

SEC. 41108. CLARIFICATION OF WHISTLEBLOWER AWARDS.

(a) Definition of Proceeds.--

(1) In general.--Section 7623 is amended by adding at the end the following new subsection:

“(c) Proceeds.--For purposes of this section, the term ‘proceeds’ includes--

“(1) penalties, interest, additions to tax, and additional amounts provided under the internal revenue laws, and

“(2) any proceeds arising from laws for which the Internal Revenue Service is authorized to administer, enforce, or investigate, including--

“(A) criminal fines and civil forfeitures, and

“(B) violations of reporting requirements.”.

(2) Conforming amendments.--Paragraphs (1) and (2) (A) of section 7623(b) are each amended by striking ‘‘collected proceeds (including penalties, interest, additions to tax, and additional amounts) resulting from the action’’ and inserting ‘‘proceeds collected as a result of the action’’.

(b) Amount of Proceeds Determined Without Regard to Availability.--Paragraphs (1) and (2) (A) of section 7623(b) are each amended by inserting ‘‘(determined without regard to whether such proceeds are available to the Secretary)’’ after ‘‘in response to such action’’.

(c) Disputed Amount Threshold.--Section 7623(b) (5) (B) is amended by striking ‘‘tax, penalties, interest, additions to tax, and additional amounts’’ and inserting ‘‘proceeds’’.

(d) <<NOTE: 26 USC 7623 note.>> Effective Date.--The amendments made by this section shall apply to information provided before, on, or after the date