

Index

- Accuracy of return, § 5.19(j)
Advisory letters, §§ 5.32(a), 5.33(b)
Agreed case:
 in general, § 5.32(a)
 in private foundation context, § 5.33(g)
 in unrelated business context, § 5.33(i)
Agricultural organizations, IRS examinations of, § 7.1(l)
Amateur athletic sports organizations, IRS examinations of, § 7.1(h)
American National Red Cross Governance Modernization Act of 2007, § 3.1(o)
Announcements, issuance of, § 2.10
Apostolic organizations, IRS examinations of, § 7.1(aa)
Appeals function:
 in general, §§ 2.2, 2.11(a)
 IRS district office action, § 3.9(a)
 organization, priorities, and mission, § 2.11(a)
 proposed additional tax, § 3.9(c)
 regional office appeal, § 3.9(b)
 and tax-exempt organizations, § 2.11(b)
Associate offices, definition of, § 1.9
Audit controversy, IRS, § 1.7
Audit lottery, winning of, §§ 3.2, 5.2
Audit unfolds: ongoing steps:
 documents, § 3.3(a)
 outcomes, §§ 3.3(c), 5.33
 perspective, § 3.3(d)
 stay calm, things take time, § 3.3(b)
Audit workpapers, defined, § 5.19(b)
Audits of tax-exempt organizations by IRS:
 audit issues, introduction, § 1.3
 audit procedures in general, § 1.4
 controversy as to, § 1.7
 current focus of, § 1.14
 expansion of audit activity, § 1.13
 future focus of, § 1.14
 initial steps and reactions (see Winning audit lottery), § 3.2
 issues, § 1.3
 management of, § 3.0
 pre-audit precautions (see Pre-Audit Precautions), § 3.1
 procedures, introduction to, §§ 1.1, 1.4
 reasons for, § 1.2
 of returns, §
 rights, tax-exempt organizations', § 1.5
 types of, §§ 1.6, 1.12
 unfolding of (see Audit unfolds: ongoing steps), § 3.3
Automated Information Management System, IRS, §§ 5.2(a), 5.2(b), 5.2(c), 5.3(b), 5.3(c), 5.4(g), 5.16, 5.18(a)(v)
Balance sheet analysis, § 5.19(h)
Black lung benefit trusts, IRS examinations of, § 7.1(y)
Books and records:
 contracts, § 5.19(b)(vi)
 correspondence files, § 5.19(b)(viii)
 defined, § 5.19(b)(i)
 financial records, § 5.19(b)(ix)
 governing instruments, § 5.19(b)(ii)
 IRS examination of, §§ 3.1(a), 5.19(b)(i)
 minutes, § 5.19(b)(iii)
 operating manuals, § 5.19(b)(vi)
 publications, § 5.19(b)(iv)
 web sites, § 5.19(b)(v)
Brown, Kevin M., §§ 1.13, 1.14
Burden of proof, § 5.20
Business leagues, IRS examinations of, § 7.1(m)
Campus, IRS, § 5.3(c)
Case Assignment Guide, IRS, § 5.4(b)
Case chronology record, IRS, § 5.16
Cases (IRS classification of):
 agreed, § 5.32(a)
 excepted agreed, § 5.32(a)
 no change, § 5.32(a)
 no change with written advisory, § 5.32(a)
 partially agreed, § 5.32(a)
 unagreed, § 5.32(a)
Cemetery companies, IRS examinations of, § 7.1(s)
Change cases, § 5.33(c)
Charitable organizations, IRS examinations of, § 7.1(b)
Chief counsel advice memoranda, issuance of, § 2.10
Chief Counsel, Office of:
 in general, §§ 1.9, 2.2
 and issue elevation, § 3.8(g)
Church tax audit procedures:
 administrative remedies, exhaustion of, rule, § 6.15
 church records, § 6.5
 church tax examinations, § 6.7
