



MANUAL TRANSMITTAL

Department of the Treasury
Internal Revenue Service

4.24.21

AUGUST 28, 2025

EFFECTIVE DATE

(08-28-2025)

PURPOSE

- (1) This revises IRM 4.24.21, Excise Tax, Case Closings.

MATERIAL CHANGES

- (1) Refer to the table below for a description of the material changes made.

Subsection	Description of Change
IRM 4.24.21.1, Program Scope and Objectives	Reorganized content. Internal Controls must follow template in IRM 1.11.2.2.4 per the IMD Coordinator.
IRM 4.24.21.1.3, Responsibilities	Changed title to Roles and Responsibilities. Internal Controls must follow template in IRM 1.11.2.2.4 per the IMD Coordinator.
IRM 4.24.21.1.4, Program Objectives and Review	Changed title to Program Management and Review. Internal Controls must follow template in IRM 1.11.2.2.4 per the IMD Coordinator.
IRM 4.24.21.1.5, Terms/Definitions and Acronyms	Changed title to Program Controls. Added program controls. Internal Controls must follow template in IRM 1.11.2.2.4 per the IMD Coordinator. Moved Terms and Acronyms to IRM 4.24.21.1.6
IRM 4.24.21.1.6, Related Resources	Changed title to Terms and Acronyms. Internal Controls must follow template in IRM 1.11.2.2.4 per the IMD Coordinator. Moved Terms/Definitions and Acronyms from IRM 4.24.21.1.5 to here. Moved Related Resources to IRM 4.24.21.1.7.
New IRM 4.24.21.1.7	Changed title to Related Resources. Internal Controls must follow template in IRM 1.11.2.2.4 per the IMD Coordinator. Moved Related Resources from IRM 4.24.21.1.6 to here.
IRM 4.24.21.4.1, Paper Closing/Electronic Issue Management System (IMS) Closing	Updated title to Electronic Issue Management System Closing and incorporated IGM SBSE-04-0424-0013, Electronic Case Closing Procedures in the Issue Management System, which provides guidance on electronic case closures in IMS.
IRM 4.24.21.4.3, Form 3198 – Special Handling Notice for Examination Case Processing	Incorporated IGM SBSE-04-0424-0013. Removed broken link to model copies of Form 3198. The form is now generated in IMS and examples are no longer needed.

Subsection	Description of Change
IRM 4.24.21.4.4, Form 5344 -Examination Closing Record	Incorporated IGM SBSE-04-0424-0013. Removed broken link to model copies of Form 5344. The form is now generated in IMS and examples are no longer needed.
IRM 4.24.21.4.5, Form 5351 - Examination Non-Examined Closings	Removed broken link to model copies of Form 5351. The form is now generated in IMS and examples are no longer needed.
IRM 4.24.21.5.1.1, Paper Survey Procedures	Updated title to Survey Procedures for Cases With Original Returns and incorporated IGM SBSE-04-0424-0013.
IRM 4.24.21.5.1.2, Paperless Survey Procedures	Updated title to Survey Procedures for Cases Without Original Returns and incorporated IGM SBSE-04-0424-0013.
IRM 4.24.21.5.2, Closing Procedures for Agreed Cases	Incorporated IGM SBSE-04-0424-0013.
IRM 4.24.21.5.4, Closing Procedures for No Change Cases	Incorporated IGM SBSE-04-0424-0013.
IRM 4.24.21.5.5, Closing Procedures for No Liability Cases	Incorporated IGM SBSE-04-0424-0013.
IRM 4.24.21.6.1, Review of Case	Incorporated IGM SBSE-04-0424-0013.
IRM 4.24.21.6.2, Case Documentation	Incorporated IGM SBSE-04-0424-0013.
Exhibit 4.24.21-2, Excise Workpaper Naming Convention Quick Guide	Removed poor quality graphic. Naming conventions can be found on the <i>Electronic Case File Initiative ECFI</i> page in the Excise Tax Knowledge Base.
Throughout IRM 4.24.21	Fixed all broken links and updated all outdated IRM references.

(2) Editorial changes were made throughout this IRM.

EFFECT ON OTHER DOCUMENTS

This material supersedes IRM 4.24.21 dated September 8, 2023, and incorporates Interim Guidance Memorandum (IGM) SBSE 04-0424-0013, Electronic Case Closing Procedures in the Issue Management System, dated April 16, 2024.

AUDIENCE

This section is for Excise Tax Program managers, revenue agents (RAs), and fuel compliance agents (FCAs) (RAs and FCAs are collectively and hereinafter known as “examiners” throughout this section).

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Small Business/Self Employed

4.24.21

Case Closings

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4.24.21.1
(08-28-2025)
Program Scope and Objectives

- (1) **Purpose** - This IRM provides specific information and procedural guidance about closing examined and non-examined Excise Tax Examination cases. For compliance purposes, it is essential that the Excise Tax Program managers, senior-level officials, and examiners understand and correctly follow the technical guidance and closing processes explained in this IRM section.

Note: The case closing procedures for Excise Tax Program claims are found in IRM 4.24.8, Examination Guidance for Excise Claims for Refund or Abatement.

- (2) **Audience** - This IRM is for Excise Tax Program managers and examiners who close cases.
- (3) **Policy Owner** - Director, Examination - Specialty Policy, is responsible for the administration, procedures, and updates related to closing cases.
- (4) **Program Owner** - Director, Examination - Specialty Tax, owns Excise Tax Examination.
- (5) **Primary Stakeholders** - Independent Office of Appeals (Appeals), Agency-Wide Shared Services, Counsel, Excise Tax Examination, SB/SE Field and Specialty Exam Quality (FSEQ), and Large Business and International (LB&I) are the primary stakeholders for this IRM.

4.24.21.1.1
(09-08-2023)
Background

- (1) The requirement for filing Form 720, Quarterly Federal Excise Tax Return, applies separately to each tax, listed by IRS Number (IRS No.), on the face of the return. For filing purposes, IRS Nos. that are left blank are considered non-filed even if the taxpayer or collector signed, dated, and submitted to the IRS a Form 720 that was accepted by the agency.

4.24.21.1.2
(09-08-2023)
Authority

- (1) The Excise Tax Program is governed by policy statements and other internal guidance that apply to all IRS personnel regardless of operating division. The policy statements found in IRM 1.2.1, Servicewide Policy Statements, apply to all excise tax issues and examinations. Examiners should review these policy statements to properly perform their examination duties when closing cases.
- (2) *Delegation Order and Policy Statements by Process* summarizes data contained in the applicable IRM sections under IRM 1.2.2, Servicewide Delegations of Authority, in a single, electronic source.
- (3) IRM 4.24, Excise Tax, provides Servicewide instructions for all operating divisions with employees involved with the correct filing, reporting, and payment of excise taxes, as well as case closings. IRM 4.24 serves as the foundation for consistent administration of excise taxes by various IRS operating divisions. By providing one source of authority for all operating divisions, IRS greatly reduces philosophical and procedural inconsistencies.

