DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

APPEALS

October 13, 2017

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Expiration Date: 4/23/2019
Affected IRMs: 8.22.5
8.20.5
8.20.7
5.19

MEMORANDUM FOR: Director, Collection Appeals
Director, Case & Operations Support
Director, Account & Processing Support
Director, Appeals Quality Measurement System
Director, Collection Campus Operations

FROM: Kristen E. Bailey, Director /s/ Kristen E. Bailey
Collection Policy

Anita M. Hill, Director /s/ Anita M. Hill
Appeals, Case & Operations Support

SUBJECT: Paperless Collection Due Process (CDP) Case Work

This memorandum reissues guidance in AP-08-0417-0004, *Interim Guidance for Paperless Collection Due Process (CDP) Case Work*, issued on April 24, 2017, for paperless procedures on CDP cases worked by Appeals Technical Employees (ATE), Account and Processing Support (APS), Tax Examining Technicians (TE), and Automated Collection System Support (ACSS) Employees located in the Fresno Campus. Please ensure this information is distributed to all affected employees within your organization.

Purpose: AP-08-0417-0004 provided for 25 cases per week to be uploaded to Fresno Appeals by Fresno ACSS. This memorandum changes that number to a *minimum* of 25 cases per week. The number of uploaded cases may be increased, at weekly intervals, upon mutual agreement between ACSS and Appeals.

Background: As a modernization effort, Appeals is implementing paperless processes wherever possible. Appeals already transitioned to paperless processes in the Collection Appeals Program (CAP) work stream and in certain docketed Examination cases. Since fiscal year 2015, Appeals has also successfully worked a limited number of CDP cases in a paperless environment.

Procedural Change: CDP cases will be processed electronically to eliminate receiving, storing and returning paper case files to and from originating functions.

Effective Date/Effect on Other Documents: This guidance is effective as of the date of this memorandum and will be incorporated into the affected IRMs by the expiration date on this memorandum.

Contact: If you have any questions, please contact:

- Timothy Sample, Senior Program Analyst for Appeals
- Gerald Younger, Tax Analyst for SBSE Collection Policy

Attachment:
Step-by-step guidance and glossary of naming conventions

cc: www.irs.gov

Step	Description	Notes/Information
1	ACS uploads new CDP/EH case to SharePoint	After the case is approved for transfer to Appeals, ACS uploads the new CDP case to SharePoint following the How to Map to Share Point Network Drive desk guide. Files should use the following naming convention: (FRC)_(Four Character Name Control)_(Last Four of TIN). No Form 3210 Transmittal is required.
2	APS cards in the new CDP/EH case and uploads the PDF documents from SharePoint to ACDS	The receiving APS office assigns the new receipts to APS TEs from SharePoint on the ACDS system. Once the new receipt is created in ACDS, the APS TE attaches the electronic file received from ACS to the ACDS database and adds feature code EZ. APS adds the WUNO to the CDP Paperless SharePoint list.
3	APS alerts the ATM of the new receipts for assignment	Via systemic E-mail, APS alerts the ATM that there are new receipts for assignment.
4	The ATM or delegate assigns the case to a Technical Employee	On Share Point, the ATM or delegate reviews the new receipts and selects technical employees to be assigned the case(s). The employee is selected from a list of E-mail addresses available via a Share Point drop-down list, or will be added manually (by the Appeals CDP Analyst) if unavailable from the list. Both the technical employee and ATM or delegate receives a systemic E-mail notification for each assignment. The case is separately assigned to the technical employee via ACDS.
5	The Technical Employee works the case following current policy and converts all documents received to an electronic format that is attached to ACDS	The Technical employee works the CDP/EH case under existing procedures. The Technical Employee should encourage the taxpayer to submit any additional information via the Technical Employee's E-eFax number. Any paper documents sent to or received from the taxpayer are converted to an electronic format and attached to the ACDS database. Documents are attached and named as indicated in the addendum, generally: 1. A brief description of the document 2. Form or letter number (if applicable) 3. WUNO 123456789 4. Version 5. Date e.g. [Decision Letter L3210 WUNO 123456789 Ver. 2 04-03-2017] **Note:** For paperless cases that are transferred to other Appeals offices, the receiving office will have the option to work the case following these procedures, or work from a paper case file. If a paper case is preferred, the receiving office will create it and remove the EZ feature code from ACDS. The Share Point record may then be deleted by the ATM or by APS.

