

Supporting Statement for Paperwork Reduction Act Generic Information Collection Submissions for Return Preparer Office Usability Study of the Tax Professional PTIN System

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

One of Commissioner Shulman's priorities is to implement an oversight program for tax return preparers. Following the release of a landmark six-month study that proposed new requirements for tax return preparers the IRS launched a new registration system for paid preparers and established a mandatory requirement for all preparers to have a Preparer Tax Identification Number. All preparers, even those who already have a PTIN, should sign up on the system and pay a new annual user fee. The Tax Professional PTIN System (TPPS) was launched in Sept. 2010. Those who registered and received a PTIN will be required to use TPPS to renew their PTIN on an annual basis.

Release 3 of TPPS will include modifications to the system along with new functionality. Usability testing will provide data on the performance of the system and validate functional requirements for the design. Testing will also provide insight to how users are interacting with the site. This collection of information is necessary to enable the Return Preparer Office to garner customer feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery. The information collected from our customers will help ensure that users have an effective, efficient, and satisfying experience with the Agency's programs. This feedback will provide insights into customer perceptions, experiences and expectations, provide an early warning of issues with service, or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections will allow for ongoing, collaborative and actionable communications between the Agency and its customers. It will also allow feedback to contribute directly to the improvement of program management.

2. Purpose and Use of the Information Collection

RPO will collect, analyze, and interpret information gathered through this usability test to identify strengths and weaknesses of the design changes and make improvements in service delivery based on feedback. The solicitation of feedback will target areas such as: Content, navigation, and process flow. Responses will be assessed to plan and inform efforts to improve or maintain the quality of service offered to the tax professionals.

RPO's usability study meets the following conditions:

- Information gathered will be used only internally for general service improvement and program management purposes and is not intended for release outside of the agency (if released, procedures outlined in Question 16 will be followed);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions ¹;
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study ;
- The collections are voluntary;
- The collections are low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and are low-cost for both the respondents and the Federal Government;
- The collections are non-controversial and do not raise issues of concern to other Federal agencies;
- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future; and
- With the exception of information needed to provide remuneration for participants of focus groups and cognitive laboratory studies, personally identifiable information (PII) is collected only to the extent necessary and is not retained.

3. Consideration Given to Information Technology

Every attempt will be made to collect information electronically and/or use online collaboration tools to reduce burden.

4. Duplication of Information

No similar data is being gathered or maintained by IRS or is available from other sources known to RPO.

5. Reducing the Burden on Small Entities

Tax professionals will already be attending the Tax Forums which will minimize the burden on them. The information collected will be readily available information, and will utilize short, easy-to-complete information collection instruments.

¹ As defined in OMB and agency Information Quality Guidelines, “influential” means that “an agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions.”

6. Consequences of Not Conducting Collection

Without these types of feedback, design changes may not meet the needs of the Tax Professional community and could hinder their ability to effectively and efficiently use TPPS.

7. Special Circumstances

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

8. Consultations with Persons Outside the Agency

No outside agency consultations are required.

9. Payment or Gift

No payment or gift will be provided for volunteer participants for this usability study

10. Confidentiality

No confidentiality pledge will be used for the TPPS usability study since we will not be collecting PII information. Only first names will be used to identify participants. Attendees will be provided with the OMB number and Paperwork Reduction Act and address where to write. The following statement will be included on the scenario spreadsheet, which will be the only item provided to the participants:

The Paperwork Reduction Act requires that the IRS display an OMB control number on all public information requests. The OMB Control Number for this study is 1545-1349. **The time estimated for your participation is 1 hour.** If you have any comments regarding the time estimates associated with this study or suggestions on making this process simpler, please write to the, Internal Revenue Service, Tax Products Coordinating Committee, SE:W:CAR:MP:T:T:SP, 1111 Constitution Ave. NW, Washington, DC 20224.

11. Sensitive Nature

No questions will be asked that are of a personal or sensitive nature.