 church tax inquiries, § 6.6

INDEX

- Church tax audit procedures: (*contd.*)
 - constitutional law background, § 6.1
 - inapplicability of procedures, § 6.4
 - intermediate sanctions rules, interaction with, § 6.16
 - limitations on additional inquiries and examinations, § 6.13
 - limited remedy for IRS violations of procedures, § 6.14
 - ninety-day completion rule, § 6.11
 - prototype scenario, § 6.9
 - special limitation periods, § 6.12
 - statutory law background, § 6.2
 - statutory law overview, § 6.3
 - summons enforcement, § 6.8
 - two-year completion rule, § 6.10
- Classification unit, IRS Exempt Organizations (EO), §§ 5.2(a), 5.2(b), 5.2(c), 5.3(b), 5.3(c), 5.4(a)
- Claims:
 - defined, § 5.34
 - filing for, § 5.34
 - informal, § 5.34
 - processing, by IRS, § 5.2(c)
- Closing agreements:
 - authority and function, § 1.10(b)
 - finality of, § 1.10(d)
 - overall purpose of, § 1.10(a)
 - scope of, § 1.10(c)
 - in tax-exempt organizations context, § 1.10(e)
- Closing letters:
 - examination reports, § 5.32(b)
 - terminology, § 5.32(a)
- Commissioner of Internal Revenue, § 2.2
- Commissioner, Tax Exempt Government Entities Division, § 2.3(a)
- Compliance check projects, IRS, §§ 1.6(d), Chapter 4
- Condition codes, IRS, § 5.2(b)
- Conflicts of interest, IRS, § 5.6
- Contact person, §§ 3.2(b), 5.18(a)(ii)
- Cooperative organizations, IRS examinations of, § 7.1(r)
- Correspondence examinations, §§ 1.6(b), 5.4(b)
- Credit unions, IRS examinations of, § 7.1(t)
- Crop financing organizations, IRS examinations of, § 7.1(v)
- Cumulative Bulletin, § 2.10
- Customer service, § 5.18(b)(iii)
 - Data Analysis Unit, §§ 2.3(a), 2.3(d), 2.5
 - Declaratory judgment procedure, §§ 3.13(b), § 5.27, 5.33(g)
 - Department of the Treasury, structure of, § 2.1.
 - Determination file, IRS, § 5.14
 - Disbursement analysis, § 5.19(e)
 - Documents to be provided (to IRS), §§ 3.6, 5.19(b)
 - Educational organizations, IRS examinations of, §§ 7.1(b), 7.1(f)
 - Everson, Mark W., §§ 1.1, 1.13, 4.0, 4.1
 - Examination case, § 5.4(b)
 - Examination cycle, IRS, § 5.5
 - Examination, IRS, defined, §§ 1.1, 5.0
 - Examination, IRS, management of:
 - initial steps, § 3.2
 - ongoing steps, § 3.3
 - pre-audit precautions, § 3.1
 - Examination outcomes:
 - change cases, § 5.33(c)
 - modification of exempt status, § 5.33(f)
 - no change, §§ 5.9, 5.33(a)
 - no-change, with written advisory, §§ 5.9, 5.33(b)
 - nonexempt charitable trusts, § 5.33(l)
 - non-private foundation excise taxes, § 5.33(k)
 - private foundation excise taxes, § 5.33(j)
 - private foundation status, reclassification of, § 5.33(g)
 - private operating status, modification of, § 5.33(h)
 - public charity status, § 5.33(g)
 - revocation of exempt status, § 5.33(e)
 - summary of, § 3.3(c)
 - unrelated business issues, § 5.33(i)
 - Examination Planning and Programs unit, IRS, §§ 5.2(b), 5.10, 5.18(c)
 - Examination reports, § 5.32
 - Examination techniques, § 5.18(f)
