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From:

Sent: 09/29/2008 11:38 AM

To:

Cc:

Subject: Digital Signature of F906 and Acceptance Letters

Based on information below, it looks like DFOs should not execute closing agreement using digital signatures.

From:

Sent: Thursday, September 25, 2008 11:56 AM

To:

Cc:

Subject: RE: Digital Signature of F906 and Acceptance Letters

IRM 8.13.1.2.13 states that:

(1) A Service official executing a closing agreement pursuant to authority delegated by the Commissioner of the Internal Revenue should sign following the words "Commissioner of the Internal Revenue" and show (by writing, printing, typing, or stamping) the signer's title and the date signed."

Based on above language I would argue that the IRM provision does not go far enough to provide for electronic signatures on closing agreements.

But the Internal Revenue Code seems to provide more options. Section 6061 covers the ability to use electronic signatures:

§ 6061. Signing of returns and other documents

(a) General rule.--Except as otherwise provided by subsection (b) and sections 6062 and 6063, any return, statement, or other document required to be made under any provision of the internal revenue laws or regulations shall be signed in accordance with forms or regulations prescribed by the Secretary.

(b) Electronic signatures.--

(1) In general.--The Secretary shall develop procedures for the acceptance of signatures in digital or other electronic form. Until such time as such procedures are in place, the Secretary may--

(A) waive the requirement of a signature for; or

(B) provide for alternative methods of signing or subscribing,

a particular type or class of return, declaration, statement, or other document required or permitted to be made or written under internal revenue laws and regulations.

According to _____ of Branch _____ (the Branch that covers Section 6061) the Commissioner has designated the Electronic Tax Administration (ETA) Director to coordinate, review and approve all business decisions on alternative signature methods. The Service has been using this administrative process to approve various signature alternatives for documents filed with the Service. The ETA in March 2004 codified their procedures for accepting signature alternatives which I have attached. I suggested calling _____, who coordinates electronic signature issues for ETA, for more information.

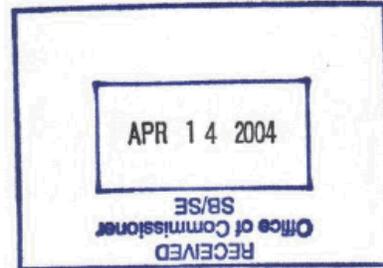
ATTACHMENT:



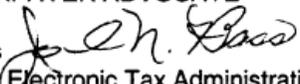
INFORMATION TECHNOLOGY SERVICES

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

March 12, 2004



MEMORANDUM FOR DIVISION COMMISSIONERS
CHIEF, CRIMINAL INVESTIGATION
CHIEF COUNSEL
NATIONAL TAXPAYER ADVOCATE

FROM: Jo Ann N. Bass 
Acting Director, Electronic Tax Administration

SUBJECT: Procedures for Alternative Signature Proposals

In March 1997, the Office of Electronic Tax Administration (ETA) established the IRS Authentication Program to address issues relating to authentication and alternative signatures. This program was responsible for approving Service-wide proposals for IRS to accept alternative signatures for documents relating to return filing and requests for tax data information. As a part of organizational redesign, it was reconfirmed that ETA should continue to play a leadership role to assure consistency and appropriate coordination with affected external stakeholders such as software companies. Because of organizational and staffing changes, many are not aware of ETA's responsibility. The purpose of this memo is to clarify this role, and establish formal procedures for submitting, reviewing, and approving alternative signature proposals.

IRS organizational units seeking approval to accept an alternative signature from taxpayers and tax professionals for tax related forms, statements, applications, information requests, and similar transactions should submit a proposal to the Strategic Services Division of ETA. For the purpose of the IRS Authentication Program, alternative signatures are signatures other than original handwritten signatures inscribed on the relevant document. They include, but are not limited to electronic signatures such as digital signatures and Personal Identification Numbers (PINs), as well as signature stamps, faxed copies of signatures, photocopies of signatures, and signature documents like Form 8453, U.S. Individual Income Tax Declaration for an IRS *e-file* Return.

The Strategic Policy Branch will conduct a review of each proposal that includes assessments of the legal validity of the signature, customer and business benefits, compliance risks, and authentication methods used to confirm the identity of the signer. They will also coordinate the clearance of proposals through Chief Counsel, Criminal Investigation, Disclosure, and Privacy Advocate as needed. Upon completion of the review, Strategic Policy will prepare a written evaluation and recommendation for approval or disapproval. The Director of Strategic Services will examine the proposal, evaluation, and recommendation; and approve or disapprove the request.

In keeping with ETA's commitment to reduce taxpayer burden, safeguard privacy, and maintain the integrity of IRS tax filing systems, we are working to improve and streamline the review process for alternative signature proposals. Attached are the general procedures, a template for providing information required for analysis, and a list of signature methods used by the Service.

If you have any questions, please call me or have a member of your staff contact Shirley Cannady at (202) 283-0453.

Attachment

Procedures for Alternative Signature Proposals

February 8, 2004

A. Background

The Electronic Tax Administration (ETA) implemented the IRS Authentication Program in March 1997 to focus on issues regarding:

- a) Alternative signature solutions for tax documents and requests for tax data information, and
- b) Authentication methods for verifying the identity of taxpayers and third parties who file, pay, and communicate electronically with IRS.

Title II of the Internal Revenue Service Restructuring and Reform Act of 1998 (RRA 98) directs the Secretary of the Treasury to "develop procedures for acceptance of signatures in electronic form." It further states that in the interim, "the Secretary may waive the requirement of a signature on an electronically filed tax return or provide for alternative methods of signing."

3. As a part of the IRS Authentication Program, ETA is responsible for evaluating and approving proposals for IRS to accept alternative signatures.
4. For the purpose of the IRS Authentication Program, alternative signatures are signatures other than original handwritten signatures inscribed on the paper relevant document. They include, but are not limited to electronic signatures such as digital signatures, Personal Identification Numbers, and passwords, as well as signature stamps, faxed copies of signatures, photocopies of signatures, and signature documents such as Form 8453, U.S. Individual Income Tax Declaration for an IRS *e-file* Return.

