



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

April 17, 2015

Control No. AP-08-0415-0004
Expiration Date: 04/17/2017
Affected IRMs: 8.4.2 and 8.20.6

MEMORANDUM FOR APPEALS EMPLOYEES

FROM: John V. Cardone /s/ *John V. Cardone*
DIRECTOR, POLICY, QUALITY AND CASE SUPPORT

SUBJECT: Streamlined Docketed "EZ" Closing Pilot

This memorandum serves as guidance on the Streamlined Docketed "EZ" Closing Pilot. Please ensure that this information is distributed to all affected employees within your organization.

Purpose: This guidance provides a step-by-step approach to streamline the closing of certain docketed cases in partnership with the Office of Chief Counsel. In this pilot, Counsel will upload documents necessary to close the case directly to the Appeals Centralized Database System (ACDS) instead of mailing documents.

Procedural Change: When Appeals settles a pilot docketed case, Appeals will send the petitioner (or counsel of record) decision document(s) with instructions to forward the signed document(s) directly to respondent's counsel. After the decision is entered with the Tax Court and the case is ready to close, Office of Chief Counsel personnel will convert the necessary closing documents into electronic files, upload the files to ACDS, and add a tracking indicator to the Tax Litigation Counsel Automated Tracking System (TLCATS). All post-decision processing by Appeals will be done using the documents in the electronic file. The process is illustrated in the attached chart (Attachment 1) and step-by-step instructions (Attachment 2).

Pilot Offices:

Appeals	Chief Counsel
Assigned on ACDS to: <ul style="list-style-type: none">Ogden Campus Appeals Office	Assigned on (TLCATS) to: <ul style="list-style-type: none">Boston, MALouisville, KYFarmers Branch, TXSeattle, WA

Affected Ogden Campus Appeals Employees:

- Account and Processing Support (APS) Employees
- APS Processing Team Managers (PTM)
- Appeals Technical Employees (ATE)
- Appeals Team Managers (ATM)
- Secretaries

Pilot Cases:

No.	Requirement	
1.	Appeals settled	
2.	Assigned on ACDS to the Ogden Campus Appeals Office	Assigned on TLCATS to a pilot Counsel Office
3.	Administrative file retained in Ogden APS in suspense pending entry of the Tax Court decision (ACDS Action Code STIPFF)	

Effect on Other Documents: This guidance supersedes existing IRM guidance only for Appeals pilot employees working pilot cases. This guidance does not otherwise affect the following IRMs for non-pilot employees and cases:

- IRM 8.4.2, *Appeals Docketed Cases, Campus Appeals Docketed Cases*
- IRM 8.20.6, *Account and Processing Support (APS), Interim Actions*

Effective Date: This guidance is effective on June 1, 2015, the date of implementation.

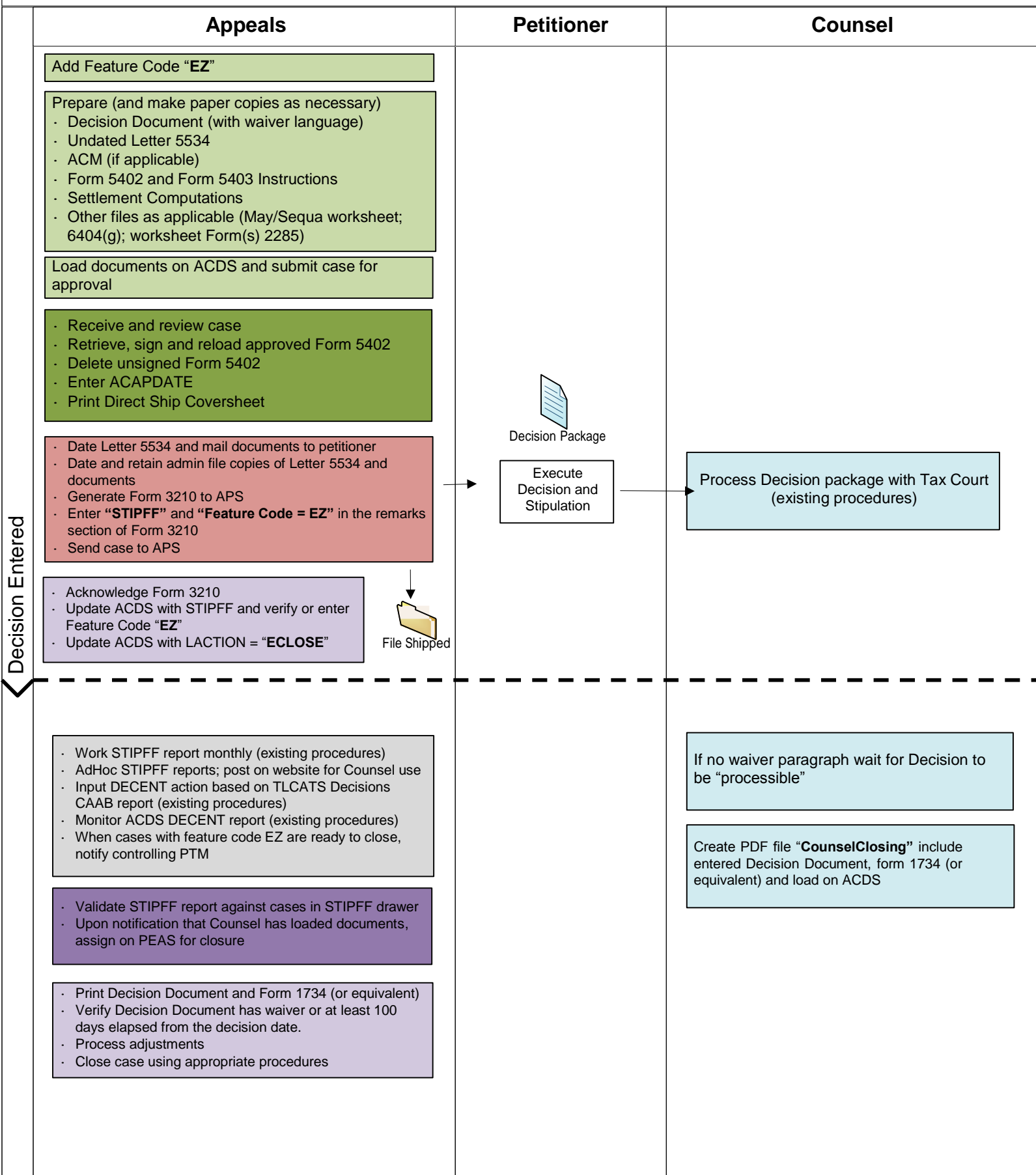
Contact: Appeals employees should follow existing procedures to elevate questions through their management chain to contact an analyst by email to [*AP Tax Policy & Procedure](#).

