

FY2009

FEDERAL, STATE AND LOCAL
GOVERNMENTS

WORK PLAN



October 1, 2008

FY2009 FSLG Work Plan

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Executive Summary

The Office of Federal, State and Local Governments (FSLG) supports the Internal Revenue Service (IRS) and the Tax Exempt and Government Entities (TEGE) Division strategic goals of:

- 1) Enhancing Enforcement of the Tax Law;
- 2) Taxpayer Education and Outreach; and
- 3) Modernizing the IRS through its People, Processes and Technology.

In support of these goals, FSLG has committed to the following work plan areas:

- Continue the Federal Agency compliance initiative,
- Continue the Large Entity compliance initiative,
- Continue work on compliance projects to address various compliance issues of specific market segments within state and local entities,
- Continue to address Abusive Tax Avoidance Transactions (ATATs),
- Build a highly qualified and satisfied work force,
- Meet customer needs by providing educational activities,
- Encourage voluntary compliance by government entities,
- Improve organizational performance, and
- Improve knowledge and information management.

A central theme in the FY2009 Work Plan is FSLG's focus on continuing to improve its enforcement activity. Specifically, FSLG is committed to continuing its Federal Agency and Large Entity compliance initiatives that began in FY2005. FSLG will continue to conduct compliance projects designed around specific market segments or issues to improve compliance among state and local entities. FSLG will complete analysis of its classification program to improve the case selection process.

FY2008 Accomplishments

In FY2008, FSLG met or exceeded its performance goals related to examination and compliance check closures, hours on cases, and outreach customers reached. FSLG staff members serve on the Enterprise-wide Employment Tax Strategy Team and the Service-wide Non-filer Strategy Team. FSLG strengthened its relationship with various stakeholders through a presentation at NCSSSA National Training Conference and inviting representatives of NCSSSA to make a presentation at FSLG's CPE. In addition, SSA and FSLG representatives continue to meet quarterly and work on educational materials of joint interest.

During FY2008, Surveys of FSLG taxpayers, whose examinations closed in FY2008, indicate an overall satisfaction of 5.76 on a scale of 1 to 7 with 7 being most satisfied. The taxpayers were most satisfied with Courtesy of Specialist (6.31).

During FY2008, FSLG created the Group of Nine. The Group of Nine consists of one specialist from each group. The members of the Group are volunteers, which are rotated every 4 months. The Group of Nine serves as an advisory group to advise the FSLG Director on anything regarding FSLG - personnel, operational, communications, and skills transfer, technical things that we do well and need to keep doing or things that need improvement. It is a specialist forum to "change FSLG for the better."

During FY2008, FSLG updated the employment code of over 17,500 government entities identified as miscoded in FSLG's Research Project. See additional information in Appendix C.

During FY2008, FSLG coordinated and conducted outreach presentations to government entities within the U.S. Territories including Guam, CNMI, USVI, and Puerto Rico and expanded its Federal Agency Outreach Seminars.

Strategic Initiatives

In FY2005, FSLG committed to addressing compliance by Federal agencies with Federal tax laws. The compliance plan included the formation of a dedicated Federal Agency compliance group in September, 2005. In FY2008, the Federal Agency compliance group opened 16 examinations and completed examinations of 20 Federal agencies. In FY2009, FSLG anticipates opening 15 and closing 15 examinations of Federal agencies or sub-agencies. FSLG will also continue to work with Collection and the CFO's office to coordinate resolution of employment tax delinquencies by Federal agencies.

In FY2005, FSLG also committed to implementing a compliance program that addresses large non-Federal government taxpayers. These taxpayers, with annual payrolls in excess of \$40 million, have generally never been examined and are large enough to have significant impacts on the Social Security and Medicare trust funds. These taxpayers employ over 80% of all non-Federal government employees. In FY2008, FSLG opened examinations of 30 large non-Federal entities and closed 40, and in FY2009, FSLG anticipates opening 30 and closing 35 examinations of large entities.

FSLG will participate in the Employment Tax National Research Program (NRP) project to develop data to help identify sources of the tax gap related to employment taxes. The tax-gap research project on employment taxes will be developed during FY2009, as part of an IRS-wide effort. FSLG has committed to examine approximately 250 returns or 60 entities each year during the three-year

examination project. These audits are expected to begin in FY 2010. Due to the potential impact of these cases, some of which could be large or Federal Agency cases, FSLG is limiting new initiative in FY2009 to cases that can be opened and closed within FY2009.

Abusive Tax Avoidance Transactions

In FY2007, FSLG completed 17 examinations of Health Reimbursement Arrangements (HRAs) that did not meet the requirements of the Code. All 17 examinations involved the same provider. FSLG entered into a closing agreement with the provider in lieu of employment and income tax to resolve similar HRAs provided to more than 500 government entities. Based on the facts it was determined that a section 6700 examination of the provider was not necessary. FSLG has identified several additional providers of HRAs that do not appear to meet the requirements of the Code. FSLG will conduct additional examinations to investigate these programs. Upon completion of these examinations, FSLG will consult with Counsel to determine whether a section 6700 examination should be conducted with regard to the promoters of the HRAs.

FSLG supports the IRS wide effort to identify and eliminate ATATs. It will continue with its efforts to identify customer participation in abusive schemes. The FSLG customer base is primarily tax-neutral enablers of some schemes. Its efforts will include developing information for use in educational programs as well as providing guidance to its compliance personnel.

Special Projects

Beginning in FY2007, FSLG began conducting market segment projects by adopting a market-segment approach for identifying and selecting returns for examination. These projects allow FSLG to determine trends and issues in various market segments. FSLG will use the results to plan outreach activities to improve compliance.

FSLG completed the first of these projects on Community Colleges, in FY2008 and published a report of its findings. Although no unusual issues were encountered in this market segment, FSLG will conduct focused outreach to this market segment based upon the most common areas of non-compliance, including publishing an article in the FSLG Newsletter, seeking opportunities to publish articles in other industry journals, conducting a phone forum, etc.

In FY2007, FSLG began a market segment project on fire districts. The first phase was focused outreach conducted in FY2007. In the second phase conducted in FY2008, FSLG conducted compliance checks of fire districts randomly selected from each state. Although FSLG had initially planned to begin an examination phase in FY2008, it has decided not to pursue the examination

phase, due to some recent legislative changes and the fact that most fire districts are relatively small (FSLG generally does examinations on entities with annual payroll of \$10 million or more). Instead, it will develop an action plan for additional focused outreach to help fire districts improve compliance; this will include phone forums, articles in industry publications, etc.

