



TaxNewsFlash

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Rev. Proc. 2021-10: Process for appealing adverse bond determinations, arbitrage rebate claim denials

The IRS released an advance version of Rev. Proc. 2021-10 to provide procedures for an issuer of tax-advantaged bonds to request an administrative appeal to IRS Office of Appeals of a proposed adverse determination made by the office that is responsible for examinations of tax-advantaged bonds with respect to certain issues.

[Rev. Proc. 2021-10](#) [PDF 101 KB] applies to proposed adverse bond determinations and arbitrage rebate claim denials.

The revenue procedure sets out, among other items, how to initiate the administrative appeals process, the information required, and the timeline for an IRS response to an appeal. It also addresses the effect of certain final adverse bond determinations or final arbitrage rebate claim denials. No user fee applies to either a request for an appeal pursuant to this revenue procedure or a closing agreement resulting from the appeal.

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