



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

OFFICE OF THE CHIEF COUNSEL

March 23, 2017

Number: **2017-0009**
Release Date: 6/30/2017

CONEX-107148-17

UIL: 9999.98-00

Dear _____ :

I am responding to your inquiry dated February 10, 2017, regarding rules relating to sabbaticals. Specifically, you asked what tax laws or codes govern the granting of what you refer to as a "terminal sabbatical."

Currently, there is no specific guidance under the Internal Revenue Code that addresses terminal sabbaticals. It is possible that sabbatical leave may have an impact on certain employment arrangements and employee benefit plans depending on the facts and circumstances. However, without further information on the employer's specific concerns with providing terminal sabbaticals, we are unable to provide any useful guidance. Accordingly, we suggest that you contact your employer to obtain specific information on the federal tax issues that are involved with which your employer is concerned.

If you have questions or additional information, please contact _____ of our office or me at _____.

Sincerely,

Joyce I. Kahn
Acting Branch Chief
(Office of Chief Counsel, Tax Exempt and
Government Entities, Employee Benefits, Qualified
Plans Branch 4)