6	Destroy certain original documents	Original documents should be destroyed after confirming they were successfully scanned and attached to ACDS. Return any documents to the taxpayer (if requested). **Note:** Be sure to retain electronically all documents you reviewed. Such documentation is necessary to frame the complete basis of your decision, which is critical in the event a case needs to be defended in Tax Court. See IRM 8.22.9.2 for details of the administrative record. **Exception:** Documents that require an original signature should be retained, as required, but attached electronically to the ACDS record nonetheless. These documents may include: a) Original Form 656, Offer in Compromise b) MMIA or DDIA signed documents c) Other required documents Upon case closing, any documents requiring an original signature should be forwarded to the appropriate compliance function monitoring section that will monitor the agreement.
7	The Technical Employee prepares all closing documents and secures the approval of the ATM. Closing documents are attached to ACDS.	At closure, the Technical Employee prepares all closing documents (generally, Form 5402 and closing letters) electronically or in paper form, depending on the signature method that is chosen. Documents may be digitally or hand signed as long as the final, signed PDF document is attached to ACDS. Generally, documents will be: a) signed by hand, scanned and attached to ACDS as a PDF, or b) converted to PDF, digitally signed by the Technical Employee as needed, then E-mailed to the ATM for digital signature and attachment to ACDS c) converted to PDF, digitally signed and attached to ACDS by both the Technical Employee and ATM, as needed. d) Any other method as long as a final, signed document is attached to ACDS as a PDF. **Note:** Any closing letters or correspondence to be sent to taxpayers and/or representatives that are digitally signed must include a signature that bears only a facsimile of the employee's hand signed name. Signatures must not include SEID, date, Adobe graphics or other employee information.
8	The ATM reviews the case and signs all necessary closing documents.	If the ATM concurs with the case resolution, they will review the closing documents and attach the final, signed documents to ACDS as a PDF.
9	The ATM enters the ACAP date in ACDS and then notifies APS that the case is ready for closure.	When the ATM enters an ACAP date to the ACDS database, the approved case is electronically transmitted to the appropriate APS PEAS Inbox using the Direct Ship criteria. The ATM accesses the CDP Paperless Share Point and initiates an email to the APS mailbox to alert that an electronic CDP case is ready for closure. The E-mail is systemic, and is initiated by the ATM selecting the appropriate APS E-mail address via Share Point.

10	The APS PTM checks the APS update mailbox and assigns the case to a TE.	The APS PTM checks the APS update mailbox and assigns the case to a TE.
11	APS prints the closing letter(s) and applies the date of mailing and Certified mail receipt number.	APS prints and date stamps the closing letter(s). For CDP or EH cases with an innocent spouse or abatement of interest claim, prepare the certified mail document(s) and also add the certified mail receipt number to the letter(s).
12	APS converts to PDF the closing letter with the date stamp and certified mail receipt number and attaches it to ACDS.	APS converts to PDF the dated closing letter(s) issued to the taxpayer and or the POA and attaches the letter(s) to the ACDS Record. APS mails the closing letter(s) on the same day they are dated.
13	At the appropriate time, APS closes the case on ACDS and sends F5402 via E-eFax to ACS. When applicable, upload the certified mailing receipt to ACDS.	After any applicable case suspense period, APS closes the case on ACDS and performs all established closing procedures and electronically sends the following documents to ACS as a PDF: • The Form 5402 • Form 433-D for DDIA (if required) The 5402 will be sent via E-eFax to the ACS site following established procedures.
14	The electronic file resides on ACDS and is to be purged 3 years **after** the close of the fiscal year in which the case was closed	It's no longer necessary to send an administrative paper file to "files", as administrative files are housed on ACDS and purged at the appropriate time.

