INDEPENDENT OFFICE OF APPEALS

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, DC 20224

July 31, 2026

Control No. AP-08-0726-0032
Expiration Date: 07/31/2028
Affected IRM: 8.2.2

MEMORANDUM FOR ALL IRS INDEPENDENT OFFICE OF APPEALS EMPLOYEES

FROM: Steven M. Martin */s/ Steven M. Martin*
Director, Operations Support

SUBJECT: Appeals Case Management System (ACMS) procedure updates for IRM 8.2.2, Statutory Notice of Deficiency Cases

This guidance incorporates ACMS procedures into IRM 8.2.2, Statutory Notice of Deficiency Cases. Please distribute this information to all impacted employees within your organization.

Purpose: This guidance provides changes in terminology and new processing functionality for the IRS Independent Office of Appeals (Appeals) new case management system, ACMS.

Background/Source(s) of Authority: Appeals Centralized Database System (ACDS), Appeals' aging legacy system, is being replaced by ACMS, a more modernized system. Appeals contracted Salesforce to create ACMS, which will provide Appeals with a new level of automation and analytics. These updates will allow for more effective collaboration within Appeals and, in the future, with other IRS business units.

Procedural Change: Release 1 of ACMS focused on Collection Appeals work. Release 2 of ACMS will focus on Examination Appeals and Specialized Examination Programs and Referrals (SEPR) work. Future releases will incorporate concepts introduced in this guidance and will be reinforced via training and applicable user guides. Procedural changes pertaining to this guidance are included in the attachment.

Additional Information: Additional information on ACMS can be found on the Appeals Exchange (ApEx) ACMS Home Page. This site contains links for helpful information with ACMS, training documents, etc.

Effect on Other Documents: Portions of this guidance may be extended, modified, or made permanent, and incorporated into the affected IRM section(s) within two years from the date of this memorandum.

Effective Date: This guidance is effective as of the date of this memorandum.

Contact: Appeals employees should follow existing procedures to elevate questions through their management chain and follow established procedures on How to Contact an Analyst.

Distribution: FOIA Library on IRS.gov (https://www.irs.gov/privacy-disclosure/foia-library)

Attachment

Attachment AP-08-0726-0032, Appeals Case Management System (ACMS) procedure updates for IRM 8.2.2, Statutory Notice of Deficiency Cases

Throughout 8.2.2

- References to Appeals Centralized Database System (ACDS) will be changed to Appeals Case Management System (ACMS).
- Form 5402, Appeals Transmittal and Case Memo, has been replaced. The 'Printable View' feature now captures the information formally found on Form 5402, and is referred to as the E-5402.
- References to Work Unit Number (WUNO) will be changed to Appeals Number.
- References to the Case Summary Card (CSC) will be changed to Case Summary (CS).
- References to Examination will be changed to Compliance.
- Removed links for IRM sections that have been superseded by this or other guidance.
- Hyperlinks will not be included for new IRM sections not yet available online.

8.2.2.1.5 (MM-DD-YYYY)
Terms and Acronyms
Revise table under paragraph (1)

(1) The table lists commonly used acronyms and their definitions:

Term or Acronym	Definition
ACM	Appeals Case Memorandum
ACMS	Appeals Case Management System is Appeals' computerized case control system used to control and track cases throughout the appeal process.
AIMS	Audit Information Management System is a computer database system used by Appeals and Compliance (for examination-sourced cases) to control returns, input assessment/adjustments to Master File and provide management reports.
APS	Account and Processing Support
ASED	Assessment Statute Expiration Date
ATE	Appeals Technical Employee
ATM	Appeals Team Manager
Compliance	Originating Function
IDRS	Integrated Data Retrieval System
PTM	Processing Team Manager

Term or Acronym	Definition
SND	Statutory Notice of Deficiency
TCS	Tax Computation Specialist
USTC	United States Tax Court

8.2.2.3.2 (MM-DD-YYYY)
Appeals Settlement Computation on Compliance Issued SND Cases
Revise paragraph (2)

(2) When a case is settled during the 90-day period, the settlement computations must be handled as a priority. The ATE will submit requests for settlement computations to the Tax Computation Specialist (TCS) function through a Technical support request. In the "description" field, the ATE will note that the case is a priority so the TCS manager can identify it for priority handling.

8.2.2.4.1 (MM-DD-YYYY)
Statutory Notice of Deficiency Issued by Appeals - Case Submitted to Counsel for Concurrence
Revise paragraphs (1) through (3), delete paragraphs (4) and (5), and renumber remaining

(1) Some notices of deficiency, as well as Employee Plans (EP) and Exempt Organizations (EO) final adverse determination letters, will go to Counsel for concurrence before the letter is issued. The administrative file reviewed by Counsel must contain the following:

- A printed or PDF copy of the current E-5402 for Counsel concurrence.
- Either a completed, but unsigned, statutory notice, or a draft of paragraphs to be included in the statutory notice.
- All returns and documents which were in the case file when it was received in the Appeals office.
- Copies of all correspondence received or sent while the case was in Appeals.

(2) For paper cases, the administrative file can be delivered directly to the servicing Counsel office by the ATE or ATM. Alternatively, the ATE may route the paper administrative file through APS by submitting an account process support request. See IRM 8.20.6.18.1, Concurrence by Counsel for Interim Actions, for more details. For paperless cases, administrative file documents will be sent electronically to Counsel.

(3) The employee who routes the case to Counsel—either the ATE or APS—must enter the date the case was transmitted in the case action record (CAR). The ATE must place the case in suspense by updating ACMS with Action/Sub-Action "SU-RC" and suspense reason "Waiting on Counsel Attorney for Information/Response." Upon return of the

paper case from Counsel, or completion of Counsel's paperless review, the ATE must update ACMS with Action/Sub-Action "SU-TO" and document the return of the case in the CAR.

8.2.2.4.4 (MM-DD-YYYY)
Tax Court Petition Filed During the Appeals Issued Statutory Notice of Deficiency Suspense Period
Combine paragraphs (1) and (2), revise new paragraph (1), and renumber and revise former paragraph (3)

(1) APS will update ACMS and forward the administrative file to Counsel. See IRM 8.20.6, Interim Actions, for APS procedures.

(2) If Counsel answers the petition and returns the administrative file to Appeals for a second attempt at settlement, APS will update the ACMS jurisdiction indicator to Appeals' jurisdiction and route the case appropriately.

8.2.2.5 (MM-DD-YYYY)
Statutory Notice of Deficiency Rescinded Under Rev. Proc. 98-54
Revise paragraph (6)

(6) In the event Appeals rescinds a statutory notice, per Form 8626, Agreement to Rescind Notice of Deficiency, APS will follow the procedures in IRM 8.20.6.8.10, Rescinded "Appeals-Issued" Notice of Deficiency Under Rev. Proc. 98-54.