4.24.21.1.3
(08-28-2025)
Roles and Responsibilities

- (1) Director, Examination - Specialty Policy, is responsible for providing policy and guidance for Excise Tax Examination employees and ensuring consistent application of policy, procedures, and tax law to effect tax administration while protecting taxpayer rights.
- (2) Director, Examination - Specialty Tax, is responsible for the delivery of policy and guidance that impacts the field and campus examination processes.

- (3) Chief, Estate & Gift/Excise Tax Exam, is responsible for ensuring information about closing cases is communicated to and carried out by managers and examiners.
- (4) Excise Tax Program managers and examiners should thoroughly familiarize themselves with case closings procedures and information contained in this IRM, as well as other resources, such as those listed in IRM 4.24.21.1.7.

4.24.21.1.4
(08-28-2025)
**Program Management
and Review**

- (1) **Program Goals** - The information explained in this IRM describes case closing procedures that examiners must understand and apply in the performance of their job duties to close examination reports correctly, thereby increasing compliance. The processes and procedures provided in this IRM are consistent with the objectives or goals for Excise Tax Examination addressed in IRM 1.1.16.5.3.1, Excise Tax Examination.
- (2) **Program Reports** - Information regarding the reporting of program objectives are included on, but not limited to Examination Headquarters Monthly Briefings, Program Manager Monthly Briefings, SB/SE Examination Operational Reviews, and Business Performance Reviews. These reports provide reliable and timely information. Periodic program reviews are conducted to:
 - Determine if procedures are being followed.
 - Validate the policies and procedures.
 - Identify and share best practices.
- (3) **Program Effectiveness** - Program effectiveness is measured by the Exam Quality Review System (EQRS) staff, located in FSEQ, that supports the SB/SE quality improvement program utilizing National Quality Review System (NQRS) to conduct independent case reviews from a statistically valid sample of examination case work. National, area, and territory trend analyses on the quality attributes establish baselines to assess program performance, identify opportunities to improve work processes, analyze causes for failure, assess the feasibility of possible solutions, and measure the success of quality improvement efforts.

4.24.21.1.5
(08-28-2025)
Program Controls

- (1) Program Manager, Excise Tax Policy, is responsible for reviewing information in this IRM annually to ensure accuracy and promote consistent tax administration.
- (2) Refer to IRM 4.24.21.1.4 for information about program goals, reports, and effectiveness.

4.24.21.1.6
(08-28-2025)
Terms and Acronyms

- (1) The following table contains terms and their definitions used throughout this IRM.

Term	Definition
30-day letter	Written communication issued to the taxpayer that reports the Excise Tax Examination findings. This includes Letter 950-E, 30-Day Letter - Straight Deficiency or Over-Assessment for Excise Tax Examination Cases, Letter 5153-E, Examination Report Transmittal - Statute, Letter 569-X, Claim Disallowance Letter, and Letter 6517, Paid Fuel Claim Short Statute Assessment.

Term	Definition
AMDISA	IDRS command code will display up to seven screens, if the modifier “A” is added to IDRS command code AMDIS and input with the Tax Identification Number (TIN), File Source, Master File Tax (MFT) (or Plan Number), and Tax Period.
BMFOLI	IDRS command code to request on/off line status of entity and tax modules.
BMFOLR	IDRS command code to request Business Master File (BMF) return screen information.
BMFOLT	IDRS command code to request BMF tax module screen information.
BRTVU	IDRS command code to gain read-only access to the tax return data submitted by business taxpayer.
CFINK	IDRS command code to research the Central Authorization File (CAF).
INOLES	IDRS command code to display specific data for the account addressed.
TXMODA	IDRS command code to request for display all tax module information for a specific tax period.

(2) Refer to Exhibit 4.24.21-1 for acronyms used throughout this IRM.

4.24.21.1.7 (08-28-2025)

Related Resources

- (1) Refer to IRM 4.10.1, Overview of Examiner Responsibilities, for guidance about the basic responsibilities related to taxpayer rights, employee contact information, oral and written communication, and the authority for conducting examinations that examiners should understand and apply in the performance of their duties.
- (2) Refer to IRM 4.10.2, Pre-Contact Responsibilities, for guidance about required responsibilities and analyses that must be completed before an examination is initiated, actions that are necessary for pre-contact planning of the examination, procedural instructions for contacting the taxpayer, and scheduling the initial appointment.
- (3) Refer to IRM 4.10.8, Report Writing, for guidance about the preparation of audit reports, details regarding the preparation of corrected reports, and discussion about issues that require special reports and forms.
- (4) Refer to IRM 4.24.8, Examination Guidance for Excise Claims for Refund or Abatement, for general guidelines and report writing procedures for examiners and campus personnel who process claims for refund or credit.
- (5) Refer to IRM 4.24.10, Appeals Referral Procedures, for information about closing unagreed cases (other than claims) to Appeals.
- (6) Refer to IRM 4.24.17, Excise Summary Terminal Activity Reporting System (ExSTARS) Compliance Examination Procedures, for guidance about fuel terminal and carrier compliance examination letters and reports.
- (7) Refer to IRM 4.24.20, Excise Tax Report Writing Guide, for guidance about examination report writing guidelines for examiners.

- (8) Refer to IRM 4.24.25, Issue Management System (IMS), Notebook and Workpapers, for guidance about the preparation of workpapers that support accurate examination reports.
- (9) The Taxpayer Advocate Service (TAS) may be of assistance to taxpayers experiencing economic harm, who are seeking help in resolving tax problems that have not been resolved through normal procedures or who believe that an IRS system or procedure is not working as designed. Pub 1546, The Taxpayer Advocate Service is Your Voice at the IRS, provides contact and additional information. For guidance, refer to the *Taxpayer Advocate - Contact Us*.
- (10) The Taxpayer Bill of Rights lists rights that already existed in the tax code, putting them in simple language, and grouping them into 10 fundamental rights. Employees are responsible for being familiar with and acting in accordance with taxpayer rights. For additional information, refer to IRC 7803(a)(3) or to the *Taxpayer Bill of Rights*.

4.24.21.2
(05-12-2017)
**Closing Information for
Examinations**

- (1) This section provides information on procedures for closing an examination of excise tax returns (returns).
- (2) All excise tax field groups should forward agreed, no change, and surveyed cases to Cincinnati Centralized Case Processing (CCP) for closing via Form 3210, Document Transmittal.

