

causing financial hardship for taxpayers with limited savings or fixed incomes.

Data transcription errors can lead to prolonged disputes, and the issues compound from there. A data entry error can cause math error notices requiring taxpayers to respond to the IRS if they disagree with the adjustments made. Errors also cause taxpayers to wait even longer for resolution, requiring more documentation from the taxpayer, more calls, and more correspondence to the IRS as delays continue to build. These extra steps all add to the backlog at the IRS costing all taxpayers more money and eroding trust in the overall tax system.

The good news is that we have a solution. The BARCODE Efficiency Act will require the IRS to implement scanning technology and dramatically reduce the number of paper tax returns that require manual data entry, thereby accelerating processing and improving taxpayer service.

IRS' problems with digitization and processing paper returns have long been an area of focus for the National Taxpayer Advocate, which listed the IRS' challenges in processing and digitization as the first and second most serious problems at the IRS in last year's annual report to Congress.

I, again, extend my appreciation to my friend, Representative YAKYM, for his partnership working to address this problem with commonsense solutions. I thank Chairman SMITH and Ranking Member NEAL for their support of this bipartisan legislation.

I also extend my thanks to the Taxpayer Advocate Service for their recommendation that led to the creation of this bill and for their critical, ongoing work to reduce taxpayer burden and improve the IRS' performance.

I am proud that this bill has the support of both the National Taxpayers Union and the American Coalition for Taxpayer Rights, the national trade association made up of retail tax preparation and tax software companies.

Mr. Speaker, I urge my colleagues to support this bill to help the IRS operate more efficiently and better serve the American taxpayer, and I reserve the balance of my time.

Mr. SMITH of Missouri. Mr. Speaker, I yield such time as he may consume to the gentleman from Indiana (Mr. YAKYM), who is the co-lead of this legislation and who is a critical member of the Ways and Means Committee fighting for oversight and keeping his eye on the IRS.

Mr. YAKYM. Mr. Speaker, I rise in strong support of H.R. 6956, the BARCODE Efficiency Act. I am proud to co-lead this act with my friend from Illinois (Mr. SCHNEIDER).

This is a simple but powerful bill that will make tax return processing faster, more accurate, and more efficient. E-filing taxes is becoming even more common. In 2009, two-thirds of taxpayers e-filed their returns. By 2015, it was up to 85 percent. Last year, 94

percent of taxpayers e-filed their returns. That remaining 6 percent still accounts for 10 million tax returns.

There are good reasons to file a paper return. I actually found myself in such a position last year. After I electronically filed my taxes, as most taxpayers do, the IRS continued to kick back my return, trying to convince me that I owed the IRS less money than I actually did.

We reran the numbers time and time again, but we still came up with the same results. We had a few choices at this point. We could either file the return, as the IRS suggested, and risk later on owing a lot of money in penalties and interest and things like that, or we could call them up and get into an argument with somebody at the IRS, or we could just simply print it off and file the return. That is exactly what we chose to do.

The problem is once we file that return, and my return this last year was 202 pages, there is someone at the IRS who actually manually enters in every single digit on all 202 pages. Just imagine the problems that could create, Mr. Speaker. If someone transposes a number, then all of a sudden, you have an inaccurate return and the IRS can later come after you for an audit. Or, Mr. Speaker, you may have substantial delays in receiving your refund because of the amount of time it takes to manually key in all that data. It is just simply a waste of time and a waste of resources.

There are better ways of handling that, and, frankly, I think it is time for the IRS to come into the 21st century. That is why my colleague, Mr. SCHNEIDER, and I have introduced the bipartisan BARCODE Efficiency Act. This would require that the IRS increase its usage of scanning technology, particularly for paper or handwritten returns. No more manual entry would be needed or required. This will certainly complement efforts already underway by the Trump administration to phase out the use of paper and to adopt scanning technology. Scanning technology has been recommended by the taxpayer advocate as well as the GAO, and it has been used by State tax agencies for years.

