

## L. International Taxpayer Service Initiatives Continue but Need a More Formal Structure

In June 2012, the IRS's Large Business & International Division (LB&I), its Wage & Investment Division (W&I), and TAS created the International Individual Taxpayer Assistance Team (IITA) to develop international taxpayer service initiatives.<sup>1</sup> The IRS Office of Online Services (OLS) joined the group in August 2012. IITA has the following objectives:

- Identify international taxpayer groups with similar characteristics;
- Identify the needs of these groups;
- Identify existing channels for assistance for these groups;
- Identify service gaps for these groups;
- Identify the consequences of service gaps;
- Prioritize taxpayer groups and service gaps based upon risk factors;
- Develop solutions and sort them in a priority order based on importance and resources; and
- Involve LB&I and IRS Office of Chief Counsel experts on tax treaties and international law issues.

IITA is in its pilot stage, but the IRS has agreed to consider the National Taxpayer Advocate's recommendation to make IITA permanent, with a formal charter.<sup>2</sup> The National Taxpayer Advocate has also recommended that IITA be required to provide periodic written reports and formal recommendations to Business Operating Division (BOD) executives through the existing Services Committee.<sup>3</sup>

Working through subteams and meeting monthly, the IITA is:

- Identifying the most common questions in incoming calls to the international customer service group in Philadelphia, as well as those submitted by foreign tax attaché offices, and developing answers to these questions. These FAQs will be posted on IRS.gov shortly.
- Seeking Chief Counsel review of flowcharts that reflect the information in the FAQs for the top five international tax topics. The flowcharts are captioned: 1) Do I Need

1 For a complete discussion of the steps the IRS has taken provide better service to international taxpayers, see National Taxpayer Advocate 2012 Annual Report to Congress 262, 265 (Most Serious Problem: *Challenges Persist for International Taxpayers as the IRS Moves Slowly to Address Their Needs*).

2 National Taxpayer Advocate 2012 Annual Report to Congress 262, 273 (IRS Response, Most Serious Problem: *Challenges Persist for International Taxpayers as the IRS Moves Slowly to Address Their Needs*).

3 As described in IRM 22.24.1.4 (June 18, 2012), "[t]he Services Committee serves as the governing body for major service investment and management decisions at the IRS. It discusses and makes decisions or recommendations on items related to taxpayer service investments, resource allocations, and program and process management in the context of IRS-wide strategic planning and budgeting (e.g., Modernization Vision and Strategy, the IRS budget, relevant research conducted by the Office of Research, Analysis, and Statistics and the Operating Divisions, etc.)."

an ITIN (Individual Taxpayer Identification Number)?; 2) Do I Have to File a US Individual Income Tax Return?; 3) Do I Qualify for the Foreign Tax Credit?; 4) Am I Qualified for the Foreign Earned Income Exclusion; and 5) Filing Status of US Citizen or Resident Alien Married to a Nonresident Alien.

- In close cooperation with OLS, reviewing and updating IRS.gov pages pertaining to international taxpayers, reorganizing the pages, and making them more readily accessible.
- Investigating the measurement tools of webpage traffic available through Online Services, such as Google Analytics, and developing content-based survey questions to identify changes in taxpayer behavior and compliance.
- Identifying IRS notices that burden international taxpayers (those identified as problematic in research studies and through discussions with subject matter experts, because, for example, they give taxpayers located abroad an insufficient time to respond).
- Working with administrators of TaxMap, an IRS-developed tax law discovery tool (available at <http://taxmap.ntis.gov/taxmap>) to add additional international search words and topics that will refer taxpayers to appropriate information on IRS.gov; and exploring the possibility of tracking referrals from TaxMap to IRS.gov and placing TaxMap links on IRS.gov.
- Verifying that all IRS forms and publications are available on IRS.gov, with the intended next step of exploring the feasibility of making some forms and publications available to groups not able to access them online.
- Collaborating with OLS in assessing the benefits and feasibility of serving international taxpayers through virtual technologies such as IRS workstations, Facetime, and Skype.

For FY 2014, TAS will continue to press for a long-term, integrated approach to international taxpayer service that includes making IITA permanent. Once IITA is a permanent, accountable group, it can engage in long-term planning, and its effectiveness can be measured.<sup>4</sup> Even if IITA remains a pilot project, TAS will continue to advocate for international taxpayer service that goes beyond providing information on the Internet.

<sup>4</sup> We note that this year for the first time, the Taxpayer Advocacy Panel, a Federal Advisory Committee that TAS supports, accepted applications from U.S. citizens living abroad or in a U.S. territory to raise awareness of issues facing international taxpayers. See *2013 Taxpayer Advocacy Panel Recruitment Period Closed* (Apr. 2, 2013) available at <http://improveirs.org/tap-news/>.