstances. You may contact the IRS for additional information. You may also want to consult a tax advisor to address your situation.

Internal Revenue Service
Federal, State and Local Governments

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FSLG RESULTS FOR FISCAL YEAR 2006 AND PLANS FOR FISCAL YEAR 2007

FY 2006

During FY2006, Federal State and Local Governments (FSLG) successfully focused on two compliance initiatives begun in FY2005: examination programs for federal agency compliance and large entities (annual payroll in excess of $40 Million). In addition, FSLG completed a compliance check follow-up project on 125 entities selected from previously completed compliance checks conducted in FY2003. FSLG also worked with the Advisory Committee on Tax-Exempt Government Entities (ACT) to create a web-based employer's toolkit.

With respect to the federal agency exams, FSLG commenced 25 exams and closed nine. Some examples of the issues that surfaced during the exams are relocation payments, settlement payments, fringe benefits, information return reporting, and mismatched taxpayer identification numbers. With respect to large entity exams, FSLG opened examinations on 33 large entities and closed examinations on 34. The issues ranged from fringe benefits and worker reclassification to tenure payments, additional wages, workers receiving both Forms W-2 and Forms 1099, etc. Eleven of the government entities under exam disagreed with FSLG's final determination and exercised their right to request review from Office of Appeals.

In addition to the examinations, FSLG conducted 914 compliance checks. For the first time FSLG conducted a follow-up study on closed compliance checks conducted in the past. FSLG randomly selected 125 entities that had received an advisory letter as a result of a compliance check conducted in FY 2003. As a result of the follow-up, it was determined that 76% of the entities were compliant with previously reported discrepancies, 19% were only partially compliant, and the remaining were either not compliant or it was difficult to make a determination from a compliance check alone. However, 70 out of the 125 entities (56%) were issued a new discrepancy letter because they were non-compliant with regard to the prior issue or a new issue. We believe that the follow-up study was useful in determining whether compliance checks are a useful tool for measuring compliance by government entities.

The Director worked closely with ACT to assemble web pages for a Toolkit designed to fill the knowledge gap created by the frequent turnover of government entity employees. The Toolkit will be updated and enhanced from time to time. We have received feedback that the Toolkit has been a

useful addition to the FSLG website. In FY 2007, FSLG continues to work with ACT members on the Toolkit and any suggestions from the readers are welcome and greatly appreciated. FSLG also conducted numerous outreach events with approximately 14,000 participants.

Plans for FY 2007

A central theme in the FY 2007 Work Plan is FSLG's focus on expansion and improvement of its compliance activity. Specifically, FSLG is committed to continuing its federal agency and large entity compliance initiatives and to conducting project initiatives designed around specific market segments to improve compliance among government entities.

FSLG will begin its first market segment project in by adopting a market-segment approach for identifying and selecting returns for examination. The project will allow FSLG to determine trends and issues in various market segments. With the results, focused FSLG outreach activities can be undertaken to improve compliance. In FY 2007, the market segment focus will be on community colleges. FSLG will continue to focus on health reimbursement arrangements and other retirement plan arrangements that may not meet the requirements of the Internal Revenue Code. In this regard, FSLG will work closely with Employee Plans function and with Chief Counsel.

In addition, FSLG will begin an outreach project for fire districts to deliver focused educational material and to conduct outreach events, tailored to provide guidance on a variety of compliance issues.

We will continue to address key areas of noncompliance through a combination of targeted outreach, development of new educational products, and various field compliance activities. While we will focus on the national and regional issues identified through research, environmental scanning, and other means, activities to address significant local issues will also be supported.

NEW EXCISE TAX AND DISCLOSURE RULES FOR TAX-EXEMPT ENTITIES ENTERING INTO PROHIBITED TAX SHELTER TRANSACTIONS

BY WANDA VALENTINE, FSLG PROGRAM ANALYST

On May 17, 2006, the Tax Increase Prevention and Reconciliation Act of 2005 (TIPRA) was signed into law creating new excise taxes and disclosure rules for tax-exempt entities that are parties to certain reportable transactions, designated as "prohibited tax shelter transactions." In addition, the law provides that entity managers who approve or cause the

tax-exempt entity to be a party to such transactions can be subject to a separate manager-level excise tax for authorizing these transactions. In the case of tax-exempt entities other than pension plans, IRAs and similar tax-favored savings arrangements, both an entity-level tax and a manager-level tax can be imposed for the same prohibited tax shelter transaction. In the case of pension plans, IRAs, and similar tax-favored savings arrangements, only the entity manager-level tax can be imposed.