B. Scope

These procedures apply to proposals for IRS to accept alternative signatures from individual and business taxpayers, as well as tax professionals (e.g., Reporting Agents, Tax Preparers, Practitioners, Electronic Return Originators, Transmitters, etc.) for tax forms, statements, applications, and requests for tax data information. They also apply to proposals to modify procedures and forms for signature alternatives when the changes impact transaction safeguards such as authentication of identity and verification of tax information.

2. These procedures do not apply to fax and stamp signatures covered by IRS guidelines issued June 2003 titled, Use of Fax and Signature Stamps for Taxpayer Submissions. These procedures do not apply to alternative signature proposals for IRS employees to sign internal forms and documents in the performance of their duties. Examples of such documents include Form 872, Consent to Extend the Time to Assess Tax, and IRS Form 5081, Information System User Registration/Change Request. Mission Assurance issues and maintains procedures for these programs. These procedures do not apply to requests for signature waivers.

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C. Effective Period

These procedures are effective upon issuance and will remain in effect until canceled or superseded.

Requesting Approval of an Alternative Signature

The originating office should complete the attached template (Proposal for Alternative Signature) and ensure it contains sufficient information to analyze the signature alternative. They should submit the proposal along with a memorandum from their Director to the Director of ETA's Strategic Services Division. To help expedite the review, the proposal should include the following:

- ◆ Background information on the document or transaction that requires the alternative signature
- ◆ A description of current and proposed procedures for signing the document or transaction
- ◆ The authentication method used to verify the identity of the signer
- ◆ Issues, benefits, and precedents relating to the new alternative
- ◆ Any known business and compliance risk scenarios
- ◆ Impact/input from internal and external stakeholders
- ◆ Opinions and related reports and regulations
- ◆ Relevant statistics that support the use of the alternative signature
- ◆ References to any IRS publications such as Internal Revenue Manuals (IRMs) that cover procedures regarding signatures for the document or transaction

References to existing documentation that provide sufficient information may be used as responses to some items in the proposal template. If references are used, they should be included as attachments to the proposal.

An electronic copy of the proposal template is available upon request.

To facilitate the review, the originating office should involve Strategic Services in the early stages of development of the signature alternative.

E. Withdrawing Proposals

If the originating office decides to rescind a proposal, they should contact the reviewing analyst as soon as possible and submit a memorandum to the Strategic Services Division noting the reason for the withdrawal. The analyst will discontinue the review and update program files.

F. Analyzing Proposals

The Strategic Policy Branch of Strategic Services will analyze the proposal and recommend approval or disapproval. As a part of the analysis, the Strategic Policy Branch will:

Procedures for Alternative Signature Proposals

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- ◆ Review the proposal and request additional information as needed.
- ◆ Coordinate meetings and discussions with impact areas
- ◆ Research requests that use similar technology and processes
- ◆ Review relevant regulations and IRS publications as well as related Treasury Inspector General for Tax Administration (TIGTA) and General Accounting Office (GAO) reports
- ◆ Forward the proposal to Chief Counsel, Criminal Investigation, Disclosure, and Privacy Advocate for opinions and advice when appropriate
- ◆ Prepare a written evaluation and recommendation for approval or disapproval
- ◆ Prepare a reply memorandum

Strategic Services will make every effort to issue timely responses to proposals. Response time will vary depending on the completeness and complexity of the request. Proposals with insufficient information may be returned for updates.

G. Approving and Disapproving Proposals

The Director of the Strategic Services Division will:

- ◆ Review the proposal, reply memorandum, written evaluation, and recommendation
- ◆ Request additional information and research as needed
- ◆ Sign the reply memorandum and evaluation to approve or disapprove the proposal

H. Follow-up

The Strategic Policy Branch will complete follow-up action items that include:

- ◆ Issuing the reply memo and the written evaluation to the requesting office
- ◆ Updating IRS Authentication Program files
- ◆ Reviewing final procedures, IRM updates, and regulation changes that relate to the signature alternative

The originating office is responsible for including the Strategic Services Division on document clearances for final procedures.

I. Attachment(s)

1. Template for alternative signature proposals
2. Chart of signature methods

J. Contact Information

If you have questions regarding these procedures, please contact Shirley Cannady at (202) 283-0453 or Harvey Finnen at (202) 283-0407.

Proposal for Alternative Signature

Request No.: <small>(Assigned by Reviewing Office)</small>	Title:	Last Revision Date: mm/dd/yy	
Originating Office	Contacts <small>(Name & Symbol)</small>	Implementation Date	Requested Response Date
Summary of Proposal: <small>(Provide background information regarding the document or transaction.)</small>			
Procedures: <small>(Briefly describe current and proposed procedures for signing the document or transaction. Include how information is exchanged (e.g., via mail/fax/electronic transmission, etc.), the signature alternative (e.g., PIN, facsimile, rubber stamp, etc.), the authentication method for verifying the identity of the signer, adherence to NARA paper and electronic records retention requirements, and security measures. When referencing other documentation, please forward them as attachments.)</small>			
<u>Current Procedures</u>			

Request No.: <i>(Assigned by Reviewing Office)</i>	Title:	Last Revision Date: mm/dd/yy
Risk Scenario(s): <i>(Identify potential business and compliance risks.)</i>		
Internal Stakeholder Impact & Input: <i>(List business units impacted by this change. If possible, provide their comments.)</i>		
External Stakeholder Impact & Input: <i>(List external stakeholders impacted by this change. If possible, provide their comments.)</i>		
Opinions & Related Reports: <i>(e.g., Chief Counsel, GAO, or TIGTA findings, etc.)</i>		
Regulations: <i>(List regulations/IR Code that apply.)</i>		