Paper returns will still be necessary at times, but we can do better, Mr. Speaker, because there is proven commercially available technology that can end the hand entry of tax returns. It will increase the speed, the efficiency, and the accuracy of processing. It will get refunds out the door quicker so Hoosiers, whom I serve, can get their money back faster.

Again, quite simply, it is time for the IRS to come into the 21st century.

Mr. Speaker, I thank my colleague across the aisle Mr. SCHNEIDER for his great work in getting this bill introduced. I would also like to thank Chairman SMITH and Chairman SCHWEIKERT for their partnership as well as Senators YOUNG and WARNOCK.

Mr. Speaker, I urge my colleagues to support this bipartisan commonsense bill.

□ 1520

Mr. SCHNEIDER. Mr. Speaker, I yield myself the balance of my time.

I am proud that we are here today to advance this seemingly modest, bipartisan bill that will have an outsized impact to improve service at the IRS.

I have long championed investing in modernization at the IRS to improve taxpayer service and make government more efficient. The archaic, manual transcription process that IRS currently uses to process paper returns results in significant delays that can last months or even years and cause severe hardship.

It is long past time that the IRS implement scanning technology to improve the speed and accuracy of processing these returns. Implementing a modernization process is a commonsense change with bipartisan support that will reduce refund delays, all the while lowering administrative costs.

No matter how Americans file their taxes—digitally or by paper—they should be able to rely on timely resolution and quality service from our IRS.

I urge my colleagues to support this bill, and I yield back the balance of my time.

Mr. SMITH of Missouri. Mr. Speaker, I yield myself the balance of my time.

Many Americans have had to endure frustration and anxiety at the hands of the IRS bureaucracy when it comes to filing or waiting on their tax returns to be processed. Anything we can do to make this process more efficient and user-friendly for the American taxpayer is well worth our time.

If we are reforming our tax code to provide more relief to working families, we should be modernizing our tax agency to get that relief to them as soon as possible.

I encourage my colleagues to support this legislation, and I yield back the balance of my time.

The SPEAKER pro tempore. The question is on the motion offered by the gentleman from Missouri (Mr. SMITH) that the House suspend the rules and pass the bill, H.R. 6956, as amended.

The question was taken; and (two-thirds being in the affirmative) the rules were suspended and the bill, as amended, was passed.

A motion to reconsider was laid on the table.

TAXPAYER EXPERIENCE IMPROVEMENT ACT

Mr. SMITH of Missouri. Mr. Speaker, I move to suspend the rules and pass the bill (H.R. 7971) to provide for modernization and technological improvements of services provided by the Internal Revenue Service, as amended.

The Clerk read the title of the bill.

The text of the bill is as follows:

H.R. 7971

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE; ETC.

(a) **SHORT TITLE.**—This Act may be cited as the “Taxpayer Experience Improvement Act”.

(b) **REFERENCES TO SECRETARY.**—For purposes of this Act, the term “Secretary” means the Secretary of the Treasury or the Secretary’s delegate.

(c) **TABLE OF CONTENTS.**—The table of contents of this Act is as follows:

- Sec. 1. Short title; etc.
- Sec. 2. Establishment of dashboard to inform taxpayers of backlogs and wait times.
- Sec. 3. Expansion of electronic access to information about returns and refunds.
- Sec. 4. Expansion of callback technology.
- Sec. 5. Expansion of online accounts.

SEC. 2. ESTABLISHMENT OF DASHBOARD TO INFORM TAXPAYERS OF BACKLOGS AND WAIT TIMES.

