

TREASURY INSPECTOR GENERAL FOR TAX ADMINISTRATION



Fiscal Year 2025 Mandatory Review of Disclosure of Collection Activity With Respect to Joint Returns

September 16, 2025

Report Number: 2025-300-046

This report has cleared the Treasury Inspector General for Tax Administration disclosure review process and information determined to be restricted from public release has been redacted from this document.

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HIGHLIGHTS: Fiscal Year 2025 Mandatory Review of Disclosure of Collection Activity With Respect to Joint Returns

Final Audit Report issued on September 16, 2025

Report Number 2025-300-046

Why TIGTA Did This Audit

The IRS Restructuring and Reform Act of 1998 requires us to annually review and certify the IRS's compliance with the requirements of Internal Revenue Code (I.R.C.) § 6103(e)(8). The Taxpayer Bill of Rights 2 added I.R.C. § 6103(e)(8), which provides that if any deficiency of tax with respect to a joint return is assessed and the individuals filing the return are no longer married or no longer reside in the same household, upon request in writing by either of such individuals, the IRS shall disclose in writing to the individual making the request as to whether the IRS has attempted to collect the balance due from the other individual, the general nature of the collection activities, and the amount collected.

I.R.C. §§ 6103(e)(6) and (e)(7) allow authorized representatives of joint filers to also receive the same collection information requested under I.R.C. § 6103(e)(8). The IRS's disclosure policy also permits requests for and disclosure of joint filer collection activity information orally.

Impact on Tax Administration

In 2015, Congress codified the Taxpayer Bill of Rights including a taxpayer's right to be informed and the right to privacy and confidentiality. If the IRS does not provide taxpayers with account information to which they are entitled, taxpayers could be burdened and their ability to resolve their tax obligations may be negatively impacted. If the IRS provides taxpayers with account information to which they are not entitled, the taxpayer right to privacy is violated.

What TIGTA Found

We reviewed 91 case history files from the Small Business/Self-Employed Division to determine whether employees followed the joint return disclosure requirements on collection information requests. We determined that disclosure requirements were not followed in 29 (32 percent) cases worked by the Automated Collection System, Field Collection, and Specialty Collection, Offer in Compromise functions. In most cases, taxpayers or their representatives did not receive the information related to collection activities of the taxpayers' joint liabilities to which they were entitled. These taxpayers were either potentially burdened with additional delays in resolving their respective tax matters or potentially had their right to privacy violated.

Twelve of the 29 cases had "mirrored accounts" (a process by which joint returns are split into two separate taxpayer accounts on IRS data systems) in which the IRS did not follow disclosure requirements. The same collection information, when requested for mirrored accounts, should be disclosed to both taxpayers as would be disclosed for any other jointly filed return, except for unrelated personal information.

The IRS does not have a system to identify or track joint filer requests for collection activity information. Therefore, we systemically searched case histories, documented by Collection function employees, to identify and select a sample of cases to review.

In addition, to assess employees' awareness of the rights that joint filers have under the law to obtain important collection-related information, each year we interview managers and employees to evaluate their knowledge in this area. This year we interviewed 26 employees and 9 managers to determine what collection information the employees would disclose from a jointly filed return, whether the taxpayers were currently married, separated, or divorced, and with mirrored or non-mirrored accounts. Twenty-two employees and eight managers interviewed either responded incorrectly or were unsure about one or more questions related to what information could or could not be disclosed. The remaining four employees and one manager responded correctly to all the questions.

What TIGTA Recommended

We recommended that the IRS: 1) update the Internal Revenue Manual to accurately reflect the IRS disclosure guidance regarding I.R.C. § 6103(e)(8); and 2) issue an annual reminder on the topic of I.R.C. §§ 6103(e)(7) and (e)(8) for all employees and managers in the Small Business/Self-Employed Division's functions we reviewed and that had direct taxpayer contact. IRS management agreed with both recommendations.



