Although Enterprise Case Management Modernization Has Begun, No Legacy Systems Have Been Decommissioned

September 11, 2025

Report Number: 2025-208-050

Why TIGTA Did This Audit

IRS uses more than 60 different case management systems that vary widely in complexity, size, and customization to support tax administration. In January 2015, the IRS established the Enterprise Case Management (ECM) program to consolidate its case management systems. The mission of the ECM Office, in part, is to set forth a strategy and methodology to improve business processes and drive modernized business processes to the ECM platform. Legacy case management system functionalities will also be incorporated into the ECM platform.

According to the IRS, the ECM platform will allow authorized employees to see a taxpayer's full account, filing history, related case data, and prior communications to resolve cases more quickly.

We determined whether the ECM Office is effectively incorporating and decommissioning legacy case management systems' functionalities.

Impact on Tax Administration

This ECM program was designed to provide an enterprise solution for performing case management functions, thus reducing long-term costs, and increasing operational efficiency, innovation, and security.

What TIGTA Found

The IRS has not fully incorporated and decommissioned any legacy systems. In September 2020, we reported that the IRS did not have a clear and comprehensive strategy for decommissioning legacy case management systems. In response to our report, the IRS developed a decommissioning strategy and started its modernization efforts; however, no legacy systems have been decommissioned. Decommissioning legacy systems improves security, operational efficiency and reduces costs.

The IRS issued an IT Decommissioning Policy in January 2022 to proactively identify and decommission legacy case management systems as part of its modernization efforts. However, ECM program leadership did not prioritize decommissioning legacy case management systems and instead focused on providing modernized functionalities for users starting in January 2023. The IRS updated its internal policies in May 2024 to focus on process improvement and efficiencies to support transformation and agilities. The updated policy no longer includes a decommissioning process.

In addition, multiple changes in scope and IRS IT leadership slowed the ECM platform's progress. As a result, the IRS has not incorporated any case management systems into the ECM platform. We found that 17 (31 percent) of the 54 systems were being incorporated. However, none of the systems' functionalities have been fully incorporated.

Finally, we found that 34 (63 percent) of the 54 systems met the IRS's definition of a legacy system at the time of our review. The IRS spent over $39 million in Fiscal Year 2024 to maintain and operate these legacy case management systems and will continue spending funds until these systems are decommissioned.

In April 2025, the Chief Information Officer issued a memorandum to redefine a legacy system. The new definition will likely impact which systems are considered legacy.

What TIGTA Recommended

We recommended that the Chief Information Officer ensure that the ECM Office prioritizes the incorporation and decommissioning of the legacy case management systems and that all existing legacy case management systems, and any new projects incorporated into the ECM platform, comply with the April 2025 legacy definition. The IRS agreed with our recommendations and plans to decommission legacy case management systems or components that meet the April 2025 legacy definition and compile a formal listing of compliance case management systems based on the updated definition.

U.S. DEPARTMENT OF THE TREASURY

WASHINGTON, D.C. 20024

TREASURY INSPECTOR GENERAL
FOR TAX ADMINISTRATION

September 11, 2025

MEMORANDUM FOR: COMMISSIONER OF INTERNAL REVENUE

FROM: Diana M. Tengesdal
Acting Deputy Inspector General for Audit

SUBJECT: Final Audit Report – Although Enterprise Case Management Modernization Has Begun, No Legacy Systems Have Been Decommissioned (Audit No.: 2024208020)

This report presents the results of our review to determine whether the Enterprise Case Management Office is effectively incorporating and decommissioning legacy case management systems' functionalities. This review was part of our Fiscal Year 2025 Annual Audit Plan and addresses the major management and performance challenge of *Information Technology Modernization*.

Management's complete response to the draft report is included as Appendix III. If you have any questions, please contact me or Linna K. Hung, Acting Assistant Inspector General for Audit (Security and Information Technology Services).

Table of Contents

Background

The Internal Revenue Service (IRS) uses more than 60 different case management systems that vary widely in complexity, size, and customization to support tax administration. The IRS implemented these case management systems over many years to support the individual needs of multiple business units. In January 2015, the IRS formally established the Enterprise Case Management (ECM) program to consolidate the business unit case management systems. The mission of the ECM Office, in part, is to set forth a strategy and methodology to improve business processes and drive modernized business processes to the ECM platform.