 - Examinations, IRS:
 - balance sheet analysis, § 5.19(h)
 - of books and records, §§ 3.1(c), 5.19(b)(i)
 - classification procedures, § 5.3(c)
 - commencement of, § 5.18
 - consecutive, § 5.8
 - contact person, § 5.18(a)(ii)
 - of contracts, §§ 3.1(h), 5.19(b)(vii)
 - controversy as to, § 1.7
 - correspondence, §§ 1.6(b), 1.12, 3.1(e), 5.19(b)(viii)
 - customer service, IRS, and, § 5.18(b)(iii)
 - cycle, § 5.5
 - defined, § 5.0
 - disbursement analysis, § 5.19(e)
 - of documents, §§ 3.2(c), 5.19(b)
 - exempt organizations—caused delays in, § 5.19(m)
 - expense allocations, § 5.19(g)
 - field, § 1.6(a)
 - of financial records, § 5.19(b)(ix)
 - of governing instruments, §§ 3.1(a), 5.19(b)(ii)
 - group manager involvement, § 5.4(f)
 - income analysis, § 5.19(d)
 - initial interview, §§ 3.2(i), 5.18(g), 7.7(b)
 - initial taxpayer contact, § 5.18(a)

INDEX

- internal controls, of, § 5.18(d)
- issue development, § 5.19(l)
- issues, sharing of, § 5.19(q)
- limited scope, IRS, § 5.18(c)
- of manuals, § 5.19(b)(vi)
- of minutes, § 3.1(f), 5.19(b)(iii)
- of nonexempt charitable trusts, § 5.33(l)
- objectives, IRS, §§ 5.4(d), 5.18(b)(ii)
- office, § 1.6(b)
- on-site, § 5.18(b)
- outcomes, §§ 3.3(c), 5.33
- place of, §§ 3.2(b), 5.18(j)
- publications, §§ 3.1(j), 5.19(b)(iv)
- quality, §§ 5.18(b)(i), 5.19(n)
- process, §§ 5.2(b), 5.4(e)
- repetitive, § 5.9
- reports of, §§ 5.32, 5.33(d)
- return surveys, § 5.10
- returns, accuracy of, § 5.19(j)
- sampling techniques, § 5.19(c)
- scope of, §§ 5.11, 5.18(b)(v)
- tax liabilities, § 5.19(i)
- team, §§ 1.6(c), 5.4(c)
- techniques, § 5.18(f)
- third-party contacts, § 5.18(h)
- tours, §§ 3.5(b), 5.19(a)
- transfers of, § 5.18(a)(iv)
- types of, § 1.6
- of web sites, §§ 3.1(k), 5.19(b)(v)
- Examiners, IRS:
 - coping with, § 3.5(a)
 - defined, § 5.4(b)
 - documents, § 3.5(d)
 - interacting with, § 3.5
 - internal controls and, § 5.18(d)
 - office facilities for, § 3.2(h)
 - point person as to, § 3.5(c)
 - research and, §§ 5.15, 5.31
 - tours for, §§ 3.5(b), 5.19(a)
 - workpapers of, § 5.18(e)
- Exempt-agreed cases, § 5.32(a)
- Excise taxes:
 - non-private foundation, § 5.33(k)
 - private foundation, § 5.33(j)
- Executive Branch influence, prohibition on, § 5.7
- Exempt Organization Case Assignment Guide, § 5.4(b)
- Exempt Organization Case Chronology Record, § 5.3(c)
- Exempt Organization Information Item Tracking Sheet, § 5.3(c)
- Exempt Organization Inventory Control system, IRS, §§ 5.2(a), 5.2(c), 5.3(b), 5.3(e)
- Exempt Organizations Compliance Unit, §§ 1.6(d), 2.3(d), 2.5, 4.0
- Exempt Organizations Division:
 - Business Systems Planning, § 2.4(e)
 - Communications and Liaison, Office of, § 2.4(d)
 - Customer Accounts Services, Office of, § 2.9
 - Customer Education and Outreach, Office of, §§ 2.3(a), 2.6
 - Customer profile, § 2.3(b)
 - Data Analysis Unit, §§ 2.3(a), 2.3(d), 2.5
 - Director of, § 2.3(a)
 - Electronic Initiatives, Office of, §§ 2.3(a), 2.5