In FY2008, FSLG began a market segment examination project on housing authorities, which will be completed in FY2009.

In FY2009, FSLG will begin several compliance projects focused on particular issues: Form 1099-MISC non-filers compliance check project will make up approximately 25% of FY2009 compliance check inventory, a health reimbursement arrangement (HRA) examination project involving approximately 6 to 8 entities, and a project to check compliance with classification settlement program (CSP) and other closing agreements that will involve 43 limited-scope examinations. Most of the cases in these projects will open and close within FY2009 to allow FSLG to devote adequate resources to NRP cases in FY2010.

FSLG is coordinating with TEGE's Exempt Organization business unit on a compliance project for colleges and universities, which is focusing on unrelated business taxes, employment taxes and inurement/private benefit issues. This project involves sending a compliance check questionnaire to 400 randomly selected public and private colleges and universities. EO plans to conduct 20 to 30 examinations beginning FY 2010. FSLG will conduct employment tax examination on public universities selected for examination.

Outreach

FSLG 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 focus will be placed on the national and regional issues identified through research, environmental scanning, and other means, activities to address significant local issues will also be supported.

One of the primary areas of outreach and education will be section 3402(t) of the Code that requires 3 percent withholding by certain government entities on any payments made to any person providing property or services.

Planning Process

OVERVIEW OF FSLG

The office of Federal, State and Local Governments is responsible for Federal tax administration issues relating to approximately 104,900 governmental units and their subordinate agencies in the United States. Issues addressed primarily involve employment taxes and information reporting. FSLG is also responsible for ensuring compliance with, and assisting in, the administration of FICA coverage agreements under the provisions of Section 218 of the Social Security Act.

In FY2009, FSLG will continue to maintain an effective balance between traditional compliance work and educational activities. Compliance activities will be a major focus for all field groups.

FSLG continues to develop an annual comprehensive compliance plan involving managers, field Specialists and CPM staff. This compliance plan is incorporated into the FSLG Annual Work Plan. Responsibility for the development of the Annual Work Plan is vested with the Manager, Compliance and Program Management.

FSLG's interaction with its customer base affects compliance levels of the governmental employers and their 23 million employees. These entities employ approximately 20% of the American workforce, pay wages in excess of \$775 billion annually and pay employment taxes in excess of \$200 billion. Governments also purchase goods and services of more than \$2.9 trillion, which represents 19% of the United States gross domestic product, and have assets in excess of \$16 trillion.

At the start of FY2009, FSLG will have 75 FSLG field Specialists, including 10 FSLG Specialists assigned to the Federal Agency Group. In FY2009, FSLG anticipates losing four employees to retirement at the end of the first quarter and three more at the end of the fiscal year. FSLG will hire three employees through attrition hiring in FY2009. Approximately 17 percent of FSLG Specialists are eligible to retire in FY2009. In spite of the loss of senior Specialists, FSLG plans to maintain roughly the same level of compliance enforcement activities as outlined in the FY2008 workplan.

METHODOLOGY

Trends, Issues, and Problems (TIPs) were identified in the Strategic Business Plan for FY2009 at the time of its formulation. The FSLG office involved the field Specialists, managers, and CPM staff in the development of the work plan.

The foundation for the formulation of the FY2009 FSLG Work Plan is based on the TIP areas, but refined to specific issues through the analysis of IRS data, stakeholder input, and employee input. These issues form the basis for the compliance activities to be undertaken in FY2009. The major areas of emphasis are: examinations, compliance checks, and information reporting compliance.

The employment tax field in general and the governmental sector in particular, have not been the subject of significant research activity or information gathering at the Service level. Governments generally file only employment tax and information returns. There are no additional returns to provide compliance indicators, thus classification avenues are limited. An additional complicating factor is the ability of governments to file “consolidated” employment tax returns, a process unavailable to any other group of employers in the country.

This lack of basic information has been considered in developing the FSLG compliance workload selection process. FSLG has considered anecdotal evidence, customer contact data, results from past compliance contacts, and employee input in developing its examination plans for FY2008-2010. It is continually improving the process. To accomplish this, FSLG:

- developed a formal workload selection plan to ensure consistency and impartiality in its examination process;
- established state folders that include state specific information (section 218 agreement, qualified retirement plan, section 403(b) plan, etc.) which are a useful tool in workload selection;
- included workload selection and risk analysis in its FY2008-2010 Research Plan;
- will conduct a portion of its examinations based on market segments and compliance projects to determine compliance levels and identify significant issues in those segments; and
- will continue to analyze the data collected from closed compliance checks and examinations and utilize the data in workload selection and in conducting future outreach activities.

WORK PLAN AREAS

FSLG will support the TEGE Division major strategies and operating priorities for FY2009. These strategies address key challenges FSLG faces in delivering top quality service to customers, and productivity through a quality work environment. These include actions to:

- Improve Compliance FSLG will continue to utilize employee input, customer feedback, data analysis, and environmental scanning, to secure a comprehensive knowledge of key compliance issues and causes of noncompliance. The information obtained from these and other sources will be used to improve compliance within its customer base.
- Meet Customer Needs FSLG will work closely with stakeholders, partners, and the Advisory Committee on Tax-exempt and Government Entities (ACT) to ascertain FSLG customer's needs, as well as to design and deliver mutually agreeable remedies to identified compliance concerns and problems whenever possible. In addition, the FSLG Newsletter and educational products will be used to address compliance questions and issues.
- Improve Organizational Performance FSLG will utilize balanced measures and analyze the results to effect operational enhancements to improve performance.
- Improve Knowledge and Information Management FSLG will expand its gathering and use of data, and fully develop database tools to improve its abilities to identify, track, and measure the impact of all field activities. It will continue to support the development and implementation of TREES as the TE/GE work-center.
- Continue to address Federal Agency Compliance FSLG will continue examinations of Federal agencies during FY2009.
- Continue the Large Entity Compliance FSLG will continue examinations of larger entities during FY2009.
- Address Abusive Tax Avoidance Transactions FSLG will continue to work on cases involving abusive health reimbursement arrangements and coordinate with Chief Counsel and area counsel. In addition, FSLG will incorporate steps to identify customer participation in abusive schemes. Its efforts will include developing information for use in educational programs as well as providing guidance to its compliance personnel.
- Build a Highly Qualified and Satisfied Work Force FSLG will continue to train its workforce to ensure that employees have the skills necessary to meet customer needs. It will continue its use of the employee survey to identify opportunities for improvements in employee satisfaction. It will continue to involve managers and employees in improvement processes for FSLG, such as with the Group of Nine.