The IRS envisioned that a new ECM investment would address the need to modernize, upgrade, and consolidate its many case management systems. This new ECM program was designed to provide an enterprise solution for performing case management functions, thus reducing long-term costs, and increasing operational efficiency, innovation, and security.[1]

The ECM program was a primary objective of the IRS's Integrated Modernization Business Plan and part of the Taxpayer First Act.[2] The ECM case management functions would be developed as common services for multiple systems to share. The updated ECM program's objectives are to:

- Administer the tax law to better enable all taxpayers to meet their obligations, while protecting the integrity of the tax system.

- Increase the access and use of federal financial data to strengthen governmentwide decision-making, transparency, and accountability.

- Improve federal financial management performance using innovative practices to support effective government.

The IRS initially received approximately $79.4 billion from the Inflation Reduction Act of 2022.[3] As of March 2025, Congress subsequently reduced this funding to $37.6 billion.[4] The Inflation Reduction Act Strategic Operating Plan also stated that the funding will allow the IRS to retire legacy systems, including legacy case management systems. Approximately $4.8 billion of Inflation Reduction Act funding was designated to modernize IRS systems.

The IRS developed a Decommissioning Strategy in 2021

It is important for the IRS to decommission a legacy system to improve security, operational efficiency and reduce costs. IRS defined a legacy system as one that is 25 years or older, used obsolete programming language, or lacked vendor support. In September 2020, we reported that the IRS did not have a clear and comprehensive overall strategy for decommissioning

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[1] See Appendix IV for a glossary of terms.

[2] *IRS Integrated Modernization Business Plan* (April 2019) and Pub. L. No. 116-25, 133 Stat. 981 (2019) (codified in scattered sections of 26 U.S.C.).

[3] Pub. L. No. 117-169, 136 Stat. 1818.

[4] The Fiscal Responsibility Act of 2023 (Pub. L. No. 118-5, 137 Stat. 10) rescinded $1.4 billion; the Further Consolidated Appropriations Act, 2024 (Pub. L. No. 118-47, 138 Stat. 460) rescinded $20.2 billion; and the Full-Year Continuing Appropriations and Extensions Act, 2025 (Pub. L. No. 119-4) rescinded another $20.2 billion.

legacy case management systems.[5] We recommended that the IRS develop a strategy that informs the ECM platform's sequencing and enables the Information Technology (IT) organization to execute decommissioning system activities in a timely manner. In September 2021, the IRS completed the *IRS Enterprise Case Management Initiative Decommissioning Strategy* (hereinafter referred to as Decommissioning Strategy).

The goal of the IRS's Decommissioning Strategy is to enable and expedite the retirement of the legacy case management systems and tools. According to the strategy, four basic principles will reduce the risk to the organization while maximizing the benefits of retirement efforts:

- Proactively identifying opportunities to decommission legacy case management systems by analyzing legacy case management systems and their data migration requirements.

- Accelerating the decommissioning of components.

- Identifying and developing plans early for non-case management components which are unable to migrate to ECM.

- Reporting frequently on decommissioning status including impacts on legacy case management systems and tools and identifying opportunities to redirect cost savings to other priorities.

In January 2022, the IRS formally implemented a new IT Decommissioning Policy that required all modernization project leads to identify the products, systems and services to be decommissioned as part of the modernization project plan. In September 2022, the IRS updated its Enterprise Lifecycle Guidance to incorporate the new Decommissioning Policy. The Enterprise Lifecycle Guidance outlines the IRS's processes for the management and oversight of IT investments.

ECM modernization progress since 2020

The ECM Office delivered seven releases to the ECM platform from December 2020 through January 2024. A release is a delivery of software into a production environment. During this time, the IRS delivered core case management functionalities, migrated multiple business processes (*e.g.*, the Exempt Organization's Correspondence Unit processes), and modernized data access to the ECM platform at a total cost of over $190 million. Figure 1 shows the dates and the cost of ECM platform releases. According to the IRS, the ECM platform will allow authorized employees to see a taxpayer's full account, filing history, related case data, and prior communications to resolve cases more quickly.

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[5] TIGTA, Report No. 2020-20-061, *The Enterprise Case Management Solution Deployment Is Delayed, and Additional Actions Are Needed to Develop a Decommissioning Strategy* (September 2020).