Note: If a taxpayer failed to timely respond to a 30-day letter or otherwise failed to satisfy the requirements for a review of case findings by Appeals, that case should be sent to CCP via Form 3210. Refer to IRM 4.24.10.2, Prerequisites for an Appeals Referral, for further guidance.

- (3) Unagreed and partially agreed cases going to Appeals are routed through Technical Services (Tech Services). Refer to IRM 4.24.10, Appeals Referral Procedures, for additional guidance.

4.24.21.3
(09-08-2023)
**Case Closing Time
Frames**

- (1) Taking timely actions on a case is an essential element for managing the examination cycle time and is key to taxpayer satisfaction. Nationally mandated time frames dictate when the examiner must initiate, follow-up, or complete certain actions.
- (2) The current time frames for case action may be found in the exhibit of IRM 4.2.8-1, National Standard Time Frames for Case Action. Specific case closing time frames are addressed in the subsections below.
- (3) The examiner must document Form 9984, Examining Officer's Activity Record, the date a case file is closed to the manager.

Note: Examiners must use the Examining Officer's Activity Record in IMS for case file documentation.

- (4) Examiners must also document Form 9984 when there are gaps that exceed the recommended national time frames for taking actions. The manager must make comments on a Form 9984 or Case Level Activity Record in IMS. Documentation must explain the facts and circumstances that caused the delay. Time frames may be extended when documentation establishes the examiner and/or manager exercised ordinary care and prudence.

4.24.21.3.1
(09-08-2023)

**Time Frame for Closing
Agreed and/or No
Change Cases**

- (1) For NQRS reviews, agreed and no change examinations are to be closed in 30 calendar days measured from the date the agreed report is received, or the date the no change status is communicated to the taxpayer, to the date the case is closed from the group and updated in Examination Return Control System (ERCS).

Note: When there are gaps that exceed the recommended national time frames for taking actions, refer to IRM 4.24.21.3(4) for additional guidance.

- (2) For EQRS reviews, agreed and no change examinations are to be closed within 30 calendar days. The 30 days are divided as follows:
 - a. The examiner has 15 days to close agreed and no change examinations to the manager. The 15-day period begins on the earlier of the date the agreed report is received from the taxpayer or the date the no change status is communicated to the taxpayer. The 15-day period ends on the day the case is mailed to the manager and/or the IMS case file is updated for closing.
 - b. The manager has 15 days to close agreed and no change examinations from the group. The 15-day period is measured from the date the case is mailed to the manager or the IMS case file is updated to the manager to the date the case is updated to closing status on ERCS.
- (3) The time frame is calculated beginning the day immediately following the occurrence of one of the events described immediately above.

4.24.21.3.2
(07-08-2020)

**Time Frame for Closing
Agreed Cases with
Unpaid Deficiencies of
\$100,000 and Greater**

- (1) Agreed cases with unpaid deficiencies of \$100,000 and greater are to be closed in 4 calendar days.

Note: The unpaid deficiency applies per tax period not the aggregate amount.

- (2) The time frame is measured from the date the agreed report is received to the date the case is closed from the group and updated in ERCS.

4.24.21.3.3
(09-08-2023)

**Time Frame for Closing
Unagreed Cases**

- (1) The examiner and manager have 20 calendar days to close an unagreed case measured from the earlier of:
 - The date to respond to the 30-day letter, or
 - The date the request for an Appeals conference is received from the taxpayer.

- (2) The time frame is calculated beginning the day immediately following the occurrence of one of the events described immediately above.

Note: When there are gaps that exceed the recommended national time frames for taking actions, refer to IRM 4.24.21.3(4) for additional guidance.

4.24.21.4
(07-08-2020)

**Preparing for Case
Closing**

- (1) Once the examiner issues the examination report, the case must be prepared for closing.
- (2) The IMS case file cannot be closed until a closing document is generated. These include:
 - Form 5344, Examination Closing Record
 - Form 5351, Examination Non-Examined Closings
 - Form 8278, Assessment and Abatement of Miscellaneous Civil Penalties

Note: The examiner does not need to complete Form 8278 when abating a penalty because this is accomplished in IMS on Form 3198.

- (3) As the IRS moves to a paperless closing process, Appeals Officers, reviewers, managers, and examiners can locate documents in IMS if they are indexed and uploaded in a consistent manner using standard naming conventions. This guidance applies to all Excise Tax Examination employees using IMS for case management.
- (4) The following topics address the general steps to prepare the case regardless of the type of closing.

4.24.21.4.1
(04-16-2024)

**Electronic Issue
Management System
Closing**

- (1) The case closing process requires all case files to be closed electronically in the Issue Management System (IMS).
- (2) The examiner must apply judgment and include all necessary key documents in the IMS case file.

Note: The manager's advice should be sought if there is any question about which documents are to be included in the case file.

- (3) Naming conventions contribute to an organized case file and assist users in easily locating specific documents. The examiner must index all documents in the IMS case file and follow the naming conventions found in the related Forms and Documents section of the *Electronic Case File Initiative ECFI* page in the Excise Tax Knowledge Base.

- Workpaper Series (see example 1 below)
- Workpaper/Document Name (see example 1 below)
- Supplemental documents must use the prefix associated with that section plus a numeric page number (see examples 2 below)

Example: 1 - An examiner is assigned a paid claim CRN 360 case for IRS No. 060 (issue 1). In addition, the examiner has expanded the scope of the examination to the federal excise tax paid for IRS No. 060 (issue 2). The issue 1 lead sheet would be named "F001 060 Paid CRN 360 Diesel Fuel Lead Sheet," and the supporting workpaper/document would be named "F002 060 Paid CRN 360 Diesel Fuel Workpaper." The issue 2 lead sheet would be named "G001 060 Diesel Fuel Lead Sheet," and the supporting workpaper/document would be named "G002 060 Diesel Fuel Workpaper."

Example: 2 - Supplemental documents for "B200-1 Required Filing Checks and Referrals" would be named "B200-1-02 IDRS Transcripts."

- (4) The examiner must prepare and save to the IMS case file the Form 15292-B, Excise Tax Case Closing Cover Sheet. The closing documents must be attached to Form 15292-B per Form 15292-B instructions. The examiner must notify the GM via email that the case is ready for review.

Note: The examiner may use the "ECFI-Excise Case Closing Checksheet" found in the related Forms and Documents section of the *Electronic Case File Initiative ECFI* page in the Excise Tax Knowledge Base.

- (5) The manager will review the closed case file in IMS to:

- Ensure file naming conventions are used.
- Check Form 5344 for 40X in the "Block Number" field.
- Ensure that "RETURN REQUESTED" is not present on pg. 2 of the AMDISA.

Note: If "RETURN REQUESTED" is present, then the case must be excluded from electronic closure.

