

## **AUDIT CONTROVERSY OUTLINE**

### **1. Introduction and Overview**

- a. Structure of the IRS today
- b. Geography vs. Industry and what that means

### **2. Opening procedures**

- a. The Opening Conference
  - i. Team members – who they are
  - ii. CIC vs. IC
- b. Powers of Attorney
- c. Setting the “ground rules”
- d. Getting ready for an exam

### **3. The Information Gathering process**

- a. Information Document Requests
  - i. Privilege issues
- b. Informal Q&As
- c. Summonses ( domestic, foreign and 3<sup>rd</sup> party)
- d. Treaty Exchanges of Information
- e. Third party contacts
- f. Form UTP

### **4. Resolving the case at Exam**

- a. Discussions with the agents and “Agent Relations”
- b. The rules of engagement and how they work
- c. Industry issues and coordinated issues
- d. Tiered issues and Issue Practice Networks

- e. Forms 5701, Notices of Proposed Adjustment
- f. Closing agreements and other closing documents

**5. Going to Appeals**

**6. Special Topics**

- a. Trends in transfer pricing exams
- b. Dealing with penalties
- c. Information reporting exam process and what to expect

**7. Best practices and things to remember**

**8. Audit Manager Panel**

- a. Discussion of current audit issues