(a) **IN GENERAL.**—The Secretary shall require the Internal Revenue Service to provide in real time on its public website, to the extent practical, the following:

(1) Separately with respect to each applicable phone number extension—

(A) the number of callers connected to speak directly with a representative of the Internal Revenue Service,

(B) the number of callers connected to speak with an automated system,

(C) the number of callers who are waiting to be connected to speak directly with a representative of the Internal Revenue Service or an automated system,

(D) the longest amount of time that any caller has been waiting to be connected to speak directly with a representative of the Internal Revenue Service, and

(E) whether callback service is currently available, and if not, when such service is scheduled to be available.

(2) An application or tool embedded on the website which—

(A) displays all of the information described in paragraph (1), and

(B) estimates the approximate wait time to speak directly with a representative of the Internal Revenue Service.

(3) An application programming interface which allows any person to access the information described in paragraph (1) using automation and to create an application or tool embedded on a website to display such information.

(4) For each applicable phone number extension, a summary of the information described in paragraph (1) with respect to the prior month, including—

(A) the average and median length of calls,

(B) the average and median amount of time that callers were speaking directly with a representative of the Internal Revenue Service,

(C) the number and percent of calls that were directed to an automated system,

(D) the number and percent of calls that were disconnected or terminated by the Internal Revenue Service,

(E) the number of callers who were transferred to another applicable phone number extension after the call was initially answered by a representative of the Internal Revenue Service,

(F) the average and median amount of time that callers described in subparagraph (E) were on hold following the transfer, and

(G) the number and percent of callers who indicated that they received the answers or service for which they were contacting the Internal Revenue Service.

(b) **DETECTION OF AUTOMATED CALLS.**—The Secretary shall require the Internal Revenue Service to use technology to detect and screen out automated calls.

(c) **INFORMATION REGARDING DELAYS.**—For any week in which there was a significant delay with respect to any applicable item (referred to in this subsection as an “applicable week”), the Secretary shall require the Internal Revenue Service to provide on its public website, during the week subsequent to the applicable week, information with respect to each such applicable item regarding the earliest date on which any such applicable items that were processed during the applicable week were received by the Internal Revenue Service.

(d) **DEFINITIONS.**—For purposes of this section—

(1) **APPLICABLE ITEM.**—The term “applicable item” means each category of tax return, claim, statement, or other document filed with the Internal Revenue Service.

(2) **APPLICABLE PHONE NUMBER EXTENSION.**—The term “applicable phone number extension” means any extension or application which may be reached by calling a phone number which is listed by the Internal Revenue Service on any website, publication, form, or instruction which is available to the public and—

(A) operated by the Internal Revenue Service accounts management function,

(B) operated by the Internal Revenue Service automated collection function,

(C) managed by the Internal Revenue Service Joint Operations Center,

(D) managed and staffed by a contractor on behalf of the Internal Revenue Service, or

(E) received not less than 200,000 calls during the preceding calendar year.

(3) **SIGNIFICANT DELAY.**—The term “significant delay” means, in the case of any applicable item for any week, the failure to process all of such applicable items which were received by the Internal Revenue Service at least 21 days before the first day of the week.

(e) **EFFECTIVE DATE.**—The requirements of this section shall apply to periods beginning after the date which is 12 months after the date of enactment of this Act.

SEC. 3. EXPANSION OF ELECTRONIC ACCESS TO INFORMATION ABOUT RETURNS AND REFUNDS.

Not later than January 1 of the first calendar year beginning more than 12 months after the date of enactment of this Act, through a website and mobile application, the Secretary shall provide individualized, specific, and up-to-date information to taxpayers regarding their tax returns and amended returns, including information with respect to whether the Internal Revenue Service has—

(1) received such return and entered such return into their systems,

(2) completed processing such return, including—

(A) the date on which the Internal Revenue Service issued any refund of any overpayment of tax,

(B) the estimated date on which the taxpayer can expect to receive such refund, and

(C)(i) if the refund will be issued by electronic fund transfer, the financial account to which such refund will be deposited, including—

(I) the partial or full account number for such account, and

(II) the name and routing number of the financial institution, or

(ii) if the refund will be issued by paper check, the address to which the check will be mailed, or

(3) suspended processing such return, including—

(A) the reason for the suspension, and

(B) in the case of any information which was requested by the Internal Revenue Service—

(i) the information requested,

(ii) the form and manner for submission of such information, and

(iii) the date on which such information is due to be submitted to the Internal Revenue Service.

