



OFFICE OF THE TAXPAYER ADVOCATE
WASHINGTON, DC 20224

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MEMORANDUM FOR TAXPAYER ADVOCATE SERVICE EMPLOYEES

FROM: /s/ Bridget Roberts
Deputy National Taxpayer Advocate

SUBJECT: Interim Guidance – Advance Child Tax Credit

This memorandum addresses the Advance Child Tax Credit (Adv CTC) and explains why these cases do not qualify under Taxpayer Advocate Service (TAS) case acceptance criteria and our monitoring efforts for future developments. Internal Revenue Manual ([IRM](#) 21.6.3.4.1.24.2, Advance CTC, allows for minimal manual adjustments to the Adv CTC. Under our current IRMs, TAS does not accept cases in which we cannot expedite or improve assistance to taxpayers. Consistent with this guidance, TAS will not accept stand-alone Adv CTC cases. As explained in more detail below, TAS will continue to accept cases where an underlying account or entity issue TAS normally resolves is preventing the taxpayer from receiving Adv CTC. It is anticipated that IRS phone assistors will be able to help taxpayers make changes to their Adv CTC and the IRS will be rolling out a number of self-help tools over the next six months. The IRS [Child Tax Credit Update Portal \(CTC UP\)](#) allows taxpayers to check if they are enrolled and unenroll. The CTC UP will soon allow taxpayers to change their address or bank information and update information with life events such as adding an additional child or changing their income qualification. At this time, TAS cannot expedite resolution for these issues. TAS will continue to monitor IRS developments in Adv CTC processing and will re-evaluate this determination as the situation changes.

Section 9611(a) of the American Rescue Plan Act, Public Law 117-2 (2021), signed into law on March 11, 2021, amended Internal Revenue Code (IRC) section 24 to create special rules for the Child Tax Credit (CTC) applicable to only calendar year 2021 and added new IRC section 7527A to provide for periodic advance payments of the CTC to eligible individuals in calendar year 2021. The Adv CTC payments will commence July 15, 2021 and end by December 31, 2021. During this time IRS programming will use tax year 2020 return data (or 2019, if 2020 is not available) to generate monthly payments totaling up to 50 percent of the taxpayer’s projected 2021 CTC amount. Taxpayers who have not filed a 2020 or 2019 federal income tax return and do not have a filing requirement can use the “[Child Tax Credit Non-filer Sign up Tool](#)” on [irs.gov](#) to file a 2020 tax return. Eligible taxpayers who do not want to receive Adv CTC can

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elect to unenroll to decline the advanced payments using the [CTC UP](#). The CTC UP also allows eligible taxpayers to check enrollment, and future updates will allow taxpayers to change other items such as address, bank information, and life event changes.

TAS will not accept cases involving stand-alone Adv CTC issues from any source, including congressional offices. Stand-alone Adv CTC issues include, but are not limited to:

- Unenrollment
- Use of the Non-Filer Sign-up Tool
- Adv CTC payment inquiries
- IRS Online Account accessibility, such as IRS username, ID.me, etc.

TAS will continue to accept cases meeting normal case criteria where the taxpayer is attempting to resolve a problem that is preventing the taxpayer from receiving Adv CTC. During the intake process, employees will review the taxpayer's account in IDRS along with [IRM 21.6.3.4.1.24.2](#), Advance CTC, to determine if there are any Tax Module or Entity conditions that are postponing Adv CTC payments. Generally, resolution of these issues will allow the Adv CTC payments to begin, so in these situations TAS can accept the case to resolve the underlying Tax Module or Entity conditions that will in turn allow the Adv CTC payments. IRS programming will then recompute the monthly payment amounts based on the remaining number of months within the year. These situations are not considered stand-alone Adv CTC cases.

When creating a case with an Adv CTC issue in the Taxpayer Advocate Management Information System (TAMIS), **TAS employees will add the literal ***ADVCTC*** in the TAMIS History and Tax Period 202112 to TAMIS Taxpayer Screen 5 to identify cases accepted under this guidance.**

Although TAS will not accept new cases involving stand-alone Adv CTC issues, it is expected that TAS may still receive taxpayer inquiries and assistance requests. TAS employees should be empathetic to the financial hardship some taxpayers may be experiencing and seize the opportunity to explain the circumstances surrounding the Adv CTC and educate taxpayers about self-help tools and informational resources.

When receiving an inquiry involving a stand-alone Adv CTC issue, TAS employees must complete a TAMIS Contact Record per [IRM 13.1.16.5](#), Taxpayers Contacting TAS and the TAMIS Contact Record, and select the appropriate reason for contact per [IRM 13.1.16-5](#), Contact Record Case Coding, Reason for Contact.

While TAS will not accept cases where Adv CTC is a stand-alone issue, TAS will continue to educate taxpayers by directing them to [IRS resources](#) that answer their questions. We will also use outreach and other forums to gather feedback to improve IRS's educational resources. Finally, we will continue to identify systemic problems using the [Systemic Advocacy Management System \(SAMS\)](#) and work with the IRS to correct them.



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TAS will continue to monitor IRS's implementation of the Adv CTC. The Deputy National Taxpayer Advocate may modify or rescind this guidance at any time by notifying TAS employees through the issuance of a TAS Welcome Screen article discussing the change in guidance.

Effect on Other Documents: TAS may incorporate this guidance into the next revision of [IRM 13.1.7](#), Taxpayer Advocate Service (TAS) Case Criteria, and [IRM 13.1.16](#), Receipt and Intake of TAS Cases.

Please contact Michael Kenyon, Deputy Executive Director of Case Advocacy, Technical Support, at (701) 237-8299, if you have questions.

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