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ALTERNATIVE SIGNATURE	DOCUMENT SIGNED AND SIGNER (e.g., Indiv./Business Taxpayer, Preparer, ERO, Reporting Agent, Practitioner, etc.)	SYSTEM: TRANSACTION INFORMATION	TEST PERIOD / OPERATIONAL PERIOD	SAFEGUARDS (e.g., authentication methods, proof of signer intent to adopt signature method, perjury statements, proof of authority to sign, data verification, etc.)
<p>Signature Document: Form 8453, U.S. Individual Income Tax Declaration for an IRS e-file Return</p>	<p>Electronic Form 1040 & 1040 A, U.S. Individual Income Tax Return Electronic Form 1040 EZ, Income Tax Return for Single Filers and Joint Filers With No Dependents Form 8453 can be used to authorize Direct Deposit and Electronic Funds Withdrawal (EFW)</p>	<p>IMF e-file: After return is prepared, taxpayer & ERO/Preparer complete and sign Form 8453. ERO forwards return electronically to IRS or to a third-party transmitter who transmits it to IRS. Form 8453 is mailed to IRS.</p>	<p>Operational 1985 TY thru Present</p>	<p>Form 8453 contains tax return information from a specific electronic Form 1040, Form 1040A, or Form 1040EZ. It is signed to authenticate/legalize the information on the electronic return. Form 8453 contains perjury statements for the taxpayer, ERO, and Preparer. The ERO is required to mail the completed Form 8453 with original signatures to IRS.</p>
<p>Signature Document: Form 8453-F, U.S. Estate or Trust Income Tax Declaration and Signature for Electronic and Magnetic Media Filing</p>	<p>Signer: Taxpayer, ERO, Paid Preparer Electronic Form 1041, U.S. Income Tax Return for Estates and Trusts Related paper schedules & statements Form 8453-F can be used to authorize Electronic Funds Withdrawal (EFW)</p>	<p>Magnetic Tape Program: Return is prepared and filed by ERO who forwards it to IRS on magnetic media. After return is prepared, Reporting Agent/Fiduciary/ERO/Preparer complete and sign Form 8453-F. Reporting Agent/ERO forwards return to IRS on magnetic media. Form 8453-F is mailed to IRS.</p>	<p>Operational 1988 thru February 2004</p>	<p>Participants must file Form 9041, Application/Registration for Electronic/Magnetic Media Filing of Business Return. Form 8453-F contains tax return information from a specific electronic Form 1041. It is signed to authenticate/legalize the information on the electronic return and related paper schedules & statements. Form 8453-F contains perjury statements for the Fiduciary, ERO and preparer. IRS receives original copy of Form 8453-F with original signatures. If Form 8453-F is for multiple returns, an authorized signer must attach a multiple-return information listing. Each taxpayer's name and EIN must be confirmed with Form 8655, Reporting Agent Authorization for Magnetic Tape/Electronic Filers.</p>
<p>Signature Document: Form 8453-P, U.S. Partnership Declaration for Magnetic Media/Electronic Filing (1988 - 1998) Form 8453-P, U.S. Partnership Declaration and Signature for Electronic Filing (1999 - 2003)</p>	<p>Electronic Form 1065, U.S. Return of Partnership Income Related paper schedules & statements Signer: Partner or LLC Member, ERO, Paid Preparer</p>	<p>Magnetic Tape, BBS using modem and telephone lines, MITRON, floppy disk (all discontinued): After return is prepared, taxpayer/ERO/Preparer complete and sign Form 8453-P. ERO forwards return to IRS or a third-party transmitter who transmits to IRS. Form 8453-P is mailed to IRS.</p>	<p>Magnetic Media Operational 1986 thru 1998 TY ----- EMS Operational 1999 thru Present</p>	<p>Participants must file Form 9041, Application/Registration for Electronic/Magnetic Media Filing of Business Return Form 8453-P contains tax return information from a specific electronic Form 1065. It is signed to authenticate/legalize the information on the electronic return and related paper schedules & statements. Form 8453-P contains perjury statements for the Partner/LLC Member, ERO, & Paid Preparer. IRS receives original copy of Form 8453-P with original signatures. If Form 8453-P is for multiple returns, an authorized signer must attach a multiple-return information listing.</p>
<p>Signature Document: Form 8453-OL, U.S. Individual Income Tax Declaration for an e-file Online Return</p>	<p>Electronic Form 1040, Form 1040EZ Form 8453-OL can be used to authorize Direct Deposit and Electronic Funds Withdrawal (EFW) Signer: Taxpayer</p>	<p>IMF e-file: Taxpayer or tax professional prepares return on computer & transmits it on-line to an electronic return transmitter who formats it & transmits it to IRS. Taxpayer mails completed signed Form 8453-OL to IRS.</p>	<p>Operational 1993 thru Present</p>	<p>Form 8453-OL contains tax return information from a specific electronic Form 1040, Form 1040A, or Form 1040EZ. It is signed to authenticate/legalize the information on a specific electronic return. Form 8453-OL contains a perjury statement for the taxpayer. The taxpayer is required to mail the completed Form 8453-OL with original signatures to IRS</p>

