



COMMISSIONER

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, DC 20224

Policy Statement 8-48 (Rev. 2), Split-Issue and Specific Dollar Settlements Permitted Under Certain Circumstances

Effective: October 16, 2023

(1) "Split-Issue" and "Specific Dollar" Settlements Permitted Under Certain Circumstances

(2) The IRS Independent Office of Appeals (Appeals) may consider and accept proposals for "split issue" settlements. A split-issue settlement is the settlement of an issue for a percentage or a stipulated amount of the tax in controversy that if litigated, would result in a decision completely for the Government or the taxpayer.

(3) Appeals may consider and accept proposals for "specific dollar" settlements. A specific dollar settlement is the settlement of a case for a percentage or stipulated amount of the tax in controversy that approximates the amount that would have been reached by computing the tax.

(4) Split issue and specific dollar settlements are not appropriate in cases involving issues affecting prior or subsequent tax periods not included in the settlement, such as adjustments to depreciation/depletion, carryovers, carrybacks, or other reoccurring issues.

Signed: /s/ *Daniel I. Werfel*, Commissioner of Internal Revenue