Learning Objectives:

- Understand the current IRS priorities in enforcement and their impact on taxpayers
- Learn to identify key issues in dealing with non-filers and how to help them correct their non-compliance
- Understand the current Department of Justice tax priorities in enforcement and be able to explain their focus on practitioners
- Understand the valuation issues in gift tax returns and examination issues that arise frequently with the IRS
- Identify the ethical issues practitioners face when handling taxpayer matters
- Learn what other options exist for advocating for your taxpayers position
- Describe how to respond to an IRS document request when the client's records are not stellar
- Be able to explain the pros and cons of the Offer-in-Compromise program and how to file an offer that is acceptable to the IRS
- Be able to identify options for reopening tax cases when there is an issue of the underlying liability not considered by the IRS previously

Course Content: This program will consist of a Thursday workshop of 180 minutes and the Friday full-day program of 435 minutes of panel discussions with practitioners and government personnel covering a variety of hot tax topics, including practitioner penalties, ethical issues, and non-filers.

Point slides, written outlines and exhibits will be provided to illustrate the issues and mechanics involved in IRS Representation, including notices, forms and key cases that practitioners should be aware of when helping their clients.

Course level:	Basic
Prerequisites:	None
Advance Preparation Needed:	None
Recommended CPE Credits (based upon a 50 minute hour):	
	Thursday LITC Workshop: 3 CPE Credits (Tax)
	Friday Full-Day Program: 8 CPE Credits (7 Tax, 1 Ethics)
Method of Study:	Group Live and Group Online Live
Field of Study:	Thursday: 3 CPE Credits – Taxes
	Friday: 7 CPE Credits – Taxes, 1 CPE Credit – Ethics