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ALTERNATIVE SIGNATURE	DOCUMENT SIGNED AND SIGNER (e.g., Individ./Business Taxpayer, Preparer, ERO, Reporting Agent, Practitioner, etc.)	SYSTEM: TRANSACTION INFORMATION	TEST PERIOD/ OPERATIONAL PERIOD	SAFEGUARDS (e.g., authentication methods, proof of signer intent to adopt signature method, perjury statements, proof of authority to sign, data verification, etc.)
<p>Signature Document: Form 4996, Electronic/Magnetic Media Filing Transmittal for Wage and Withholding Tax Returns</p>	<ul style="list-style-type: none"> ◆ Electronic Form 941, Employer's Quarterly Federal Tax Return ◆ Electronic Form 940, Employer's Annual Federal Unemployment (FUTA) Tax Return ◆ Other Electronic Form 94x <p>Signer: Reporting Agent, Authorized Preparer</p>	<p>Magnetic Tape Program: After return is prepared, Form 4996 is completed, signed by reporting agent or authorized corporate employee, and sent to IRS. The return is forwarded to IRS on magnetic media.</p>	<p>Operational 1986 thru February 2004</p>	<ul style="list-style-type: none"> ◆ Participants must file Form 9041, Application/Registration for Electronic/Magnetic Media Filing of Business Return ◆ Form 4996 is completed, signed by a reporting agent or corporate employee who is responsible for preparation of tax returns. It is received by IRS before any magnetically filed return is complete. ◆ Form 4996 contains cumulative tax totals from associated tax returns. It is signed to authenticate the information on the electronic return. ◆ Form 4996 contains perjury statements for the Reporting Agent/Authorized Preparer. ◆ Form 8655, Reporting Agent Authorization for Magnetic Tape/Electronic Filers, must be completed with taxpayer and reporting agent information and signed by the taxpayer/authorized representative & reporting agent. This form is mailed to IRS.
<p>PIN: Customer Service Number (CSN); 5-Digit PIN; IRS-Generated</p>	<ul style="list-style-type: none"> ◆ Form 1040EZ TeleFile, Income Tax Return for Single Filers and Joint Filers With No Dependents <p>Signer: Individual Taxpayer</p>	<p>IMF TeleFile: Return filed via Touch-Tone telephone. After return data is entered and taxes are computed, taxpayer enters CSN to sign return. The Integrated Voice Response System (IVRS) translates the data, inserts it into a data packet, & transmits it to an IRS mini-computer system.</p>	<p>Piloted in Ohio 1982 - 1993 FS ----- Expanded to 6 additional states for 1984 FS ----- Expanded to 3 additional states for 1995 FS ----- Operational nationwide 1996 FS thru Present</p>	<ul style="list-style-type: none"> ◆ IRS pre-identifies eligible taxpayers & mails them a federal TeleFile Tax Package for 1040EZ that includes the CSN PIN. ◆ Primary taxpayer's SSN, CSN, & Date of Birth (DOB) are required, and must match the info. on the IRS database. For joint returns, the spouse's SSN and CSN are required and must match the info. on the IRS database. ◆ After taxpayer enters tax return information and TeleFile computes taxes, TeleFile plays a voice perjury statement and primary taxpayer must enter the CSN as their signature. ◆ For joint returns, TeleFile will replay tax amount and spouse must enter their CSN.
<p>Identification Information: SSN + first 5 characters of responsible official's last name</p>	<ul style="list-style-type: none"> ◆ Form 941 TeleFile, Employer's Quarterly Federal Tax Return <p>Signer: Business Filer</p>	<p>BMF TeleFile: Return filed via Touch-Tone telephone. After return data is entered and taxes are computed, filer enters identification information to sign return. Front end processor is the same IVRS system used for 1040EZ TeleFile.</p>	<p>Piloted in Southeast Region 1st Qtr. 1997 - Jan 1998 ----- Operational nationwide 1st Qtr. 1999 thru Present</p>	<ul style="list-style-type: none"> ◆ IRS mails 941 TeleFile packages to taxpayers who meet qualifications. ◆ After the TeleFile user enters 941 return information & TeleFile computes taxes, TeleFile plays a jurat statement & prompts for the authorized signer to enter the identification information that constitutes their electronic signature.

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ALTERNATIVE SIGNATURE	DOCUMENT SIGNED AND SIGNER (e.g., Indiv./Business Taxpayer, Preparer, ERO, Reporting Agent, Practitioner, etc.)	TRANSACTION INFORMATION	TEST PERIOD / OPERATIONAL PERIOD	SAFEGUARDS (e.g., authentication methods, proof of signer intent to adopt signature method, perjury statements, proof of authority to sign, data verification, etc.)
<p><u>Name & Date Entry:</u> Paid Preparer name (up to 35-characters) + Date (8 characters)</p>	<p>Electronic Forms: <ul style="list-style-type: none"> ◆ Form 2688, Application for Additional Time to File U.S. Individual Income Tax Return. ◆ Form 2350, Application for Extension of Time To File U.S. Income Tax Return. ◆ Form 56, Notice Concerning Fiduciary Relationship ◆ Accompanying statements and schedules Signer: <i>Preparer other than Taxpayer, Fiduciary</i> </p>	<p>Individual Electronic Filing: Electronic Transmitted Documents (ETD) System. Application or notice is prepared and signed electronically (by Preparer other than Taxpayer, or by Fiduciary) by entering name & date. Transmitter or Preparer/ERO transmits it to IRS.</p>	<p>Operational 1996 thru Present ----- Form 56 Operational 2001 TY thru Present</p>	<p>◆ Preparer must be authorized to participate in the IRS e-file Program. ◆ Form 2350, 2688 & 56: A jurat statement and a statement indicating signer intent to adopt name and date entry as signature displays above entry fields.</p>
<p><u>PIN:</u> 10-Digit PIN; IRS-Generated from the EMS Customer Database. Referred to as EMS PIN</p>	<p>◆ Form 941 e-file, Employer's Quarterly Federal Tax Return ◆ Form 940 e-file, Employer's Annual Federal Unemployment (FUTA) Tax Return Signer: <i>Reporting Agent, Business Filer</i></p>	<p>Form 941 e-file Program & Form 940 e-file Program Return is prepared electronically & filer signs by entering the EMS PIN. Return is filed in Electronic Data Interchange (EDI) and non EDI format directly to IRS via dial-up phone lines.</p>	<p>F 941 Piloted 1994 F 941 Operational nationwide 1996 thru Present ----- F 940 Operational FY 2001 thru Present</p>	<p>◆ To request a PIN, a business filer who has signature authority for the return submits a Letter of Application (LoA) through the mail or electronically through an Approved IRS e-file for Business Provider (Transmitter). ◆ Upon approval of filer's LoA, IRS mails a PIN and Statement of Receipt to the filer. ◆ The filer signs the Statement of Receipt and mails to IRS to complete approval and activate PIN. ◆ Only authorized users have access to the system.</p>
<p>◆ Form 941 On-Line, Employer's Quarterly Federal Tax Return ◆ Form 940 On-Line, Employer's Annual Federal Unemployment (FUTA) Tax Return Signer: <i>Business Filer</i></p>	<p>Return is prepared electronically & business filer signs by entering the EMS PIN. Return is filed via Internet thru third party transmitter who batches & electronically forwards return to IRS.</p>	<p>On-Line ELF: Return is prepared electronically & business filer signs by entering the EMS PIN. Return is filed via Internet thru third party transmitter who batches & electronically forwards return to IRS.</p>	<p>F 941 Piloted 1999 ----- F 941 Operational nationwide April 2000 thru Present ----- F 940 Operational 2001 TY 2002 FS thru Present</p>	<p>◆ To request a PIN, a business filer who has signature authority for the return submits a Letter of Application (LoA) through the mail or electronically through an Approved IRS e-file for Business Provider (Transmitter). ◆ Upon approval of filer's LoA, IRS mails a PIN and Statement of Receipt to the filer. ◆ The filer signs the Statement of Receipt and mails to IRS to complete approval and activate PIN. ◆ Only authorized users have access to the system.</p>
<p>◆ Form 941 On-Line, Employer's Quarterly Federal Tax Return ◆ Form 940 On-Line, Employer's Annual Federal Unemployment (FUTA) Tax Return Signer: <i>Business Filer</i></p>	<p>Employment Tax e-file: Return filed online (using XML technology) thru an ERO, Reporting Agent, or third-party transmitter. Business Filer enters EMS PIN as their signature on the return.</p>	<p>Employment Tax e-file: Return filed online (using XML technology) thru an ERO, Reporting Agent, or third-party transmitter. Business Filer enters EMS PIN as their signature on the return.</p>	<p>Operational January 2003 thru Present</p>	<p>◆ Transmitters, Reporting Agents, & Software Developers must complete Form 9041, Application/Registration for Electronic Filing. ◆ The ERO or ERO's client (business filer) must register for a PIN thru an IRS approved software provider. IRS sends PIN to the business client who uses it to sign their return. ◆ The program conducts security checks & sends electronic acknowledgments. ◆ Only authorized users have access to the system.</p>