In addition to the new disclosure rules for tax-exempt entities, TIPRA creates a new disclosure requirement for taxable parties to prohibited tax shelter transactions involving tax-exempt entities. TIPRA also imposes penalties for the failure to comply with the new disclosure requirements.

Tax-Exempt Entities Subject to New Tax and Disclosure Rules

In general, the new provisions affect state and local governments, Indian tribal governments, qualified pension plans, IRAs, similar tax-favored savings arrangements and other tax-exempt entities such as charities and churches.

Prohibited Tax Shelter Transactions

Prohibited tax shelter transactions are defined by reference to the Income Tax Regulations under section 6011 to include transactions that are identified by the IRS as potentially abusive "listed" tax avoidance transactions and two other types of reportable transactions: confidential transactions and transactions with contractual protection. A complete listing of listed transactions is available on IRS website at www.irs.gov.

Liability for Tax

TIPRA created new Internal Revenue Code Section 4965. Section 4965(a)(1) imposes an excise tax on certain tax-exempt entities (Non-Plan Entities) that are a party to a prohibited tax shelter transaction. Non-Plan Entities include tax-exempt entities described in sections 501(c), 170(c) (other than the United States), and 501(d), and Indian tribal governments described in section 7701(a)(40)).

Generally, the amount of excise tax imposed under section 4965(a)(1) is the product of the highest rate of tax under section 11 (currently 35%), and the greater of:

1) The entity's net income "for the taxable year" attributable to the transaction, or

2) 75 percent of the proceeds “received by the entity for the taxable year” attributable to the transaction.

Subsequently Listed Transactions

A “subsequently listed transaction” is defined as a transaction that the Secretary of the Treasury identifies as a listed transaction at any time after the entity becomes a party to that transaction, provided that the transaction was not otherwise a prohibited tax shelter transaction.

If the entity knew or had reason to know that the transaction was a prohibited tax shelter transaction at the time the entity became a party to the transaction, the rate of tax is 100%. In the case of subsequently listed transactions, the amount of tax is the product of the highest rate of tax under section 11 and the greater of:

1) The entity’s net income “for the taxable year” attributable to the transaction and properly allocable to the period beginning on the date of the listing or the first day of the taxable year, whichever is later. or

2) 75 percent of the proceeds “received by the entity for the taxable year” attributable to the transaction and properly allocable to the period beginning on the date of the listing or the first day of the taxable year, whichever is later.

Taxable Year

The taxable year for government entities, who do not file an income tax return, is the annual period the entity has used in keeping its books and records.

Entity Manager Tax

Section 4965(a)(2) imposes a separate excise tax on entity managers who approve the entity as a party to a prohibited tax shelter transaction and know or have reason to know that the transaction is a prohibited tax shelter transaction. The amount of tax is $20,000 per manager for **each** approval or act causing the entity to be a party to the transaction.

In the case of Non-Plan Entities (including government entities), an entity manager is defined as a person with authority or responsibility similar to that of a director, officer or trustee or with respect to any act, the person having authority or responsibility with respect to such act. In the case of other tax-exempt entities covered by section 4965, an entity manager is a person who

approves or otherwise causes the entity to be party to the prohibited tax shelter transaction.

Effective Date of Tax

The excise taxes imposed by section 4965 apply to taxable years ending after the date of enactment with respect to transactions before, on or after such date, except that no taxes under section 4965 apply with respect to income or proceeds that are properly allocable to any period ending on or before August 15, 2006.

New Disclosure Requirements

TIPRA also amends Sections 6033 and 6011(g) of the Code. Under the amended section 6033(a)(2), every tax-exempt entity that is a party to a prohibited tax shelter transaction must disclose its involvement in the prohibited tax shelter transaction to the IRS and must identify all other parties to the transaction that are known to the tax-exempt entity. Under the amended Section 6011(g), every taxable person that is a party to a prohibited tax shelter transaction to which a tax-exempt entity is also a party must disclose by statement to the tax-exempt entity that the transaction is a prohibited tax shelter transaction. New procedures and forms are currently being developed to meet the new filing and disclosure requirements. Additional guidance will be issued at a future date.

Penalties for Failure To Disclose

If a tax-exempt entity fails to comply with the disclosure rules under the amended Section 6033(a)(2), the tax-exempt entity can be subject to a penalty for **each transaction** it failed to disclose. The amount of the penalty is $100 per day during which the failure continues but not to exceed $50,000. In cases where the tax-exempt entity is a pension plan, IRA or a similar tax-favored savings arrangement, the penalty is imposed on the entity manager.