**TREASURY INSPECTOR GENERAL
FOR TAX ADMINISTRATION**

**U.S. DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20024**

September 16, 2025

MEMORANDUM FOR: COMMISSIONER OF INTERNAL REVENUE

FROM: Diana M. Tengesdal
Acting Deputy Inspector General for Audit

SUBJECT: Final Audit Report – Fiscal Year 2025 Mandatory Review of Disclosure of
Collection Activity With Respect to Joint Returns
(Audit No.: 2025300004)

This report presents the results of our review to determine whether the Internal Revenue Service (IRS) complied with the statutory provisions of Internal Revenue Code § 6103(e)(8) related to the disclosure of collection activities to joint filers. This review is part of our Fiscal Year 2025 Annual Audit Plan and addresses the major management and performance challenge of *Taxpayer Service*.

Management's complete response to the draft report is included as Appendix II. If you have any questions, please contact me or Matthew A. Weir, Assistant Inspector General for Audit (Compliance and Enforcement Operations).

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Background

Internal Revenue Code (I.R.C.) § 6103(e) outlines the provisions relating to the disclosure of taxpayer information to people with a material interest. In July 1996, Congress passed the Taxpayer Bill of Rights 2 expanding these disclosure provisions related to joint returns by adding I.R.C. § 6103(e)(8).¹ This addition authorizes the Internal Revenue Service (IRS) to disclose in writing certain collection activity information when requested in writing by taxpayers. Specifically, taxpayers who filed a joint return and are no longer married or no longer reside in the same household (hereafter referred to as divorced or separated) are entitled to information, *e.g.*, whether the IRS has attempted to collect the balance due from the other individual, the general nature of the collection activities, and the amount collected. I.R.C. §§ 6103(e)(6) and (e)(7) allows authorized representatives of joint filers to also receive the same collection information requested under I.R.C. § 6103(e)(8).

If the IRS does not provide taxpayers with the account information to which they are entitled, taxpayers could be burdened and their ability to resolve their tax obligations may be negatively impacted. If the IRS provides taxpayers with account information to which they are not entitled, taxpayer rights are violated. In 2015, Congress codified the Taxpayer Bill of Rights in I.R.C. § 7803(a)(3). These rights include the right to be informed and the right to privacy and confidentiality.

After the passage of the Taxpayer Bill of Rights 2, the IRS Disclosure Office issued guidance permitting employees to provide both oral and written responses to taxpayers' requests made orally or in writing. Also, according to Internal Revenue Manual (IRM) guidance, employees are prohibited from disclosing certain personal information of the other spouse. Specifically, this includes information about the other spouse's location, name change, telephone number, employment, income, assets, income level at which a currently not collectible module would be reactivated, or the bankruptcy chapter filed.

The IRS Restructuring and Reform Act of 1998 (RRA 98) requires us to annually review and certify whether the IRS is complying with the requirements of I.R.C. § 6103(e)(8).² The IRS does not have a system to identify or track joint filer requests, made orally or in writing, for collection activity information. Therefore, we cannot readily identify the population of cases in which joint filers made such requests. In the cases we reviewed, the requests made by taxpayers and the information disclosed by the IRS were made orally. To identify written requests and disclosures, a manual review of every taxpayer case in the collection process with a jointly filed tax return would have to be conducted, looking for a notation in the case file or a copy of the taxpayer's letter. This would be too difficult; thus, we reviewed a sample of case narratives and interviewed employees to evaluate compliance with the disclosure requirements.

¹ Pub. L. No. 104-168, 110 Stat. 1452 (1996) (codified as amended in scattered sections of 26 U.S.C.).

² Pub. L. No. 105-206, 112 Stat. 685 (codified as amended in scattered sections of 2, 5, 16, 19, 22, 23, 26, 31, 38, and 49 U.S.C.).

During this review, we followed up on the implementation of the corrective actions taken in response to the recommendations made in prior reviews.³ We confirmed that the IRS implemented the corrective actions recommended in the Fiscal Years 2022 and 2024 reviews. For Fiscal Year 2023, the IRS implemented the training and issued interim disclosure guidance to the Specialty Collection, Offer in Compromise (OIC) function. The IRS plans to incorporate the guidance into the IRM by October 2025. We will confirm that this guidance was incorporated during next year's review.