- Sign the closing letter(s) and save to IMS.
 - Verify electronic case indicator (E indicator) is correct when approving ERCS.
- (6) If any deficiencies exist, the manager will reopen the IMS case file and notify the examiner to take corrective action. The manager will document all closing actions in IMS on the Case Level Activity Record. If the manager added or changed any documents, those documents must be uploaded or saved in the IMS case file.
 - (7) The excise tax field group (group) will add the E indicator to the ERCS record during the closing process.
 - (8) The status of the IMS case file must be updated to "closed" by the examiner but not until it reaches either Status "51" or Status "52" on ERCS. The manager has the discretion to determine when to close the IMS case file. When this occurs, the manager must then complete the managerial actions in IMS.
 - (9) After the manager completes the review of the case, Form 15292-B and the ERCS record is emailed to Centralized Case Processing (CCP), at **SBSE CCP Exam Cincinnati*, by the group.
 - (10) After CCP completes the review of the electronic file, the signed Form 15292-B is emailed to the manager and the examiner. The examiner must then upload Form 15292-B in to the IMS case file with all signatures and then close the case off IMS.
 - (11) The closing letters will be mailed by the group and documented.

4.24.21.4.2 (05-12-2017)

Obtain Necessary IDRS Transcripts

- (1) The examiner must verify that the correct statute of limitations (SOL) date for assessment of tax is reflected on all transcripts. Transcripts must be less than 30 days old but preferably less than one week old.
- (2) The examiner must include the following IDRS transcripts in the closed case:
 - AMDIS
 - AMDISA for each period - attached to the inside left of the case file folder
 - BMFOLT (reflecting the most current module activity) - attached to the back of the return facing outward (for filed returns)
 - INOLES - attached to the inside left of the case file folder
 - CFINK, if there is a representative - attached to the bottom of the first page of the filed return (or BMFOLT for an Substitute for Return (SFR) facing outward
 - TXMODA (current within 30 days of closure) - attached to the back of the filed return (or BMFOLT for an SFR) facing outward

Note: An original return should be used when appropriate. TXMODA may not always be present for a return. For example, TXMODA is not present for an SFR. In some situations, TXMODA may not be present for a filed return. If TXMODA is not present, the examiner should substitute BRTVU for TXMODA.

4.24.21.4.3
(04-16-2024)
**Form 3198 - Special
Handling Notice for
Examination Case
Processing**

- (1) The examiner is responsible for completing Form 3198, Special Handling Notice for Examination Case Processing. It provides closing instructions to CCP and Tech Services, and is prepared in IMS.
- (2) After the examiner enters specific data into IMS, Form 3198 will automatically populate. This will generally result in improved accuracy. The examiner will need to manually complete the remaining applicable fields and itemize the closing data on Form 3198.

Note: For example, the Failure to File, Failure to Pay, and Failure to Deposit penalties are individually entered in IMS as IRC 6651(a)(1), IRC 6651(a)(2), and IRC 6656. These penalties are then listed separately on Form 3198 when generated in IMS. Additionally, if no penalties are asserted, IMS allows the examiner to report “zero” for penalty non-assertion.

- (3) The examiner will provide instructions on Form 3198 and indicate the required letter, form, report, or other materials to enclose in correspondence to the taxpayer based on the type of closure. Refer to IRM 4.24.21.5 for additional guidance.

Note: The mailing of items under “Letter Instructions for CCP” on page two will now be the responsibility of the group.

- (4) If a copy of the closing letter is to be issued to a POA, then the examiner will check the box “Copy to POA -Letter 937” on the second page of Form 3198 under “Letter Instructions for CCP.”
- (5) For cases with agreed and unpaid deficiencies or overassessments of \$100,000 and greater, Form 3198 must be flagged in the “Expedite Processing” section by checking the “Over \$100,000 Agreed and Unpaid” box.
- (6) For cases involving claims or certain overassessments, examiners must determine if restricted interest applies. If restricted interest applies, then Form 3198 must be documented appropriately. Refer to IRM 4.24.8.25, Restricted Interest, for additional information on restricted interest and procedures for documenting Form 3198 when restricted interest applies.
- (7) If Form 3198 is not annotated correctly with all closing actions, the case closing may be delayed, and the case returned to the group for additional closing actions.

4.24.21.4.4
(04-16-2024)
**Form 5344 - Examination
Closing Record**

- (1) Form 5344, Examination Closing Record, serves as an input document for the Audit Information Management System (AIMS), which captures the closing information on examined cases. The system also transmits Form 5344 adjustment information to Master File to update taxpayer account records.

- (2) The examiner must generate Form 5344 in IMS. It automatically populates when data is entered on the “IMS Entity Closing Data” tab. After the examiner has verified Form 5344 is properly completed, then the examiner must click “Submit to IMS.”
- (3) For SFR cases, write “SFR/Original Return” in the top margin of Form 5344. Refer to IRM 4.4.9.5.3.1.1, Prepare Case for Closing, for guidance.
- (4) To complete Form 5344 correctly, a “Block Number” must be manually input into the P38-40 field:
 - a. 40X for closing electronic case files
 - b. 30X for closing paper case files 4
 - c. 10X for closing to Appeals with disposal code 07

4.24.21.4.5
(08-28-2025)
**Form 5351 - Examination
Non-Examined Closings**

- (1) Form 5351, Examination Non-Examined Closings, is used as an input document to close non-examined cases, such as when cases are surveyed to remove them from AIMS.
- (2) The examiner must generate Form 5351 in IMS. Refer to IRM 4.24.21.5.1 for additional guidance on generating and preparing Form 5351.

4.24.21.4.6
(09-08-2023)
**Form 4665 - Report
Transmittal**

- (1) Form 4665, Report Transmittal, (also known as the transmittal letter or T-Letter) is used in unagreed and partially agreed cases. It is not required in agreed cases but may be used if deemed necessary by the examiner.
- (2) In unagreed and partially agreed cases, Form 4665 must summarize the unagreed issues, if necessary, and indicate when the taxpayer was offered the opportunity to discuss the unagreed issues with a manager. Information included on Form 4665 should complement and not repeat information in the report and workpapers.
- (3) Form 4665 must not contain statements or comments intended to influence Appeals’ decision-making process. This includes recommendations concerning what Appeals should consider and how Appeals should resolve the case. It is permissible to include a neutral list of unagreed issues, without discussion, and indicate which ones, if any, are coordinated issues.
- (4) If Form 4665, or other similar document, includes statements or comments that may be considered as prohibited “ex parte communications,” or includes prohibited communications, regardless of whether such content is included as part of a document that is either placed on top of the case file as a transmittal or inserted into the case file in conjunction with preparing the case for transmission to Appeals, the Form 4665 or document must be shared by the examiner with the taxpayer and representative at the time the case file is sent to Appeals.