Additional Guidance

Notice 2006-65 provides additional plain language information and questions and answers on this new law. Additional guidance will be published at a later date. Check the FSLG website at www.irs.gov for additional updates and information.

IRS RELEASES NEW WRITTEN DOCUMENTATION REQUIREMENTS FOR "PICK-UP" CONTRIBUTIONS

BY DENISE Y. BOWEN, FSLG TAX LAW SPECIALIST

On August 28, 2006, the Office of Chief Counsel published Revenue Ruling 2006-43 providing what is considered appropriate action for governmental entities that wish to implement or maintain a "pick-up" pursuant to §414(h)(2) of the Internal Revenue Code (the Code). Rev. Rul. 2006-43 also provides transition relief for governmental employers who have previously implemented "pick-ups" that do not meet the formal action set forth in the revenue ruling.

Background

Section 414(h)(2) of the Code permits certain governmental employers to pay or "pick up" all or a portion of an employee's contribution to a tax-qualified plan. Contributions picked up by the employer within the meaning of §414(h)(2) are excluded from the employees' gross income until such time as they are distributed to the employees. (See Rev. Rul. 77-462)

The employer must specify that the contributions, although designated as employee contributions, are being paid by the employer in lieu of contributions by the employee. Additionally, the employee must not be given the option of choosing to receive the contributed amounts directly, instead of having them paid by the employer to the pension plan. (See Rev. Rul. 81-35 and Rev. Rul. 81-36.)

The governmental action necessary to effectuate the pick-up must be completed before the period to which such contributions relate (Rev. Rul. 87-10). Thus, designated employee contributions to a qualified plan established by a governmental entity are excluded from gross income as "pick-up" contributions that are treated as employer contributions, only to the extent the contributions relate to compensation for services rendered after the date of the last governmental action necessary to effectuate the "pick-up."

Written Documentation Requirement

Rev. Rul. 2006-43 describes what is considered an appropriate action taken by a governmental employer for the contributions by such employer to be considered picked up and treated as employer contributions pursuant to §414(h)(2). The revenue ruling provides that to designate the contributions as being picked up by the governmental employer, an authorized person must take formal action with respect to the employer. The action must (a) be evidenced by a contemporaneous written document, such as minutes from a meeting or a resolution, (b) apply only prospectively, and (c) not permit any participating employee, from or after the date of the implementation of the pick-up, to have a cash or deferred election (within

the meaning of §401(k)-1(a)(3)) with respect to designated employee contributions.

Additionally, participating employees must not be permitted to opt out of the pickup, or to receive the contributed amounts directly instead of having them paid by the employer to the plan.

Transition Relief for Pre-Existing Pick-Ups

Rev. Rul. 2006-43 provides transition relief under §7805(b)(8) of the Code to governmental plans that do not satisfy the requirement of a proper pick-up solely because the employer failed to take a formal action when such plan was implemented. Under the transition rule, the Service will not treat an existing plan as failing to satisfy the requirements of §414(h)(2) if:

1) At the time of the implementation of the plan, the employer took action evidencing its intent to establish a pick-up (for example, the employing unit provided information to its employees relating to the establishment of the pick-up), and, since that time, has operated the plan accordingly, and

2) The employer takes formal action in writing (e.g., it adopts a resolution with respect to the pick-up) prior to January 1, 2009, with respect to future actions.

This transitional relief applies only if the actions taken by the governmental employer since the implementation of the pick-up otherwise comply with Rev. Rul. 81-35, Rev. Rul. 81-36, and Rev. Rul. 87-10, and only if the employer did not report the contributions as wages subject to federal income tax withholding from the date of the implementation of the pick-up.

Those governmental employers that have implemented a pick-up and meet the requirements of (1) above, but did not take a formal action or cannot find any documentation of a prior formal action, may consider taking such action described in (2) above, before January 1, 2009.

For more assistance with your governmental plan, contact your FSLG Specialist. A directory appears in this newsletter.

NEW REGULATIONS ADDRESS WITHHOLDING ON SUPPLEMENTAL PAY

BY STEWART ROULEAU, FSLG SENIOR ANALYST

New regulations released July 25, 2006, finalize new rules for the treatment of supplemental wages.

The new regulations define the term “supplemental wages” as any compensation paid to an employee that is not a regular wage. “Regular wages” are defined as amounts paid by the employer for a pay period at a regular hourly rate or in a predetermined fixed amount.

Supplemental wages include:

- Reported tips
- Overtime pay
- Bonuses
- Back pay
- Commissions
- Reimbursements
- Noncash fringe benefits
- Sick pay
- Any other irregular payments.