SEC. 4. EXPANSION OF CALLBACK TECHNOLOGY.

It is the sense of Congress that—

(1) taxpayers contacting the Internal Revenue Service should have the option to receive a callback, and

(2) not later than calendar year 2028, the Internal Revenue Service should provide any taxpayer (including any taxpayer residing outside of the United States) the option to receive a callback for any call made by the taxpayer to an applicable phone number extension (as defined in section 2(d)(2) of this Act) which has not been answered within 5 minutes.

SEC. 5. EXPANSION OF ONLINE ACCOUNTS.

(a) **IN GENERAL.**—Not later than January 1 of the first calendar year beginning more than 18 months after the date of enactment of this Act, the Secretary shall make available a website or mobile application which allows any taxpayer (including any taxpayer residing outside of the United States) the ability to—

(1) in a manner consistent with any applicable limitations under section 6103 of the Internal Revenue Code of 1986, view any return (as defined in section 6103(b)(1) of the Internal Revenue Code of 1986), document, notice, or letter (with the exception of any educational item which has no legal effect) which, during the applicable period (as defined in subsection (d)), has been—

(A) sent by the Internal Revenue Service to such taxpayer, or

(B) filed with (or, in the case of any document not required to be filed, sent to) the Internal Revenue Service—

(i) by such taxpayer,

(ii) by a person described in subsection (c) of section 6103 of the Internal Revenue Code of 1986 with respect to such taxpayer, or

(iii) with respect to such taxpayer in a manner described in subsection (e) of such section,

(2) with respect to any document, notice, or letter sent to such taxpayer by the Internal Revenue Service, respond to such document, notice, or letter by uploading or otherwise transmitting the taxpayer’s response through the website or mobile application, and

(3) in the case of—

(A) any representative of such taxpayer who is authorized to practice before the Department of the Treasury pursuant to section 330 of title 31, United States Code,

(B) any tax return preparer (as defined in section 7701(a)(36) of the Internal Revenue Code of 1986) with an identifying number (as described in section 6109(a)(4) of such Code), or

(C) any qualified reporting agent, permit such representative, preparer, or agent, to the extent authorized by the taxpayer, to access the information described in paragraph (1) or transmit any information described in paragraph (2).

(b) **AVAILABILITY FOR VIEWING.**—With respect to any return, document, notice, or letter described in paragraph (1) of subsection (a), such return, document, notice, or letter shall be made available for viewing by the taxpayer (or, pursuant to paragraph (3) of such subsection, any representative, tax return preparer, or qualified reporting agent authorized by the taxpayer) as soon as is practicable and within such periods as are established pursuant to regulations prescribed by the Secretary.

(c) **ACCESS TO MULTIPLE ACCOUNTS BY REPRESENTATIVE, PREPARER, OR AGENT.**—For purposes of subsection (a)(3), the website or mobile application shall allow a representative, tax return preparer, or qualified reporting agent to be able to access information for multiple taxpayers who have provided permission under such subsection without any requirement to individually and separately access the account of each such taxpayer.

(d) **APPLICABLE PERIOD.**—

(1) **IN GENERAL.**—Subject to paragraph (2), for purposes of subsection (a)(1), the term “applicable period” means the preceding 6-year period.

(2) **PROSPECTIVE APPLICATION.**—The term “applicable period” shall not include any years ending before the date of enactment of this Act.

(e) QUALIFIED REPORTING AGENT.—

(1) IN GENERAL.—For purposes of this section, the term “qualified reporting agent” means a person—

(A) which is properly authorized as an agent to sign and file employment tax returns, make related payments and deposits, and perform such other acts on behalf of a taxpayer under procedures set forth by the Secretary,

(B) which has met such requirements as may be established by the Secretary, and

(C) for which authorization has not been revoked or suspended by the Secretary pursuant to procedures established by the Secretary.