BUDGET ACTIVITY CODE 52, PAC TT

These codes correspond to the resources devoted to Pre-filing Education and Assistance, which includes customer education and outreach, direct and indirect assistance, and coordination of assistance actions between FSLG and other functions.

Customer Education and Outreach

FSLG continues to address key areas of noncompliance through a combination of targeted outreach, development of new educational products, and various field compliance activities.

FSLG recognizes the potential positive impact on taxpayer compliance resulting from providing customer education and outreach. Therefore as it seeks new outreach partnering opportunities, FSLG is working to expand the use of phone forums to reach large numbers of taxpayers. For example, it will conduct phone forums for community colleges and fire districts to share findings of the community college and fire district market segment compliance projects and to discuss areas of non-compliance in those market segments.

FSLG will continue to publish its semiannual newsletter. The FSLG Newsletter serves as a useful means for providing information on current issues, such as tax law changes, ATATs, and new published guidance. There are currently almost 33,000 subscribers.

Stakeholder Relationship

SSA

FSLG will continue to partner with the Social Security Administration (SSA) as a major external stakeholder while maintaining and increasing partnership activities with other stakeholders. In FY2007, FSLG worked with SSA to develop procedures for its employees to contact designated officials at SSA with regard to the interpretation of Section 218 Agreements during an examination. FSLG continues to monitor this process and implement improvements when necessary. This partnership with SSA will enhance its relationship with an important partner in addition to improving cycle time on examinations. FSLG continues to partner with SSA in the development of important legal questions. During FY2008, FSLG and SSA developed a compliance tool entitled "Section 218 Questions for use by SSA coverage specialists" to assist both FSLG Specialists and SSA Regional Coverage Specialists.

NCSSSA

The National Conference of State Social Security Administrators (NCSSSA) is an organization with which FSLG partners regularly in providing education and outreach to government entities. Additionally, FSLG Specialists contact the State Social Security Administrator (SSSA) for the specific State if assistance with Section 218 Agreement and other State specific issues is needed. In FY2008, NCSSSA was invited to speak at FSLG's annual continued professional education meeting. As a result many proactive steps to improve the relationship between the SSSAs and FSLG have been taken by NCSSSA and FSLG. In FY2009, these improvements will continue and FSLG Specialists will be encouraged to partner with the appropriate SSSA when conducting outreach events.

ACT

The Advisory Committee on Tax-Exempt Government Entities (ACT) includes three members who represent government entities and work on project related to FSLG issues. The ACT makes recommendation that improve compliance by government entities. For example, in FY2006, as recommended by the ACT, FSLG created a Public Employer Toolkit on it website to assist government entities in meeting their tax obligations and in FY2007, the ACT made recommendations with regard to Forms 1042. A number of enhancements have been made to the Toolkit since it was originally created. In FY2009, Director, FSLG will work with the ACT to develop projects and will seek its input in various projects undertaken by FSLG.

Section 3402(t)

Section 3402(t)(1) of the Code requires the Government of the United States, every State, and every political subdivision and instrumentality of the foregoing, to deduct and withhold 3 percent of any payment made to any person for property or services. Political subdivisions of a State (or any instrumentality thereof) making less than \$100,000,000 of payments for property or services are exempt from this requirements. There is no statutory exception for *de minimis* payments for property or services made by a Government entity (or an instrumentality thereof) that is not exempt from this withholding requirement. There are certain exceptions to the general rule which is effective for payments made after December 31, 2010.

It is expected that the IRS will issue proposed regulations providing guidance with regard to section 3402(t) before October 31, 2008. In FY2008, FSLG along with Counsel met with numerous Federal agencies (including the IRS' CFO's office) and associations and groups representing State and local governments to understand their concerns regarding application and implementation of Section 3402(t). The comments and suggestions received during the meetings were

extremely useful in understanding the systems used by government entities in making payments to third parties and thus assisted the IRS in the drafting of the proposed regulations. In FY2009, FSLG will continue to meet with Federal agencies and State and local governments affected by Section 3402(t) to discuss the proposed regulations, obtain suggestions and comments on the proposed regulations and finally, to provide education on the final regulations, when issued. The education and outreach with regard to the application of Section 3402(t) will be a large part of FSLG's outreach activities in FY2009. The outreach Action Plan specific to section 3402(t) is attached as Appendix D.

Cross Functional Relationships

Enterprise-wide Employment Tax Strategy Team

In FY2007, the IRS adopted an Enterprise-wide Employment Tax Strategy and created a team consisting of member from each Operating Division in order to ensure consistency in the application of laws regarding Federal employment tax. FSLG, represented by the Director and CPM manager, actively participated on this Team in FY2008 and will continue to do so in FY2009.

Service-wide Non-filer Strategy Team

In FY2007, the IRS also adopted a Service-wide Non-filer Strategy and created a team consisting of members from each Operating Division to ensure that each Unit included non-filer compliance in its work plan. In FY2007 and 2008, FSLG addressed filing compliance through soft notices/self-correction, compliance checks and correspondence examinations. In FY2009, FSLG will continue to address filing compliance in all compliance contacts, will continue to identify regional pockets of non-filing by small governments that can be addressed primarily through "soft-notices" and self-correction, and will also conduct a specific project dealing with Forms 1099-MISC Non-filers.

LMSB (International)

FSLG is participating with LMSB International on several activities: a cross-functional committee to discuss outreach and education on international issues and determine how requests for outreach should be routed so that appropriate BODs are involved; developing a follow-up compliance plan on federal agencies with overseas workers (based on compliance reviews done 15-20 years ago on certain Federal agencies, wherein IRS determined issues of incorrect worker classification (resulting in improper IRC Sec 911 exclusions), and inadequate wage and 1099 reporting), creating a web-based course called "Implications of International Tax Law on TEGE-Web Based Learning Development Project" (course will include international issues and employment tax issues).

In addition, FSLG will continue an outreach effort to provide education to government entities with the U.S. Possessions.

SB/SE (Collection)

FSLG and SBSE Collection will continue to work together to resolve Federal ARDI accounts, and coordinate activities to resolve delinquent accounts of state and local governments.