This year's review focused on the following Small Business/Self-Employed (SB/SE) Division Collection functions:

- The Automated Collection System (ACS), which is responsible for resolving balances due or delinquent returns through a telephone-based operation. Collection representatives use the Account Management System (AMS) to document incoming calls and actions taken on the taxpayer accounts.
- The Field Collection function, which is responsible for direct collection and enforcement activity, and is conducted by revenue officers in contact with taxpayers and/or their representatives. Revenue officers use the Integrated Collection System (ICS) to document taxpayer contact and actions taken on the taxpayer accounts.
- The Specialty Collection, OIC function, which is responsible for considering the acceptance of an offer in compromise when it is unlikely that the tax liability can be collected in full and the amount offered reasonably reflects collection potential. The offers in compromise are worked or monitored by Field Offer Specialists, Campus Offer Examiners, and Tax Examiners. Field Offer Specialists use the ICS to document taxpayer contact and actions taken on the taxpayer accounts. Campus Offer Examiners and Tax Examiners use the Automated Offer-in-Compromise (AOIC) System to document taxpayer contact and actions taken on the taxpayer accounts.

During this review, we also interviewed bankruptcy specialists and tax examiners within the SB/SE Division's Specialty Collection Insolvency (SCI) function. The SCI function is responsible for collecting tax debts through the bankruptcy court and ensuring the Bankruptcy Code provisions are followed by other IRS functions. Bankruptcy specialists and tax examiners within SCI document their cases in the Automated Insolvency System.

Results of Review

Our review identified that IRS employees and managers have issues understanding disclosure requirements. In case history reviews and interviews, IRS employees and managers were unaware of what information they must or must not disclose to taxpayers. These errors potentially burdened taxpayers or their representatives with additional delays in resolving their respective tax matters or violated their right to privacy.

³ TIGTA, Report No. 2022-30-058, [Fiscal Year 2022 Statutory Review of Disclosure of Collection Activity With Respect to Joint Returns](#) (September 2022). TIGTA, Report No. 2023-30-063, [Fiscal Year 2023 Mandatory Review of Disclosure of Collection Activity With Respect to Joint Returns](#) (September 2023). TIGTA, Report No. 2024-300-051, [Fiscal Year 2024 Mandatory Review of Disclosure of Collection Activity With Respect to Joint Returns](#) (September 2024).

Employees Did Not Consistently Disclose Collection Activity on Jointly Filed Returns of Divorced or Separated Taxpayers As Required

We reviewed case narratives and interviewed employees to evaluate compliance with disclosure requirements. As part of this year's review, we queried AMS, ICS, and AOIC case history files to identify a population of joint filer disclosure contacts. We identified 671 case histories (367 ACS, 209 Field Collection, and 95 Specialty Collection, OIC) that were potentially related to these types of contacts in case histories for these SB/SE Division functions during our audit time frame of April 1, 2023, through March 31, 2024. In our case reviews, we found that employees failed to comply with disclosure requirements in 29 out of 91 (32 percent) cases. In our interviews, we found 22 (85 percent) of the 26 employees and 8 (89 percent) of the 9 managers responded incorrectly or were unsure how to respond to one or more questions.

Case history narratives showed that employees are not always aware of the disclosure requirements for taxpayers who file jointly

We reviewed a judgmental sample of 91 cases (35 ACS, 35 Field Collection, 21 Specialty Collection, OIC) where a taxpayer requested collection activity information regarding a balance due on a jointly filed return.⁴ The employees failed to comply with disclosure requirements in 29 (32 percent) cases (10 cases worked by ACS, 13 cases worked by Field Collection, and 6 cases worked by Specialty Collection, OIC). IRS officials agreed with all exception cases except [REDACTED]

In [REDACTED] of the 29 exception cases, the employee did not disclose collection activity information to which the taxpayer or their representative was entitled. In most cases, the employees documented that they could not provide the collection activity information, incorrectly believing that they were not permitted to make the disclosures. As a result, these taxpayers or their representatives may have been burdened with additional delays in resolving their respective tax matters.

In the remaining [REDACTED] exception cases, [REDACTED] This resulted in a potential violation of the ex-spouse's right to privacy. According to the IRM, tax account information must not be provided to a requester if the requester is not clearly the taxpayer or other recipient authorized by I.R.C. § 6103 to receive the information. Thus, former spouses can only receive certain tax account information related to their jointly filed tax returns.