(2) EMPLOYMENT TAX RETURN.—For purposes of paragraph (1)(A), the term “employment tax return” means—

(A) any return required to be filed by an employer to report the obligations of the employer and its employees under section 3101, 3111, 3301, or 3402 of the Internal Revenue Code of 1986, and

(B) such other returns as designated by the Secretary.

(f) PREVENTING UNAUTHORIZED DISCLOSURE OF RETURN INFORMATION BY PERSONS DESIGNATED BY TAXPAYERS.—Not later than January 1 of the first calendar year beginning more than 18 months after the date of enactment of this Act, the Secretary shall—

(1) establish a program to investigate and address—

(A) any access, use, or disclosure of return information (as defined in section 6103(b) of the Internal Revenue Code of 1986) by any person which is in excess of the authorization permitted to such person pursuant to subsection (a)(3), and

(B) any related misconduct, and

(2) annually publish, on the public website of the Internal Revenue Service, the actions undertaken pursuant to the program described in paragraph (1), such as the number of complaints investigated, the number of persons whose access was revoked, and other relevant statistical data.

(g) FOCUS GROUPS.—For purposes of subsection (a), prior to the date that the website or mobile application described in such subsection is made available, the Secretary shall conduct focus groups with taxpayers and tax professionals to ensure that any amounts appropriated or otherwise made available for such purposes are expended in an appropriate manner.

The SPEAKER pro tempore. Pursuant to the rule, the gentleman from Missouri (Mr. SMITH) and the gentleman from Virginia (Mr. BEYER) each will control 20 minutes.

The Chair recognizes the gentleman from Missouri.

GENERAL LEAVE

Mr. SMITH of Missouri. Mr. Speaker, I ask unanimous consent that all Members have 5 legislative days to revise and extend their remarks and submit extraneous material on this bill under consideration.

The SPEAKER pro tempore. Is there objection to the request of the gentleman from Missouri?

There was no objection.

Mr. SMITH of Missouri. Mr. Speaker, I yield myself such time as I may consume.

Mr. Speaker, I rise in support of H.R. 7971, the Taxpayer Experience Improvement Act, bipartisan legislation introduced by Ways and Means Oversight Subcommittee chair, Representative SCHWEIKERT, and Representative DON BEYER.

In 2023, the Government Accountability Office found that roughly one-

third of IRS information technology applications and over 20 percent of agency IT software were anywhere from 25 to 64 years old. That means some of the systems in place at the IRS today were in operation before the Apollo 11 crew landed on the Moon.

This bill responds to that reality by imposing much-needed transparency on the IRS and requiring the agency to be more accessible for taxpayers, including folks who are seeking information about the status of their tax refunds or data on how the agency is performing when it comes to responding to taxpayers.

Our Ways and Means Oversight Subcommittee Chairman SCHWEIKERT has been a leading voice in Congress on deploying new technology to bring government into the modern era, and I appreciate his leadership on this issue.

Mr. Speaker, I reserve the balance of my time.

Mr. BEYER. Mr. Speaker, I yield myself such time as I may consume.

Mr. Speaker, firstly, I thank my friend and colleague from Arizona (Mr. SCHWEIKERT) for his leadership on the Taxpayer Experience Improvement Act, and I am proud to support him on this.

The IRS has made great strides since the pandemic to improve customer service for taxpayers, contributing to a successful filing season last year. The agency was able to process more than 165 million income tax returns and deliver refunds to 104 million taxpayers, the overwhelming majority on time and with no issues.

This is in large part thanks to the funds provided to the IRS through the Inflation Reduction Act, which reversed decades of underinvestment in the agency.