Note: An “ex parte communication” is an oral or written communication that takes place between any Appeals employee and employees of other IRS functions, without the taxpayer/representative being given an opportunity to participate in the communication. See Rev. Proc. 2012-18, 2012-10 IRB 455, and IRM 4.2.7, Ex Parte Communication Procedures.

- (5) Form 4665 can also be used to request a pre-conference with Appeals. Refer to IRM 4.24.10.9, Appeals Pre-conference Procedures.

- (6) For additional procedures relating to Form 4665, refer to IRM 4.24.10.8, Transferring an Excise Tax Examination Case to Appeals.

4.24.21.5
(07-08-2020)

**Closing Procedures by
Type of Closure**

- (1) Excise Tax Examination cases are closed based on type of closure.
- (2) The examiner is responsible for selecting those forms and letters that apply to the taxpayer's situation. During the examination, the examiner must selectively issue forms and letters directly to the taxpayer and selectively forward letters to CCP to be issued to the taxpayer when the case fully closes. The examiner must complete those forms and letters that are not automatically populated, as well as review and correct them for accuracy.
- (3) Standardized closing letters are generated and deployed in Notebook based on type of closure. Standardized closing forms are generated in IMS.

4.24.21.5.1
(09-08-2023)

**Closing Procedures for
Surveyed Returns**

- (1) If the taxpayer has not been contacted, taxpayer books and records have not been inspected and an examination will most likely not result in a material change to the taxpayer's tax liability, the examiner may survey the return after assignment by completing Form 2503, Survey After Assignment - Excise or Employment Tax, and Form 5351, Examination Non-Examined Closings.

Note: This authority extends to excise returns identified for examination on Form 5346, Examination Information Report.

Note: Under certain conditions, a return may be surveyed after assignment after the taxpayer has been contacted, but before the records have been inspected. Refer to IRM 4.10.2.5.1(3), Conditions Allowing Survey of Returns After Assignment, for additional guidance.

- (2) The examiner must prepare Form 2503 and Form 5351 in IMS by completing the following steps:
 - a. In the "Edit Entity" window in IMS, under the "ERCS Data" tab, select disposal code (DC) "32."
 - b. In the "Returns" window in IMS, select "Add New Return Document" and select "Form 5351" from the drop down.
 - c. In the "Add ERCS Survey Data" window, select the applicable Survey Reason Code (SRC) and complete the "Additional Information" field with an explanation justifying why the case is being surveyed after assignment. Below the "Additional Information" field, select "Form 2503" from the "Survey Form" drop down and complete applicable sections.
 - d. IMS will generate a Form 2503 and Form 5351 populated with data entered by the examiner. Review Form 2503 and Form 5351 and verify that the necessary data fields were populated correctly. Form 5351 must have the appropriate taxpayer's name control, TIN, MFT, period, DC, and Requester/ EGC/ Date.
 - e. Submit Form 2503 and Form 5351 to the manager in IMS by selecting "Edit Return Document Status" and selecting "Submitted for Approval" from the "Form Status" drop down.
- (3) If the manager concurs with the examiner's determination to survey the case after assignment, then the manager will approve Form 2503 and Form 5351 via the IMS Team Website.
- (4) The examiner will close the case in IMS after manager approval of Form 2503

and Form 5351 using the paper survey procedures in IRM 4.24.21.5.1.1 or paperless survey procedures in IRM 4.24.21.5.1.2.

- (5) To support the decision to survey the return after assignment, the examiner must ensure the case file has been documented with all actions taken, which led to this conclusion, including, but not be limited to, consideration of Large, Unusual or Questionable items, completion of required filing checks, consideration of collectibility, evaluation of audit potential, repetitive audits, and other materials that influenced the examiner's decision.
- (6) Paper surveys are required for unpaid claims and cases with original returns in the case file. If not required, paperless survey procedures can be utilized. Refer to IRM 4.24.21.5.1.2 for guidance.
- (7) The examiner should stamp the face of the return or a paper copy of the Business Transactions File View (BRTVU) with the message "Closed Survey After Assignment," "Examiner's Signature and Date," and "Approved - Manager's Signature and Date." If a stamp is not available, the message may be handwritten. The examiner should sign and date the message. The manager should do the same.
- (8) When a return is surveyed **before** assignment DC "31" is used by a manager. When a return is surveyed **after** assignment DC "32" is used by an examiner.
- (9) Refer to IRM 4.24.8.9, Unpaid Claims - Survey After Assignment, and the *Survey* page in the Excise Tax Knowledge Base for more information about closing forms and procedures for surveying excise claim cases.

4.24.21.5.1.1
(04-16-2024)
**Survey Procedures for
Cases With Original
Returns**

- (1) Special survey procedures are required for cases **with original returns** in the case file. If special survey procedures are not required, survey procedures found in IRM 4.24.21.5.1.2 should be utilized.
- (2) If the original return is in the case file, complete Form 2503, Survey After Assignment - Excise or Employment Tax, and Form 5351, Examination Non-Examined Closings, in IMS and submit for managerial approval.
- (3) Upon receiving managerial approval, the examiner must complete and upload the following documents into IMS case file as follows and submit to manager:
 - a. Form 3210, Document Transmittal, Form 3198, and Form 895, Notice of Statute Expiration, if applicable.
 - b. IDRS transcripts for AMDISA, INOLES, and BRTVU (less than 30 days old)
 - c. Form 5351, Form 2503, the return, or BRTVU with TXMODA, Examining Officer's Activity Record in IMS, and Form 5546, Examination Return Charge-Out Sheet, if available
 - d. Form 15292-B, Excise Tax Case Closing Cover Sheet

Note: If TXMODA is not found on IDRS, the examiner can attach a BMFOLT that is less than 30 days old and a BMFOLR (for a filed return only).
- (4) Form 5344 is not required for a survey.
- (5) Close the case to the manager for further processing.

4.24.21.5.1.2
(04-16-2024)

**Survey Procedures for
Cases Without Original
Returns**

- (1) Generally, this type of survey is used when the return was established on ERCS/AIMS and the original return was never requested.
- (2) If the original return is not in the case file, then only Form 5351 and Form 3210 are submitted to CCP.

Note: In addition to Form 5351 and Form 3210, Form 2503 must be completed and submitted to the manager for approval. A signed copy is uploaded for record into IMS although it is not submitted to CCP.

- (3) Form 5351 and Form 3210 are to be e-mailed to the Examination Cincinnati Centralized Case Processing site mailbox at **SBSE CCP Exam Cincinnati*. CCP has 45 days from the receipt to process these cases.