Attachment(s):

- (1) Streamlined Docketed “EZ” Closing Pilot Chart
- (2) Step-by-Step Instructions

cc: www.irs.gov

SETTLED BY APPEALS (Docketed "EZ" Closings)



Appeals Officer



Tax Examiner



Appeals Team Manager (ATM)



Processing Team Manager (PTM)



Secretary



Reports Section



Office of Chief Counsel

Rev. 4/17/2015

1. Appeals Technical Employee (ATE)

Appeals Technical Employee (ATE)											
Step	Action										
1.	Add Feature Code “EZ”.										
2.	Prepare settlement documents.										
3.	<p>Include a sufficient number of copies of the settlement documents in the administrative file.</p> <table border="1"> <thead> <tr> <th>Document</th><th>Number of Copies</th></tr> </thead> <tbody> <tr> <td>Undated Letter 5534</td><td> <ul style="list-style-type: none"> One copy to each signatory (petitioner(s), if pro se, or counsel of record, if applicable) One copy to attach to Letter 937 to the Power of Attorney(s) (POA), if any Copies of all letters for the administrative file </td></tr> <tr> <td>Undated Letter 937, Transmittal Letter For Power of Attorney, if needed</td><td> <p>For each POA:</p> <ul style="list-style-type: none"> One copy to use as a cover letter to transmit a copy of the Letter 5534, decision document, and settlement computation, if any, One copy to retain in the administrative file </td></tr> <tr> <td>Decision document – include the waiver paragraph</td><td> <ul style="list-style-type: none"> Three copies to include with each Letter 5534 to a signatory <ul style="list-style-type: none"> Two to return signed to Area Counsel One to retain for their records One copy to include with each letter 937 to a POA, if applicable One copy for the administrative file </td></tr> <tr> <td>Settlement Computation</td><td> <ul style="list-style-type: none"> One copy for each signatory to retain One copy for each POA(s), if applicable One copy for the administrative file </td></tr> </tbody> </table> <p>Reminder: Follow existing guidelines for married petitioners living at separate addresses.</p>	Document	Number of Copies	Undated Letter 5534	<ul style="list-style-type: none"> One copy to each signatory (petitioner(s), if pro se, or counsel of record, if applicable) One copy to attach to Letter 937 to the Power of Attorney(s) (POA), if any Copies of all letters for the administrative file 	Undated Letter 937, Transmittal Letter For Power of Attorney, if needed	<p>For each POA:</p> <ul style="list-style-type: none"> One copy to use as a cover letter to transmit a copy of the Letter 5534, decision document, and settlement computation, if any, One copy to retain in the administrative file 	Decision document – include the waiver paragraph	<ul style="list-style-type: none"> Three copies to include with each Letter 5534 to a signatory <ul style="list-style-type: none"> Two to return signed to Area Counsel One to retain for their records One copy to include with each letter 937 to a POA, if applicable One copy for the administrative file 	Settlement Computation	<ul style="list-style-type: none"> One copy for each signatory to retain One copy for each POA(s), if applicable One copy for the administrative file
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4.	Prepare appropriately sized envelope(s) to mail the letters and attachments.										