**Figure 1: Planned and Actual Expenditures and
Delivery Dates of ECM Platform Releases**

Release No.	Planned Scope of Work	Expenditures		Delivery Dates
		Planned	Actual	
1	Incorporate case management functionality and treatment streams for fraud outcomes.	$59.5M	$55.4M	Dec. 31, 2020
2	Deliver core case management functionalities.	$15.9M	$15.8M	May 20, 2021
3	Deploy additional functionalities to enable further business migration.	$24.7M	$23.0M	Dec. 31, 2021
4	Initiate development of additional functionalities to enable further business migration.	$29.6M	$29.3M	July 15, 2022
5	Continue development of additional functionalities and integrate data sources.	$26.2M	$26.2M	Jan. 13, 2023
6	Develop additional functionalities to enable further business migration.	$36.0M	$36.2M	July 14, 2023
7	Deliver initial Examination solutions and expand functionalities.	$4.3M	$4.3M	Jan. 12, 2024
Totals		$196.0M	$190.3M	

Source: Analysis of IT organization investment reports, Baseline Change Requests and the Department of the Treasury's database reports.

In addition to the $190.3 million the IRS spent to modernize case management; the IRS spent more than $39 million to maintain the legacy case management systems that had not been decommissioned. The IRS will continue to spend money maintaining these systems until they are all fully decommissioned.

The recent departures of IRS IT employees may impact the IRS's Information Technology organization and to effectively deliver its mission, including the ECM program's ability to decommission its legacy case management systems. For example, in May 2025, we reported that 48 senior IT employees were placed on administrative leave.[6] Of the 48 employees placed on leave, 27 (56 percent) were either in key management positions or were individuals recruited for their expertise related to the IRS's restructuring efforts. As of June 6, 2025, 26 separated from the IRS through programs such as the deferred resignation, and the other 22 remain on administrative leave.[7] In total, 2,163 IT employees separated from the IRS as of May 2025.

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[6] TIGTA, Report No. 2025-IE-R017, *Snapshot Report: IRS Workforce Reductions as of March 2025* (May 2025).

[7] TIGTA, Report No. 2025-IE-R027, *Snapshot Report: IRS Workforce Reductions as of May 2025* (July 2025).

Results of Review

This report presents the results of our review to evaluate whether the IRS decommissioned its legacy case management systems. As the time of our review, the IRS defined a legacy system as one that is 25 years or older, used obsolete programming language, or lacked vendor support. In April 2025, the Chief Information Officer issued a memorandum outlining a new definition of a legacy system. The new definition focuses on business outcomes and mission alignment, shifting away from age- and technology-based criteria. Accordingly, a system will now be considered as legacy if it obstructs IRS mission-critical outcomes by limiting functionality, increasing operational risk, or causing delays or inefficiencies. The new definition will likely impact which systems are considered legacy.

In addition, the IRS is working on an initiative to deliver additional functionality for its compliance functions (*i.e.*, examination) as part of the ECM platform. This includes enabling case workers to access technologies, such as Artificial Intelligence, and guided workflows that will help reduce case processing time. The results in this report are based upon the IRS's prior definition of a legacy system.

The IRS Has Not Decommissioned Any Legacy Case Management Systems

The goal of the Decommissioning Strategy is to enable and expedite the retirement of legacy case management systems and tools. In addition, part of the IRS's modernization process requires components or functionalities of a legacy case management system to be incorporated and then decommissioned. The IRS's Decommissioning Strategy included steps to identify and decommission legacy case management systems. However, our review of the ECM legacy case management systems found that, to date, the IRS has not fully incorporated or decommissioned any legacy systems. Instead, the IRS spent IRS spent more than $39 million to maintain legacy case management systems.

Changes in leadership priorities has delayed the decommissioning of legacy systems

As previously mentioned, the IRS issued an IT Decommissioning Policy in January 2022 to proactively identify and decommission legacy case management systems as part of its modernization efforts. However, we found that ECM program leadership deprioritized decommissioning legacy case management systems and instead focused on providing modernized functionalities for users. The new direction set by ECM leadership in January 2023 prioritized moving functionalities and users onto the new ECM platform instead of focusing on decommissioning legacy systems. The ECM Office continued following this new direction throughout Calendar Year 2024.