 - Enforcement function, § 2.3(d)
 - Examinations, Office of, §§ 2.5, 5.1
 - Executive Steering Committee, § 5.2(a)
 - Exempt Organizations Compliance Unit, §§ 1.6(d), 2.3(d), 2.5, 4.0
 - Finance, Office of, § 2.4(c)
 - Operations, § 2.3(c)
 - Planning, Office of, § 2.4(b)
 - Program Management, Office of, § 2.8
 - Research and Analysis, Office of, § 2.4(f)
 - Returns Inventory and Classification System Advisory Board, § 5.2(a)
 - Rulings and Agreements, Office of, §§ 2.3(a), 2.7
 - Senior Technical Advisor, §§ 2.4(a), 3.8(d), 7.1(d)
 - Single Point of Contact position, § 5.2(a)
 - Technical groups, § 2.3(a)
 - Technical Guidance and Quality Assurance, Office of, § 2.3(a)
- Exempt Organizations Financial Investigations Unit, §§ 2.3(d), 2.5
- Exempt Organizations Examinations, IRS Office of, §§ 1.1, 1.4, 2.5, 5.1
- Exempt Organizations Examinations Programs and Review, § 5.1
- Exempt Organizations Implementing Guidelines, §§ 1.1, 1.6(d), 2.3(a), 4.2
- Exempt Organizations Information Item Tracking Sheet, § 5.3(c)
- Exempt Organizations Referral Committee, §§ 5.3(b), 5.3(d)
- Exempt Organizations Returns Inventory and Classification System, § 5.2(a)
- Exempt organization–caused delays in examinations, § 5.19(m)
- Expense allocations, § 5.19(g)
- Explanation of Items form (886-A), §§ 5.32(b), 5.33(d), 5.33(f), 5.33(h), 5.33(i), 5.33(k), 5.34, 5.35(a), 5.35(c), 5.35(d)
- Facts:
 - collecting and recording, by IRS, § 5.19(o)
 - developing and documenting, by IRS, § 5.19(m)
- Field examinations, § 1.6(a)
- Field office, IRS, definition of, § 1.9
- Filing requirements, § 5.19(f)

INDEX

- Forms (IRS):
- 11-C, §§ 5.4(d), 5.18(b)(ii)
 - 211, § 5.3(c)
 - 730, §§ 5.4(d), 5.18(b)(ii)
 - 843, § 5.34
 - 870-E, §§ 5.32(a), 5.32(b), 5.33(j), 5.34
 - 872, §§ 3.10, 5.10, 5.16
 - 886-A, §§ 3.10, 5.32(b), 5.33(c), 5.33(d), 5.33(f), 5.33(h), 5.33(i), 5.33(k), 5.34, 5.35(a), 5.35(c), 5.35(d)
 - 906, § 1.10(b)
 - 940, §§ 5.4(d), 5.18(b)(ii), 5.33(b), 7.1(p)
 - 941, §§ 5.2(a), 5.4(d), 5.18(b)(ii), 5.33(b), 7.1(p)
 - 945, § 5.18(b)(ii)
 - 990, §§ 1.13, 3.1(g), 4.5, 4.9(b), 5.2(a), 5.3(c), 5.4(d), 5.18(b)(ii), 5.18(e), 7.1(bb), 7.3(a), 7.4
 - 990-BL, § 5.33(k)
 - 990-EZ, §§ 5.2(a), 5.4(d), 5.18(b)(ii), 7.4
 - 990-PF, §§ 3.1(g), 5.2(a), 5.4(d), 5.18(b)(ii), 5.33(j), 5.34
 - 990-T, §§ 1.12, 3.1(g), 5.2(a), 5.3(c), 5.4(d), 5.4(g), 5.18(b)(ii), 5.18(e), 5.33(b), 5.33(i), 5.34
 - 1024, § 5.21
 - 1041, §§ 5.2(a), 5.33(l), 5.34
 - 1041-A, § 5.33(l)
 - 1065, § 3.1(g)
 - 1096, §§ 5.4(d), 5.18(b)(ii)
 - 1099, §§ 3.1(g), 5.18(b)(ii), 5.19(f), 5.33(b)
 - 1099-MISC, §§ 3.1(g), 5.4(d)
 - 1120-POL, §§ 3.1(g), 5.2(a), 5.4(d), 5.4(g), 5.18(b)(ii), 5.34
 - 1139, § 5.34
 - 1254, § 5.30
 - 2297, §§ 5.32(b), 5.34
 - 2807, § 5.25
 - 2848, §§ 3.4, 3.10, 5.16
 - 3363, §§ 5.32(b), 5.34
 - 4549, §§ 5.32(a), 5.32(b), 5.33(c), 5.33(d), 5.33(i), 5.34, 5.35(a)
 - 4549-A, §§ 5.32(b), 5.33(d), 5.33(i), 5.35(a)
 - 4549-B, § 5.32(b)