ALTERNATIVE SIGNATURE	DOCUMENT SIGNED AND SIGNER (e.g., Indiv./Business Taxpayer, Preparer, ERO, Reporting Agent, Practitioner, etc.)	TRANSACTION INFORMATION	TEST PERIOD/ OPERATIONAL PERIOD	SAFEGUARDS (e.g., authentication methods, proof of signer intent to adopt signature method, perjury statements, proof of authority to sign, data verification, etc.)
<p>PIN: Self-Select PIN; 5-Digit Numeric, except all zeros; Taxpayer created; IRS does not maintain a database of this Self-Select PIN. This PIN is not verified against IRS records.</p>	<ul style="list-style-type: none"> Electronic Form 1040 & 1040 A, U.S. Individual Income Tax Return Electronic Form 1040 EZ, Income Tax Return for Single Filers and Joint Filers With No Dependents Electronic Form 4868, Application for Automatic Extension of Time To File U.S. Individual Income Tax Return, when <i>EFW</i> is authorized. (Operational 2003 TY) Electronic Form 2350, Application for Extension of Time To File U.S. Income Tax Return, when <i>EFW</i> is authorized. Form 9465, Installment Agreement Request <p>Signer: <i>Individual Taxpayer</i></p>	<p>IMF e-file: Self-Select PIN Method (requires <i>Taxpayer Adjusted Gross Income (AGI)</i>): Individual using an On-line Provider, or a tax professional, uses computer & tax preparation software to prepare an electronic form. Taxpayer enters PIN to sign form. Form is electronically transmitted to an authorized e-file provider (transmitter) who formats & transmits it to IRS.</p>	<p>Operational 2000 TY 2001 FS thru Present ----- Form 9465 Operational 2001 TY thru Present</p>	<ul style="list-style-type: none"> Primary taxpayer's Name, SSN, DOB, & original AGI from prior year tax return are required & must match IRS records If taxpayers are married filing jointly, spouse's SSN is required and must match IRS records If taxpayers are married filing jointly, each spouse must select and enter their PIN to sign form after it is completed. Entry for signature follows perjury statement. Form 4868: Includes statement showing signer intent to adopt PIN as their signature. For FS 2001 only, taxpayer's "Total Tax" from prior year tax return was required and verified against IRS records.
	<ul style="list-style-type: none"> Electronic Form 2350, Application for Extension of Time To File U.S. Income Tax Return, without <i>EFW</i>. Electronic Form 2688, Application for Additional Extension of Time To File U.S. Income Tax Return, without <i>EFW</i>. <p>Signer: <i>Taxpayer</i></p>	<p>IMF e-file: Self-Select PIN (Taxpayer AGI not required): Individual using an On-line Provider, or a tax professional, uses computer & tax preparation software to prepare an electronic application. Taxpayer enters PIN to sign application. Application is electronically transmitted to an authorized e-file provider (transmitter) who formats & transmits it to IRS.</p>	<p>Operational 2000 TY 2001 FS thru Present</p>	<ul style="list-style-type: none"> Primary taxpayer's Name, SSN & DOB must match IRS records. AGI is not required. If taxpayers are married filing jointly, spouse's SSN is required and must match IRS records If taxpayers are married filing jointly, each spouse must select and enter their PIN to sign application after it is completed. Entry for signature follows perjury statement. Form 2350 & 2688: Includes statement showing signer intent to adopt PIN as their signature.
	<ul style="list-style-type: none"> Form 4868 TeleFile, Application for Automatic Extension of Time to File U.S. Individual Income Tax Return <p>Signer: <i>Individual Taxpayer</i></p>	<p>IMF TeleFile: Application filed via Touch-Tone telephone with authorization for Electronic Funds Withdrawal (EFW). After application data is entered, taxpayer enters PIN as signature.</p>	<p>Operational 2000 FS thru Present</p>	<ul style="list-style-type: none"> Primary taxpayer's SSN, DOB, & original AGI from prior year tax return are required & must match IRS records. Taxpayer must have filed a prior year return. System informs taxpayer that the Self-Select PIN is their signature and authorizes EFW prior to taxpayer entering a Self-Select PIN.

