FTD COMPLIANCE CARD — M1e IA Payment Calculator

Fbaum Enterprises LLC d/b/a The Federal Tax Desk | Version 1.2 | Issued 2026-07-15 | Last verified 2026-07-29

HOW TO USE THIS CARD FOR §10.36 COMPLIANCE

OPR Alert 2026-19 (June 24, 2026) requires firms to vet third-party tools and document that vetting under Circular 230 §10.36. To satisfy this requirement using this card:

1. Print or save this PDF. Date your review in the space provided at the bottom of this card.
2. Add this card to your firm's AI tool inventory or WISP third-party provider list.
3. Before first use with any client matter, verify that the dollar thresholds in Element 3 match current IRS.gov content by following the verification steps in that element — installment agreement thresholds are one of the figures most likely to change.
4. Document that verification with the date and your initials.
5. Your completed card constitutes the §10.36 vetting documentation for this tool.

ELEMENT 1 — TOOL IDENTIFICATION

Tool name / version
M1e IA Payment Calculator, version 1.2

FTD issue date
2026-07-15

Most recent update
2026-07-29

Last verified against source
2026-07-29

Governing authority
IRC §6159(c); IGM SBSE-05-0325-0008; IGM SBSE-05-0126-0008; IRM 5.14.5.2, .3, .4; IRM 5.14.7, 5.14.7.4; IRM 5.14.1.2(3), (4); IRM 5.15.1

Threshold source
IGM SBSE-05-0325-0008 and IGM SBSE-05-0126-0008, live-fetched 2026-07-24; confirmed against irs.gov/payments/simple-payment-plans-for-individuals-and-businesses same day; formal IRM 5.14 text not yet republished to reflect either IGM; IRC §6159(c), uscode.house.gov, fetched 2026-07-12

Source URLs
irs.gov/pub/foia/ig/spder/sbse-05-0325-0008-public.pdf; irs.gov/pub/foia/ig/sbse/sbse-05-0126-0008-public.pdf; irs.gov/payments/simple-payment-plans-for-individuals-and-businesses; irs.gov/irm/part5/irm_05-014-001r; irs.gov/irm/part5/irm_05-014-005; irs.gov/irm/part5/irm_05-014-007; uscode.house.gov (26 U.S.C. §6159)

Note: IA dollar thresholds are the kind of figure that lags across sources. Before this tool's eligibility logic was finalized, the SB/SE interim-guidance raise of the Streamlined threshold from $25,000 to $50,000 and the term from 60 to 72 months was flagged for verification that it was fully incorporated into current IRM text (not just interim guidance). A live fetch on 2026-07-12 confirmed the $50,000/72-month figures ARE the current IRM text in both IRM 5.14.1 (2024 revision) and IRM 5.14.5 (2021 revision) — the pre-flagged threshold risk was confirmed correct rather than found stale. No placeholder citations were needed anywhere in this tool. (Superseded 2026-07-24 — see the next note and the version 1.1 correction log entry: the 72-month figure itself went stale twelve days later.)

Note: Version 1.1 correction (2026-07-13): the original release routed any business account with a mixed trust-fund/income-tax liability composition to the financial-analysis-required path regardless of aggregate balance, as a conservative judgment call flagged for review. A live re-fetch of IRM 5.14.5.4(1)(a) on 2026-07-13 confirmed the aggregate SUMRY balance test includes "tax, assessed penalty and interest, and all other assessments on the tax modules" with no composition-purity requirement, and paragraph (1)(c)'s note that Express IAs cover "ALL IBTF accounts" does not exclude mixed accounts. Forrest reviewed and adopted the plain aggregate reading: IBTF Express now keys off the $25,000 aggregate balance alone, with a caveat disclosed in the tool's output for mixed-composition accounts recommending confirmation with the assigned revenue officer, since IRM 5.14.5.4 does not squarely address the mixed case even though it doesn't exclude it. (This caveat carries forward unchanged into version 1.1's Simple Payment Plan (Business Trust Fund) — see below.)

Note: Version 1.1 correction (2026-07-24): a live IRS.gov check plus two Interim Guidance Memoranda (SBSE-05-0325-0008, Mar. 3, 2025, and SBSE-05-0126-0008, Jan. 30, 2026 — both fetched and read directly) showed the 72-month Streamlined and 24-month IBTF Express terms are stale. Both programs are renamed (Streamlined Installment Agreement -> Simple Payment Plan; In-Business Trust Fund Express -> Simple Payment Plan (Business Trust Fund)), the DDIA/PDIA requirement is removed entirely at any balance, and the fixed term is replaced by pay-in-full-by-the-CSED — there is no longer a separate fixed-month cap for either program. The $50,000 and $25,000 balance ceilings are unchanged. IGM SBSE-05-0126-0008 also extends Simple Payment Plan eligibility to in-business BMF accounts with a purely non-trust-fund liability, previously excluded entirely under Streamlined. Because the operative rule is genuinely CSED-based, the tool now requires a CSED date to compute a numeric minimum payment for these two types; absent one, it surfaces a CSED-required message instead of a number. Neither IGM affects Guaranteed IA (IRC §6159(c)) or the IRM 5.14.7.4 financial-analysis-required path. The formal IRM text has not been republished to reflect either IGM as of this fix — cite the IGMs directly alongside IRM 5.14.5 until it is, and re-verify the next time this tool is touched.