Note: Refer to IRM 4.24.21.5.1.3, Form 5351, for additional guidance.

- (4) The following actions must be taken when the original return is not in the case file:
 - a. Update ERCS to Status "51."
 - b. Use only one MFT per Form 5351.
 - c. Include Form 3210 listing all appropriate TINs.
 - d. Secure electronic signature by the manager on Form 5351.
- (5) If the return was requested when the case was established on ERCS/AIMS, then follow procedures in IRM 4.24.21.5.1.1.

Note: If a return was requested IDRS command code AMDISA will show "Return Requested" on page 2.

- (6) An electronic print can be surveyed using this survey process, if there is no requirement to attach any documentation to the survey.
- (7) Only surveyed cases by the group with DC "31" or DC "32" may use this survey process.

4.24.21.5.1.3
(05-12-2017)

**Survey of Return and
Pick Up of Later Period**

- (1) A period may become overaged, which means an unstarted case remained in an examiner's inventory for 210 days or more. For this reason, the examiner may decide to request examination controls on a later period to be more current. When these periods are surveyed and a subsequent period is requested, the examiner will follow the procedures listed below:
 - a. When surveying the original period, maintain and include the original Classification Checksheet and Form 5346, if applicable, in the case file of the subsequent period.
 - b. When completing Form 5345-D, Examination Request-ERCS (Examination Returns Control System) Users, for the subsequent period, the examiner will write on Form 5345-D "previous period surveyed-requesting subsequent period."
 - c. DC "31" should be used for returns surveyed **before** assignment. DC "32" should be used for returns surveyed **after** assignment.
 - d. Refer to the *Source Code Job Aid* for more information about determining the correct source code for returns.
 - e. The AIMS controls on the subsequent period must be fully established prior to closing the surveyed period.

4.24.21.5.2
(04-16-2024)

**Closing Procedures for
Agreed Cases**

- (1) If the taxpayer agrees to all proposed adjustments, the case is closed using the agreed closing procedures below.
Note: Agreed cases with 60 days or less remaining on the SOL must first be processed using quick assessment procedures. Refer to IRM 4.24.21.5.7.
- (2) To process an agreed examination, the examiner should take the steps itemized below:
 - a. Generate Form 5344 in IMS and verify that all required fields are completed and accurate.
 - b. Prepare Letter 987-X, Agreed Excise Tax Change, which will be signed by the manager on behalf of the Chief, Estate & Gift/Excise Tax Exam and left in the case file. It will be dated and mailed to the taxpayer by the group.
 - c. On Form 3198, check the appropriate letter box on page 2 under "Letter Instructions for CCP".
Note: The mailing of items under "Letter Instructions for CCP" on page two will now be the responsibility of the group.
- (3) DC "03" is used for returns closed agreed prior to issuance of the 30-day letter, while DC "04" is used for returns closed agreed after issuance of the 30-day letter.
- (4) Refer to the *Agreed and Partially Agreed/Excepted Agreed Examinations* page in the Excise Tax Knowledge Base for additional guidance about closing forms, letters, and procedures for agreed excise cases where the taxpayer fully agreed to all proposed adjustments.

4.24.21.5.3
(09-08-2023)

**Closing Procedures for
Excepted Agreed and
Partially Agreed Cases**

- (1) If the taxpayer does not agree to all the proposed adjustments, but will agree to some of the proposed adjustments, the case is partially agreed.
- (2) In a partially agreed case, the agreed report must first be closed by following the partial assessment procedures in IRM 4.24.21.5.7.
- (3) After the agreed report is processed using partial assessment procedures, the examiner can proceed with the unagreed case closing. Refer to IRM 4.24.21.5.6 for unagreed case closing procedures.
- (4) In addition, Form 4665, Report Transmittal, must be prepared for all partially agreed cases with the details of the agreed and unagreed issues. Include Form 4665 in the case file but do not issue it to the taxpayer. Refer to IRM 4.24.21.4.6 for additional guidance.
- (5) Refer to IRM 4.10.8.5, Excepted Agreed Cases, and IRM 4.10.8.6, Partially Agreed Cases, and the *Agreed and Partially Agreed/Excepted Agreed Examinations* page in the Excise Tax Knowledge Base for more information about closing forms, letters and procedures for agreed cases where the taxpayer partially agreed or excepted agreed to proposed adjustments.

4.24.21.5.4
(04-16-2024)

**Closing Procedures for
No Change Cases**

- (1) If an examination of the books and records for a filed return results in the examiner determining that no adjustment exists for the IRS No. examined, no change closing procedures must be followed.

Note: No change closing procedures apply only to filed returns. Refer to IRM 4.24.20.1.1, Background, for an explanation of what constitutes a filed return and the background that applies to filing Form 720 separately for each tax listed by IRS No. on the face of the return.

Note: No liability case closing applies to non-filed returns. Refer to IRM 4.24.21.5.5 for further guidance.

(2) To complete a no change examination, the examiner will:

- a. Complete Form 3198, in IMS and enter DC "02" for no change, or DC "01" for no change with adjustments.
- b. Complete Form 5344, Examination Closing Record, in IMS and enter "zero" or "(0)" on line 404d.
- c. Prepare Letter 590-X, No Change - Final, which will be signed by the manager for the Chief, Estate & Gift/Excise Tax Exam and left in the case file. It will be dated and mailed to the taxpayer or collector by the group.
- d. On Form 3198, check the "No Change Letters" and "Letter 590 (straight N/C)" boxes under the letter instructions for CCP.

Note: The mailing of items under "Letter Instructions for CCP" on page two will now be the responsibility of the group.

(3) If the taxpayer or collector has a no change for the IRS No. examined, no further action is generally required regarding Form 720 filing requirements.

(4) Submit the case file to the manager for review and closure.

(5) The manager will review the case file and, if in agreement with the no change, sign Letter 590-X, and leave the letter in the case file.

(6) Refer to the *No Change Reports* page in the Excise Tax Knowledge Base for more information about no change examinations.

4.24.21.5.5
(04-16-2024)
**Closing Procedures for
No Liability Cases**

(1) If a taxpayer did not file a return and the examiner determines the taxpayer is not liable for any excise taxes, then no liability SFR non-filer procedures must be followed.

(2) If a taxpayer or collector files a Form 720 but does not enter information next to an IRS No. on the face of the document, then that is considered a "non-filed" return. These returns must be worked as no liability SFR non-filer cases whenever the examiner determines no adjustment exists for the IRS No. examined.

(3) No liability SFR non-filer cases are to be closed using DC "02." This applies only to cases where the examiner has taken actions that may include, but are not limited to, conducting an interview, reviewing books and records, and ultimately making the decision the taxpayer is not liable for excise taxes.