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ALTERNATIVE SIGNATURE	DOCUMENT SIGNED AND SIGNER (e.g., Individ./Business Taxpayer, Preparer, ERO, Reporting Agent, Practitioner, etc.)	TRANSACTION INFORMATION	TEST PERIOD/ OPERATIONAL PERIOD	SAFEGUARDS (e.g., authentication methods, proof of signer intent to adopt signature method, perjury statements, proof of authority to sign, data verification, etc.)
<p>PIN: ERO PIN: 11-Digit Alphanumeric; Consist of ERO's 6-Digit EFIN (assigned by IRS) followed by 5-Digit Self-Selected numeric (except all zeros) PIN</p>	<p>Electronic Forms: <ul style="list-style-type: none"> Form 1040, 1040 A, 1040 EZ Signer: Authorized Preparer (ERO)</p>	<p>IMF e-file: Practitioner PIN Method Tax professional/ERO prepares electronic return. The taxpayer or ERO enters the taxpayer's PIN as the taxpayer's signature. When the Practitioner PIN Method is used, the ERO also signs by entering their ERO PIN. The ERO electronically forwards return to IRS or to a transmitter who transmits return to IRS.</p>	<p>Operational 2000 TY 2001 FS thru Present</p>	<p> <ul style="list-style-type: none"> Tax professional (ERO) is required to enter their ERO PIN for all e-file returns except On-line returns, when the Practitioner PIN Method is used. IRS assigns EFINs. The ERO PIN is captured as a part of the Authentication Record and validated. The first six numbers must be the EFIN contained in the DCN. </p>
<p>PIN: e-Services Self-select PIN; Designated by registrant during e-services Registration; 5-Digit Numeric</p> <p>After established, IRS maintains a record of this Self-select PIN and it is verified against IRS records when used for e-services.</p>	<p>Electronic Forms: <ul style="list-style-type: none"> Form 1120, 1120S, 1120-POL, 990, 990EZ, 8868, 941. Signer: Practitioner/ERO, Reporting Agent</p>	<p>BMF e-file: Practitioner PIN Method Tax professional/ERO or reporting agent prepares electronic return (using XML technology). The corporate officer or ERO enters the corporate officer's PIN as the corporate officer's signature. When the Practitioner PIN Method is used, the ERO also signs by entering their ERO PIN. The ERO electronically forwards return to IRS or to a transmitter who transmits return to IRS.</p>	<p>Operational 2003 TY 2004 FS thru Present</p>	<p> <ul style="list-style-type: none"> All of the above safeguards for ERO PIN apply. Payroll Services (Reporting Agents) must be authorized by IRS to prepare and electronically file returns. </p>
<p>PIN: e-Services Self-select PIN; Designated by registrant during e-services Registration; 5-Digit Numeric</p> <p>After established, IRS maintains a record of this Self-select PIN and it is verified against IRS records when used for e-services.</p>	<p>On-line e-file Application to become an e-file provider. Signer: Business Taxpayer, ERO, Transmitter, Reporting Agent, Other Tax Professionals</p>	<p>e-services e-file Application: Individual logs in to e-services Registered User Portal (RUP), e-file Application, inputs application information, enters PIN as electronic signature, and submits application.</p>	<p>Operational 2003 TY thru Present</p>	<p> <ul style="list-style-type: none"> Applicant must be registered with e-services. On-line registration requires an individual to provide their name, SSN, DOB, and Adjusted Gross Income (AGI), which are verified against IRS database records. IRS mails a confirmation code to the user who must log in to e-services and enter the confirmation code to complete registration. A username, password, and PIN are established during registration and are required to use e-services e-file Application. The system validates username and PIN against IRS database records. The PIN entry field follows a statement indicating the PIN represents the applicant's electronic signature. The communication session for all external users is encrypted. All of the above safeguards for e-services e-file Application PIN apply. </p>
<p>On-Line Preparer Tax ID Number (PTIN) Application Signer: Preparer</p>	<p>Electronic Business Returns: <ul style="list-style-type: none"> Form 1120, 1120S, 1120-POL, 990, 990EZ, 8868, 941 Signer: Business Filer (Corporate Officer), ERO</p>	<p>e-services PTIN Application: Individual logs in to e-services Registered User Portal (RUP), PTIN Application, inputs application information, enters PIN as electronic signature, and submits application.</p>	<p>Operational 2003 TY thru Present</p>	<p> <ul style="list-style-type: none"> This option is under development. </p>