The employer may treat reported tips and overtime pay as either supplemental or regular wages. The employer may treat these payments differently for different employees. However, the other items listed above must be treated as supplemental wages.

Withholding on Supplemental Wages of $1 Million or Less

In general, there are two withholding methods available for supplemental wages:

Aggregate – Include the supplemental wages with the regular wages for the pay period, and withhold according to the tables used for regular wages. If the supplemental wages are paid concurrently with regular pay, they must be aggregated with the regular pay for that payroll period.

Optional Flat Rate Withholding – Apply flat rate withholding (currently 25%) to the supplemental wage. The number of withholding allowances claimed by the employee on Form W-4, “Employee’s Withholding Allowance Certificate” is disregarded.

The employer must meet two requirements to use the optional method:

1) The employer must have withheld income tax from regular wages paid to the employee during the same or the previous calendar year, and
2) The supplemental wages are either (a) not paid concurrently with regular wages, or are (b) separately stated on the payroll records of the employer.

Special Rules for Supplemental Wages Exceeding $1 Million

Special withholding rules apply to supplemental wages in excess of $1 million in the calendar year. Payments that exceed $1 million, and the portion of the payment that brings the total over $1 million, must be withheld at the highest rate of tax in effect for that year, currently 35%.

An agent withholding on behalf of an employer is subject to the same rules However, a de minimis provision allows an employer to disregard payments by an agent of less than $100,000 in total compensation (regular and supplemental wages) to one individual in determining whether the individual has received $1 million of supplemental wages during the calendar year.

For a general explanation of the tax withholding rules, see Circular E. To read the complete text of the final regulations, click here.

REQUESTING A TECHNICAL ADVICE MEMORANDUM

BY DENISE Y. BOWEN, FSLG TAX LAW SPECIALIST

The Office of Chief Counsel provides technical legal advice to Internal Revenue Service personnel and taxpayers during an examination through a technical advice memorandum (TAM). Revenue Procedure 2006-2 (updated annually), governs the process by which Service personnel and taxpayers request technical advice memorandum from the Division Counsel/Associate Chief Counsel.

A technical advice memorandum is advice furnished by the Office of Division Counsel/Associate Chief Counsel concerning the interpretation and proper application of the tax law, tax treaties, regulations, revenue rulings, notices or other precedents published by the Associate Chief Counsel office to a set of specific facts involving a specific taxpayer.

A TAM is requested when there is a lack of uniformity on the disposition of an issue, or when an issue is unusual or complex enough to warrant consideration.

Taxpayer cooperation is not required in order to request a TAM.

Field Office Determination To Request a TAM

The FSLG specialist conducting the examination and the group manager will determine whether to request a TAM on an issue. The Director, FSLG (Director) will approve the request before submission to the Associate office. The Director will not request a TAM on any issue if the same issue is involved in a docketed case for any taxpayer for any taxable year.

A taxpayer may also make a written or oral request to the FSLG specialist to refer an issue for a TAM. If the specialist and the group manager disagree with the request, the taxpayer may request reconsideration of the denial from the Director.

Pre-Submission Conference

In an effort to promote expeditious processing of a request for a TAM, the field is required to confer with the Associate office in Chief Counsel prior to the time a request for a TAM is submitted to the Associate Chief Counsel office. The field must provide the taxpayer an opportunity to participate in the process by permitting the taxpayer to submit a statement discussing its factual and legal position on the issue. Taxpayer participation in the conference is not required. Pre-submission conferences for the TAM will generally be conducted by telephone, but the parties can request a meeting in person.

Request for a TAM

A request for a TAM, whether initiated by the taxpayer or by FSLG, must include a written statement of issues, facts, law, and arguments. If the field initiates the request, the examining agent prepares the factual statement with the assistance of field counsel. The taxpayer has ten calendar days to respond to the field's statement by providing the field with a written statement specifying any disagreement on the facts and issues.

If the Service initiates the request, then taxpayer is encouraged to submit a written statement explaining the taxpayer's position to the field office within 21 calendar days after the taxpayer receives a copy of the TAM request.

If the taxpayer initiates the request, the taxpayer prepares the factual statement and forwards it to the appropriate field office. The Service will notify the taxpayer in writing of any areas of disagreement. The taxpayer has ten calendar days after receiving the written notice to reply.

While the taxpayer is given an opportunity to submit a statement and information, if the request for a TAM is prepared without the taxpayer's cooperation, the Associate office in Chief Counsel will process the request, as neither factual agreement nor taxpayer participation are required.