15	***Interims:*** For any case on which an account adjustment or credit transfer is required, this step is applied based upon the timing of the ATE's request. ***Note:*** When an OIC, MMIA or PPIA is accepted, follow established IRM procedures – as this **acceptance document** will be in paper format.	**Interim Adjustment**: a. The ATE will prepare, sign and upload the F-3870 (including all necessary coding) as an attachment to the ACDS record. Refer to 8.22.7.8.1., *Interim Adjustments* b. APS uses the F-3870 prepared by the ATE, reviews and edits to ensure appropriate Hold/Source/Reason and Priority Codes are included. Also enter in Remarks and on the ADJ54 input screen "RSD" for Retained Source Document. c. If there were any changes made to the original F-3870, upon completion of the ADJ54 input, convert the final F-3870 adjustment document to an electronic file and attach it to the ACDS record. **Closing Adjustment**: d. Upon receipt of the closing request in ACDS, APS uses the F-3870 uploaded by the ATE to process the account adjustments as part of the closing action. Refer to Interim adjustment procedures b. and c. above for additional information. See IRM 8.20.6.18.3, *Partial Interim Assessment/Abatement Non-AIMS CC: REQ54/ADJ54,* IRM 8.20.7.11.1, *Non-AIMS Adjustments General Closing,* IRM 8.20.7.11.2, *Non-AIMS CC: REQ54/ADJ54* for working F3870s.
	Addendum	Glossary of Document Naming Conventions

Addendum: Glossary of Naming Conventions

There are two components to saving and attaching a document to ACDS. The first is naming and saving the file to your computer. The second is naming the document on ACDS. The first item should be saved by using the item description followed by the WUNO. The second is a simple, quickly recognizable description. Items not included in the table below should follow the same naming convention.

Index of Naming Conventions for Forms, Letters, etc.

Type	No.	Title	Save to Folder As: (e.g. Decision Letter L3210 WUNO 123456789 Ver. 2)	Description When Attaching
Form		ACDS Update Request Form	ACDS Update Request Form WUNO 123456789 Ver. X	ACDS Update Request
Form		30-40 Transfer Form	30-40 Transfer Form WUNO 123456789 Ver. X	30-40 Transfer Form
Form		CDP – Attachment	ACM Attachment WUNO 123456789 Ver. X	ACM
Form		Fax Cover Page – TP	Fax Cover Page – TP WUNO 123456780 Ver. X	Fax – TP
Form		Fax Cover Page – REP	Fax Cover Page – REP WUNO 123456789 Ver. X	Fax – REP
Form	12256	Withdrawal of Request for CDP or Equivalent Hearing	Withdrawal F12256 WUNO 123456789 Ver. X	CDP Withdrawal
Form	12257	Waiver of Right to Judicial Review	Waiver F12257 WUNO 123456789 Ver. X	CDP Waiver
Form	12523	Bankruptcy Resolution Checklist for CDP/EH File	BK Resolution Checklist F12523 WUNO 123456789 Ver. X	BK Resolution Checklist
Form	13929	Bankruptcy Resolution Transmittal Memorandum – CDP Cases	BK Resolution Transmittal F13929 WUNO 123456789 Ver. X	BK Resolution Transmittal
Form	14111	ASFR-SFR Routing Sheet	ASFR-SFR Routing Sheet F14111 WUNO 123456789 Ver. X	ASFR-SFR Routing Sheet
Form	14559	Appeals Offer in Compromise Memorandum	Appeals OIC Memorandum F14559 OIC WUNO 123456789 Ver. X	OIC ACM
Form	14561	Income and Expense/Asset Equity Calculation Table	Income and Expense/Asset Equity Calculation Table F14561 WUNO 123456789 Ver. X	IE/AET
Form	14640	Addendum to Form 656	Addendum to Form 656 F14640 OIC WUNO 123456789 Ver. X	656 Addendum
Form	2209	Courtesy Investigation	Courtesy Investigation F2209 WUNO 123456789 Ver. X	Courtesy Investigation
Form	2261	Collateral Agreement	Collateral Agreement F2261 WUNO 123456789 Ver. X	Collateral Agreement
Form	2261c	Waiver of Net Operating Loss	Waiver – NOL F2261c WUNO 123456789 Ver. X	Waiver of NOL
Letter	3193	Tax Court	NOD L3193 WUNO 123456789 Ver. X	NOD
Letter	3210	Decision	Decision Letter L3210 WUNO 123456789 Ver. X	Decision Letter
Letter	3846	Contact – Frivolous Issue	SCL Frivolous L3846 WUNO 123456789 Ver. X	SCL Frivolous
Form	3870	Request for Adjustment	Adjustment F3870 WUNO 123456789 Ver. X MM-DD-YYYY	F3870 Request for Adjustment
Letter	3978	Supplemental NOD	Supplemental NOD L3978	Supplemental NOD