Other Actions

Balanced Measures - FSLG will continue to utilize balanced measures to determine employee satisfaction, customer satisfaction, and business results. Results of these measures will assist FSLG in ensuring that actions undertaken do not adversely impact any of the three areas, and will assist FSLG in identifying areas in need of operational improvements in subsequent years.

The FSLG measures being utilized for employee satisfaction and business results are generally consistent with measures used by other functions. FSLG will continue use of the employee survey to identify opportunities for improvements in employee satisfaction. It will continue to involve managers and employees in improvement processes for FSLG. As described below, FSLG will continue to provide training to its workforce to ensure that employees have the skills necessary to meet the visions and goals of FSLG.

The FSLG Customer Satisfaction Survey conducted at outreach events has shown a high degree of customer satisfaction with the content and delivery of its educational programs. FSLG will work to keep the customer satisfaction at current levels during FY2009.

Performance Measures

The following performance indicators will be used in FY2009 for assessing Budget Activity Code 52, PAC TT activities:

Federal State & Local Governments	FY2008 Projected	FY2009 Plan
Number of Outreach Events	142	142
Number of Customers Reached	14,200	14,200

BUDGET ACTIVITY CODE 64, PAC EF

This area represents the resources devoted to Field Compliance Services, including compliance checks, return examinations, research projects, and related support work.

Workload Selection

FSLG will continue to refine the workload selection criteria utilized in prior years. In addition, FSLG will partner with Exempt Organizations (EO) in situations where the government entity is also an exempt organization (e.g., community colleges, charter schools, hospitals) and Employee Plans (EP) where the government entity is participating in a retirement plan or similar arrangement.

Workload selection will be monitored to ensure that key areas identified through environmental scanning, research, and other means are addressed, and that the actions being assigned represent the optimal approach to the identified issue. FSLG will continue to undertake compliance checks as a mechanism to provide broad-based compliance coverage, to identify customer needs, and to foster self-correction. In appropriate situations, compliance checks may be converted to examinations with the approval of the group managers.

Training

FSLG provides basic and advance training to its newly hired Specialists and Continued Professional Education to all Specialists. FSLG Specialists have consistently commented favorably on the training provided. In FY2007, a task force was created to rewrite the new hire training. The task force will complete its work by the end of the 2nd quarter of FY2009. For the Training Plan, see Appendix A.

Compliance Plan

FSLG examinations of books and records relating to the determination of a tax liability will generally address employment tax issues, Social Security Act Section 218 compliance issues, information return issues, FICA replacement plan issues, Abusive Tax Avoidance Transactions and other priority work. Examinations are generally limited to the most current year. Expansion to other years occurs in appropriate situations with written managerial approval.

Examinations of claims for refund will continue to constitute a significant portion of FSLG's examination workload for FY2009. Field groups will prioritize claim work while maintaining an active non-claim examination program.

FSLG generally conducts compliance checks on smaller entities (annual payroll less than \$10 million) to determine compliance with their employment tax and information return reporting obligations. Compliance checks do not include review of the books and records of the taxpayer and are designed to foster self compliance. If the Specialist determines that the government entity is not in compliance, the case is converted into an examination or an advisory letter is issued to the government entity depending upon the extent of non-compliance.

FSLG will continue the two strategic initiatives started in FY2005: the Federal Agency Initiative and the Large Entity Initiative. In addition, FSLG will complete the Housing Authority Project begun in FY2008 and begin a Form 1099-MISC Non-filer Project, a Health Reimbursement Arrangement Project, and a Closing Agreement Follow-up Project. For the Compliance Plan see Appendix B.

FSLG will participate on an Employment Tax National Research Program (NRP) project to develop data to help identify sources of the tax gap related to employment taxes. The tax-gap research project on employment taxes will be developed during FY2009, as part of an IRS-wide effort. FSLG has committed to examining approximately 250 returns or 60 entities each year during the three-year examination project. These audits are expected to begin in FY2010. Due to the potential impact of these cases, some of which could be large or Federal Agency cases, FSLG is limiting opening new initiatives in FY2009 to cases that can be opened and closed within FY2009.

In the last few years, numerous entities have contacted FSLG to resolve inadvertent errors in filing or payment compliance in prior years. In such instances, the issues have been resolved through closing agreements between the entity and FSLG. In FY2007 and FY2008, FSLG executed 19 and 24 (YTD) voluntary closing agreements, respectively. FSLG encourages government entities to regularly review their filing and payment compliance and, if inadvertent errors have occurred, to contact FSLG. The voluntary closing agreement requests are controlled and worked by CPM specialists. In FY2009, FSLG will create a questionnaire that government entities may use to conduct self-checks. The questionnaire will be added to FSLG's website.

Research

FSLG will continue to work on perfecting the customer database. During FY2006, FSLG worked with the Census Bureau database of government entities to identify its customers and substantially increase the number of government entities listed on the IRS Business Master File. In FY2007, FSLG worked with the system owners to make systemic changes to insure FSLG customers remain coded properly and also to update the IRM procedures that were necessary related to these changes. In FY2008, FSLG updated employment codes of over 17,500 government entities. In FY2009, FSLG will continue to identify additional entities and change employment codes. For the Research Plan see Appendix C.

Performance Measures

The following performance indicators will be used in FY2009 for assessing Budget Activity Code 64, PAC EF:

Federal State & Local Governments	FY2008 Actual	FY2009 Plan
Examinations Closed	2008	1800
Compliance Checks Closed	860	855
Examination Timeliness	303	280
Examination Quality	80%	82%

Appendix A

TRAINING

The following items are descriptions of FSLG training courses:

Course 10055: Continuing Professional Education – FSLG

This course covers continuing education to maintain and enhance employee professional skills. The class will be provided to all field Specialists and selected OPR staff.

Course RICS/CDA – Phase I

The current RICS system will be replaced by a new system. This training covers RICS functionality for using the new RICS/CDA system. CPM staff that classify FSLG work and/or develop the FSLG workplan and compliance projects will attend this class.

Course: TREES

New FSLG Specialists and CPM staff will attend this Work Center training course.

Course 4307: Medical Resident FICA Claims Training

This training will provide guidance to selected FSLG examination personnel in handling FICA refund claims and related issues with respect to medical residents.

Course 4323: Federal, State and Local Government Specialist- Ph III

This is advanced phase training for FSLG field employees. Training will be provided to new FSLG field Specialists, managers, and CPM staff.