 - 4564, §§ 1.4, 3.10, 5.18(a)(v)
 - 4620, §§ 5.32(b), 5.33(d), 5.33(f), 5.33(h), 5.34, 5.35(a), 5.35(b)
 - 4621, §§ 5.32(b), 5.33(c), 5.33(d), 5.33(h), 5.33(k), 5.34, 5.35(a), 5.35(c)
 - 4621-A, §§ 3.10, 5.32(b), 5.33(c), 5.33(d), 5.33(f), 5.35(d)
 - 4720, §§ 1.13, 5.2(a), 5.4(g), 5.33(b), 5.33(j), 5.33(k), 5.34
 - 4883, §§ 5.32(b), 5.33(d), 5.34, 5.35(a), 5.35(e)
 - 5227, §§ 5.2(a), 5.4(d), 5.33(l)
 - 5464, § 5.16
 - 5464-A, § 5.3(c)
 - 5546, §§ 5.4(g), 5.9, 5.13
 - 5666, §§ 5.3(c), 5.25
 - 5772, §§ 5.17, 5.18(e), 5.33(a)
 - 5773, §§ 5.17, 5.18(e), 5.33(a)
 - 5774, §§ 5.17, 5.18(e)
 - 5788, § 7.1(d)
 - 6018, §§ 3.10, 5.32(b), 5.33(e), 5.33(g), 5.33(h), 5.35(d)
 - 6018-A, §§ 5.32(b), 5.33(e), 5.33(f), 5.35(d)
 - 6069, § 5.33(k)
 - 8282, § 4.9(g)
 - 8283, § 4.9(g)
 - 8821, § 3.4
 - 8871, § 3.1(g)
 - 8872, § 3.1(g)
 - Letter 3602, § 5.34
 - Letter 3611, § 3.10
 - Letter 3618, § 3.10
 - Letter 4290 (CG), § 4.9(b)
 - W-2, §§ 3.1(g), 5.4(d), 5.18(b)(ii), 5.33(b)
 - W-2G, §§ 3.1(g), 5.33(b)
 - W-3, § 5.18(b)(ii)
- Fraternal societies, IRS examinations of, § 7.1(o)
- Freedom of Information Act, §§ 1.11, 5.16, 5.18(e)
- Fundraising, issues as to:
- advertisements of fundraising activities, § 7.6(a)
 - annual reporting, § 7.6(g)
 - disclosure of nondeductible contributions, § 7.6(b)
 - disclosure of quid pro quo contributions, § 7.6(c)
 - Internet, use of, § 7.6(f)
 - non-cash charitable contributions, § 7.6(e)
 - unrelated business rules, § 7.6(d)
- Gaming, issues as to:
- bingo activity, § 7.7(c)
 - exempt status, qualification for, § 7.7(f)
 - initial contact interview, § 7.7(b)
 - preexamination analysis, § 7.7(a)
 - public charity status, qualification for, § 7.7(g)
 - pull-tab activity, § 7.7(d)
 - related entities, § 7.7(h)
 - unrelated business activities, § 7.7(e)
- Good governance practices, IRS, § 3.1(o), App. C
- Grassley, Charles E., § 1.14
- Group managers, §§ 2.3(a), 5.4(f)
- Health maintenance organizations, § 7.1(cc)
- Horticultural organizations, IRS examinations of, § 7.1(l)
- Inability to locate organization, IRS, § 5.28
- Inadequate records:
- in general, §§ 5.25, 5.26
 - revocation of exemption due to, § 5.26
- Income analysis, § 5.19(d)
- Informal claims, § 5.34

INDEX

- Information document requests, §§ 1.4, 3.2(c), 3.10, 5.4(c), 5.18(a)(v)
- Information, failure to provide, § 5.26
- Information items:
- action on, by IRS, § 5.3(b)
 - defined, § 1.2
 - sources of, § 5.3(a)
 - types of, § 5.3(a)
- Initial taxpayer contact, by IRS:
- contact person, § 5.18(a)(ii)
 - definition of, § 5.18(a)(i)
 - examination transfers, § 5.18(a)(iv)
 - initial contact, § 5.18(a)(iii)
 - initial examination scope, § 5.18(b)(v)
 - initial information document request, § 5.18(a)(v)
 - initial interview, § 5.18(g)
 - initial interview, planning of, § 5.18(a)(vi)
- Insurance companies, IRS examinations of, § 7.1(u)
- Integrated Data Retrieval System, IRS, §§ 5.2(c), 5.3(c), 5.15, 5.16, 7.1(a)