Note: In situations where no examination of books and records occurred, the examiner or manager will follow closing procedures for surveyed returns in IRM 4.24.21.5.1.

(4) Closing the IMS case file to CCP requires the actions described in the paragraphs that follow.

- (5) Procedures for Letter 930, Non-Filer No Liability Substitute for Return Transmittal:
- The examiner must prepare Letter 930 advising the taxpayer there is no liability for the excise tax indicated.
 - The manager will sign Letter 930 on behalf of the Chief, Estate & Gift/Excise Tax Exam.
 - Letter 930 will be mailed by the group.
- (6) IMS case file closing:
- Established no change IMS case file closing procedures are followed for no liability SFR non-filer cases.
 - The IMS case file must contain documentation to support the no liability determination.
 - The IMS case file serves as the historical record for all examiner actions, findings, and determinations that is essential background, if that case is subsequently identified and/or classified.
- (7) At a minimum the IMS case file, must contain the following:
- BMFOLT for the periods involved showing the transaction code 150 posting for the SFR.
- Note:** The examiner should also check TXMODA to ensure there are no pending transactions.
- AMDISA to show the module is fully established on AIMS
 - Letter 930 with proper signature
 - Form 3198
 - Form 5344
 - Supporting documentation explaining the reasons for the no liability SFR non-filer closure, such as Examining Officer's Activity Record in IMS and any lead sheets or workpapers
- Note:** If an SFR examination results in a decision that the taxpayer is not liable for an excise tax in the period examined, no examination report is required. Letter 930 is all that is necessary because the taxpayer did not file an excise return.
- Note:** Not all mandatory workpapers are required for a no liability case.
- (8) If the taxpayer is not liable for **any** excise tax for the same MFT examined, the examiner will prepare Form 3177, Notice of Action for Entry on Master File. This is necessary to release the expectation the taxpayer should file returns.
- If the taxpayer is not liable for the period(s), enter "590" in the TRC column and "Closing Code 75" in the "Other" space provided under the Explanation column.
 - If the taxpayer is not liable for the period(s) and will not be liable for any subsequent period(s) for the same MFT examined, enter "591" in the TRC column and "Closing Code 75" in the "Other" space provided under the Explanation column.

Note: On Form 3198 in the “Forms Enclosed” section, the examiner must check the “Form 3177” box to indicate that Form 3177 is in the case.

4.24.21.5.6
(09-08-2023)

Closing Procedures for Unagreed Cases

- (1) If the taxpayer does not agree to the proposed adjustments, then the case is closed using unagreed closing procedures.
- (2) If a taxpayer requests an Appeals conference, the examiner must determine if the case meets the requirements for an Appeals referral in IRM 4.24.10.2, Prerequisites for an Appeals Referral.
- (3) If the unagreed case is eligible for Appeals consideration, then closing procedures in IRM 4.24.10.7, Case Routing Procedures for Unagreed Excise Tax Examination Cases to Appeals, and IRM 4.24.10.8, Transferring an Excise Tax Examination Case to Appeals, must be followed.
- (4) If the unagreed case is not eligible for Appeals consideration, then the case is closed to CCP using DC “08.” This includes unagreed cases that have less than 365 days remaining on the statute when it is projected to be received in Appeals, or cases where the taxpayer did not timely respond to a 30-day letter, which requires an assessment.
- (5) Refer to the *Unagreed Case* page in the Excise Tax Knowledge Base for more information about closing forms, letters, and procedures for more information about closing unagreed cases where the taxpayer disagrees with the proposed adjustments and either did not file an acceptable protest, or the SOL will not have 365 days remaining on the case when the case is expected to be received at Appeals and the taxpayer will not or cannot extend the SOL.
- (6) In unagreed SFR cases not going to Appeals and for which the Failure to Pay penalty is assessed, IRC 6020(b) certification procedures must be followed. Refer to IRM 4.24.9.6, IRC Section 6020(b) Certification Procedures for Non-Filed Excise Tax Returns, for guidance.

4.24.21.5.7
(09-08-2023)

Partial Assessments and Quick Assessments

- (1) (1) This section provides guidance for cases requiring the following types of expedited assessments:
 - Partial assessments
 - Quick assessments
- (2) A partial assessment is required for the following:
 - Partially agreed cases, where the unagreed issues will be closed to Appeals, and
 - Unagreed paid claim assessments that fall under IRC 6206, where the taxpayer has requested an Appeals conference, and the SOL has 445 days or less, but more than 60 days remaining.

Note: Partial assessment procedures do not apply to no change or overassessment cases, except for those applicable overassessment situations outlined in IRM 4.10.8.6.1, Partial Overassessments.

- (3) Quick assessments are required when an assessment must be made expeditiously to protect the Government's interest. In these instances, the assessment is made manually (directly on master file).
- (4) A quick assessment, or manual assessment, is limited to the following cases:
- Imminent Statute: 60 days or less remaining on the SOL or in cases where the assessment of taxes or credits is in jeopardy.
 - Agreed Unpaid Deficiency over \$100,000: Deficiencies over \$100,000 which are agreed and unpaid, that will not be received in CCP for final closure within 30 days of the agreement date.

Note: The \$100,000 criteria is not cumulative but is determined per period. Refer to IRM 4.38.1.9.7.2, Processing Agreed and Unpaid Deficiencies, and IRM 4.10.8.2.4.3.1, Large Dollar Cases: Agreed and Unpaid Deficiency, for guidance.

- (5) When a case has an imminent statute date that requires a quick assessment, the examiner must contact the Cincinnati CCP Field Liaison to notify them that a quick assessment will be needed on the case. Contact information can be found at *Contacts for FORT (Field Office Resource Team)*.

- (6) Form 3198 must be completed with following information:

- For cases with less than 90 days remaining on the SOL: In the Expedite Processing section, check the box "Statute Less Than 90 days."
- For partial assessments: In the Special Features section, check the boxes "Partial Assessment Requested" and "Other Instructions." Next to "Other Instructions" enter the following: "Return via fax when completed."
- For quick assessments: In the Special Features section, check the box "Other Instructions." Next to "Other Instructions" enter the following: "QUICK ASSESSMENT REQUIRED. Return via fax when completed."

Note: Do not complete the bottom of page 1 or page 2 of Form 3198 unless the quick assessment is being processed as a final case closing.

- If the quick assessment is being processed as a final case closing, complete the additional procedures in paragraphs 10 through 12 of this section.

Note: If the case is not ready for final closure, the case must remain in status "12" (do not update to status "51").

- (7) Form 5344 must be completed for each period. The following procedures apply to the Form 5344 completion:

- Enter the amount of the partial agreement or the amount of the quick assessment in Item 12 and Item 15.
- For partial assessments: Enter the appropriate disposal code in Item 13.