However, even during what was a relatively smooth filing season, millions of taxpayers experienced delays receiving their refunds or difficulties communicating with the IRS due to issues on the agency’s side.

It is hard to overstate how disruptive delayed refunds and unresolved notices can be for taxpayers. Families structure their annual budgets around the timely arrival of the refund checks, and a lengthy delay can throw their budget into chaos, particularly if the taxpayers aren’t able to find out when they can expect to receive a check.

Similarly, a notice from the IRS to the taxpayer can cause enormous confusion or anxiety, especially when an individual is unable to get in touch with the agency quickly enough to answer their questions and address unresolved issues.

While this bill wouldn’t reverse the recent ill-advised staffing and funding cuts pushed by this administration that are undermining the progress we made with the IRA, it will go a long way toward alleviating the harm to taxpayers.

The provisions in this bill aim to reduce the long-term demands on the agency by increasing the level of infor-

mation available to taxpayers online and facilitating plans to digitize tax returns and correspondence.

It would also require the IRS to provide personalized electronic updates to taxpayers regarding the status of their returns and refunds, which should reduce the agency’s incoming call volume.

Additionally, it would push the agency to implement customer callback technology and add a real-time service dashboard to its website to display call volumes, wait times, and promote the availability of its callback services. All these add up to an improved taxpayer experience and a more efficient IRS.

I greatly appreciate Mr. SCHWEIKERT’s efforts with this bill to improve the IRS, and I hope that we can build on our success here and give the agency the resources it needs to provide the stellar customer service the American people deserve.

Mr. Speaker, I strongly support this measure. I urge a “yes” vote, and I reserve the balance of my time.

Mr. SMITH of Missouri. Mr. Speaker, I yield such time as he may consume to the gentleman from Arizona (Mr. SCHWEIKERT), the sponsor of this legislation, who as our Ways and Means Oversight Subcommittee chairman is a tireless advocate for embracing new technology to improve services at the IRS.

Mr. SCHWEIKERT. Mr. Speaker, I ask the chairman whether it is tireless or annoying. It is one or the other.

Look, I have an absolute fixation, and I have got to thank my Democratic colleague and a number of the team here for tolerating my fixation on the fact that one of the ways you work within the IRS budget to make things more efficient is the adoption of technology.

Imagine a world—because it is the one we live in—where some of the number one calls we get to my district office are IRS questions: Where is my refund? Do I owe money? I can’t get someone to pick up the phone. How do I get information?

This piece of legislation is a great start. It will provide wonderful visibility. The concept that on this thing we all walk around with, this super-computer we have in our pocket, I can go on and actually see the dashboard. I can see: Hey, I owe money. I have money coming back. Here is where it is in process. Here are my different years. The ability to actually have a system that calls you back.

In many ways, these are technologies the private sector has had for a decade. In many ways, these are actually technologies that we have been talking about in the Ways and Means Committee for almost a decade, but now we finally have a fairly simple piece of legislation here that means that taxpayers in the next couple of years will be able to log on an absolutely private login system, so we protect their identity, protect their privacy, but they will be able to see the information. By

the ability to see that dashboard, that dashboard means they don't have to be picking up the phone and calling the IRS. They don't have to be sitting there on hold for hours. They don't have to be—I would argue, if you want taxpayer participation in a voluntary tax system as we are, make it easy to understand where you are at, what you owe, and what is owed to you.

Mr. Speaker, I also thank the Ways and Means staff. I would like to go further, but this is a terrific start.

□ 1530

Mr. BEYER. Mr. Speaker, I yield myself the balance of my time.

The American people deserve a first-rate customer experience when they interact with the IRS. This legislation will help the agency reach that goal.

The IRS has been under tremendous pressure to do more with less in recent years, and based on the success of last year's filing season, it has proven it can rise to the challenge.