Signature Methods

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ALTERNATIVE SIGNATURE	DOCUMENT SIGNED AND SIGNER (e.g., Indiv./Business Taxpayer, Preparer, ERO, Reporting Agent, Practitioner, etc.)	TRANSACTION INFORMATION	TEST PERIOD/ OPERATIONAL PERIOD	SAFEGUARDS (e.g., authentication methods, proof of signer intent to adopt signature method, perjury statements, proof of authority to sign, data verification, etc.)
<p><u>COMBINATION</u></p> <p>Signature Authorization Document: Form 8878, IRS e-file Signature Authorization for Application for Extension of Time To File</p> <p>Plus</p> <p>PIN: Self-Select PIN; 5-Digit Numeric, except all zeros; Designated by Taxpayer</p> <p>The system does not verify this PIN against IRS records.</p>	<p>◆ Electronic Form 2888, & Form 2350 applications for extension of time to file U.S. Individual income tax return, only when taxpayer authorizes ERO to enter taxpayer's PIN.</p> <p>◆ Electronic Form 4868, Application for Automatic Extension of Time To File U.S. Individual Income Tax Return, when EFW is authorized.</p> <p>Signer: Taxpayer, Authorized ERO</p>	<p>IMF e-file (with & without Practitioner PIN method): Application (Form 4868, 2888, 2350) is prepared electronically using tax preparation software.</p> <p>Taxpayer uses paper Form 8878 to designate a PIN and indicate whether they authorize an ERO to enter the PIN as the taxpayer's signature on the electronic application/form. Taxpayer signs Form 8878.</p> <p>ERO uses Practitioner PIN Method (Taxpayer DOB & AGI not required): ERO also signs Form 8878. Taxpayer or ERO enters PIN as the taxpayer's signature on the electronic form.</p> <p>ERO does not use Practitioner PIN Method (Taxpayer DOB & AGI required): On the electronic form, the taxpayer or ERO enters the PIN as the taxpayer's signature and the taxpayer's DOB and prior year AGI for the Authentication Record.</p> <p>ERO forwards return electronically to IRS or a third-party transmitter who transmits return to IRS.</p>	<p>Operational 2001 thru Present</p> <p>Form 4868 with Practitioner PIN method Operational 2003 TY thru Present</p>	<p>◆ ERO confirms the identity of the taxpayer</p> <p>◆ Form 8878 contains tax return information from a specific electronic Form 4888, Form 2688, or Form 2350. It is signed to authenticate/legalize the information on a specific electronic application and to authorize ERO to enter the Self-Select PIN as taxpayer's signature on an electronic application. Form 8878 also contains a Declaration Control Number (DCN) from the electronic return.</p> <p>◆ Form 4868: If ERO does not use the Practitioner PIN method, the taxpayer's DOB & AGI are required.</p> <p>◆ If taxpayers are married filing jointly, each spouse must select their own PIN.</p> <p>◆ Form 8878 contains a perjury statement for the taxpayer.</p> <p>◆ Form 8878 contains original signature of taxpayer.</p> <p>◆ If ERO uses the Practitioner PIN method, the ERO must also sign using the ERO PIN.</p> <p>◆ The ERO must retain Form 8878 for 3 years.</p>
<p><u>COMBINATION</u></p> <p>Signature Authorization Document: Form 8879, IRS e-file Signature Authorization</p> <p>Plus</p> <p>PIN: Self-Select PIN; 5-Digit Numeric, except all zeros; Designated by Taxpayer</p> <p>The system does not verify this PIN against IRS records.</p>	<p>◆ Electronic Form 1040, Form 1040A, & Form 1040EZ</p> <p>Signer: Taxpayer, Authorized ERO</p>	<p>IMF e-file (with & without Practitioner PIN method): Return is prepared electronically using tax preparation software.</p> <p>Taxpayer uses paper Form 8879 to designate a PIN & indicate whether they will enter the PIN, or authorize the ERO to enter the PIN as the taxpayer's signature on the electronic return. Taxpayer signs Form 8879.</p> <p>ERO uses Practitioner PIN Method (Taxpayer DOB & AGI not required): ERO also signs Form 8879. Taxpayer or ERO enters PIN as the taxpayer's signature on the electronic return.</p> <p>OR</p> <p>If the ERO uses the Practitioner PIN method, the ERO is</p>	<p>Operational 2001 thru Present</p>	<p>◆ ERO confirms the identity of the taxpayer.</p> <p>◆ Form 8879 must be completed before the electronic return is transmitted. It contains tax return information from a specific electronic Form 1040, Form 1040A, or Form 1040EZ. It is signed to authenticate/legalize the information on a specific electronic return, to designate a PIN, and to indicate whether the taxpayer will enter the PIN or authorize the ERO to enter the PIN as taxpayer's signature on an electronic return. Form 8879 also contains a Declaration Control Number (DCN) from the electronic return.</p> <p>◆ SSN of taxpayer & taxpayer's spouse (if applicable) must match IRS records.</p> <p>◆ If taxpayers are married filing jointly, each spouse must select their own PIN.</p> <p>◆ Form 8879 contains one perjury statement for the taxpayer and one for the ERO, and has the original signature of taxpayer and ERO.</p> <p>◆ If the ERO uses the Practitioner PIN method, the ERO is</p>