ELEMENT 2 — WHAT THIS TOOL DOES

The M1e IA Payment Calculator evaluates eligibility for the Guaranteed, Simple Payment Plan, and Simple Payment Plan (Business Trust Fund) installment agreement programs against IRC §6159(c), IGM SBSE-05-0325-0008, IGM SBSE-05-0126-0008, and IRM 5.14.5, recommends the best available agreement type (or flags that a full Form 433-A/433-B/CIS financial analysis is required), computes the minimum monthly payment (Guaranteed: over its fixed 36-month statutory term, capped at the CSED if closer; Simple Payment Plan / Simple Payment Plan (Business Trust Fund): paid in full by the CSED, which is now required as an input for those two types to produce a number), and produces a simplified lien-filing-risk indicator and an optional feasibility check against a practitioner-proposed payment. Direct debit/payroll deduction is no longer required for any currently-supported type.

Inputs

Taxpayer type; aggregate unpaid balance of assessment; filing and current-year compliance status; whether a prior IA was entered in the preceding 5 years; for business taxpayers, in-business/out-of-business status and liability composition; optionally, a proposed monthly payment; a CSED date (required to compute a numeric minimum payment for Simple Payment Plan / Simple Payment Plan (Business Trust Fund) results). No taxpayer-identifying information.

Output

Recommended agreement type; eligibility breakdown for each administrative type with citation; minimum monthly payment and term (or the Form 433 requirement, or the CSED-required message, with reason); direct-debit requirement (always No under current guidance); lien-filing-risk indicator; optional proposed-payment feasibility assessment; threshold currency statement; limitation disclosure; a copy-paste-ready plain-text block.

What this tool IS

This tool produces a calculation reference for practitioner use.

What this tool IS NOT

This tool does not produce tax advice, legal advice, or written advice subject to Circular 230 §10.37. It does not model Partial Payment Installment Agreements, Offers in Compromise, or Currently Not Collectible status, and its lien-filing-risk indicator is a simplified proxy, not the IRM 5.12 lien-filing determination. The practitioner retains full professional responsibility for all conclusions presented to clients.

ELEMENT 3 — ACCURACY AND VERIFICATION

Primary sources

IRC §6159(c) (Guaranteed IA statutory basis, $10,000 threshold, 3-year term); IRM 5.14.5.3 (Guaranteed IA); IGM SBSE-05-0325-0008 (Simple Payment Plan for IMF accounts, $50,000 ceiling, pay-in-full-by-CSED, DDIA/PDIA removed); IGM SBSE-05-0126-0008 (Simple Payment Plan (Business Trust Fund) for BMF trust-fund accounts, $25,000 ceiling; Simple Payment Plan extended to in-business/OOB BMF non-trust-fund accounts); IRM 5.14.5.2, .4 (formal text not yet republished to reflect either IGM); IRM 5.14.7.4 (financial-analysis-required); IRM 5.14.1.2(3) (CIS trigger), (4) (threshold restatement); IRM 5.15.1 (Financial Analysis Handbook).

Placeholder citations

None. Every dollar threshold and citation in this tool traces to a same-day live fetch of the governing IGM PDFs and/or irs.gov, unlike the M1f CSED Calculator's two IRM-analog placeholders.

Update trigger

This card and the tool are updated within 5 business days of an IRS threshold change, an IGM revision or expiration, formal incorporation of an IGM into IRM 5.14 (which supersedes the IGM citation), or a correction being discovered.

