

Niles Elber Comments on OVDP Hotline Guide

08.21.2017

Tax Notes

In a partial response to a Freedom of Information Act request from Tax Analysts, the IRS has released the current version of its offshore voluntary disclosure program hotline guide, which offers the agency's interpretations of specific questions about OVDP and the streamlined filing compliance procedures.

Niles A. Elber of Caplin & Drysdale, Chtd. said that the guide seems to reflect what is seen in practice, "though not necessarily with uniformity." He added that the guide could be helpful in understanding how the IRS is addressing various issues. "Having this information in writing available to be presented to the agent handling the taxpayer's offshore case may help resolve a disagreement without having to elevate the issue to a manager or technical adviser," Elber said. "To the extent it has not already done so, the IRS should seriously consider adding this guidance to the appropriate FAQs."

For the full article, please visit *Tax Notes'* website (subscription required).

Excerpt taken from the article "FOIA Request Ferrets Out OVDP Hotline Guide" by Andrew Velarde for Tax Notes.

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