1SUPPORTING STATEMENT Form 6525

1. <u>CIRCUMSTANCES NECESSITATING COLLECTION OF INFORMATION</u>

The Chief Counsel Application Form has been in use for over 18 years and provides a wealth of information that is not available on a resume or optional form OF-306. On one page, the form provides us with the data we deem critical for evaluating an applicant's qualifications for employment as an attorney. E.g., LSAT (Law School Admission Test) score, bar admission status, type of work preference.

2. <u>USE OF DATA</u>

This form is used as a screening device to evaluate prospective applicants and is completed before form OF-306 is required. Since we hire on the average approximately 200 attorneys yearly, only a small percentage of the 3,000 respondents to this form have to later fill out an OF-306, and thus any possible duplication of information is kept to a minimum.

3. <u>USE OF IMPROVED INFORMATION TECHNOLOGY TO REDUCE</u> <u>BURDEN</u>

We have no plans at this time to offer electronic filing because of the low volume compared to cost of electronic enabling.

4. EFFORTS TO IDENTIFY DUPLICATION

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

5. <u>METHODS TO MINIMIZE BURDEN ON SMALL BUSINESSES OR OTHER</u> <u>SMALL ENTITIES</u>

Not applicable.

6. <u>CONSEQUENCES OF LESS FREQUENT COLLECTION ON FEDERAL</u> 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, 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 6524.

We received no comments during the comment period in response to the Federal Register notice dated July 29, 2010 (75 FR 44851).

9. <u>EXPLANATION OF DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS</u>

Not applicable.

10. ASSURANCE OF CONFIDENTIALITY OF RESPONSES

Generally, recruiting, examining, and placement records and security, background, and character investigation files are confidential as required by 5 U.S.C. 552a (k) (5).

11. JUSTIFICATION OF SENSITIVE QUESTIONS

Not applicable.

12. ESTIMATED BURDEN OF INFORMATION COLLECTION

	NUMBER OF RESPONSES	TIME PER <u>RESPONSE</u>	TOTAL <u>Hours</u>
Form 6524	3,000	.30	900

Estimates of the annualized cost to respondents for the hour burdens shown are not available at this time.

13. ESTIMATED TOTAL ANNUAL COST BURDEN TO RESPONDENTS

As suggested by OMB, our Federal Register notice dated July 29, 2010, requested public comments on estimates of cost burden that are not captured in the estimates of burden hours, i.e., estimates of capital or start-up costs and costs of operation, maintenance, and purchase of services 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

After consultation with various functions within the Service, we have determined that the cost of developing, printing, processing, distribution and overhead for the form is \$550.00 annually.

15. REASONS FOR CHANGE IN BURDEN

There is no change in the paperwork burden previously approved by OMB. We are making this submission to renew the OMB approval.

16. PLANS FOR TABULATION, STATISTICAL ANALYSIS AND PUBLICATION

Not applicable.

17. REASONS WHY DISPLAYING THE OMB EXPIRATION DATE IS INAPPROPRIATE

See attachment.

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.