12. Burden of Information Collection

The sampling of volunteer participants will come from the Nationwide IRS Tax Forums. The desired goal is to test at 1 forum location, 8 participants per day, 2 days per tax forum, for a total of 16 participants. The data collection will follow a classic usability test design with one participant at a time going through the registration and/or renewal process. The participant will be asked to use a talk aloud method to inform the test team of their thought process. Each participant will be asked to spend approximately 1 hour to provide feedback on the TPPS registration and/or renewal process. Tests will be conducted between the hours of 8:00 AM and 4:00 PM during the work days during the following week:

Las Vegas, NV

July 31, Aug. 1, 2012

The annual burden hours requested (28) are based on the number of collections we expect to conduct over the requested period for this clearance .

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Recruitment	An average of 48 participants asked to volunteer in order to get a 1/3 response rate for	1 tax forum location	15 minutes recruitment time	12 hours

Estimated Annual Reporting Burden				
	the desired 16 participants			
Testing	16	1 tax forum location	1	16 hours

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The anticipated cost to the Federal Government is approximately \$6,000 which is an estimation of travel costs for 3 RPO personnel to attend 1 tax forum location. Additional RPO staff will already be attending the Tax Forums for other purposes.

15. Reason for Change

Not applicable. This is a new request for a generic ICR.

16. Tabulation of Results, Schedule, Analysis Plans

Data to be collected

This test will gather baseline performance metrics, i.e. task success, task timings, etc.

The participant reactions will be monitored by having a moderator sitting with the participant. Study sessions are expected to last approximately 60 minutes per participant.

How data will be used

The data gathered from this research will be instrumental for determining any future revisions to TPPS. Future performance metrics will be validated against the baseline data gathered at the tax forums. All information collected is strictly for research, and will not be used to personally identify participants nor will it be shared for commercial purposes.

How data will be analyzed

Study team observations are geared toward assessing the performance (design) of the product. Observations of the users will be reviewed for user preference and to identify areas of the application functionality that are confusing.

17. Display of OMB Approval Date

We are requesting no exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.

B. STATISTICAL METHODS

1. Universe and Respondent Selection

The desired goal is to test at 1 tax forum location, recruiting eight participants per day, 2 days per tax forum, for a total of 16 participants. Participants will be recruited from the attendees of the Tax Forums. Efforts will be made to recruit various types of tax preparers; CPA's, Enrolled Agents, etc.

2. Procedures for Collecting Information

The usability test will be based on scenarios. Scenarios are brief problem statements that the participant solves by using TPPS. The scenarios will be tailored to the participant's background, i.e., tax professionals will work scenarios designed for tax preparers. The test team will prepare various suites of scenarios reflecting situations typical for the test group. The moderator and one or two note takers observe the test and work with the participant, where needed. The participant is encouraged to describe aloud what he/she is thinking and continue with the test, even if he/she has difficulty.

The moderator will introduce himself/herself and provide an overview of the test process. No personally identifiable information will be captured. This will be communicated to each participant during the introduction.

At the conclusion of the scenarios, the moderator will debrief the participant. Debriefing consists of open discussion. The participant provides feedback on the test experience, a subjective view of TPPS and may be asked to comment on various hypothetical enhancements to the system. The Tax Professional participants will be thanked for volunteering to participate during their attendance at the Tax Forum.

3. Methods to Maximize Response

Information collected will not yield generalizable quantitative findings; it can provide useful customer input, but it does not yield data about customer opinions that can be generalized.

4. Testing of Procedures

Pretesting may be done with internal staff, a limited number of external colleagues, and/or customers who are familiar with the programs and products. Pretesting will not exceed nine members of the public.

5. Contacts for Statistical Aspects and Data Collection

The usability study is not a survey, thus it does not follow statistically valid sample sizes. Therefore, statistical expertise is not required from the agency. RPO staff will conduct their own analysis of the findings