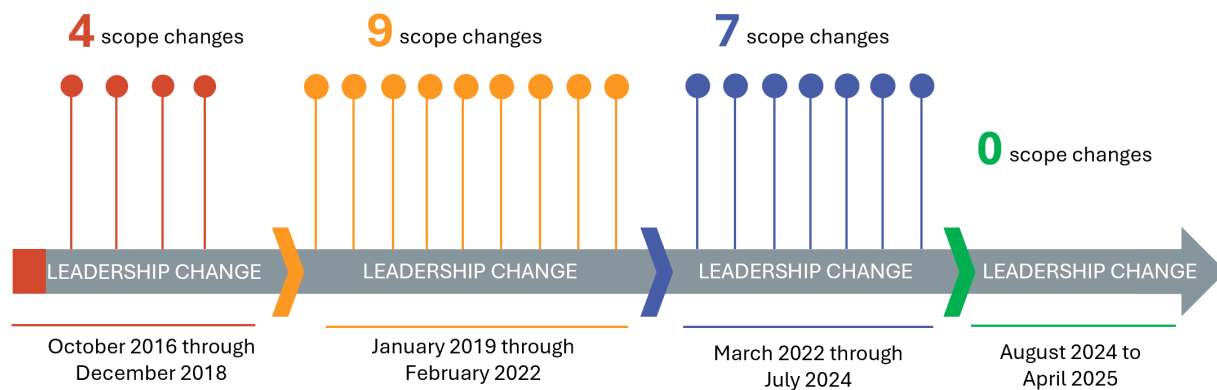In May 2024, the IRS updated its internal policies, replacing Enterprise Lifecycle Guidance with a new lifecycle delivery process that focused on process improvement and efficiencies to support its transformation priorities and agilities. However, the updated policy did not include a decommissioning process, thus aligning with the decision to deprioritize the decommissioning of legacy case management systems.

Multiple ECM scope changes and IRS IT leadership changes slowed the progress incorporating case management systems

The IRS has not fully incorporated any case management systems into the ECM platform. Our review of the 54 case management systems with functionalities to be incorporated into the ECM platform found that 17 (31 percent) of the 54 systems were in the process of being incorporated. However, none of the systems' functionalities have been fully incorporated. The status of the remaining 37 case management systems is unknown because the IRS did not track their status.

Our review of ECM governance documentation identified four changes in IT leadership and 20 scope changes for the ECM program, which we believe contributed to not fully incorporating any of the legacy case management systems. Figure 2 outlines the timeline of ECM scope and leadership changes.

Figure 2: Significant Scope and Leadership Changes during the ECM Project

4 scope changes — October 2016 through December 2018 — LEADERSHIP CHANGE

9 scope changes — January 2019 through February 2022 — LEADERSHIP CHANGE

7 scope changes — March 2022 through July 2024 — LEADERSHIP CHANGE

0 scope changes — August 2024 to April 2025 — LEADERSHIP CHANGE

Source: Analysis of ECM governance documentation.

There were no scope change requests since the last leadership change in August 2024.

Change in definition requires a reevaluation of a legacy system

In December 2020, the Enterprise Architecture Office defined a legacy system as one that is either 25 years or older or is written in an obsolete programming language. We evaluated a list of 54 case management systems with functionalities to be incorporated into the ECM platform and found that:

- 34 (63 percent) of the 54 systems met the IRS's definition of a legacy system.
- 19 (35 percent) of the 54 systems did not meet the IRS's definition of a legacy system.
- 1 (2 percent) of the 54 systems identified by the ECM Office as a legacy case management system could not be confirmed as an actual case management system.[8]

The IRS spent over $39 million in Fiscal Year 2024 to maintain and operate these legacy case management systems and will continue spending funds until the systems are decommissioned.[9]

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[8] When requested, the IRS could not provide additional information about the system or its cost.

[9] Our review found the IRS spent $39,058,495 on operations and maintenance of 20 legacy case management systems in Fiscal Year 2024. There was no operations and maintenance cost data available for the remaining 14 legacy case management systems.

As of April 2025, none of the legacy systems have been decommissioned. As the IRS moves forward with implementing the ECM platform, it should re-evaluate the list of 54 legacy case management systems to ensure these systems comply with the new legacy definition and prioritize these systems in its ECM decommissioning strategy. In addition, any new projects that are added to the ECM platform initiative should adhere to this new definition.

The Chief Information Officer should:

Recommendation 1: Ensure that the ECM Office prioritizes incorporating and decommissioning of the legacy case management systems.

> **Management's Response:** The IRS agreed with this recommendation and will continue ongoing efforts to migrate high-value business workflows to the ECM platform and decommission case management systems or components that meet the April 2025 legacy definition and can be retired based on business readiness and available resources. Several legacy components have already been decommissioned. The IRS will build on this progress.

Recommendation 2: Ensure that all existing legacy case management systems, and any new projects incorporated into the ECM platform, comply with the April 2025 legacy definition.

