



Exhibit A - Research Credit Claim Check Sheet (Published 5/2008)

Research Credit Claim Check sheet		
TP NAME:		
TAX YEAR:		
Procedure:	Date Completed	
1) Enforce compliance with Notice 2008-39 (i.e. claim filing required at Ogden Service Center).		
2) Verify if I.R.C. §280C(c)(3) election was made on original return. If election is made only on the claim, enforce compliance with I.R.C. § 280(c)(3) LMSB Directive procedures for invalid elections.		
3) Verify “overpayment” status for each return year to determine if a refund claim or only amended return (i.e. refund due or only impacts NOL or GBC carryovers).		
4) Review tax transcripts to verify activities on account for source year and any carryover years affected.		
5) Decide whether claim should be examined within the current examination cycle. Joint committee and “late cycle” circumstances should be considered.		
6) Apply mandated tracking codes to the appropriate examination year(s).		
7) Issue Research Credit Claims mandatory IDR.		
8) Secure Engagement Letter to confirm preparer fee arrangement and details of the engagement.		
9) Evaluate RC claim IDR responses and engagement letter information with an RCTA.		
10) Perform computational procedures per the Computation Check sheet		
11) Decide whether Notice of Claim disallowance should be issued, or whether additional examination procedures are needed.		
12) Decide whether there are deficiencies in the approach or methodology of the RC claim study.		
13) In determining the scope of the examination, consider: (1) whether taxpayer has a long history of claiming RCs on original returns vs. 1 st time RC claim; (2) multiple year claims vs. 1 year claim; and (3) change in overall approach from original return to compute the credit vs. only claiming additional credit.		
14) Formulate examination plan.		
15) Consider potential “high risk” non-compliance issues.		
16) Prepare and issue additional IDRs if necessary to assure that requests were made for the proper documents and information to support any required examination adjustments to the claim.		
17) Prepare audit reports (F5701 & F886A) to explicitly address study methodology, adequacy of documentation and other evidence. Focus on clear and concise presentation of facts and examination procedures conducted. If non-compliance issue(s) exist, prepare individual reports by I.R.C. §41 sub-issues, presenting facts and legal arguments.		
18) Consider appropriateness of Penalties, such as the Preparer Penalty under §6694 and the Erroneous Refund Penalty under §6676.		
19) If applicable, respond to taxpayer’s written protest with formal written rebuttal(s).		

