

IRM PROCEDURAL UPDATE

DATE: 02/03/2026

NUMBER: 26U0179

SUBJECT: Removed the Need for AM to Send STS 72 Cases to Insolvency Prior to Taking Account Actions

AFFECTED IRM(s)/SUBSECTION(s): 21.3.3

CHANGE(s):

IRM 21.3.3.4.8.2 Updated paragraph 10 to remove Accounts Management requirements to contact Insolvency on status 72 cases prior to working them.

(1) A Collection function, such as CSCO, is authorized for each campus (Compliance Center) to perform collection tasks in a centralized manner based on the taxpayer's BOD and state. The objective of a Collection function is to collect taxes through personal taxpayer contact whenever there is an outstanding balance due. CSCO cannot work claims so do not send carryback applications/claims or numbered and unnumbered amended returns/claims received with a balance-due notice attached. **Input** a STAUP for at least four cycles and **route** all notice responses and correspondence relating to balance due accounts to the correct area listed in Collection Payments/Addresses/Issues if the case is not listed in IRM 21.3.3.4.8.2.1 *Compliance Criteria for Amended Returns/Claims and/or Balance Due Correspondence*, and if any of the following conditions are present:

- a. Taxpayer wishes to pay in installments, including Form 9465, Installment Agreement Request, or needs other help with arranging payments or has a question relating to the installment agreement.

Note: The Form 433-D or Form 9465 must be input by the Compliance Center with jurisdiction for the taxpayer's account when the taxpayer is requesting a Direct Debit Installment Agreement (DDIA). Route these forms to the DDIA Liaisons (Campus). See IRM 5.19.1.6.4.13.1, *DDIA - Installment Agreement and Installment Agreement Requests*, for more information.

- b. Taxpayer refuses to pay. See IRM 21.3.3.4.8.2.1, *Compliance Criteria for Amended Returns/Claims and/or Balance Due Correspondence*, for more information.
- c. Taxpayer promises to pay in the future or is unable to pay. See IRM 21.3.3.4.8.2.1, *Compliance Criteria for Amended Returns/Claims and/or Balance Due Correspondence*, for more information.
- d. Taxpayer responds to the installment notice (CP 521) they are unable to make the monthly payment or similar language.

- e. Taxpayer responds to a default notice (CP 523).
- f. Taxpayer's account is in Masterfile status 41, 42, 43, 44, 46, and 91.
- g. There are claims for refund, or request for abatement of the Trust Fund Recovery Penalty (TFRP) assessments. See IRM 5.19.14.1.3, *Roles and Responsibilities*, for more information.
- h. Responses on military deferment, and Substitute for Return (except fully paid SFR assessments or Exam SFRs) cases.
- i. Responses on deceased or incarcerated taxpayers that meet collection criteria (can't pay, won't pay, or will pay later).
- j. Taxpayer states they are not liable for employment taxes because workers were independent contractors or subcontractors.
- k. Field office 6020(b) assessments (identified by TC 599 Closing Codes 63 and 64).
- l. Taxpayer requests release of levy or federal tax lien.
- m. Requests for extension of time to pay estate tax must be routed to the Centralized Estate & Gift Tax Department at the Cincinnati Compliance Campus.

Reminder: See the Campus Program Locator Guide, found on SERP under the Who/Where tab for routing help.

Note: Regardless of the phase of collection, if the case is a Combined Annual Wage Reporting (CAWR) case, it should be routed according to the state mapping found in the Campus Program Locator Guide.

Exception: Field Assistance (FA) employees only, FA employees will address all issue(s) within FA authority presented by the taxpayer in their correspondence. All issues presented by the taxpayer must be carefully reviewed, addressed, and resolved before closing the case. See IRM 21.3.4.2.5, *Alternative Work Stream and IRM References*, for more information.

Exception: If a taxpayer's account is in Service Center (SC) status 53 set by a TC 530 and does not meet the requirement in IRM 21.3.3.4.8.2.1, *Compliance Criteria for Amended Returns/Claims and/or Balance Due Correspondence*, AM will work the taxpayer's issue.

(2) Field Collection (FC) employees must route status 26 cases (including Form 3870) per IRM 5.4, *Case Processing*, and IRM 5.1.15, *Abatements, Reconsiderations and Adjustments*. If Forms 3870 are received in Accounts Management (AM) from Revenue Officers, reject the form back to the FC originator using Form 3210, Document Transmittal.

