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FBAR information collection from U.S. citizens who reside outside the United States is an undue burden due to lack of awareness, confusion of filing requirements, and definitions - even tax professionals aren't aware of the filing requirements, which puts taxpayers at risk of disproportionately high penalties.

The FBAR should exclude Americans abroad to reduce the signal-to-noise ratio so Treasury can devote its resources to the actual overseas money launders. Some banks refuse American citizens because of the reporting burden on their side.

Americans abroad are treated as collateral damage in the war against overseas tax evasion and money laundering. The IRS recognizes Americans abroad as an underserved community.

Surely reporting could be improved if the rules were simplified and better explained.

The Department of Treasury should work with Congress to bring the US into line with the entire rest of the world in the way it taxes its expats.