We identified 12 (41 percent) of the 29 cases with "mirrored accounts" (a process by which joint returns are split into two separate taxpayer accounts on IRS data systems) for which disclosure requirements were not followed. Mirroring an account does not divide the legal responsibility for the liability in half; each taxpayer remains liable for the entire debt. Because joint filers remain jointly liable, the same collection information should be provided to both taxpayers when requested on mirrored accounts. As reported in prior reviews, some employees and managers continue to incorrectly believe that mirrored accounts limit the IRS's requirement to disclose collection information to jointly liable spouses.

⁴ A judgmental sample is a nonprobability sample, the results of which cannot be used to project to the population.

We reviewed the relevant IRMs and identified sections that should be updated to provide clearer guidance. For example, IRM 5.1.22, *Field Collection Procedures-Disclosure*, inaccurately describes the law. The purpose of this section is to provide SB/SE Division revenue officers with guidance about disclosure topics that may arise while communicating with taxpayers and/or their authorized representatives. The IRM states:

“...the IRS may disclose limited information related to the collection of the tax from the other individual with whom the taxpayer filed a joint return when the taxpayer and the other individual are no longer married or are separated...”

The IRS’s use of the word “may” implies that employees can choose whether to disclose the requested information. According to IRS disclosure guidance regarding I.R.C. § 6103(e)(8), IRS employees “shall” disclose collection information upon receiving a taxpayer’s valid request. Therefore, the IRS should replace the word “may” with “must” in IRM 5.1.22 to clearly state that, upon the receipt of a valid taxpayer request, the information must be disclosed.

Although the IRS provided additional training for its employees, we continue to identify instances of noncompliance with the IRS’s disclosure policy in our annual reviews. The IRS should continue to provide guidance and training to employees who respond to taxpayer inquiries about a joint return matter.

Some IRS employees and managers are not always aware of the disclosure requirements for taxpayers who file jointly

The I.R.C. states that return information related to a joint return must be disclosed to either of the individuals with respect to whom the return is filed. We interviewed a judgmental sample of 26 employees and 9 managers to determine what collection activity information they would disclose to taxpayers in this circumstance. We found 22 (85 percent) of the 26 employees and 8 (89 percent) of the 9 managers responded incorrectly or were unsure how to respond to one or more questions. The remaining four employees and one manager responded correctly to all the questions.

During the interviews, we asked employees and managers questions about whether they would provide collection activity information to taxpayers based on three different scenarios. These scenarios included taxpayers who requested collection activity information regarding a balance due on a jointly filed return.

- **Scenario 1: Married taxpayers:** Six (23 percent) of the 26 employees and 3 (33 percent) of the 9 managers responded incorrectly that they would not disclose information or were unsure how to respond.
- **Scenario 2: Divorced or separated taxpayers without a mirrored account:** Thirteen (50 percent) of the 26 employees and 5 (56 percent) of the 9 managers responded incorrectly that they would not disclose information or were unsure how to respond.
- **Scenario 3: Divorced or separated taxpayers with a mirrored account:** Twenty-one (81 percent) of the 26 employees and 8 (89 percent) of the 9 managers responded incorrectly that they would not disclose information or were unsure how to respond.

We also asked employees and managers whether they would disclose prohibited information to a taxpayer who was divorced or separated. Two (8 percent) of the 26 employees responded that

they were unsure if they would disclose the bankruptcy chapter filed by the other spouse. According to the IRM, prohibited disclosures include providing information about the other spouse's location, name change, telephone number, employment information or information related to bankruptcy.

When employees are unsure of the appropriate disclosure, they may choose not to risk inappropriate disclosure under I.R.C. § 6103 and potential discipline, even when the taxpayer is entitled to the information. If a manager is unclear on the guidance, they may provide inaccurate information to their employees regarding the disclosure of collection activity of joint filers, resulting in an improper disclosure. SB/SE Division employees have access to resources, such as the Disclosure Help Desk, which help determine if the taxpayer is authorized to receive confidential tax information. However, most of the 26 employees and managers we interviewed stated that they have never contacted the Disclosure Help Desk and some were unaware of how to contact it. The IRS should continue to inform employees of the available resources.