(3) The Taxpayer Services Division (TS) and Small Business/Self Employed Division (SB/SE) have implemented a Service Level Agreement (SLA) to establish uniform

standards for the processing of certain status 26 casework (Forms 3870, Request for Adjustment) received in Centralized Case Processing (CCP) from Field Collection (FC).

- a. CCP will route only these specific cases to the designated point of contact (POC) at the Philadelphia AM Campus. These cases will then be scanned (into CII) to Ogden Accounts Management (AM).
- b. Status 26 casework will not be routed to any other AM campus. If received, return to CCP at:
Philadelphia CCP
BLN 5-E04.114
2970 Market St.
Philadelphia, PA 19104
- c. **Only** Ogden AM will process specific status 26 casework.
- d. AM Instructions: Return any Form 3870 status 26 requests directly from Field Collection (FC) back to the originator. Do not respond to telephone, fax, or e-mail or direct inquiries from FC requesting adjustment help. Refer any such contacts to General Case Processing (GCP), IRM 5.4.10, *General Case Processing*, for help.

(4) Route all amended/duplicate returns/claims and any correspondence from the taxpayer or their authorized representative to the Revenue Officer (RO) assigned to the account when at least one tax period is in **status 26**. An RO has a unique eight-digit number (not all zeros) (collection assignment number) located in the upper right-hand corner of CC SUMRY. Cases assigned to a specific RO or an RO group need to be routed. A Revenue Officer's address and instructions for when to route to an RO Group can be found on the SERP Who-Where tab titled RO Lookup. If there are tax periods in notice status (e.g., 21, 56 or 58), in addition to the status 26 module(s), input CC STAUP 22 01 to accelerate those tax periods to status 26. Also input a TC 971-012 for audit trail purposes on amended / duplicate returns or formal claims (only) for all tax periods involved. See IRM 21.5.1.4.8, *Transaction Code 971*, and IRM 21.5.3.2, *What Are Claims for Credit, Refund, and Abatement*, for more information.

Note: Account refers to the entire TIN, not just one tax period. The RO is responsible for resolving the entire account, not just the status 26 modules. The amended / duplicate return or correspondence does not have to pertain to the status 26 tax period.

Reminder: Do not route tax increase/credit decrease cases to the Revenue Officer if the Assessment Statute Expiration Date (ASED) will expire within 90 days. Forward the case to the Statute Team.

Exception: Employee Retention Credit (ERC) is a tax credit against certain employment taxes reported on quarterly and annual employment tax returns. This exception is for those employees trained to work ERC cases to allow ERC adjustments on accounts in Status 26. Once the ERC adjustment is completed, the employee will note, **ERC adjustment**

completed at the top of the claim and forward the case to the applicable RO or RO Group per the instructions above. Case work exception includes TAS requests regarding ERC claims, ERC claim withdrawals, and ERC Congressional Inquiries or director requests. Employees are to review IRM 21.7.2.7.2, *Employee Retention Credit (ERC)*, for more information and to determine if the current moratorium for adjusting new claims has been lifted.

Note: If a workable ERC adjustment request is received in AM from a revenue officer through Centralized Case Processing (CCP) with a Form 3870 attached and an open CCP control of 0577000000 on IDRS with a category of MISC, route the case to the AM CCP SME 0430407054 for adjustment input.

Exception: Do not route stand-alone (i.e., without correspondence) original returns that have not been processed to the assigned RO or RO Group. Forward the unprocessed return to the appropriate Campus location. See IRM 21.5.3.4.13, *Unprocessed Return*, for more information. Input an appropriate closing code if required to indicate the return was sent for processing. See paragraph 4 of IRM 21.5.2.4.23.8, *IDRS Account Actions*, for more information.

Exception: BMF International units in OAMC process requests for reasonable cause on systemically assessed Failure to File (FTF) penalty on Form 5471, Information Return of U.S. Persons With Respect to Certain Foreign Corporations, and Form 5472, Information Return of a Foreign Owned Corporation. For more information see IRM 21.8.2.20.2, *Form 5471 Penalties Systemically Assessed from Late-Filed Form 1120 Series or Form 1065*, IRM 21.7.4.4.16, *Failure to File Form 1120 and Form 5471 penalties*, and IRM 21.8.2.21.2, *Form 5472 Penalties Systemically Assessed from Late-Filed Form 1120 Series*. Manually assessed Failure to File penalty on Form 5471 and Form 5472 route penalty abatement request to the originator. The penalty assessed on Form 5471 and Form 5472 are subject to enforcement actions by Compliance.