Course 3142: Basic Employment Tax Training

New FSLG Specialists attend the basic employment tax training offered by SB/SE when FSLG Phase training is not available.

Course 15770: SGML Training (IRM Writing)

This course provides training to CPM staff members who write the IRM.

Course: Functional Leadership

This course provides training to frontline managers.

Course: Mandatory Topics

This training includes various annual mandatory briefings such as UNAX, Ethics, POSH, etc.

Course: Micro Purchase Card Training

This skillsoft course provides employees training on using purchase cards. One staff member will take this course.

Course: Frontline Leadership Readiness Program

This course provides training to frontline managers.

Course: International Tax Seminar

This training provides information about international tax law.

Course: Annual Fraud Summit

This training provides information about service-wide fraud policies and procedures. FSLG's Fraud Coordinator will attend this training.

Appendix B

COMPLIANCE PLAN

I. INTRODUCTION

The FY2009 compliance plan continues to focus on areas where FSLG can most effectively apply its compliance resources to meet organizational goals.

Compliance activities include general examinations, examinations of refund claims, and compliance checks of entities for reporting compliance, non-filing conditions, and balance due accounts. In response to numerous, Government Accountability Office (GAO), Treasury Inspector General for Tax Administration (TIGTA) and Office of Management and Budget (OMB) reports indicating widespread and longstanding Federal agency non-compliance, during FY2005 FSLG established a group dedicated exclusively to working Federal agencies.

II. CHALLENGES AND CONSIDERATIONS IN DEVELOPING THE COMPLIANCE PLAN

Determining the best use of compliance activities is a daunting challenge, made more so because of the lack of FSLG examination benchmarks and baselines.

In FY2006, FSLG began collecting examination results with the use of Case Selection Survey sheets that are required to be completed by the Specialists for all closed examinations and compliance checks. While FSLG began collecting data since January 1, 2005, the data was not collected in a manner conducive to analysis. During FY2007, FSLG completed modifications to the information database and has begun analyzing the data collected for use in developing market segment projects. Although in-depth analysis of the data was not yet available for extensive use in creating the FY2009 Compliance Plan, such analysis should be available at the beginning of FY2009 to help identify the most productive classification criteria to use in the return classification process during FY2009. The data may also provide compliance information that can be used in outreach activities.

The Compliance Plan is developed through a cooperative process involving input from field group managers, Specialists and the CPM staff. Field groups contribute to the plan by continuing to refer issues and information for consideration in the planning process. CPM utilizes the approved Compliance Plan and the supporting information to develop workload classification criteria for FSLG.

Because FSLG baseline data are currently insufficient to provide statistically valid data, FSLG must rely on currently available data in developing issues for audit consideration. These sources include:

- Anecdotal comments based on employee experience;
- State folders developed by Specialists;
- Outreach results;
- Filters developed by CPM;
- cursory review of compliance issues reported on closed compliance check and examination cases;
- Referrals;
- GAO Reports, and
- Top Payers with TIN mismatch reports.

Coordinated/Support Examinations with Other IRS Functions

FSLG continues to work with EP when issues arise with respect to retirement plans and also when EP discovers employment tax issues during its examinations. In addition, FSLG works with EO where the government entity is also an exempt organization. In addition, in FY2007, FSLG and LMSB (International) began coordination of common issues, such as appropriate classification and tax treatment of workers in Federal agency offices overseas where the workers are United States citizens or residents. This coordination will continue in FY2009.

FSLG receives referrals from, and provides referrals to, EP and EO via the Specialist Referral System program.

III. EXAMINATION PLAN

All compliance work will originate in or be approved by CPM prior to initiation of the cases. Compliance selections will include large, medium and small entities.

(a) STRATEGIC INITIATIVES

FSLG Large Entity Program

During FY2009, FSLG will address a number of entities with annual payrolls in excess of \$40 million. This is a nationwide strategy - each group across the country will be responsible for working a number of large entity examinations. These are time intensive cases and will often require the assignment of a team of Specialists. Most of these examinations will be conducted as focused audits. The cases will be identified by CPM using RICS. FSLG will commence 30 examinations of large government entities in FY2009.

Based upon the results of the large entity examinations conducted in FY2006 through 2008, FSLG will continue to:

- refine large case selection criteria,
- commence 30 examinations of large government entities and complete at least 35,
- conduct focused examinations of large entities (the issues on which the Specialist will focus will be determined with the assistance of the group manager and will be based on the Case Selection Survey sheet provided by CPM),
- increase use of teams (two or more Specialists and CAS, if needed) to conduct audits on larger governments, and
- plan outreach activities based on results.

Uncertainty continues to surround resolution of medical resident claims. This uncertainty precludes specific planning objectives for these claims. Most of the medical resident claims are filed by large entities.

Federal Agencies Program

During FY2009, examinations of Federal agencies and sub-agencies will remain a strategic initiative of FSLG. These present the largest and most complex cases. Examinations in this sector will be based initially on specific non-compliance issues identified from sources such as GAO reports, SS-8 determinations, outreach/assistance efforts, and other sources. As noted in GAO Report 04-74, Federal agencies continue to exhibit significant non-compliance with information returns and backup withholding requirements. FY2006 was the first full year for FSLG to conduct examinations of Federal agencies. The issues most prevalent in such examinations were: worker classification, relocation and settlement payments, foreign residents; information reporting, and fringe benefits. In other words, issues similar to those raised in state and local governments. In FY2009, FSLG will conduct additional Federal examinations using a team audit method. The Director, FSLG will continue to approve all proposed Federal examinations prior to initiation. FSLG will commence examinations of 15 Federal agencies in FY2009.

Based upon the results of the Federal agency examinations conducted in FY2006 through 2008, FSLG will continue to:

- refine case selection criteria,
- evaluate the need for resources,
- commence 15 examinations of Federal agencies/sub agencies and complete at least 15,
- continue to refine processes for Federal agency examinations,
- conduct focused examinations (the issues on which the Specialist will focus will be determined with the assistance of the group manager and will be based on the Case Selection Survey sheet provided by CPM),
- increase use of teams to conduct audits on larger Federal agencies, and
- plan outreach activities.

For several years, FSLG, the CFO's office, and Collection have been discussing the issue of Federal agency delinquencies. In FY2007, FSLG, the CFO's office and SB/SE Collection began monthly status calls/meetings to discuss the roles and responsibilities of the three functions and the IRS policy for enforcing Federal Agency filing and paying compliance issues. This will continue in FY2009.