			WUNO 123456789 Ver. X	
Letter	4000	Last Chance	Last Chance L4000 WUNO 123456789 Ver. X	Last Chance Letter
Letter	4299	CDP Bankruptcy	NOD Bankruptcy L4299 WUNO 123456789 Ver. X	NOD Bankruptcy
Letter	4300	Equivalent Bankruptcy	Decision Letter Bankruptcy L4300 WUNO 123456789 Ver. X	Decision Letter Bankruptcy
Form	433A	Collection Information Statement for Wage Earners and Self Employed Individuals	CIS F433A WUNO 123456789 Ver. X	F433A CIS
Form	433B	Collection Information for Businesses	CIS F433B WUNO 123456789 Ver. X	F433B CIS
Form	433F	Collection Information Statement	CIS F433F WUNO 123456789 Ver. X	F433F CIS
Form	433D	Installment Agreement	Installment Agreement F433D WUNO 123456789 Ver. X	F433D Installment Agreement
Form	4340	Certificate of Assessments and Payments	Certificate of Assessments F4340 WUNO 123456789 Ver. X	Certificate of Assessments
Letter	4380	Frivolous Acknowledgement	Frivolous Acknowledgement L4380 WUNO 123456789 Ver. X	Frivolous Acknowledgement
Letter	4381	Disregard Frivolous	Disregard Frivolous L4381 WUNO 123456789 Ver. X	Disregard Frivolous
Letter	4382	Closing Letter F12257	Waiver Closing Letter L4382 WUNO 123456789 Ver. X	Waiver Closing Letter
Letter	4383	Withdrawal Acknowledgement	Withdrawal Acknowledgement L4383 WUNO 123456789 Ver. X	Withdrawal Acknowledgement
Letter	4388	Withdrawal Solicitation	Withdrawal Solicitation L4388 WUNO 123456789 Ver. X	Withdrawal Solicitation
Letter	4389	NOD: CDP/ABINT	NOD Interest Abatement L4389 WUNO 123456789 Ver. X	NOD ABINT
Letter	4390	NOD: CDP/IS	NOD Innocent Spouse L4390 WUNO 123456789 Ver. X	NOD Innocent Spouse
Letter	4439	Decision EH & IS	Decision Letter L4439 Innocent Spouse WUNO 123456789 Ver. X	Decision Letter IS
Letter	4440	Decision: EH & INT AB	Decision Letter ABINT L4440 WUNO 123456789 Ver. X	Decision Letter ABINT
Letter	4836	Substantive Contact	SCL L4386 WUNO 123456789 Ver. X	SCL
Letter	4837	Substantive Contact UAL	SCL/ACK L4387 WUNO 123456789 Ver. X	SCL/ACK
Form	4844	Request for Terminal Action	Request for Terminal Action F4844 WUNO 123456789 Ver. X	Request for Terminal Action
Form	5402	Customized	F5402 WUNO 123456789 Ver. X	F5402 SO Signed
Form	5402	Customized	F5402 WUNO 123456789 Ver. X	F5402 ATM Signed
Form	5402	Customized	F5402 WUNO 123456789 Ver. X	F5402 Dated - Final
Letter	5490	OIC Acceptance Letter	OIC Acceptance Letter L5490 OIC WUNO 123456789 Ver. X	L5490 Acceptance
Letter	5491	DATL OIC Acceptance Letter	DATL OIC Acceptance Letter L5491 OIC WUNO 123456789 Ver. X	L5491 Acceptance
Form	656	Offer	Offer in Compromise F656 WUNO 123456789 Ver. X	
Form	7249	Offer Acceptance Report	OIC Acceptance Report L7249 WUNO 123456789 Ver. X	F7249 Offer Acceptance Report
		Correspondence to TP	Correspondence to TP WUNO 123456789 Ver. X	Correspondence to TP (MMDDYYYY)
		Correspondence to REP	Correspondence to REP WUNO 123456789 Ver. X	Correspondence to REP (MMDDYYYY)
		Correspondence to Third Party	Correspondence to Third Party WUNO 123456789 Ver. X	Correspondence to Third Party (MMDDYYYY)
		Correspondence from TP	Correspondence from TP WUNO 123456789 Ver. X	Correspondence from TP (MMDDYYYY)
		Correspondence from REP	Correspondence from REP WUNO 123456789 Ver. X	Correspondence from REP (MMDDYYYY)

	Correspondence from Third Party	Correspondence from Third Party WUNO 123456789 Ver. X	Correspondence from Third Party (MMDDYYYY)
	IDRS Prints	IDRS WUNO 123456789 Ver. X	IDRS (TXMODA, ENMOD, etc.)