> **Management's Response:** The IRS agreed with this recommendation. Based on an initial analysis using the updated April 2025 definition, many compliance-focused applications no longer meet the threshold for classification as legacy systems. The Chief Information Officer will compile a formal listing of compliance case management systems based on the updated definition to guide the incorporation of future projects into the ECM platform and to reevaluate existing systems for potential retirement.

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Appendix I

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Detailed Objective, Scope, and Methodology

The overall objective of this review was to determine whether the ECM Office is effectively incorporating and decommissioning legacy case management systems' functionalities. To accomplish our objective, we:

- Assessed ECM progress by reviewing program release schedules, scope changes, and costs and by reviewing IRS IT organization investment reports and other documentation.

- Identified legacy case management systems whose functionalities will be or are in the process of being incorporated into the ECM platform by obtaining the ECM Office's list of these systems and interviewing ECM Office management to determine the cause for any legacy systems that were not decommissioned.

Performance of This Review

This review was performed with information obtained from the IT organization's ECM Office located at the New Carrollton Federal Building in Lanham, Maryland, during the period February 2024 through December 2024. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Data Validation Methodology

We performed tests to assess the reliability of data from the Department of the Treasury's Investment Knowledge Exchange database, the IRS's Plan Development site database and the IRS's As-Built Architecture database by: (1) comparing release schedule and cost data to the Investment Knowledge Exchange database reports, and legacy case management systems to the As-Built Architecture database; (2) verifying that the appropriate type of information was captured in the systems; and (3) interviewing IT organization management and staff acquainted with the systems and data. We validated that the data were sufficiently reliable for purposes of this report.

Internal Controls Methodology

Internal controls relate to management's plans, methods, and procedures used to meet their mission, goals, and objectives. Internal controls include the processes and procedures for planning, organizing, directing, and controlling program operations. They include the systems for measuring, reporting, and monitoring program performance. We determined that the following internal controls were relevant to our audit objective: Government Accountability Office guidance; IRS policies, procedures, guidelines, and strategies related to the identification, incorporation, and decommission status of legacy case management systems' functionalities. We evaluated these controls by interviewing both the ECM Office and IT organization leadership

and management representatives, and by reviewing the As-Built Architecture documentation and other relevant documentation.

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Appendix II

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Outcome Measure

This appendix presents detailed information on the measurable impact that our recommended corrective actions will have on tax administration. This benefit will be incorporated into our Semiannual Report to Congress.

Type and Value of Outcome Measure:

- Funds Put to Better Use – Potential; $39,058,495 in operations and maintenance costs spent in Fiscal Year 2024 on 20 of the 34 legacy case management systems that met the definition of a legacy system and should be decommissioned. (see Recommendation 1).

Methodology Used to Measure the Reported Benefit:

Current ECM program leadership deprioritized decommissioning legacy case management systems while focusing on providing modernized functionalities for current users. We evaluated a list of 54 case management systems, with functionalities to be incorporated into the ECM platform and identified 34 that met the definition of a legacy system. We found that the IRS spent $39,058,495 on operations and maintenance costs for 20 legacy case management systems in Fiscal Year 2024. There was no operations and maintenance cost data available for the remaining 14 legacy case management systems.

Appendix III

Management's Response to the Draft Report

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, DC 20224

CHIEF INFORMATION OFFICER

August 25, 2025

MEMORANDUM FOR DIANA M. TENGESDAL
                              ACTING DEPUTY INSPECTOR GENERAL FOR AUDIT

FROM: Kaschit Pandya   **Kaschit D.**   Digitally signed by Kaschit D. Pandya
                            Chief Information Officer **Pandya**   Date: 2025.08.25 11:26:52 -04'00'

SUBJECT: Draft Audit Report – Although Enterprise Case Management
                  Modernization Has Begun, No Legacy Systems Have Been
                  Decommissioned (Audit #2024208020)

Thank you for the opportunity to review your draft report. The ECM platform was established to provide an enterprise solution for case management, and it is doing so, with more than 9,000 IRS employees now using the platform to support a growing number of business workflows.

We are moving away from outdated technology by focusing first on the business workflows that benefit most from modernization. As the Treasury Inspector General for Tax Administration (TIGTA) acknowledges, the IRS has made measurable progress by delivering seven ECM releases since 2020, transitioning specific functions off legacy systems. This includes enhancements underway for compliance functions, where ECM is enabling IRS employees access to advanced research tools and guided workflows that will reduce processing time.