How to verify the IA calculation

1. Navigate to irs.gov/payments/simple-payment-plans-for-individuals-and-businesses and confirm the current Simple Payment Plan description (pay-in-full-by-CSED, $50,000 ceiling) is still current.
2. Fetch IGM SBSE-05-0325-0008 (irs.gov/pub/foia/ig/spder/sbse-05-0325-0008-public.pdf) and IGM SBSE-05-0126-0008 (irs.gov/pub/foia/ig/sbse/sbse-05-0126-0008-public.pdf) directly — do not rely on the

consumer-facing summary page alone — and confirm both remain in effect (check each memo's Expiration Date) and have not been superseded by a newer control number.
3. Check whether IRM 5.14.1, 5.14.5, 5.14.7, 5.14.10, or 5.4.11 has been republished to formally incorporate either IGM; if so, the formal IRM text supersedes the IGM as the citation to use, and this tool should be re-verified against it.
4. Confirm IRC §6159(c) text at uscode.house.gov or a current annotated code (Guaranteed IA, $10,000 threshold, unaffected by either IGM).
5. Confirm IRM 5.14.7.4's current subsection number and financial-analysis trigger for in-business trust-fund accounts that exceed the $25,000 Simple Payment Plan (Business Trust Fund) ceiling.
6. Independently verify the aggregate unpaid balance (CC SUMRY), the taxpayer's actual filing/current-year compliance status, and the CSED — this tool takes all three as given inputs and does not query IDRS.

Known limitations — KNOWN FAILURE MODES

- This tool does not model Partial Payment Installment Agreements, Offers in Compromise, or Currently Not Collectible status — only the three administrative IA types and the full-433 fallback.
- This tool does not evaluate the levy-release-request or "Solely to Delay" (IRM 5.14.3.3, including indicators of pyramiding or successor entities) exclusions that remove a business account from Simple Payment Plan / Simple Payment Plan (Business Trust Fund) eligibility regardless of balance (IGM SBSE-05-0126-0008). Confirm neither applies before relying on a business result.
- Simple Payment Plan and Simple Payment Plan (Business Trust Fund) terms run to the CSED, not a fixed month count. Without a CSED date, the tool cannot compute a numeric minimum payment for these two types and instead surfaces a message directing the practitioner to obtain the CSED (e.g., via the M1f CSED Calculator) first.
- Simple Payment Plan (Business Trust Fund) eligibility keys off the $25,000 aggregate SUMRY balance alone (IRM 5.14.5.4(1)(a)) and applies to both pure trust-fund and mixed trust-fund/income-tax liability compositions (added in version 1.1, carried forward unchanged). For a mixed-composition account, the tool's output includes a caveat that the trust-fund test does not squarely address the mixed case and recommends confirming eligibility with the assigned revenue officer before assuming a full Form 433 isn't required.
- In the narrow edge case of an out-of-business taxpayer with a trust-fund liability at or under $25,000 (eligible for both Simple Payment Plan and Simple Payment Plan (Business Trust Fund)), this tool recommends Simple Payment Plan because it is evaluated first in the function order — a judgment call, not a distinction drawn in either IGM, and worth a second look by the practitioner for that specific fact pattern.
- Lien-filing risk reflects that no NFTL determination is required for Guaranteed, Simple Payment Plan, or Simple Payment Plan (Business Trust Fund) accounts under current guidance; it is not the actual Notice of Federal Tax Lien filing determination, which has its own criteria under IRM 5.12 for accounts routed to financial analysis or a full 433.
- The minimum-payment calculation assumes level monthly payments over the full term; it does not model balloon payments, graduated payment structures, or a partial-pay case.

ELEMENT 4 — DATA HANDLING

This tool does not receive or store tax return information. No §7216 consent is required for use of this tool.

Data retention: No inputs are logged. Amounts entered are processed entirely in your browser and are never transmitted to or stored by FTD. Anonymous, aggregate usage events (for example, that a calculation was run) are recorded with no input values and no personal data.

ELEMENT 5 — CIRCULAR 230 / SSTS 1.4 COMPLIANCE STATEMENT

This tool is designed for use by tax practitioners subject to Circular 230. Use of this tool does not satisfy the practitioner's obligation to exercise due diligence under Circular 230 §10.22 or to possess technological competence under Circular 230 §10.35. The practitioner must independently verify tool outputs before relying on them in client matters or submissions to the IRS. OPR Alert 2026-19 (June 24, 2026) confirms that practitioners may not delegate professional judgment to software tools.

ELEMENT 6 — TOOL CLASSIFICATION

TOOL CLASSIFICATION: This tool is a deterministic calculation engine, not a generative AI tool. Given the same taxpayer type, balance, compliance answers, and business details, it always returns the same eligibility determination and payment. It does not generate, infer, or predict outputs. The practitioner retains full obligation to exercise appropriate judgment and verify outputs before relying on them in client matters.