National Research Program (NRP) Project

FSLG will participate on an Employment Tax National Research Program (NRP) project to develop data to help identify sources of the tax gap related to employment taxes. The tax-gap research project on employment taxes will be developed during FY2009, as part of an IRS-wide effort. FSLG has committed to examining approximately 250 returns or 60 entities each year during the three-year examination project. These audits are expected to begin in FY2010. Due to the potential impact of these cases, some of which could be large or Federal Agency cases, FSLG is limiting opening new initiative cases in FY2009 and developing projects for FY2009 that can be opened and closed within FY2009.

(b) GENERAL CASE WORK

States and State Agencies

These cases are potentially very large and complex, on par with Federal entities. The challenge in this sector is to determine the number of filing entities in each state. State agencies and entities have been identified by the field and furnished to CPM. CPM will cross-reference this data with the BMF to determine the

number of state entity filers. State level entities will then be identified for examination through the field referral process, third-party information, compliance issues developed in outreach/assistance efforts, and regular CPM examination selection criteria.

Local Governments

These include all other entities. The complexity and size of these entities varies significantly. The local government sector includes the following major segments: counties, cities/municipalities (further stratified by population, wages or other criteria), school districts, local hospitals/medical facilities, library boards, and special purpose districts.

Information Reporting

Payments by FSLG customers represent a significant part of the national economy. When information returns are not issued, or incorrect TINS are used, significant income amounts are not reported on tax returns. A GAO review of Federal agencies found significant compliance issues involving information reporting and back-up withholding. No similar study was done on non-Federal entities. FSLG requires that each examination and compliance check contain information reporting compliance determination. FSLG will work with governments to improve information reporting at all levels of government. Reporting compliance in the proper filing of Forms 1099, 1042, 1042-S, and W-2G will be addressed through field compliance actions, including compliance checks and examinations. A determination whether the government entity meets with its information reporting requirement is mandated in every examination and compliance check. In FY2009, FSLG will conduct a Form 1099-MISC Non-filer Project.

(c) SPECIFIC PROJECTS

Community Colleges

In FY2008, FSLG completed its first structured market segment examination project on the Community College Market Segment and will publish a report of its findings. Although no unusual issues were encountered in this market segment, FSLG will conduct focused outreach to this market segment based upon the most common areas of non-compliance, including publishing an article in the FSLG Newsletter, seeking opportunities to publish articles in other industry journals, conducting a phone forum, etc.

Fire Districts

In FY2007, FSLG began a market segment project on fire districts. The first phase was focused outreach conducted in FY2007. In the second phase, conducted in FY2008, FSLG conducted compliance checks of fire districts randomly selected from each state. Although FSLG had initially planned to begin an examination phase in FY2008, it has decided not to pursue the examination phase, due to recent legislative changes and the fact that most fire districts are relatively small (FSLG generally does examinations on entities with annual payroll of \$10 million or more). Instead, it will develop an action plan for additional focused outreach to help fire districts improve compliance based upon the findings from the compliance checks conducted in FY2008; this will include phone forums, articles in industry publications, etc.

Housing Authorities

In FY2008, FSLG began a nationwide project to examine a sample of housing authorities. Based upon limited compliance activities conducted in the Housing Authority Project, there appears to be a number of non-compliance areas that warrant additional compliance work, including unreported taxable fringe benefits, failure to file Forms 1099, and poor internal controls, which can lead to additional compliance problems such as fraud and accuracy related problems. Ninety-five housing authorities were selected across the country using a variety of selection methods, including standard FSLG classification queries, random selections, and internet research. Although this selection methodology will not result in a statistically valid sample, which would allow FSLG to measure the level of compliance across the entire universe, FSLG will be able to identify trends and compliance issues that are common to this universe without adversely impacting other resources, such as the Large Case Initiative or other projects. This project will be completed in FY2009.

Section 403(b) Examinations

An FSLG Specialist identified a compliance issue related to elections on 403(b) plans of some government entities in the Northeast, which resulted in under-reporting FICA taxes. Eight examinations were initiated in FY2008 to gather additional information about this potential compliance issue. FSLG is coordinating these examinations with EP as necessary. These examinations will be completed in FY2009. Based upon findings of these examinations, FSLG may expand this into a project for FY2010.

Abusive Tax Avoidance Transactions (ATATs)

FSLG customers that participate in ATATs may derive current revenue, not tax benefits from the transactions. As tax neutral third parties ('accommodation parties'), they are not normally concerned with the income tax effects of the transactions. FSLG Specialists will include an assessment and/or referral of potential ATAT issues in all examinations. In addition, there is a potential issue when FSLG's customers purchase retirement or health plans that are misrepresented as complying with the Internal Revenue Code when they do not, resulting in additional taxable wages for the participants. In FY2007, FSLG completed 17 examinations of Health Reimbursement Arrangements (HRAs) promoted and sold by one provider, which did not meet the requirements of the Code. FSLG entered into a closing agreement with the provider which made a settlement payment in lieu of employment and income tax that resolved issues with regard to more than 500 government entities that had participated in similar HRAs. Based on the facts of the cases under exam, it was determined that a section 6700 examination was not necessary. In FY2009, FSLG will select about 6 to 8 entities with HRAs that do not appear to meet the requirements of the Code. Upon completion of these examinations, FSLG will also consult with Counsel to determine whether a section 6700 examination should be conducted with regard to the promoters of the HRAs.

Form 1099-MISC Non-filer

In FY2009, FSLG will begin a Form 1099-MISC Non-filer Compliance Check Project based upon research provided by and a recommendation from TIGTA. FSLG developed a list of government entities that have not filed Forms 1099-MISC in the last three years on which FLSG has made no prior compliance contact through either a compliance check or examination. Of the 23,632 entities that have not filed Forms 1099-MISC for the three year period, 200 will be randomly selected for a compliance check. The project will determine how many of the 23,632 entities, which did not file a Form 1099-MISC over a three year period, did so correctly. The project will measure the level of compliance with a 95% confidence level in the results with an anticipated margin of error +/- 7%. In addition to measuring compliance in this "non-filer" population, the project will help FSLG analyze the reasons why the entities have not filed Forms 1099-MISC and to devise strategies to improve overall compliance in this area. These compliance checks are expected to open and close within FY2009.