- Internal controls, IRS evaluation of, § 5.18(d)
- Internal IRS transmittal letter, § 5.35(b)
- Internal Revenue Bulletin, § 2.10
- Internal Revenue Manual, thoughts on, § 1.0
- Internal Revenue Service (IRS):
- administrative functions, § 2.10
 - Appeals function, § 2.2
 - Chief Counsel of, § 2.2
 - Commissioner of Internal Revenue, § 2.2
 - Exempt Organizations Division, § 2.3(a)
 - National Office of, § 2.2
 - National Taxpayer Advocate, §§ 2.2, 2.12
 - organization of, in general, § 2.2
 - Oversight Board, § 2.2
 - practice before, § 2.13
 - Professional Responsibility, Office of, § 2.13
 - restructuring of, §§ 2.2, 2.3
 - Tax Exempt and Government Entities Division, §§ 2.2, 2.3
- Interviews, IRS, §§ 1.4, 5.18(a)(vi), 5.18(g)
- Issue development, § 5.19(l)
- Issue elevation:
- Counsel, referrals to or consultation with, § 3.8(g)
 - elevation, definition of, § 3.8(a)
 - elevation to inform managers or executives, § 3.8(d)
 - elevation to obtain decisions, § 3.8(e)
 - in general, § 2.3(c)
 - issue, definition of, § 3.8(b)
 - issues that are candidates for elevation, § 3.8(f)
 - why issues are elevated, § 3.8(c)
- Issues:
- elevation of, § 3.8
 - examination reports, presentation in, § 5.33(d)
 - sharing of, § 5.19(q)
 - suspended, § 5.30
 - Joint Committee claim cases, § 5.2(d)
 - Joint Committee on Taxation, § 5.2(d)
 - Labor organizations, IRS examinations of, § 7.1(k)
 - Law of tax-exempt organizations:
 - research of, by IRS examiners, § 5.31
 - sources of, App. A
 - summary of, App. C
 - Limited scope examinations, IRS, § 5.18(c)
 - Litigation:
 - declaratory judgment rules, § 3.13(b)
 - general rules, § 3.13(a)
 - other approaches, § 3.13(c)
 - Local associations of employees, IRS examinations of, § 7.1(j)
 - Mandatory Review, §§ 5.3(c), 5.25, 5.30
 - Market segment studies, §§ 1.13, 4.2
 - Miller, Steven T., §§ 1.14, 3.1(o)
 - Multi-parent title-holding companies, § 7.1(z)
 - Mutual organizations, IRS examinations of, § 7.1(r)
 - National standard time frames, § 5.18(b)(iv)
 - National Taxpayer Advocate, Office of:
 - general rules, § 2.12(c)
 - mission fulfillment, § 2.12(a)
 - organization, §§ 2.2, 2.12(b)
 - systemic advocacy, § 2.12(d)
 - and tax-exempt organizations, § 2.12(e)
 - News releases, issuance of, § 2.10
 - No-change cases, §§ 5.9, 5.32(a)
 - No-change-with-written-advisory cases, § 5.32(a)
 - Nonexempt charitable trusts, IRS examinations of, §§ 5.33(l), 7.3
 - Notice of proposed adjustment, § 1.4
 - Notices, issuance of, § 2.10
 - Office/Correspondence Examination Program, IRS, §§ 1.6(b), 5.18(b)(v)
 - Office of Personnel Management, § 5.4(b)
 - Office of Professional Responsibility, IRS, § 2.13
 - Office space, for IRS, § 3.2(h)
 - Partially agreed cases, § 5.32(a)
 - Penalties, § 5.19(k)
 - Political Activity Compliance Initiative, IRS, §§ 1.7, 4.4
 - Political organizations, IRS examinations of, § 7.1(bb)
 - Power of attorney, § 3.4

INDEX