This bill will focus the agency's efforts on providing timely information to taxpayers, speed the digitization of forms and correspondence, and implement other resource- and time-saving measures. These provisions will take some of the load off of the IRS, its limited resources, and overworked staff, all while improving the experience for the taxpayers.

I greatly appreciate the bipartisan support for this bill and the leadership of tireless and annoying Congressman SCHWEIKERT. I hope that the success of this initiative will lead to more bipartisanship on tax administration going forward, and I look forward to working with my colleagues across the aisle to further improve the IRS.

Mr. Speaker, I urge my colleagues to vote for the bill, and I yield back the balance of my time.

Mr. SMITH of Missouri. Mr. Speaker, I yield myself the balance of my time.

Mr. Speaker, it is disappointing, though sadly not surprising, that we have to legislate to modernize an agency like the IRS so that its operations are more user-friendly to the American taxpayer, but that is the reality that we are facing.

The Taxpayer Experience Improvement Act pushes the IRS to be an agency more worthy of the taxpayers it serves and more responsive to their needs, whether it is tracking a tax refund, receiving a call back from the agency, or making a payment.

Mr. Speaker, I encourage my colleagues to support this legislation, and I yield back the balance of my time.

The SPEAKER pro tempore. The question is on the motion offered by the gentleman from Missouri (Mr. SMITH) that the House suspend the rules and pass the bill, H.R. 7971, as amended.

The question was taken; and (two-thirds being in the affirmative) the rules were suspended and the bill, as amended, was passed.

A motion to reconsider was laid on the table.

IRS WHISTLEBLOWER PROGRAM IMPROVEMENT ACT

Mr. SMITH of Missouri. Mr. Speaker, I move to suspend the rules and pass the bill (H.R. 7959) to amend the Internal Revenue Code of 1986 to make improvements with respect to the treatment of whistleblowers, and for other purposes, as amended.

The Clerk read the title of the bill.

The text of the bill is as follows:

H.R. 7959

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE; ETC.

(a) *SHORT TITLE.*—This Act may be cited as the “IRS Whistleblower Program Improvement Act”.

(b) *AMENDMENT OF 1986 CODE.*—Except as otherwise expressly provided, whenever in this Act an amendment is expressed in terms of an amendment to a section or other provision, the reference shall be considered to be made to a section or other provision of the Internal Revenue Code of 1986.

(c) *REFERENCES TO SECRETARY.*—For purposes of this Act, the term “Secretary” means the Secretary of the Treasury or the Secretary's delegate.

(d) *TABLE OF CONTENTS.*—The table of contents of this Act is as follows:

Sec. 1. Short title; etc.

Sec. 2. Standard and scope of review of whistleblower award determinations.

Sec. 3. Whistleblower privacy protections.

Sec. 4. Modification of IRS whistleblower report.

Sec. 5. Interest on whistleblower awards.

Sec. 6. Correction regarding deductions for attorney's fees.

SEC. 2. STANDARD AND SCOPE OF REVIEW OF WHISTLEBLOWER AWARD DETERMINATIONS.

(a) *IN GENERAL.*—Paragraph (4) of section 7623(b) is amended—

(1) by striking “appealed to” and inserting “reviewed by”, and

(2) by adding at the end the following: “Any review by the Tax Court under the preceding sentence shall be de novo and shall be based on the administrative record established at the time of the original determination and any additional newly discovered or previously unavailable evidence.”.

(b) *CONFORMING AMENDMENT.*—The heading of paragraph (4) of section 7623(b) is amended by striking “APPEAL” and inserting “REVIEW”.

(c) *EFFECTIVE DATE.*—The amendments made by this section shall apply to petitions under section 7623(b)(4) of the Internal Revenue Code of 1986 which are pending on, or filed on or after, the date of the enactment of this Act.

SEC. 3. WHISTLEBLOWER PRIVACY PROTECTIONS.