Appeals Technical Employee (ATE)	
Step	Action
5.	Upload each settlement package document to ACDS as a case file attachment: <ul style="list-style-type: none"> • Form 5402, signed by ATE • Form 5403 Instructions • ACM (if prepared) • Settlement Computation • Other files (as applicable) <ul style="list-style-type: none"> ○ May/Sequa Worksheet ○ 6404(g) Worksheet ○ Form 2285(s)
6.	Submit case to ATM for approval.

2. Appeals Team Manager (ATM)

Appeals Team Manager (ATM)	
Step	Action
1.	Receive and review the case.
2.	Retrieve, sign and reload the approved Form 5402.
3.	Delete the unsigned Form 5402.
4.	Enter ACAPDATE.
5.	Print Direct Ship Coversheet and attach it to the front of the case file.

3. ATM’s Secretary

ATM’s Secretary	
Step	Action
1.	Date and mail the Letter(s) 5534 and decision documents, and attachments using the envelope(s) provided by the ATE.
2.	Date and retain the administrative file copies of Letter(s) 5534, decision documents, and attachments.
3.	Generate Form 3210 for transmission of the case file to APS.
4.	Enter “STIPFF” and “Feature Code = EZ” in the Remarks section of the Form 3210.
5.	Send the case file to APS for STIPFF suspense, until the decision is entered.

4. Appeals Processing Support (APS)

Appeals Processing Support (APS)	
Step	Action
1.	Receive case and acknowledge Form 3210.
2.	Update ACDS with “STIPFF” action and verify that the ATE entered Feature Code “EZ”. Note: If the Feature Code “EZ” is not already entered, update the Feature Code to “EZ” using the validation tracking system (VTS) and identify the update as an Error Correction.
3.	Update ACDS with LACTION = “ECLOSE”.

5. Chief Counsel (CC)

Chief Counsel (CC)	
Step	Action
1.	Use the STIPFF report on the SharePoint site to identify cases where Appeals sent decision documents to the petitioner/counsel of record.
3.	Follow-up with the petitioner/counsel of record as needed to secure signed decision documents.
4.	Receive the signed decision documents from the petitioner and send it to the Tax Court for entry.
5.	Upload entered decision and Form 1734 or equivalent to ACDS to “Green Light” the closing. Note: If the decision document does not include the waiver paragraph, do not upload the documents to ACDS until the decision is legally processable. See CCDM 35.9.3.3 Closing Tax Court Cases – Ready Reference .
6.	Update TLCATS with “ACD”, indicating documents are loaded to ACDS.

5. APS Reports Team

APS Reports Team	
Step	Action
1.	Work STIPFF report monthly using existing procedures. <ul style="list-style-type: none"> If a case is overage, contact Counsel to determine if they want the administrative file for trial preparation. If yes, notify the PTM to update ACDS and send the admin file to Counsel.
2.	Generate AdHoc BOE STIPFF Report and upload to the shared website.
3.	Receive the TLCATS Decision CAAB report (a list of entered decisions) from Counsel weekly and input DECENT action.
4.	Monitor ACDS DECENT report (worked according to existing procedures)

APS Reports Team	
Step	Action
5.	Work DECENT Report monthly to identify cases with feature code “EZ” that are ready for closure. Notify controlling APS Processing Team Manager (PTM) that the closing information is uploaded to ACDS and the case should be pulled and assigned on PEAS for final closure.

6. APS Processing Team Manager (PTM)

APS Processing Team Manager (PTM)	
Step	Action
1.	<p>Work STIPFF Report monthly to validate against cases in the STIPFF Drawer.</p> <ul style="list-style-type: none"> If notified to send the administrative file to Counsel for trial preparation, update ACDS using trial preparation procedures and send the case to Counsel. Do not remove feature code “EZ”. Appeals will use Part 3 with feature code “EZ” to track cases that fell out of “ECLOSE”.
2.	<p>Upon notification that case is ready for closure, and Counsel uploads the entered Decision Document and Form 1734 (or equivalent) to ACDS, pull the case from STIPFF drawer.</p> <p>Note: Counsel will not upload Entered Decisions without a waiver paragraph until the 100th day after the Decision Entered Date. The Decision Document can be viewed by accessing the United States Tax Court (USTC) website and searching for the Docket Number.</p>
3.	Assign on PEAS for closure.

7. APS Tax Examiner (TE)

APS Tax Examiner (TE)	
Step	Action
1.	Print entered decision document and Form 1734 (or equivalent) from ACDS.
2.	Verify that the entered decision includes the waiver paragraph. If not, verify that at least 100 days have elapsed from the decision entered date.
3.	Process account adjustments in accordance with the entered decision.
4.	Close the case using appropriate closing procedures IRM 8.20.7.21, Docketed Cases .