Reminder: See IRM 21.3.3.4.8.2.1.2, *IMF Compliance Routing (ASFR Reconsideration and Status 26)*, for information about some collection assignment numbers that may not be assigned to a RO.

(5) Forward return delinquency cases that involve a module with an open control base in Collection or if taxpayer states not liable, previously filed, or will file and TC 140 is present on module, or in Tax Delinquency Investigation (TDI) status of 02 or 03 to CSCO.

(6) Route all other balance due notice responses or correspondence to Accounts Management function. This includes CP 504 responses where the case has not rolled to status 22 and status 6X cases unrelated to a collection issue.

(7) If correspondence is received in status 24, unrelated to a collection issue (can't pay, won't pay, or will pay later), reply to the correspondence unless a notice generated by an adjustment will answer the correspondence. Correspondence in status 24 with can't pay,

won't pay, or will pay later issues see the chart in IRM 21.3.3.4.8.2.1, *Compliance Criteria for Amended Returns/Claims and/or Balance Due Correspondence*.

(8) If working correspondence in status 22 (IDRS status), route the correspondence per IRM 5.19.1.3.2 *For All Employees*, for instructions specific to working status 22 correspondence.

Reminder: AM will work status 22 correspondence cases if the case was received in AM in notice status **before** the case went into status 22. **Do not** route these cases to Automated Collection System Support (ACSS). Work the correspondence case following normal processing procedures. After completing the case, document the history on AMS. If a case was received in ACSS in status 22 and then subsequently went into another MF status e.g., status 12, ACSS will work the case.

Note: The earliest date stamp by ICT or any AM site indicates the date a case is received in AM.

Exception: If a Decedent account includes **any** modules in status 22, transfer the correspondence to the appropriate ACSS site. See IRM 5.19.1.5.3, *Deceased Taxpayers*.

Note: If working Amended Returns/Claims or the account is in status 22 and meets the criteria in paragraph 1 above, see IRM 21.3.3.4.8.2.1, *Compliance Criteria for Amended Returns/Claims and/or Balance Due Correspondence*.

(9) If working correspondence in status 71, route per SERP Website under "Who/Where". Offer-in-Compromise (OIC) Centralized Service Center Locations.

(10) When working correspondence, amended returns or claims in bankruptcy status 72, **Insolvency contact is not required by Accounts Management employees before making any adjustments or sending correspondence**. The Accounts Management employee should process the taxpayer request following normal adjustment procedures.

Exception: If the closing code on a transaction code (TC) 520 is 76 or 77, these are Collection Due Process (CDP) cases and must be referred to the CDP caseworker in Automated Collection System (ACS) Support.

IRM 21.3.3.4.8.2.1 Updated paragraph 2 to remove Accounts Management requirements to contact Insolvency on status 72 cases prior to working them.

(1) This IRM sub-section provides guidance for processing amended returns/claims and /or balance due correspondence on accounts in Collection status 22, 24, or involving other Collection criteria.

(2) When working correspondence, amended returns or claims in bankruptcy status 72, **Insolvency contact is not required by Accounts Management employees before making any adjustments or sending correspondence**. The Accounts Management employee should process the taxpayer request following normal adjustment procedures.

(3) Exempt Organization (EO) AM employees work EO accounts (MFTs 34, 36, 37, 44, 46, 50, 67, and 02 (Form 1120-POL *only*)) that are in Status 22, 24, and 26. Non-EO accounts (all other MFTs) are worked or forwarded per IRM guidelines.

(4) Amended returns/claims (both numbered and unnumbered) in status 22 and 24 received in Accounts Management, are processed in Accounts Management following normal procedures, including inputting any necessary adjustments. See IRM 21.5.3.2, *What Are Claims for Credit, Refund, and Abatement?*, for more information about claims.

Reminder: Processing amended returns/claims that by-pass SP can be found in IRM 21.7.9.3.1, *Amended/Corrected/Adjusted/Original Returns that By-Pass Submission Processing*.

(5) Requests for reasonable cause penalty abatement (including First Time Abate (FTA) and penalty appeals) in status 22 must be forwarded to ACSS (Automated Collection System Support). Use the following link for ACSS routing: ACS Support and Status 22 TAS Liaisons.

