

Attorney-Advisor in the Office of International Tax Counsel

Priority Application Deadline is September 8, 2023

Job Description: The Office of International Tax Counsel is made up of a small group of lawyers and other advisors that develop and review policy and legal matters addressing all aspects of the U.S. international tax system and advise the Assistant Secretary for Tax Policy and other Treasury officials on related issues. Attorney-advisors in the office assist Congressional staff in drafting tax legislation and work with the Internal Revenue Service to draft and develop Treasury regulations and other guidance to implement the international aspects of the tax code. Attorney-advisors also are responsible for negotiating and reviewing double taxation treaties and other bilateral and multilateral tax agreements, as well as representing the United States in various international organizations including the Organization for Economic Cooperation and Development (OECD).

Attorney-advisors work in the Main Treasury Building located at 1500 Pennsylvania, Ave. Partial telework is permitted; full remote work schedules may be considered in extraordinary circumstances, depending on the relevant experience of the applicant and the needs of the office. Some international travel may be required.

Relevant Qualifications and Experience: Applicants must have graduated from an accredited law school with an LLB, JD, or equivalent, be a member in good standing of a bar in a state or territory of the United States or the District of Columbia, and have at least 6 years of relevant legal experience (which may include a judicial clerkship). In certain circumstances, the education requirements may be met by being a C.P.A. in good standing in a state or territory of the United States or the District of Columbia, depending on the relevant experience of the applicant and the needs of the office. Applicants must be U.S. citizens or nationals.

Applicants should have significant experience in the field of international taxation. The office is particularly interested in applicants with the experience in the following areas:

- taxation of non-U.S. persons and entities on their U.S. income,
- exchange of information,
- taxation of U.S. persons and entities (in particular, pass-through entities) on their foreign income,
- foreign tax credits,
- interpretation of U.S. income tax treaties.

Applicants should also have strong legal research and writing skills, as well as an interest in public service.

Our office places a high value on diversity of experiences and perspectives and encourages applications from individuals from all ethnic and racial backgrounds, veterans, LGBTQ+ individuals, and persons with disabilities.

To Apply: Please email a resume to taxpolicyrecruiting@treasury.gov and reference **ITC Attorney-Advisor position** in the subject line. The application deadline is **September 8, 2023**, however applications received later may be considered on a case-by-case basis. Any questions may also be submitted to taxpolicyrecruiting@treasury.gov.