- Practice before IRS, § 2.13
- Pre-audit precautions:
 - conflict-of-interest policy, § 3.1(i)
 - employment taxes, § 3.1(l)
 - governance, § 3.1(o)
 - legal audit, § 3.1(p)
 - media coverage, § 3.1(m)
 - other documents, § 3.1(j)
 - review books and records, § 3.1(c)
 - review contracts, § 3.1(h)
 - review correspondence, § 3.1(e)
 - review federal returns, § 3.1(g)
 - review governing instruments, § 3.1(a)
 - review minutes, § 3.1(f)
 - review operations, § 3.1(b)
 - review publications, § 3.1(d)
 - review web site, § 3.1(k)
 - testaments, § 3.1(n)
- Preexamination processes, IRS:
 - accompanying documents, IRS, review of, § Case Assignment Guide, § 5.4(b)
 - examination objectives, § 5.4(d)
 - guidelines, IRS, § 5.4(c)
 - procedures, § 5.11
 - recordkeeping system, IRS, § 5.4(a)
 - returns, review of, § 5.12
 - workpaper summaries, § 5.17
- Private foundation status:
 - in general, § 7.2
 - reclassification of, § 5.33(g)
- Private letter rulings, issuance of, § 2.10
- Private operating foundation status, modification of, § 5.33(h)
- Private schools, IRS examinations of, § 7.1(d)
- Proof, burden of, § 5.20
- Public charity status:
 - in general, § 7.2
 - reclassification of, § 5.33(g)
- Public interest law firms, IRS examinations of, § 7.1(e)
- Publications, IRS:
 - 1, IRS, §§ 1.5, 5.18(a)(vi), 5.18(g)
 - 892, § 3.10
 - 1035, § 5.4(g)
 - 3498, § 3.10
- Qualified amended returns, § 3.7
- Quality examinations, IRS, § 5.18(b)(i)
- Records, *see* Books and records
- Referral Committee, IRS EO, §§ 5.3(b), 5.3(d)
- Regulations, promulgation of, § 2.10
- Religious organizations, IRS examinations of, § 7.1(c)
- Reporting requirements, §§ 7.5, 7.6(g)
- Research, IRS, § 5.15
- Retroactivity of:
 - revocation of tax-exempt status, § 1.12
 - technical advice memoranda, § 1.9(j)
- Returns:
 - accuracy of, § 5.19(j)
 - review of, § 5.12
 - surveys, § 5.10
- Returns Inventory and Classification System (RICS), IRS Exempt Organizations, § 5.2(a)
- Revenue agent's report, § 5.33(c)
- Revenue procedures, issuance of, § 2.10
- Revenue rulings, issuance of, § 2.10
- Revocation of exemption:
 - because of failure to provide information, § 5.26
 - because of inadequate records, § 5.26
 - following IRS examination, § 5.33(e)
- RICS Advisory Board, § 5.2(a)
- Rossotti, Charles, §§ 3.13(a), 4.0
- Sampling techniques:
 - judgment sampling, § 5.19(c)
 - statistical sampling, § 5.19(c)
- Scientific organizations, IRS examinations of, § 7.1(g)
- Single-parent title-holding corporations, IRS examinations of, § 7.1(a)
- Single Point of Contact position, § 5.2(a)
- Social clubs, IRS examinations of, § 7.1(n)
- Social welfare organizations, IRS examinations of, § 7.1(i)
- Split-interest trusts, IRS examinations of, § 7.3
- Statute of limitations, §§ 3.11, 5.4(f), 5.4(g), 5.10, 5.30
- Stiff, Linda, § 1.13
- Successor member interest contributions, § 4.9
- Summons, IRS:
 - authority for, § 1.8
 - enforcement in church audit context, § 6.8