Exception: Penalty Abatement requests such as Civil Penalties and Exempt Organizations (EO) will be routed to the appropriate area that assessed the penalty. See IRM 20.1.1-4, *Penalty Reference Numbers (500 Series)*, or IRM 20.1.1-5, *Penalty Reference Numbers (600 Series)* for Civil Penalty reference numbers and descriptions. Penalty request from Form 5471 and Form 5472, see the exception in IRM 21.3.3.4.8.2, *Campus Collection Function Correspondence/Inquiry/Notice*.

Reminder: AM will work status 22 reasonable cause abatement (including penalty appeals) cases if the case was received in AM **before** the case went into status 22. Do not route these cases to ACSS. If a case was received in ACSS in status 22 and then subsequently went into another MF status e.g., status 12, ACSS will work the case. Example: Correspondence is received in AM on January 12th, 2024, which is not, **Can't pay, won't pay, will pay later**. The case updated to Status 22 on January 22nd before AM could review and work it. AM would still work the case and not forward to ACS Support because the received date of the case for AM occurred before the update of the case to Status 22.

(6) Route all amended/duplicate returns/claims and correspondence received from the taxpayer in status 26 to the appropriate Revenue Officer group office except for stand-alone original returns or specific case work noted in paragraph 4 of IRM 21.3.3.4.8.2, *Campus Collection Function Correspondence/Inquiry/Notice*.

(7) If correspondence (not in status 26) is can't pay, won't pay, or will pay later is received with an amended return/claim, detach the correspondence from the return and forward based on the guidance below. Notate across the top of the correspondence "Detached from Form 1040-X or Form 94X-X, etc., " to alert the receiving function that Accounts Management is processing a claim for this account.

Example: Correspondence is received with a Form 1040-X or claim: Detach the correspondence, notate at the top of the correspondence "1040-X Detached", route according to the Compliance Routing chart below, and process the Form 1040-X or claim.

Example: Correspondence is received with a Form 94X-X: Detach the correspondence, notate at the top of the correspondence "94X-X Detached", route according to the Compliance Routing chart below, and process the Form 94X-X. See IRM 21.7.2.4.5.6, *Adjusted Employer's Federal Tax Return or Claim for Refund*, for processing Form 94X-X.

Reminder: If the case is imaged in CII, please see the guidance in the Correspondence Imaging Inventory (CII) for Accounts Management - Course 28570 (Version 5 - 3/1/2024) accessed through Integrated Talent Management, for more information on splitting images.

(8) Accounts Management does not work any correspondence cases in status 22, unless otherwise noted in the IRM. For more information on working status 22 correspondence, see IRM 21.3.3.4.8.2(8), *Campus Collection Function Correspondence/Inquiry/Notice*.

(9) Reply to status 24 correspondence not related to collection matters (can't pay, won't pay, will pay later) unless the notice generated by the adjustment will provide a complete response to the taxpayer's issue(s).

(10) If the correspondence is can't pay, won't pay, or will pay later, regardless of the account status, see the table below for collection routing:

Cases in Status:	Route Collection correspondence to:	Action needed:
1) BOD SB/SE and TS Status 22 or 24	Depending on the BOD, route to ACS Support Liaisons at SB/SE Consolidated State Mapping for ACS Support or W&I (TS) Consolidated State Mapping for ACS Support.	1. Route correspondence using EEFax. For CII cases, see IRM 21.5.1.5.2(7)(2nd Exception), <i>Cases Currently Assigned in CII</i> , for procedures. 2. ACSS will process the correspondence.
2) 20, 21, 23, 53, 56, or 58	Compliance Services Collection Operations at Service Center Addresses for Collection Operations.	1. Cases in status 20, 21, 56, or 58, input CC STAUP for 06 cycles. 2. Route the correspondence using EEFax. For CII cases, see IRM 21.5.1.5.2 (7)(2nd Exception), <i>Cases Currently Assigned in CII</i> , for procedures. 3. CSCO will process the correspondence.

(11) If an original return is attached to correspondence on an account not in status 26 and research shows no TC 150 posted, input TC 599 with appropriate closing code and send to the proper function for processing. See IRM 5.19.2, *Individual Master File (IMF) Return Delinquency*, for IMF guidance or IRM 5.19.22, *Business Master File (BMF) Return Delinquency*, for BMF guidance.

Reminder: For more information on inputting TC 599 with the appropriate closing code, see Document 6209 TDI/DEL RET Closing Codes.