Closing Agreement Follow-up

In FY2009, FSLG will begin a project to check compliance with classification settlement program (CSP) and other closing agreements to determine what percent of taxpayers comply with closing agreements. FSLG will select a statistically valid random sample of CSP agreements and other closing agreements entered into between FY2000 and FY2006. 43 limited-scope

examinations will be conducted in this project. These examinations are expected to open and close within FY2009.

Colleges and Universities

FSLG is coordinating with TEGE's Exempt Organization business unit on a compliance project for colleges and universities, which is focusing on unrelated business taxes, employment taxes and inurement/private benefit issues. This project involves sending a compliance check questionnaire to 400 randomly selected public and private colleges and universities. EO plans to conduct 20 to 30 examinations beginning May 2009. FSLG will conduct employment tax examination on public universities selected for examination.

(d) COMPLIANCE CHECKS

The Form 1099-MISC Non-filer Project (discussed above) will constitute approximately 25% of compliance check activities. Other compliance checks planned for FY2009 will primarily address non-filer entities and Form 1099-MISC filing compliance issues and will generally encompass the entities with an annual payroll of less than \$10 Million. These types of compliance check cases may not directly translate into examination issues/ adjustments; however, field groups will be encouraged to recognize situations where a significant examination issue arises from a compliance check and to re-establish the case appropriately. Data regarding issues found are being gathered for use in future compliance efforts. FSLG is currently planning on completing 855 compliance checks in FY2009, covering all of its market segments.

(e) NON-FILERS

FSLG Specialists are encouraged to be mindful of non-filers by identifying potential areas of non-filing. In FY2007 and 2008, FSLG addressed filing compliance through soft notices/self-correction, compliance checks and correspondence examinations. In FY2009, FSLG will continue to address filing compliance in all compliance contacts, will continue to identify regional pockets of non-filing by small governments that can be addressed primarily through "soft-notices" and self-correction, and will also conduct a specific project dealing with Forms 1099-MISC Non-filers. In addition, CPM will continue to conduct research to identify government entities that are non-filers for potential workload selection.

Appendix C

FY2009 FSLG RESEARCH PLAN

I. OVERVIEW OF RESEARCH PLAN

Purpose

The purpose of the FSLG Research Plan is to coordinate existing and future research efforts that FSLG is conducting to address identification of customers, customer characteristics, assessment of risk, allocation of resources, trends, issues and problem identification. The research plan is necessary to meet the goals and objectives of the TE/GE Strategic and Program Plan as well as the FSLG Work Plan. The research plan will also provide a basis for predicting taxpayer needs and compliance levels.

Information developed through research will allow FSLG to identify and analyze risk, educational gaps, and to develop trends and measurements. An ongoing research process is an essential component of FSLG's efforts to ensure compliance. In order to meet its obligations to its customers, FSLG will use techniques including focused taxpayer education, improved reporting, and early intervention through notices and phone calls, to address voluntary compliance.

The primary objectives of the research plan are to identify, quantify and monitor FSLG customers and their unique compliance issues. The major goals of the plan are as follows:

- To identify all government entity customers
- To identify trends, issues and problems of customers
- To determine compliance risk levels
- To identify workload for various compliance treatments

Scope

The scope of the research plan is being set at a level that can be achieved using existing resources without adversely impacting FSLG's major educational and compliance goals.

Background

When the research plan started in FY2005, the FSLG customer base comprised 85,382 government entities, not including potentially thousands of sub-units that provide employment tax and information return reporting information for consolidation to a particular entity. Of those, 73,069 customers filed at least one Form 941 in the tax year 2005. There were 69,010 FSLG customers who filed Form 941, and 3734 who filed an annual Form 944 for the tax year 2006.

Government entities employ approximately 20% of the workers in the US, approximately 23 million government employees. They pay over \$775 billion annually in wages and employment taxes in excess of \$200 billion. The majority of these organizations are local government entities such as cities, counties, towns, school districts, etc. The governments also purchase goods and services of more than \$2.9 trillion and have an economic impact of representing 19% of the United States gross domestic product.

II. IDENTIFICATION OF CUSTOMERS

Objective

To identify the universe of FSLG customers

Background

FSLG has now identified approximately 104,900 government entities through the IRS Business Master File (BMF). However, this figure does not include all of the sub-units that report employment tax and information return reporting information to the entity that files a consolidated Form 941 or has one Employer Identification Number. There are many larger government entities that contain multiple operating units that are counted as a single entity while filing multiple returns or, conversely, entities filing a single return for multiple entities. These units report millions of dollars of wages and vendor/contractor payments through the "filing" entity. For example, the U.S. Department of Agriculture National Finance Center processes payroll for a significant number of Federal agencies and files one return. This significantly understates the number of government entities in the FSLG customer base.

FSLG identified its initial customer base using the Government Integrated Directory (GID) based on the Census of Governments conducted by the U.S. Bureau of the Census every five years. FSLG uses IRS BMF records with employment codes F (Federal agencies), G (state and local governments) and T (state or local governments with Section 218 Agreements with the Social Security Administration) to identify return filings of its identified customer base.

However, these data sets contain some significant flaws. These include:

- The Census database contains duplicate, disestablished and incomplete data. The latest Census data available was from 2002. Census data excluding duplicate identification numbers are now computed at 77,053.
- The Public Employer FICA Compliance Initiative (218 Initiative) data are not provided in electronic format and does not provide an EIN (Employer Identification Number). The data need to be compiled, scanned and researched for an EIN before an employment code T can be added to the BMF to identify FSLG with a Section 218 Agreement.
- The process of assigning EINs to new entities does not readily identify government entities that need to be coded with employment code F, G, and T. Therefore, FSLG must either rely on other business units and operating divisions to properly code and/or continue to monitor and query for miscoding issues.
- FLSG taxpayers are generally not assigned an employment code of T unless the taxpayer correctly indicates on the Form SS-4 that they have a 218 agreement.
- Significant sub-units of governments are not identified as part of a larger organization.

