

SUPPORTING STATEMENT
For
IRS Form 13614-C and 13614(SP), Interview/Intake & Quality Review
Sheet

1. CIRCUMSTANCES NECESSITATING COLLECTION OF INFORMATION

In the 2004 Filing Season, TIGTA audited several VITA sites and concluded that "...VITA volunteers did not always correctly prepare tax returns..." (Audit 2004-40-154) In the 2005 Filing Season, TIGTA conducted Audit 200540002 (August 9, 2005), which was a follow up to determine SPEC's progress in addressing challenges detailed in the 2004 audit.

TIGTA stated "Central to the SPEC function's strategy for ensuring the accuracy of tax returns completed by volunteers is its Integrated Return Preparation Process Model (IRPPM). This model outlines a step-by-step method for preparing accurate returns at VITA sites. The model's premise is that to complete accurate tax returns, volunteer preparers must ask certain questions about the taxpayers and, if relevant, their families. The model reinforces the importance of completing [an Interview/Intake Sheet] (Form 13614)..."

"The SPEC function developed the Form 13614 that contains a standardized list of required intake questions to guide volunteers in asking taxpayers basic questions about themselves." To incorporate improvements learned through the use of the form and recommendations by Lean Six Sigma, Form 13614 evolved to Form 13614-C. Form 13614-C includes the Quality Review process.

"If used correctly, the intake/interview sheet is an effective tool for ensuring critical taxpayer information is obtained and applied during the interview process."

Although volunteer tax return preparers receive quality training and tools, Form 13614-C ensures they consistently collect personal information from each taxpayer to assure the returns are prepared accurately, avoiding erroneous returns. This form is critical to continued improvements in the accuracy of volunteer-prepared returns for taxpayers having low to moderate incomes.

The use of Form 13614-C is also outlined in the following impending updated portions of IRM 22.30.1, Stakeholder

Partnerships, Education and Communication:

- **22.30.1.4.6.1.2, Preparing Returns with the Taxpayer Present.** This states that the questions on Form 13614-C must be asked, at a minimum, to ensure all mandatory questions are asked.
- **22.30.1.4.5.1.1, "Process Based" Training.** This section describes SPEC's training approach that blends intake questions and an interview to probe the taxpayer so their return can be accurately completed.
- **22.30.1.4.10.4.7, Quality Review Checklist, E-File Returns.** This reminds employees that Form 13614-C should be signed to authorize retention of customer information.
- **22.30.1.4.10.1.2, Frequency and Priority of Reviews in Addition to SOI Sample.** This section describes on-site quality reviews and includes instruction that the mandatory questions from Form 13614-C must be asked of each taxpayer and documented—preferably on the form itself.
- **22.30.1.4.10.5, Quality Control Requirements for Tax Assistance.** This small portion reemphasizes the requirement for all volunteers who provide tax preparation service to use a mandatory "intake questioning process" prior to the completion of a return.

2. USE OF DATA

The completed form is used by screeners, preparers, or others involved in the return preparation process to more accurately complete tax returns of taxpayers having low to moderate incomes. These persons need assistance having their returns prepared so they can fully comply with the law. If authorized by the taxpayer, the form can also be used to assist the taxpayer after their appointment.

3. USE OF IMPROVED INFORMATION TECHNOLOGY TO REDUCE BURDEN

This form is completed by the taxpayer requesting tax return preparation assistance at temporary Volunteer Return Preparation Sites nationwide. There are currently no plans to make this form electronic due to where and how it is used.

4. EFFORTS TO IDENTIFY DUPLICATION

We have attempted to eliminate duplication within the agency wherever possible.

5. **METHODS TO MINIMIZE BURDEN ON SMALL BUSINESSES OR OTHER SMALL ENTITIES**

Not applicable.

6. **CONSEQUENCES OF LESS FREQUENT COLLECTION ON FEDERAL PROGRAMS OR POLICY ACTIVITIES**

Not applicable.

7. **SPECIAL CIRCUMSTANCES REQUIRING DATA COLLECTION TO BE INCONSISTENT WITH GUIDELINES IN 5 CFR 1320.5(d)(2)**

Not applicable.

8. **CONSULTATION WITH INDIVIDUALS OUTSIDE OF THE AGENCY ON AVAILABILITY OF DATA, FREQUENCY OF COLLECTION, CLARITY OF INSTRUCTIONS AND FORMS, AND DATA ELEMENTS**

Periodic meetings are held between IRS personnel and representatives of the American Bar Association, the National Society of Public Accountants, the American Institute of Certified Public Accountants (AICPA), and other professional groups to discuss tax law and tax forms. During these meetings, there is an opportunity for those attending to make comments regarding Form 13614-C.

In response to the Federal Register notice dated August 12, 2009 (74 FR 40646), we received no comments during the comment period regarding Form 13614-C.

9. **EXPLANATION OF DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS**

Not applicable.

10. **ASSURANCE OF CONFIDENTIALITY OF RESPONSES**

Generally, tax returns and tax return information are confidential as required by 26 USC 6103.

11. **JUSTIFICATION OF SENSITIVE QUESTIONS**

Not applicable.

12. ESTIMATED BURDEN OF INFORMATION COLLECTION

List the number of responses, time per response, and total burden for each form included in the submission.

The burden estimate is as follows:

	<u>Number of Responses</u>	<u>Time per Response</u>	<u>Total Hours</u>
Form 13614-C	3,150,000	10 min	525,000
Form 13614-C (SP)	<u>225,500</u>	10 min	<u>37,583</u>
Total	3,375,500		562,583

Estimate of the annualized cost to respondents for the hour burdens shown are not available at this time, however they are completing this form as part of the process to have their tax returns prepared at no charge.

13. ESTIMATED TOTAL ANNUAL COST BURDEN TO RESPONDENTS

As suggested by OMB, our Federal Register notice dated August 12, 2009, requested public comments on estimates of burden hours, i.e., estimates of capital or start-up costs and costs of operation, maintenance, and purchase of service to provide information. However, we did not receive any response from taxpayers on this subject. As a result, estimates of the cost burdens are not available at this time.

14. ESTIMATED ANNUALIZED COST TO THE FEDERAL GOVERNMENT

The cost of developing, printing, processing, distribution and overhead for Form 13614-C will be approximately \$80,000 annually.

15. REASONS FOR CHANGE IN BURDEN

The number of taxpayers assisted through the volunteer return preparation program has significantly increased. The time needed by each respondent to complete the form decreased by two minutes. The net result is an increase in estimated responses by 675,500 and a total estimated burden increase of 22,583 hours.

16. PLANS FOR TABULATION, STATISTICAL ANALYSIS AND PUBLICATION

Not applicable.

17. REASONS WHY DISPLAYING THE OMB EXPIRATION DATE IS INAPPROPRIATE

See attached.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT ON OMB FORM 83-I

Not applicable.

Note: The following paragraph applies to all of the collections of information in this submission:

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection of information displays a valid OMB control number. Books or records relating to a collection of information must be retained as long as their contents may become material in the administration of any internal revenue law. Generally, tax returns and tax return information are confidential, as required by 26 U.S.C. 6103.