 - preparation and issuance, by IRS, § 5.19(p)
 - third-party, § 1.8
- Supplemental unemployment benefit trusts, IRS examinations of, § 7.1(w)
- Suspended issues, § 5.30
- Tax liabilities, § 5.19(i)
- Tax exemption:
 - modification of, §§ 5.22, 5.33(f)
 - revocation of, §§ 1.12, 5.21, 5.22, 5.26, 5.33(e)
- Taxpayer, definition of, § 1.9
- Taxpayer Advocate Service, §§ 1.5, 2.12
- Taxpayer confidentiality privilege, § 5.18(i)
- Tax Exempt Quality Measurement System, IRS, §§ 1.6(a), 5.4(b), 5.4(c), 5.18(b)
- Tax-exempt organizations:
 - categories of, § 7.1
 - inability of IRS to locate, § 5.28
 - rights of, § 1.5

INDEX

- Tax Exempt and Government Entities (TE/GE)
Division:
 Commissioner, TE/GE, § 2.3(a)
 customer profile of, § 2.3(b)
 enforcement function of, § 2.3(d)
 headquarters mission, § 2.4
 in general, §§ 1.4, 2.2, 5.2(c)
 operations of, § 2.3(c)
 overall organization of, § 2.3(a)
 priorities of, § 2.3(a)
Teachers' retirement fund associations, IRS
 examinations of, § 7.1(q)
Team examination procedures, §§ 1.6(c), 5.4(c)
TE/GE Executive Steering Committee, § 5.2(a)
TE/GE Headquarters:
 Business Systems Planning, Office of,
 § 2.4(e)
 Communication and Liaison, Office of,
 § 2.4(d)
 Finance, Office of, § 2.4(c)
 Planning, Office of, § 2.4(b)
 Research and Analysis, Office of, § 2.4(f)
 Senior Technical Advisor, § 2.4(a)
Technical advice:
 appeals of decisions to not seek advice,
 § 1.9(e)
 conference scheduling, § 1.9(g)
 defined, §§ 1.9, 1.9(a), 5.23
 effect of, § 1.9(i)
 future use of, § 1.9(k)
 general procedures in exempt
 organizations context, §§ 1.9(a), 5.23
 IRS use of, § 1.9(h)
 limited retroactive effect of, § 1.9(j)
 pre-submission conferences, § 1.9(b)
 requests, contents of, § 1.9(c)
 requests, handling of, § 1.9(d)
 requests, withdrawal of, § 1.9(f)
Technical advice memoranda, issuance of, § 2.10
Technical advisor issues, § 5.29
Technical Guidance and Quality Assurance,
 Office of, § 2.3(a)
Terminations, § 5.24
Third-party contacts, §§ 1.8, 5.18(h)
Third-party recordkeeper, definition
 of, § 1.8
Tours, for IRS, §§ 3.5(b), 5.19(a)
Treasury, Department of, § 2.1
Treasury Inspector General for Tax
 Administration, §§ 1.7, 2.1(b)
Unagreed cases, § 5.32(a)
Unemployment tax, § 3.1(l)
Unrelated business issues, §§ 5.33(i), 7.4, 7.6(d),
 7.7(e)
Unusual items, defined, § 5.19(c)
Unwanted outcome, § 3.12
Veterans' organizations, IRS examinations of,
 § 7.1(x)
Voluntary employees' beneficiary associations,
 IRS examinations of, § 7.1(p)
Web sites, tax-exempt organizations, §§ 3.1(k),
 5.15, 5.19(b)(v)
Winning audit lottery: initial steps and
 precautions:
 communications strategy, § 3.2(f)
 contact person, § 3.2(e)
 documents requested, § 3.2(c)
 first impressions, § 3.2(j)
 get organized, § 3.2(d)
 interviews, § 3.2(i)
 know the cast, § 3.2(g)
 notice of examination, § 3.2(b)
 office facilities for IRS, § 3.2(h)
 telephone call, § 3.2(a)
Workpaper summaries, IRS, § 5.17