Public Inspection

TAMs are available for public inspection under §6110(a) of the Code. The Service deletes certain information from the text of TAMs before making them available for public inspection. To assist the Service with making the

required deletions, the taxpayer is required to provide a statement indicating the deletions desired ("deletion statement").

If the taxpayer does not submit the deletion statement, the Director will inform the taxpayer that the statement is required. In the case of a taxpayer-initiated TAM, if the deletion statement is not received within 10 calendar days after the request is made to the taxpayer, the Director may decline to submit the request for a TAM.

Copy of the TAM to the Taxpayer

Upon adopting the TAM, the Director gives the taxpayer a copy of the TAM and the notice of intention to disclose the TAM under §6110(f)(1) of the Code (including a copy of the version proposed to be open to public inspection and notations of third party communications under § 6110(d)). The Director must also notify the Associate office when the TAM is given to the taxpayer. In the event that a TAM request pertains to more than one taxpayer the Director will provide each pertinent taxpayer with a copy of the TAM.

Taxpayer Protest of Deletions Not Made

After receiving the notice of intention to disclose the TAM, the taxpayer may protest the disclosure of certain information included in the TAM. To do so, the taxpayer must submit a written statement within 20 calendar days identifying those deletions not made by the Service that the taxpayer believes should be made, along with a copy of the version of the TAM proposed to be open to public inspection (with brackets around the deletions proposed by the taxpayer that have not been made by the Associate office). Within 20 calendar days after receipt of the taxpayer's response to the notice, Chief Counsel is required to mail the taxpayer its final administrative conclusion about the deletions to be made.

Effect of a TAM

The holding in a TAM applies only to the taxpayer for whom the TAM was requested. Consequently, a taxpayer may not rely on a TAM issued by the Service for another taxpayer.

Except in rare or unusual circumstances, a holding in a TAM that is favorable to the taxpayer is applied retroactively. A holding that is adverse to the taxpayer, or modifies or revokes a prior TAM is also applied retroactively, unless the Associate Chief Counsel with jurisdiction over the TAM exercises its discretionary authority under §7805(b) to limit the retroactive effect of the holding. Section 15 of Rev. Proc. 2006-2 provides a

discussion of the conditions under which the holding in a TAM is not applied retroactively.

A taxpayer for whom a TAM has been issued or for whom a request for a TAM is pending may make a request to Associate Chief Counsel to limit the retroactive effect of any holding in the TAM or of any subsequent modification or revocation of the TAM. See Section 16 of Revenue Procedure 2006-2.

For more information, see Revenue Procedure 2006-2 or contact your local FSLG Specialist.

Directory of FSLG Contacts

State	Specialist	Telephone Number	Ext.
Alabama	John Givens	(251) 340-1761	
Alaska	Gary Petersen	(775) 325-9282	
Arkansas	Jan Germany	(501) 324-5328	253
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State	Specialist	Telephone Number	Ext.
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	Robert Lettow	(318) 869-6312	
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	Dena Jones	(816) 966-2346	
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New Hampshire	Bob Westhoven	(207) 784-6988	
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	George Vega	(505) 837-5554	
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	Dave Coulon	(315) 233-7305	
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	Jean Redman	(607) 734-1063	108
	Fran Reina	(315) 793-8171	
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	Catherine Wides	(919) 402-0918	
North Dakota	Rhonda Kingsley	(701) 239-5400	261
	Al Klaman	(701) 227-0133	

State	Specialist	Telephone Number	Ext.
Ohio	Trudee Billo	(419) 522-2359	
	Amy Myers	(419) 522-2259	
	Wendy Speelman	(419) 526-2607	
Oklahoma	Pat O'Neil	(405) 297-4895	
Oregon	Marilee Basaraba	(503) 326-5030	
Pennsylvania	Hilton Finney	(215) 861-3732	
	Jean Redman	(607) 734-1063	108
Rhode Island	Mary Robert	(401) 826-4754	
South Carolina	Clifford Brown	(803) 253-3523	
South Dakota	Rhonda Kingsley	(701) 239-5400	261
	Al Klaman	(701) 227-0133	
Tennessee	Denver Gates	(404) 338-8205	
Texas	Robert Jackson	(281) 721-7993	
	JoAnn Lacey	(512) 464-3609	
	Steve O'Brien	(512) 464-3129	
	Donna Richard	(512) 499-5033	
Utah	Katherine Dees	(406) 761-1825	229
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	Ruthann Watts	(262) 513-3520	
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