Available Data Sources

- Business Masterfile Entity records
- Bureau of Census database for 2002 Census of Governments
- Public Employer FICA Compliance Initiative (218 Initiative) data
- Information Returns data from RICS
- TEGE Entity information from RICS
- Various internet sites listing governmental organization data

Resource Requirements

- Assistance of LMSB Computer Audit Specialist
- Assistance from the EOCA at Ogden Campus with staff time (FTE) to update BMF and contact taxpayers
- Assistance of TE/GE research office and GE research analyst in developing criteria and ensuring statistical accuracy of the program.
- Appropriate computer systems support, including software, training and equipment.
- Adequate staff time (FTE) to develop this aspect of the program.
- Assistance from MITS in updating the FSLG customers with the proper employment codes.
- Assistance from MITS in searching payer master file data to identify non-filers

Milestones

The principal task is to compare and reconcile various sources to identify all government entities or significant sub-units for inclusion in FSLG's customer base. Many major milestones have been completed. However, the identification of FSLG customers will be an ongoing process due to new entities, mergers, and dissolutions. The major milestones completed and to be completed are as follows:

- Match data from the census of government's data to BMF data to develop unmatched entity database and identify needed BMF corrections - Completed 09/30/06.
- Send survey letters/request for entity information to taxpayers on the unmatched database (25,167 entities) - Completed 01/29/07.
- Reconcile unmatched entities to determine proper classification and contact those taxpayers where additional information is necessary to determine whether entity should have an employment code of G, T or F. This includes reviewing survey letters responses (11,636). This is being worked by EOCA at the Ogden Campus. Completion estimated FY2010.
- Work with BMF analysts and programmers to correct systemic problems in entering FSLG employment codes. Completed a work request to allow BMF to accept an employment code with no filing requirements. Completed July, 2007.
- Request that all relevant IRM procedures be revised to ensure FSLG employment codes are assigned even if there are no filing requirements – Completed July, 2007.
- Identify potential non-filers – work request completed to request a list of taxpayers that exist in the Payer Master File but not in the Business Master File. Information received June, 2007.
- Identify and correct errors in employment codes – Submitted work request that will keep FSLG employment codes in master file indefinitely. This work request will allow unique filing requirement codes, such as Puerto Rico, Virgin Islands, Guam and American Samoa filers to be coded as FSLG customers. Completed January, 2008.
- Identify significant sub-units through on-line research and other appropriate means – Initiated with the survey letter project at the Ogden Campus and with the review and research of Section 218 entities and the RICS database, Ongoing.
- Identify and implement procedures to keep the database of customer's current- Work request submitted to update entities that have been identified as FSLG customers. In process beginning January, 2008, Ongoing.

III. IDENTIFICATION OF TRENDS, ISSUES AND PROBLEMS (TIP)

Objective

Identify customer trends, issues and problems to support TE/GE Strategic Program and Plan and the FSLG Workplan.

Background

There is an ongoing need to develop TIPs for planning purposes. FSLG has been gathering information from various sources for this purpose. Some examples are customer outreach data, issues identified during compliance checks and examinations, internal/external information items, etc. Including these sources in the research plan will allow FSLG to formalize the process of securing the information, analyzing the data, and taking actions to address the TIPs as part of the planning process.

Available Data Sources

- FSLG outreach database
- Examination/Compliance Check issue tracking data
- Internal/external information reports
- Internet/media reports
- Payer Master File Data
- La Hacienda, Puerto Rico
- Other Divisions: EO, SBSE

Milestones

- Centralization of data
- Analysis of current data
- Identification of TIPs
- Identification of compliance issues suitable for targeted treatments

IV. ASSESSMENT OF RISK OF NON COMPLIANCE

Objective

To determine the risk of non-compliance with employment tax and information return reporting statutes. This also involves identifying major compliance risks.

Background

The risk of non-compliance is primarily based on limited compliance activities, anecdotal information and various external reports/data. FSLG believes that

government entities want to comply. There is also an assumption that the smaller local governments are at greater risk due to lack of understanding of the Federal tax law as well as high rates of employee turnover. The larger entities, including Federal and state agencies, are at risk due to their larger numbers of employees, potential for error and impact on the trust funds due to their size.

Available Data Sources

- Bureau of Census database for 2002 Census of Governments
- Historical Forms 941 data from master file
- Forms 941 data for CY2001 forward on RICS
- Public Employer FICA Compliance Initiative (Section 218)
- Information returns data from RICS
- Balance due data based on employment codes
- FSLG customer contact data
- Additional data sources to be made accessible to RICS
- Potential development of a service wide employment tax classification database currently under development in SB/SE

Resource Requirements

- Assistance of TE/GE research office in developing criteria and ensuring statistical accuracy of the program
- Appropriate computer systems support, including software, training and equipment
- Adequate staff time (FTE) to develop this aspect of the program
- Formal training on use of software

Milestones

- Develop an FSLG risk analysis methodology in conjunction with TE/GE research
- Refine definitions of non-compliance for FSLG entities in cooperation with TE/GE research office
- Identify and obtain additional data sources
- Maintain the developed risk analysis system to insure continued viability

Appendix D

Post – Proposed 3402(t) Regulations:

After the Proposed Regulations are issued, FSLG specialists will be provided outreach materials (Power Point, handouts, etc.) so they are prepared to discuss the Proposed Regulations when they conduct outreach. FSLG will seek comments from Federal agencies, States and local government subject to 3402(t) through face-to-face meetings and conference calls. In addition, FSLG will partner with industry groups, such as, GFOA and NASACT to conduct phone forums with such groups' members. FSLG will also conduct a workshop for Federal agencies solely focused on 3402(t) and the Proposed Regulations. In addition, FSLG can work with EOCA to mail a short explanation of the Proposed Regulations to all taxpayers that we believe will be impacted by the legislation.

ACTION	RESPONSIBLE PARTY	TARGET DATE
Add link to Regulations and a short explanation on the FSLG Website and send the same to persons on FSLG Listserve	Director, FSLG	The day after the Proposed Regulations are issued
Include article explaining Proposed Regulations in FSLG's Newsletter	Director, FSLG	1/1/2009
Prepare outreach materials for FSLG specialists – Power Point, handouts, etc.	Director, FSLG	15 days of issuance
Meet with ACT members	Director, FSLG	1 st possible ACT meeting in DC
Prepare and mail letters and explanation of Proposed Regulations to taxpayers affected by the legislation	GE, Tech Advisor and EOCA	1/1/ 2009
Coordinate with SBSE (CLD), LMSB (C&L) to prepare materials for outreach and education to their taxpayers	GE, Tech Advisor	Within 30 days of issuance
Conference calls with various stakeholder associations (e.g., GFOA, NASACT) and various states to discuss proposed regulations	Director, FSLG	Ongoing
Meeting and conference calls with various Federal agencies to discuss proposed regulations	Director, FSLG	Ongoing
Conduct outreach events with FSLG taxpayers	Director, FSLG	Ongoing