As modernization efforts progress, the IRS remains committed to aligning ECM activities with updated guidance, business needs, and the broader goals of improved revenue collection and taxpayer service. Please refer to the attached planned corrective actions for specific details.

The IRS values the continued support and assistance provided by your office. If you have any questions, please contact me at (304) 616-1818, or a member of your staff may contact Eric Markow, Coordinating Director, Compliance, at (202) 317-5000.

Attachment

Attachment

Audit #2024208020, Although Enterprise Case Management Modernization Has
Begin, No Legacy Systems Have Been Decommissioned

Recommendations

<u>**RECOMMENDATION 1:**</u> The Chief Information Officer should ensure that the ECM
Office prioritizes incorporating and decommissioning of the legacy case management
systems.

<u>**CORRECTIVE ACTION 1:**</u> The IRS agrees with this recommendation. The Chief
Information Officer will continue ongoing efforts to migrate high-value business
workflows to the ECM platform and will decommission case management systems or
components that meet the April 2025 legacy definition and can be retired based on
business readiness and available resources. Several legacy components, including
SharePoint-based applications, have already been decommissioned. The IRS will build
on this progress.

<u>**IMPLEMENTATION DATE:**</u> February 15, 2026

<u>**RESPONSIBLE OFFICIAL(S):**</u> Coordinating Director, Compliance

<u>**RECOMMENDATION 2:**</u> The Chief Information Officer should ensure that all existing
legacy case management systems, and any new projects incorporated into the ECM
platform, comply with the April 2025 legacy definition.

<u>**CORRECTIVE ACTION 2:**</u> The IRS agrees with this recommendation. Based on an
initial analysis using the updated April 2025 definition, many compliance-focused
applications no longer meet the threshold for classification as legacy systems. The
Chief Information Officer will compile a formal listing of compliance case management
systems based on the updated definition to guide the incorporation of future projects
into the ECM platform and to reevaluate existing systems for potential retirement.

<u>**IMPLEMENTATION DATE:**</u> February 15, 2026

<u>**RESPONSIBLE OFFICIAL(S):**</u> Coordinating Director, Compliance

Appendix IV

Glossary of Terms

Term	Definition
Appropriation	Statutory authority to incur obligations and make payments out of Department of the Treasury funds for specified purposes.
As-Built Architecture	The authoritative source of the IRS's information technology and business environments. It documents the production environment of IRS systems, infrastructure, technology platforms, *etc.*
Baseline Change	A formal process for updating a project's baseline, which is a starting point or set of data used to measure progress.
Case Management	The process that addresses the resolution of tax administration issues through the management of case creation, execution, maintenance, and closure.
Decommission	To remove something, *e.g.*, system, server, from service.
Functionality	The set of features, capabilities, and actions that a software application or system provides to its user.
Inflation Reduction Act Strategic Operating Plan	The plan was developed in April 2023 by the Department of the Treasury and the IRS to organize and coordinate modernization spending.
Information Technology	Any services, equipment, or interconnected systems or subsystems of equipment that are used in the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by an agency.
Legacy System	An information system that may be based on outdated technologies but is critical to day-to-day operations. In the context of computing, it refers to outdated computer systems, programming languages, or application software that are used instead of more modern alternatives.
Migration	The process of moving data, applications, and processes from outdated systems to modern platforms. This can involve moving systems from on premises to the cloud, updating hardware, or completely overhauling information technology frameworks.
Modernization	The process of updating, improving, and bringing in line with modern standards.
Platform	A computer or hardware device, associated operating system, or virtual environment on which software can be installed or run.
Program	Activities or sets of activities recognized as programs by the public, Office of Management and Budget, or Congress as well as those that entail agency program management or policy direction.

Term	Definition
Risk	A potential event or condition that could have an impact or opportunity on the cost, schedule, business, or technical performance of an information technology investment, program, project, or organization.
Schedule	A plan that assigns resources to tasks and specifies when those tasks should be completed.
Scope	An outline of all the objectives and goals of a project.

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Appendix V

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Abbreviations

ECM	Enterprise Case Management
IRS	Internal Revenue Service
IT	Information Technology
TIGTA	Treasury Inspector General for Tax Administration

**To report fraud, waste, or abuse,
contact our hotline on the web at
https://www.tigta.gov/reportcrime-misconduct.**

**To make suggestions to improve IRS policies, processes, or systems
affecting taxpayers, contact us at www.tigta.gov/form/suggestions.**

Information you provide is confidential, and you may remain anonymous.