Note: For unagreed cases going to appeals, disposal code "07" is not input until the case is ready for final closure from the group.

- If the quick assessment is being processed as a final case closing, complete the additional procedures in paragraphs 10 through 12 of this section.

Note: Do not complete the right side of page 1 or the entire page 2 of Form 5344 unless the quick assessment is being processed as a final case closing.

Note: Additional guidance for processing quick assessments is found in IRM 4.4.25, Quick Assessments. Additional instructions for processing partial assessments are found in IRM 4.4.12, Examined Closings, Surveyed Claims, Partial Assessments, and Closings to Appeals.

- (8) Fax the partial assessment or quick assessment package to CCP for assessment at (855) 386-5122. The subject line of the e-fax must state "Partial Assessment Request" or "Manual Assessment Request." The package must consist of the following:

- Form 3198
- Form 5344
- Applicable Examination Report

Note: A signed Form 5384, Excise Tax Examination Changes and Consent to Assessment & Collection, or Form 2504-E, Agreement to Assessment and Collection of Additional Tax and Acceptance of Overassessment, is sent for agreed cases, a signed Form 2504-E is sent for partially agreed cases, and a Form 5385, Excise Tax Examination Changes, is sent for unagreed cases.

- Form 8278 (if applicable)

- (9) CCP will:

- Acknowledge the request within 48 hours of receipt.
- Make the partial assessment or quick assessment within 5 business days.
- Fax the originator copies of Form 5344 marked "Request Completed" to the group for association with the case file to verify the assessment was completed.

- (10) When the case is ready for final closure, examiners must follow regular closing procedures, based on the type of closure described in this IRM section or in IRM 4.24.8, Examination Guidance for Excise Claims for Refund or Abatement.

- (11) In addition to regular closing procedures, when the case is ready for final closure, Form 5344 must be completed as follows:

- Enter the DC based on the final case disposition of the remaining issues.
- Enter any additional adjustments after the processing of the partial assessment in Items 12 and 15 of Form 5344.

Note: If the final closing is to Appeals, Item 12 must be left blank and the unagreed amount entered in Item 18 must not include the amount of tax previously assessed as a partial assessment.

- Enter a TC "300" with a zero amount in Item 12 of Form 5344 for periods where there is no additional assessment after the processing of the quick assessment or partial assessment.

- Enter the net of all adjustments that were processed using the quick assessment procedures in Item 35 of Form 5344. If more than one quick assessment has been processed, ensure that this entry is the total of all quick assessments processed.

(12) In addition to regular closing procedures, when a case is ready for final closure, Form 3198 must be completed as follows:

- Enter the DC based on the final case disposition of the remaining issues.
- On Form 3198 under the Special Features section, check the box "Final Closure - partial assessment previously completed."

4.24.21.6
(09-08-2023)
**Case Closing
Procedures for
Managers**

- (1) The manager will review, document all actions, and determine the grade of case for all Excise Tax Examination cases.

4.24.21.6.1
(04-16-2024)
Review of Case

- (1) Review the completed case, including but not limited to, Form 3198, Form 5344, and workpapers or supporting documentation (or portions thereof) detailing all proposed adjustments.
- (2) At a minimum, review the current AMDISA, TXMODA, BMFOLI, BMFOLR, BMFOLT, CFINK, and INOLES (less than 30 days old) to verify the accuracy of the balance on the account, all prior assessments have been acknowledged and used in computations, and to confirm the correct SOL is being used in all systems, reports, and case closing documents.
- (3) After a review of the case file and if in agreement, sign any applicable closing letters.
- (4) Review and close the case within the recommended national time frames.

Note: When there are gaps that exceed the recommended national time frames for taking actions, refer to IRM 4.24.21.3(4).

- (5) After the review is completed, the secretary or designated group closing official will update the status of the case in ERCS to status "21" or "51" and Form 15292-B, Excise Tax Case Closing Cover Sheet, along with attached documents will be emailed to CCP for closure. Changing the status in ERCS to status "21" or "51" should be the last update prior to closing the IMS case file. Tech Services will have access to the case in IMS once updated to status "21".
- (6) Ensure all IMS required closing actions are completed when the case is closed from the group. For additional guidance on IMS, refer to IRM 4.24.25.2, Issue Management System (IMS), and the *Issue Management System* page for specific IMS areas of interest, such as IMS Help, IMS Team Website, and IMS Frequently Asked Questions.

4.24.21.6.2
(04-16-2024)
Case Documentation

- (1) Document the Case Level Activity Record in IMS with (but not limited to) the following:
- Actions taken for case review
 - Actions taken for closing case

- The date the case file was closed from the group to CCP, Tech Services or SEQ (if selected for National Quality Review). See IRM 4.2.8.6, Overview of National Quality Review Case Selection Procedures, for additional guidance.
- Explanation of all delays (i.e., manager traveling, group meeting, etc.) from the date the case is closed to the manager to the date the case is closed from the group.

Note: When there are gaps that exceed the recommended national time frames for taking actions, refer to IRM 4.24.21.3(4).

4.24.21.6.3
(07-08-2020)

Grade of Case

- (1) Determine the grade of case for all examination cases.
- (2) Refer to IRM 1.4.40, Resource Guide for Managers - SB/SE Field and Office Examination Group Manager, and Document 6036, Examination Division Reporting Codes Booklet, for more information about recording grade of case on Form 5344.
- (3) The case grading guidelines may be used at any point in the examination process. However, at assignment, only the excise return information will be available. Development during the examination may more fully disclose the final grade of case. Final grading factors take into account excise return information, workpapers, and the examination report. Thus, the final grade may differ from grade at assignment. The final grade is entered in box "32" on Form 5344.

Exhibit 4.24.21-1 (09-08-2023)**Acronyms**

The following table contains acronyms and their definitions used throughout this IRM.

Acronym	Definition
AIMS	Audit Information Management System
AMDIS	Audit Management Display Information System
BMF	Business Master File
BRTVU	Business Transactions File View
CCP	Centralized Case Processing
DC	Disposal Code
EQRS	Examination Quality Review System
ERCS	Examination Returns Control System
ExSTARS	Excise Summary Terminal Activity Reporting System
FSEQ	Field and Specialty Exam Quality
IDRS	Integrated Data Retrieval System
IGM	Interim Guidance Memorandum
IMS	Issue Management System
LB&I	Large Business and International
MFT	Master File Tax
NQRS	National Quality Review System
SB/SE	Small Business Self Employed
SFR	Substitute for Return
SOL	Statute of Limitations
TAS	Taxpayer Advocate Service
TC	Transaction Code
TIN	Taxpayer Identification Number
WSD	Workload Selection and Delivery