Based on our results from case reviews and interviews, employees and managers are providing inconsistent responses to taxpayer requests for collection information on their jointly filed returns. RRA 98 § 1204(b) requires IRS employees to be evaluated using the fair and equitable treatment of taxpayers as a performance standard. This provision was enacted to provide assurance that employee performance is focused on providing quality service to taxpayers. One example of performance that meets the fair and equitable treatment standard is to conduct "oral and written communications with taxpayers that are professional, courteous, and accurately states the facts." To help employees meet this standard, the IRS should consistently provide periodic training for all IRS personnel that addresses collection activity inquiries.

Additionally, RRA 98 requires all IRS employees to annually sign a statement in which they agree to treat taxpayers fairly and equitably. The standard requires employees to administer the tax laws fairly and equitably, protect all taxpayers' rights, and treat each taxpayer ethically with honesty, integrity, and respect. Employees receive annual training on taxpayer rights as part of the IRS's requirement under RRA 98 § 1204(b). We continue to report annually on problems with taxpayers who file jointly that do not receive the collection information to which they are entitled. The IRS should continue to take steps to help clarify its employees' misunderstandings about what the law requires.

According to IRS officials, as of December 2024 there were 8,382 employees in the SB/SE Division's ACS, Field Collection, Specialty Collection, OIC, and SCI functions who respond to taxpayer inquiries related to collection activity. The IRS confirmed that, as of June 2025, 1,989 employees in these functions are no longer working with the IRS or their work has been shifted to other priorities within the IRS.⁵ Workforce reductions may have a negative impact on the IRS's ability to respond to taxpayer requests for information, including collection information. We have a number of reviews underway to assess the impact of staffing reductions on the IRS's ability to provide service to taxpayers.

⁵ ACS has lost 1,465 employees, Field Collection has lost 163 employees, Specialty Collection, OIC has lost 207 employees, and SCI has lost 154 employees.

The Director, Collection Policy, SB/SE Division, should:

Recommendation 1: Update IRM 5.1.22, *Field Collection Procedures-Disclosure*, to accurately reflect the IRS disclosure guidance regarding I.R.C. § 6103(e)(8).

Management's Response: IRS management agreed with this recommendation and will update IRM 5.1.22, *Field Collection Procedures-Disclosure*, to accurately reflect the IRS disclosure guidance regarding I.R.C. § 6103(e)(8).

Recommendation 2: Issue an annual reminder on the topic of I.R.C. §§ 6103(e)(7) and (e)(8) for all employees and managers in the ACS, Field Collection, and Specialty Collection, OIC functions who have direct contact with taxpayers. The reminder should be in official format, such as a memorandum, and include guidance on disclosure for mirrored and non-mirrored accounts, provide a link to the training course related to I.R.C. §§ 6103(e)(7) and (e)(8), and inform employees of the availability of the Disclosure Help Desk.

Management's Response: IRS management agreed with this recommendation and will issue an annual reminder on the topic of I.R.C. §§ 6103(e)(7) and (e)(8) for all employees and managers in the ACS, Field Collection, and Specialty Collection, OIC functions who have direct contact with taxpayers. The reminder will include guidance on disclosure for mirrored and non-mirrored accounts, provide a link to the training course related to I.R.C. §§ 6103(e)(7) and (e)(8), and inform employees of the availability of the Disclosure Help Desk.

Appendix I

Detailed Objective, Scope, and Methodology

The overall objective of this audit was to determine whether the IRS complied with the statutory provisions of I.R.C. § 6103(e)(8) related to the disclosure of collection activities to joint filers. To accomplish our objective, we:

- Determined whether any systems or processes had been implemented or modified since our last review, dated September 2024, to track taxpayer complaints relating to the requirements of I.R.C. § 6103(e)(8) or joint filer requests, and the IRS's responses for collection information relating to the requirements of I.R.C. § 6103(e)(8).
- Selected and interviewed a judgmental sample of 26 SB/SE Division employees and 9 of their managers to determine how they responded to questions about collection activity on accounts of taxpayers who jointly filed a return but are no longer married or no longer reside in the same household of the other taxpayer on the return.¹ The judgmental sample of 26 employees consisted of 8 collection representatives that were selected out of a population of 4,685 total collection representatives, 8 revenue officers that were selected out of a population of 2,802 total revenue officers, 2 campus offer examiners, 2 field offer specialists, and 2 tax examiners out of 415 Specialty Collection OIC employees, and 2 tax examiners and 2 bankruptcy specialists out of 480 SCI employees. We judgmentally selected 2 managers of the 8 selected collection representatives, 2 managers of the 8 selected revenue officers, 1 manager of the campus offer examiners, 1 manager of the field offer specialists, 1 manager of the tax examiners in Specialty Collection, OIC, and 1 manager of the bankruptcy specialists and 1 manager of the tax examiners in SCI. A judgmental sample was used to ensure that selected employees and managers represented diverse locations.
- Identified potential joint filer disclosures related to SB/SE Division taxpayer contacts from April 1, 2023, through March 31, 2024, and reviewed all potential results to determine if employees' responses to these contacts were appropriate based on the I.R.C. §§ 6103(e)(7) and (8) and the IRS's disclosure policy. To identify the potential disclosures, we data mined IRS systems for cases containing specific key words. In the cases we identified and reviewed, the requests made by taxpayers and the information disclosed by the IRS were made orally.
- Reviewed a judgmental sample of 91 case histories from the SB/SE Division Collection functions to determine the IRS's compliance with the joint return disclosure requirements. Our judgmental sample consisted of 35 case histories from ACS operation, 35 case histories from Field Collection, and 21 case histories from Specialty Collection, OIC. We requested assistance from TIGTA's Applied Research and Technology Data Analytics group to identify a potential population of divorced or separated taxpayers with disclosure-related contacts from April 1, 2023, through March 31, 2024. The group identified 671 case histories (367 ACS, 209 Field Collection, and 95 Specialty Collection OIC) that potentially related to taxpayer requests for collection activity information on

¹ A judgmental sample is a nonprobability sample, the results of which cannot be used to project to the population.

jointly filed returns for which the taxpayers were now either divorced or separated. We reviewed the cases in the order in which we received them from the data team. We reviewed 44 ACS and 112 Field Collection case histories and identified the first 35 cases from each population that met our criteria. We also reviewed 80 Specialty Collection, OIC case histories to identify the first 30 cases that met our criteria; however, only 21 cases met our criteria.

Performance of This Review

This review was performed with information obtained from the SB/SE Division located in Washington, D.C., during the period September 2024 through June 2025. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our finding and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective.

Data Validation Methodology

The TIGTA Applied Research and Technology Data Analytics team performed data analytics using an extract from the TIGTA Data Center Warehouse's AMS, ICS, and AOIC datasets. These datasets were used to identify a potential population of separated or divorced taxpayers with disclosure-related contacts during the period of April 1, 2023, through March 31, 2024. We evaluated the results of the data analytics by performing electronic data testing for missing data, outliers, duplicates, or obvious errors. We verified the completeness of the data by reviewing the date fields of the narratives, which all fell within the requested time frame.

Internal Controls Methodology

Internal controls relate to management's plans, methods, and procedures used to meet their mission, goals, and objectives. Internal controls include the processes and procedures for planning, organizing, directing, and controlling program operations. They include the systems for measuring, reporting, and monitoring program performance. We determined that the following internal controls were relevant to our audit objective: documented procedures pertaining to requests under I.R.C. § 6103(e)(8). We evaluated these controls by reviewing SB/SE Division AMS, ICS, and AOIC case history files and conducting interviews with SB/SE Division personnel who receive these requests.

Appendix II

Management's Response to the Draft Report



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

August 29, 2025

MEMORANDUM FOR DIANA M. TENGESDAL
ACTING DEPUTY INSPECTOR GENERAL FOR AUDIT
Elizabeth J. Kinzer
FROM: Lia Colbert Kinzer
Commissioner, Small Business/Self-Employed Division
SUBJECT: Draft Audit Report – Fiscal Year 2025 Review of Disclosure of
Collection Activity with Respect to Joint Returns (Audit No.:
2025300004)

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Elizabeth J. Kinzer
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Thank you for the opportunity to review and provide comments on the subject draft report. TIGTA is required to annually review and certify the IRS's compliance with Internal Revenue Code (IRC) § 6103(e)(8), which requires disclosure of collection information to joint filers on joint tax liabilities when requested in writing by taxpayers who are no longer married, separated, or no longer reside in the same household. For this annual review, since written requests were not available, TIGTA reviewed oral requests as authorized by IRS disclosure policy.