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ALTERNATIVE SIGNATURE	DOCUMENT SIGNED AND SIGNER (e.g., Indiv./Business Taxpayer, Preparer, ERO, Reporting Agent, Practitioner, etc.)	SYSTEM: TRANSACTION INFORMATION	TEST PERIOD / OPERATIONAL PERIOD	SAFEGUARDS (e.g., authentication methods, proof of signer intent to adopt signature method, perjury statements, proof of authority to sign, data verification, etc.)
<p>COMBINATION</p> <p>Signature Authorization Documents:</p> <ul style="list-style-type: none"> ◆ Form 8879-C, IRS e-file Signature Authorization for Form 1120 ◆ Form 8879-S, IRS e-file Signature Authorization for Form 1120S ◆ Form 8879-EO, IRS e-file Signature Authorization for an Exempt Organization <p>Plus</p> <p>PIN:</p> <ul style="list-style-type: none"> Self-Select PIN; 5-Digit Numeric, except all zeros; Designated by Corporate Officer <p>The system does not verify this PIN against IRS records.</p>	<p>Electronic Forms:</p> <ul style="list-style-type: none"> ◆ Form 1120 ◆ Form 1120S ◆ Form 990, Form 990-EZ, Form 1120-POL ◆ Form 8879 can be used to authorize Electronic Funds Withdrawal (EFW) <p>Signer, <i>Business Filer (Corporate Officer), ERO</i></p>	<p>ERO does not use Practitioner PIN Method (Taxpayer DOB & AGI required):</p> <p>On the electronic return, the ERO enters the PIN as the taxpayer's signature and the taxpayer's DOB and prior year AGI for the <i>Authentication Record</i>.</p> <p>ERO forwards return electronically to IRS or a third-party transmitter who transmits return to IRS.</p>	<p>Operational 2003 TY 2004 FS thru Present</p>	<p>◆ If the Corporate Officer uses an ERO, the ERO confirms the identity of the Corporate Officer.</p> <p>◆ Corporate Officers that do not use an ERO must be registered with e-Services.</p> <p>◆ Form 8879 contains tax return information from a specific electronic Form 1120, Form 1120S, Form 990, Form 990EZ, or Form 1120-POL. It is signed to authenticate/legalize the information on a specific electronic return.</p> <p>◆ Form 8879 contains one perjury statement for the taxpayer and one for the ERO</p> <p>◆ Form 8879 contains original signature of taxpayer and ERO.</p> <p>◆ The ERO must retain Form 8879 for 3 years</p>
<p>Signature Stamp:</p>	<p>◆ BMF returns</p> <p>Signer, <i>Preparer</i></p>	<p>Modernized e-file (MeF)</p> <p>Return is prepared electronically using tax preparation software.</p> <p>Corporate Officer signs return with their PIN:</p> <p>Corporate Officer uses paper Form 8879 to designate PIN & indicate they will enter the PIN as their signature on the electronic return. Corporate Officer & ERO sign Form 8879. After return is complete, Corporate Officer enters their PIN on the electronic return.</p> <p>OR</p> <p>ERO signs return with Corporate Officer's PIN. Corporate Officer uses Form 8879 to designate PIN & authorize the ERO to enter the PIN as the Corporate Officer's signature on the electronic return. Corporate Officer & ERO sign Form 8879. After return is complete, ERO enters Corporate Officer's PIN on the electronic return.</p> <p>ERO forwards return electronically to a third-party transmitter who transmits to IRS. ERO retains Form 8879 for 3 years.</p>	<p>Currently Operational</p>	<p>◆ Taxpayer must sign return with original signature or approved alternative.</p> <p>◆ Guidelines exclude documents such as POAs, elections, applications for change in accounting method & consent forms.</p>

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ALTERNATIVE SIGNATURE	DOCUMENT SIGNED AND SIGNER (e.g., Indiv./Business Taxpayer, Preparer, ERO, Reporting Agent, Practitioner, etc.)	TRANSACTION INFORMATION	TEST PERIOD/ OPERATIONAL PERIOD	SAFEGUARDS (e.g., authentication methods, proof of signer intent to adopt signature method, perjury statements, proof of authority to sign, data verification, etc.)
<p><i>Faxed</i> Copy of Original Handwritten Signature</p>	<p>• Paper Forms used in document perfection (e.g., Form 2848, Form 8821, Form 4506, Form 2553, etc.) Signer: <i>Business Taxpayer, Individual Taxpayer, ERO, Practitioner, Representative</i> • Form 4804, Transmittal of Information Returns Reported Magnetically/Electronically Signer: <i>Business Taxpayer, Reporting Agent</i> • Form 8508, Request for Waiver From Filing Information Returns Magnetically</p>	<p>Paper Return Processing Completed tax returns and related documents are manually signed and transmitted to IRS via FAX. See "Use of Fax and Signature Stamps for Taxpayer Submissions," issued June 24, 2003. Paper Return Processing Form is completed, signed manually, & transmitted to IRS via FAX.</p>	<p>Operational 2003 thru Present</p>	<p>• IRS must be in communication with the taxpayer via telephone or mail. • FAX numbers are not publicized.</p>
<p>Scanned Signature Documents • Form 8453-C, U.S. Corporation Income Tax Declaration for an IRS e-file Return • Form 8453-S, S Corporation Declaration and Signature for Electronic Filing • Form 8453-EO, Exempt Organization Declaration and Signature for Electronic Filing</p>	<p>• Form 4419, Application for Filing Information Returns Magnetically/Electronically Signer: <i>Transmitter</i> Electronic Forms: • Form 1120 • Form 1120S • Form 990, Form 990-EZ, Form 1120-POL Signer: <i>Business Filer (Corporate Officer), Preparer, ERO</i></p>	<p>Paper Return Processing Form is completed, signed manually, & transmitted to IRS via FAX. Modernized e-file (MeF): Alter the return is prepared, an individual authorized to sign the business return signs a paper Form 8453-x, an ERO or the business scans the form and transmits it as a binary file attachment to the electronic return. The return is transmitted to IRS EMS.</p>	<p>Currently Operational</p>	<p>• A Power of Attorney (POA) is required. • IRS has trusted relationship with Transmitter</p>
			<p>Operational 2003 TY thru Present</p>	<p>• Form 8453-x contains tax return information from a specific electronic return and is signed to authenticate/legalize the information on the electronic return. • Form 8453-x contains perjury statements for the taxpayer/Corporate Officer, ERO, and Preparer. • If the taxpayer uses an ERO, the ERO authenticates the taxpayer's identity. • IRS receives Form 8453-x as a binary attachment to the electronic return.</p>

Notes:

- For the purpose of this document, alternative signatures are signatures other than original handwritten signatures affixed on the relevant paper document.
- This chart includes signature alternatives used for accepting tax returns and related documents. It does not include signature alternatives used by IRS for personnel and administrative purposes, nor those used by IRS employees in the performance of their official duties.
- This draft contains information collected from IRM's, Forms, IRS announcements, and a variety of other available sources. If you have corrections or updates, please contact Shirley Cannady at 202-283-0453 or Shirley.Cannady@irs.gov.
- Future updates to this chart may include:
 - o Form NJ-8879, NJ e-file Signature Authorization
 - o Form 8453 E, Employee Benefit Plan Declaration and Signature for Electronic/Magnetic Media Filing
 - o Form 5500, Annual Return/Report of Employee Benefit Plan
 - o Other signature alternatives used by IRS for administrative and work related purposes.