(a) *IN GENERAL.*—Paragraph (6) of section 7623(b) is amended by adding at the end the following new subparagraph:

“(D) *WHISTLEBLOWER ANONYMITY BEFORE THE TAX COURT.*—Notwithstanding sections 7458 and 7461, a whistleblower may elect to proceed anonymously before the Tax Court for all proceedings under this section absent a finding by the Tax Court that a societal interest exists for disclosing the whistleblower's identity which exceeds the potential harm disclosure could cause to the whistleblower.”.

(b) *EFFECTIVE DATE.*—The amendments made by this section shall apply to petitions under section 7623(b)(4) of the Internal Revenue Code of 1986 which are pending on, or filed on or after, the date of the enactment of this Act.

SEC. 4. MODIFICATION OF IRS WHISTLEBLOWER REPORT.

(a) *IN GENERAL.*—Section 406(c) of division A of the Tax Relief and Health Care Act of 2006 is

amended by striking “such use,” in paragraph (1) and inserting “such use (which shall include a list and descriptions of the top tax avoidance schemes, not to exceed 10, disclosed by whistleblowers during such year)”.

(b) *EFFECTIVE DATE.*—The amendments made by this section shall apply to reports for fiscal years ending after the enactment of this Act.

SEC. 5. INTEREST ON WHISTLEBLOWER AWARDS.

(a) *IN GENERAL.*—Section 7623(b) is amended by adding at the end the following new paragraph:

“(7) *INTEREST.*—

“(A) *IN GENERAL.*—If the Secretary has not provided notice to an individual described in paragraph (1) of a preliminary award recommendation before the applicable date, the amount of any award under this subsection shall include interest from such date at the overpayment rate under section 6621(a).

“(B) *EXCEPTION.*—No interest shall accrue under this paragraph after the date on which the Secretary provides notice to the individual of a preliminary award recommendation.

“(C) *APPLICABLE DATE.*—For purposes of this paragraph, the applicable date is the date that is 12 months after the first date on which—

“(i) all of the proceeds resulting from actions subject to the award recommendation have been collected, and

“(ii) either—

“(I) the statutory period for filing a claim or suit for refund has expired, or

“(II) the taxpayers subject to the actions and the Secretary have agreed with finality to the tax or other liabilities for the periods at issue, and either the taxpayers have waived the right to file a claim or suit for refund or any claim or suit for refund has been resolved.”.

(b) *EFFECTIVE DATE.*—

(1) *IN GENERAL.*—The amendments made by this section shall take effect 180 days after the date of the enactment of this Act.

(2) *SPECIAL RULE.*—If, as of the date described in paragraph (1)—

(A) the Secretary has not provided notice to the individual of a preliminary award recommendation as described in paragraph (7)(A) of section 7623(b) of the Internal Revenue Code of 1986, as added by this Act, and

(B) the applicable date provided in paragraph (7)(C) of such section, as so added, has passed, the applicable date for purposes of such paragraph (7)(C) is the date that is 12 months after the date described in paragraph (1).

SEC. 6. CORRECTION REGARDING DEDUCTIONS FOR ATTORNEY'S FEES.

(a) *IN GENERAL.*—Section 62(a)(21)(A)(i) is amended by striking “7623(b)” and inserting “7623”.

(b) *EFFECTIVE DATE.*—The amendment made by this section shall apply to taxable years ending after the date of the enactment of this Act.

The SPEAKER pro tempore. Pursuant to the rule, the gentleman from Missouri (Mr. SMITH) and the gentleman from California (Mr. THOMPSON) each will control 20 minutes.

The Chair recognizes the gentleman from Missouri.

GENERAL LEAVE

Mr. SMITH of Missouri. Mr. Speaker, I ask unanimous consent that all Members may have 5 legislative days to revise and extend their remarks and include extraneous material on this bill under consideration.

The SPEAKER pro tempore. Is there objection to the request of the gentleman from Missouri?

There was no objection.

Mr. SMITH of Missouri. Mr. Speaker, I yield myself such time as I may consume.