We continue to prioritize ensuring taxpayers receive only information they are entitled to, to avoid violating taxpayer rights. The statutory obligation to protect taxpayer data confidentiality is balanced with necessary disclosures of information under IRC 6103(e)(8) and IRS policy.

Based on TIGTA's recommendations from a prior audit in fiscal year 2023, Collection created an electronic training class focusing on disclosure of collection activity for divorced taxpayers. All Collection employees and managers in the Campus, Field and Offer In Compromise functions completed the course by the end of fiscal year 2024. This topic is also included in our new hire training curriculum which ensures all employees understand this important requirement. In addition to training, we also continue to update the IRM with procedures that reinforce this policy. We will assess the most effective method for regularly reiterating the importance for our workforce, which could be accomplished through training and other options.

We appreciate TIGTA's review, your insights, and recommendations.

Attached are our comments and proposed actions to your recommendations. If you have any questions, please contact me, or Frederick W. Schindler, Director, Collection, Small Business/Self-Employed Division.

Attachment

Attachment

Recommendations

The Director, Collection Policy, SB/SE Division, should:

RECOMMENDATION 1:

Update IRM 5.1.22, *Field Collection Procedures-Disclosure*, to accurately reflect the IRS disclosure guidance regarding I.R.C. § 6103(e)(8).

CORRECTIVE ACTION:

We agree. We will update the guidance in IRM 5.1.22, *Field Collection Procedures-Disclosure*, to accurately reflect the IRS disclosure guidance regarding I.R.C. § 6103(e)(8).

IMPLEMENTATION DATE:

February 15, 2026

RESPONSIBLE OFFICIAL:

Director, Collection Policy, Small Business/Self-Employed Division

CORRECTIVE ACTION MONITORING PLAN:

IRS will monitor this corrective action as part of our internal management system of controls.

RECOMMENDATION 2:

Issue an annual reminder on the topic of I.R.C. §§ 6103(e)(7) and (e)(8) for all employees and managers in the ACS, Field Collection, and Specialty Collection, OIC functions who have direct contact with taxpayers. The reminder should be in official format, such as a memorandum, and include guidance on disclosure for mirrored and non-mirrored accounts, provide a link to the training course related to I.R.C. §§ 6103(e)(7) and (e)(8), and inform employees of the availability of the Disclosure Help Desk.

CORRECTIVE ACTION:

We agree. We will issue an annual reminder on the topic of I.R.C. §§ 6103(e)(7) and (e)(8) for all employees and managers in the ACS, Field Collection, and Specialty Collection, OIC functions who have direct contact with taxpayers. The reminder will include guidance on disclosure for mirrored and non-mirrored accounts, provide a link to the ITM course related to I.R.C. §§ 6103(e)(7) and (e)(8), and inform employees of the availability of the Disclosure Help Desk. The first reminder will be issued before December 15, 2025.

IMPLEMENTATION DATE:

February 15, 2026

RESPONSIBLE OFFICIAL:

Director, Collection Policy, Small Business/Self-Employed Division

CORRECTIVE ACTION MONITORING PLAN:

IRS will monitor this corrective action as part of our internal management system of controls.

Appendix III

Abbreviations

ACS	Automated Collection System
AMS	Account Management System
AOIC	Automated Offer-in-Compromise
ICS	Integrated Collection System
I.R.C.	Internal Revenue Code
IRM	Internal Revenue Manual
IRS	Internal Revenue Service
OIC	Offer in Compromise
RRA 98	IRS Restructuring and Reform Act of 1998
SB/SE	Small Business/Self-Employed
SCI	Specialty Collection-Insolvency
TIGTA	Treasury Inspector General for Tax Administration



**To report fraud, waste, or abuse,
contact our hotline on the web at
<https://www.tigta.gov/reportcrime-misconduct>.**

**To make suggestions to improve IRS policies, processes, or systems
affecting taxpayers, contact us at www.tigta.gov/form/suggestions.**

Information you provide is confidential, and you may remain anonymous.