
From: Abner Donna J
Sent: Wednesday, June 06, 2012 5:53 AM
To: Paz Holly O
Subject: RE: advocacy cases - next steps - RESPONSE NEEDED

Hi Holly,
Just a few slight differences from my notes of our conversation last week. See below:

From: Paz Holly O
Sent: Tuesday, June 05, 2012 2:24 PM
To: Lerner Lois G; Thomas Cindy M; Abner Donna J; Light Sharon P
Subject: advocacy cases - next steps - RESPONSE NEEDED
Importance: High

Below is a draft email setting forth next steps as to the various buckets of advocacy cases. Please review and let me know if I have missed anything or stated anything incorrectly. If it looks OK to you, please let me know that as well. Once I hear from all of you, I will send this email to everyone on the team. Thanks!

Set forth below is a summary of the bucketing results. This email outlines the next steps to be taken with regard to each bucket.

83 c/3s bucketed:

16 approval
16 limited development
23 general development
28 likely denial

199 c/4s bucketed:

65 approval
48 limited development
56 general development
30 likely denial

Bucket 1:

C4s

Faye and Jodi will make calls to all c4 applicants who were sent development letters but have not yet responded before favorable determination letters are sent using the script already provided. Faye and Jodi will send the favorable c4 determinations using the letter already provided.

C3s

Faye and Jodi will make calls to make calls to all c3 applicants who were sent development letters but have not yet responded before favorable determination letters are sent. The phone script already provided will be modified accordingly by Faye and Jodi. Faye and Jodi will send the favorable c3 determinations. Addendum 1 to the c4 letter will be added to our standard favorable c3 letter. The second addendum to the c4 letter referencing the section of the pub re: political activity is not necessary.

Donor Information

C4s that provided names of their donors in response to an additional information request from the IRS will be sent a letter (to be sent in a separate email) indicating that the request was made in error and we have destroyed that information. This applies to c4 applicants that provided the information in response to a development request specifically requesting a list of all donors, a development request to detail all sources of revenue or any other additional development request by the IRS. It does not apply to c4s that provided this information in their application. In cases meeting this criteria, this letter must be sent before the favorable determination is sent.

Quality Review

In light of the small number of disagreed cases, Quality will now shift from 100% mandatory review to reviewing one of every 10 cases in bucket 1. Holly - I understood that the shift to a sample review was for the c4 approvals in bucket #1. For the c3's we were to begin reviewing the bucket #1 approvals. Like with the c4's - if the initial reviews are favorable - meaning agreement on most then we will shift to a sample review at that point. An attempt will be made to assign the review to Daniel or Mike since they are most familiar with these cases but neither will review cases he bucketed. Because of the priority given to the assignment all Cincinnati reviewers - including Daniel and Mike - are reviewing the cases. All bucket #1 case reviews are expected to be completed this week. Disagreed cases will be discussed by QA, the individuals who completed the bucketing worksheets and/or reconciliation sheet, and Sharon to reach a mutual decision re: the appropriate action on the case. If a mutual decision cannot be reached, the case will be elevated to me for decision.

Bucket 2:

Jodi, Faye, Grant, Janine, and Carly will draft the development letters consisting of the questions listed by the bucketers on the bucketing worksheets. Each letter is to be reviewed by Hilary, Matthew or Andy before it is sent based on the following partnering:

Andy -- Faye (all c3 cases)

Matthew -- Carly and Grant

Hilary -- Jodi and Janine

Hilary and Matthew should consult with Andy if they have any questions.

If an applicant was previously sent a development letter but has not yet responded, the individual assigned to write the development letter will first call the applicant to direct them to disregard the prior development letter and that a new letter will be coming (modifying phone script provided for bucket 1 cases). The new development letter should also contain such a statement (language can be pulled from first addendum to favorable c4 letter).

The assigned Determinations specialist should email the assigned DC reviewer the development letter. In reviewing the letter, the DC reviewer will look at the application on TEDS and the organization's website (if applicable).

Quality will review the the cases once a response has been received and the Determinations specialist has reached a decision on the case - just like a regular mandatory review case. Initially, all bucket 2 cases will be sent to Quality, but this will be reduced to a sampling based on the results of the review. I will send a message to the team when we are ready to shift to a sampling review.

Bucket 3:

Same as bucket 2 except the individual assigned the case will have to draft the questions. Bucket 2 cases should be done before bucket 3 cases.

Bucket 4:

Cindy will send me the 10 oldest c4 cases. She will indicate whether the case will be assigned to Mitch or to Joseph. Judy will work with Mitch, and Justin will work with Joseph. Judy and Justin will draft a development letter. Tom Miller will review the development letter. Mitch and Joseph will send the development letter and coordinate with Judy/Justin on reviewing the response.

Mitch will handle all c3s in bucket 4. He will determine whether these organizations could qualify under c4 and, if so, contact the applicant to inform them that we do not believe they qualify under c3 but may under c4 and instruct them to submit 1024 if they are interested in pursuing c4 status.

Bucketing Going Forward:

Mitch and Joseph will each review and bucket all new receipts that meet the definition of advocacy case on the BOLO. Sharon will be involved in any reconciliation discussions needed if Mitch and Joseph place cases in different buckets.

Tracking Going Forward:

Ron Bell will be responsible for tracking the advocacy cases going forward. He will use the spreadsheet created by Sharon. Everyone should notify Ron when a case is sent to their manager for closing.