



TAX EXEMPT AND  
GOVERNMENT ENTITIES  
DIVISION

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

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Expiration Date: January 24, 2026  
Affected IRM: 4.70.10

MEMORANDUM FOR All TECU EMPLOYEES

FROM: Dorothea Kimbrough /s/ *Dorothea Kimbrough*  
Program Manager, Tax Exempt / Government Entities Compliance Unit

SUBJECT: TE BOD Code on Accounts

This memo establishes a procedural exception applying specifically to EP sourced compliance strategies (i.e., projects). Currently, TECU is working the 5500-stop filer project (PC 6535). The procedures of this memo will apply to all EP sourced projects that are currently on-going and any additional EP sourced projects initiated in the future.

**Background:**

TE/GE implemented the title 26 compliance check process with issuance of interim guidance memo (TEGE-04-0522-0021) dated May 23, 2022. That memo defined the overall TE/GE Title 26 compliance check process and RCCMS issue code data grid functionality.

During the planning phase of the compliance check, the examiner conducts pre-contact analysis, including IDRS research, to determine whether the taxpayer is meeting all identified filing, reporting and payment requirements. The IDRS research aids in identifying any additional applicable Large, Unusual, or Questionable (LUQs) issues. With managerial approval, the examiner includes the additional LUQs in the established scope of the compliance check.

**Procedural Change:**

The taxpayers included in an EP sourced project may not have a BOD Code of TE. If the BOD Code is not TE, work the EP related issue(s) identified by CP&C. Prepare a referral for the other identified LUQs not related to the EP related issue(s) to be sent to the appropriate BOD that has jurisdiction over that taxpayer. In PC 6535, the EP related issue(s) generally include asking for the missing Form 5500/Form 5500-SF.

Complete your pre-contact analysis, including IDRS research to determine whether the taxpayer is meeting all identified filing, reporting and payment requirements.

Where there are other LUQs identified for issues that are not related to the EP related issue(s):

- Prepare a Form 5666, providing a summary of the other LUQ issues to be referred to another BOD.

- Post the Form 5666, with supporting documents and or IDRS prints to the RCCMS Case File Documents folder.
- Complete the RCCMS 3198-A Checksheet, check “Yes” in the SH-S6.0 Referral field on Page 3 of 6 to indicate that a referral is included in the compliance check case file.
- Follow existing procedures to complete the compliance check and prepare the case file for closure to the manager for final approval.

The manager completes the managerial review, reviewing/approving the referral package (i.e., Form 5666 with all supporting documents and/or applicable IDRS prints). If approved, the manager digitally signs the Form 5666 and sends the referral package as attachments via secure encrypted email to CP&C at [eoclass@irs.gov](mailto:eoclass@irs.gov). The subject line of the email should state: "Referral to [Insert BOD label of SB/SE, LB&I, or W&I]." Identify the BOD that holds jurisdiction.

**Effect on Other Documents:**

This guidance will be incorporated into IRM 4.70.10, Compliance Checks by January 24, 2026.

**Effective Date:**

This guidance is effective upon issuance of this memo.

**Contact:**

If you have questions, contact Nicholas Schlarman, TECU Staff Assistant at [nicholas.j.schlarman@irs.gov](mailto:nicholas.j.schlarman@irs.gov) or 513-975-6827.

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