ELEMENT 7 — UPDATE AND CORRECTION LOG

Table A — Version History

Date	Version	Change Description	Trigger
2026-07-15	v1.0	Initial release — Guaranteed/ Streamlined/IBTF Express eligibility engine, minimum-payment calculation with CSED capping, direct-debit and lien-filing-risk indicators; thresholds verified against a live IRM/IRC fetch	Initial tool build; build gate cleared 2026-07-02; deploy held pending the applicable Task Schedule gate
2026-07-24	v1.1	Streamlined Installment Agreement renamed Simple Payment Plan; In-Business Trust Fund Express renamed Simple Payment Plan (Business Trust Fund); fixed 72-month and 24-month terms replaced with pay-in-full-by-CSED (CSED now required to compute a numeric minimum payment for these two types); DDIA/PDIA requirement removed entirely; Simple Payment Plan eligibility extended to in-business BMF accounts with a purely non-trust-fund liability; lien-filing-risk logic simplified to reflect NFTL determination is no longer required for either program at any balance within the ceiling; $50,000/$25,000 balance ceilings unchanged	Drift-sweep review, triggered by a live IRS.gov check during unrelated fact-checking; confirmed via direct fetch of IGM SBSE-05-0325-0008 and IGM SBSE-05-0126-0008
2026-07-29	v1.2	Added an IGM_RECHECK_BY constant (2027-03-03, the earlier of the two governing IGMs' own 2-year IRM-republication checkpoints) and a companion test asserting today's date has not passed it. No threshold, citation, or eligibility logic changed — the $10,000/$50,000/$25,000 ceilings and both IGM citations were re-verified live against irs.gov and confirmed still current; this change makes the IGMs' own re-verification checkpoint machine-checkable instead of relying on a human noticing it has passed.	Fleet-wide currency sweep; IGM SBSE-05-0325-0008/ SBSE-05-0126-0008 re-confirmed live, no correction needed

Table B — Correction Log (OPS-002)

Date	Error Class	Description	Authority	Affected TCs

2026-07-12	Threshold assumption confirmed correct (pre-build verification)	The Streamlined $25,000!'$50,000/60!'72-month SB/SE interim-guidance change was flagged as needing confirmation that it was fully incorporated into current IRM text, not just interim guidance. A live fetch confirmed the current IRM 5.14.1 (2024 rev.) and IRM 5.14.5 (2021 rev.) text both state $50,000/72 months verbatim — no correction was needed.	IRM 5.14.1.2(4); IRM 5.14.5.2 (irs.gov, fetched 2026-07-12)	N/A — pre-build verification, no shipped code affected
2026-07-13	Overly conservative eligibility logic (caught pre-deploy, addendum v1.1)	The initial build routed any mixed trust-fund/ income-tax business liability to financial-analysis-required regardless of aggregate balance. A live re-fetch of IRM 5.14.5.4(1)(a) confirmed the aggregate SUMRY balance test has no composition-purity requirement; Forrest reviewed and adopted the plain aggregate reading. IBTF Express now keys off the $25,000 aggregate balance for mixed accounts too, with an output caveat recommending revenue-officer confirmation. Source SHA-256 changed as a result.	IRM 5.14.5.4(1)(a), (1)(c) (irs.gov, fetched 2026-07-13)	N/A — pre-deploy correction, tool not yet publicly live

2026-07-24	Stale fixed term (drift sweep, version 1.1)	The tool stated a 72-month term for Streamlined and a 24-month term for IBTF Express. A live IRS.gov check plus direct fetch of IGM SBSE-05-0325-0008 (Mar. 3, 2025) and IGM SBSE-05-0126-0008 (Jan. 30, 2026) confirmed both fixed-term calculation methodologies were removed and replaced with pay-in-full-by-the-CSED, both programs were renamed (Simple Payment Plan / Simple Payment Plan (Business Trust Fund)), the DDIA/PDIA requirement was removed entirely, and Simple Payment Plan was extended to in-business BMF non-trust-fund accounts. Note: an initial proposal considered a like-for-like swap to a fixed 120-month term based on the IRS.gov consumer page's "up to 10 years" language; the primary-source IGM text does not support a fixed 120-month cap — it is genuinely CSED-based — so the fix implemented here differs from that initial proposal and requires a CSED input to produce a numeric minimum payment for these two types. /ia has been a live, public route since July 15, 2026 — the stale fixed-term/DDIA logic this fix replaces was reaching real users until this fix shipped. Source SHA-256 changed as a result.	IGM SBSE-05-0325-0008; IGM SBSE-05-0126-0008; irs.gov/payments/simple-payment-plans-for-individuals-and-businesses (all fetched 2026-07-24)	/ia is live and public — practitioners using the tool before this fix received the stale 72/24-month terms and an inapplicable DDIA requirement

FIRM ADOPTION RECORD

Tool reviewed and adopted by (practitioner name and credentials):

Firm name:

Date of initial review:

IA thresholds verified

	against IRS.gov on:
	Initials:
	[ ] This card has been added to firm's §10.36 AI tool inventory.