

Taxpayer Advocate Service (TAS) Focus Group Interviews – TAS Underserved Approval Request to Conduct Cognitive and Psychological Research Data Collection (OMB #1545-1349)

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Taxpayer Advocate Service (TAS) is the Taxpayers' voice at the IRS. Our job is to ensure that every Taxpayer is treated fairly, and each knows and understands his or her rights and knows where to get tax assistance if it is needed. *As an independent organization within the IRS, we help Taxpayers resolve problems with the IRS and recommend changes that will prevent the problems.* In order to fulfill our mission, we need insight into Taxpayers' awareness and use of tax assistance offerings, in particular, how Underserved Taxpayers segment into addressable groups for TAS assistance. This information is not readily available from existing data sources and the research as proposed in this request will help TAS better understand the Underserved Taxpayers and their service and information needs.

The proposed research has an important history within TAS. In 2001-2002, TAS contracted for and conducted benchmark research which identified the size of the Underserved population and segmented them into unique and addressable socio-economic groups so that TAS could reach them with communications. That research showed that the actual TAS Underserved target was much broader than anticipated and included a wide mix of different life situations – ranging from Affluent Families and Empty Nesters on the higher end of the income scale to the Stable Middle Class in the middle to Surviving Spouses, Struggling Young Families and Unmarried Low Income in the lower range. The research also revealed issues requiring clarification/education across all segments, including: TAS qualifying criteria, ability to resolve problems quickly, independence from the IRS, and personal attention provided by TAS case advocates. Based upon those learnings, TAS targeted three of the key Underserved segments specifically where the greatest impact could be made – Surviving Spouses, Struggling Young Families, and Unmarried Low Income.

In 2007, after 4 years of TAS communications to the Underserveds, TAS replicated the 2001-02 research to understand the program's impact, update its knowledge of the size and shape of its target audience, analyze the effectiveness of its communications, and determine whether further marketing activities were warranted.

2. Purpose and Use of the Information Collection

In 2018, TAS will revisit the Underserveds in a replication of the earlier research efforts so that – after 10 years without research on the segmentation of this audience – TAS can update its knowledge of the size and shape of the Underserveds target; whether they segment in the same way or not and if not, how they are now shaped; and what they know and expect of TAS and the IRS when they face issues in filing. In addition, TAS wants to use the 2018 qualitative research to learn about how best to reach Underserved population; and the role that social media is playing in their lives (with this helping TAS communications evolve and be more effective in reaching the Underserveds).

This research will consist of 2 focus group interviews. The feedback received in these studies will not institute new policy, but will enable TAS to more effectively meet Taxpayer needs.

3. Consideration Given to Information Technology

TAS will recruit focus group participants by telephone using a Random Digit Dialing (RDD) approach which will incorporate cell phone numbers as well as landline telephone numbers in proportion to their current real-world presence (60-65% cell and 35-40% landlines). TAS wants to make sure all pertinent socioeconomics groups and segments of the population are represented. TAS considered other options for recruitment, but decided telephone surveys are the best option for reaching Taxpayers with lower income and education levels who may not be technologically savvy.

4. Duplication of Information

There is no other research being conducted currently that provides the depth and breadth of the information about the Underserveds that will be secured from this research. In addition, this information is not available from other sources within TAS or the IRS (or elsewhere).

5. Reducing the Burden on Small Entities

Small business or other small entities are not targeted for these surveys and the Taxpayers who are invited to participate will be interviewed only regarding essential information so that burden is limited. In addition, TAS will minimize the burden on Taxpayers by reminding them that participation is voluntary.

6. Consequences of Not Conducting Collection

Without this feedback, TAS will not have timely information from the Underserved Taxpayers that will allow TAS to understand them and communicate with them in terms and across communications channels that are meaningful to them.

7. Special Circumstances

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

8. Consultations with Persons Outside the Agency

Russell Research, the contractor who conducted both the 2001-02 and 2007 iterations of the Underserved research was consulted for study design and data collection decisions.

9. Payment or Gift

Participants in the Underserved Taxpayers Qualitative Focus Group Study will receive a \$75 stipend for spending 1.5 hours in the discussions being covered in those focus groups.

Note: the contractor has conducted research on research regarding incentives that are lower than \$100 and has found them to be too low for efficiency in recruiting and participation in the larger cities and among rare population groups, such as the Underserved.

10. Confidentiality

TAS will provide privacy to the extent allowed by law. Personal or sensitive information will not be disclosed. Random digit dialing sampling will be used to recruit focus group participants. Respondents will never be identified personally, and will only be referred to by first name. In addition, data security and limited use are contractually required of our contractor. All appropriate privacy requirements and background clearances will be obtained and followed to the extent allowed by law. TAS will not ask for, receive, or maintain any information that could be used to identify the survey respondents.

The data provided to TAS will have no identifying information relating specific records to individual Taxpayers. Information access will be tightly controlled. We will apply fair information and record-keeping practices to ensure protection of all Taxpayers. The criterion for disclosure laid out in the Privacy Act, the Freedom of Information Act, and section 6103 of the Internal Revenue Code, provides for the protection of Taxpayer information as well as its release to authorized recipients.

We will limit and control the amount of information that we collect to those items that are necessary to accomplish the research objectives. We will protect the privacy of the focus group participants to the extent allowed by law and by not using names in our report. Data will be maintained according to required record management guidelines.

11. Sensitive Nature

A few questions may be considered sensitive by respondents. These questions are used to help establish whether the individual qualifies for the research. We kept sensitive questions to the absolute minimum, and we allow respondents to decline to answer the question if it makes them uncomfortable.

12. Burden of Information Collection

- **In the Telephone based screening for the 16 Underserved + 4 Underserved Over-Recruits**, we will assume that the starting response rate will be about 15% as found in prior TAS Underserved research. However, we also should factor in the incidence of qualification as an Underserved – it's 6% Past-2-Years based upon the 2007 study – and that means our net response will be about 6% of 15% or about 1%. **For screening**, a 1% response rate means that to get 20 total recruits, we would need to contact about 2,000 Taxpayers to complete 20 recruits. Screening possible respondents requires about 2 minutes per contact, resulting in **~67 burden hours**. (Calculated as $2,000 \times 2 = 4,000$ minutes / 60 minutes = 67 burden hours).
- **Then, for the 16 individuals who complete the focus groups**, there will be 90 minutes of interviewing/group time for each. This means that there will be $(16 \times 90 = 1,440 / 60 =) 24$ **burden hours for the 16 fully-participating focus group participants**.

- Total Burden is summarized below:

Estimated Burden			
For The 2-Group Focus Group Study: Screening and Recruiting to obtain 20 Starting Participants	2,000 contacts	2 minutes	67 hrs
For The 2-Group Focus Group Study: Total Participation Time,	16 Participants	90 minutes	24 hrs
Total Burden Hours For The Qualitative Work			91 hrs

Thus, **the total burden hours for both groups** would be **91 hours**.

13. Costs to Respondents

There are no costs to respondents for participating in the focus groups.

14. Costs to Federal Government

The estimated combined cost for two focus group interviews is \$19,000.

15. Reason for Change

No change is being requested. This is a new request for OMB approval.

16. Tabulation of Results, Schedule, Analysis Plans

Once OMB approval is received, potential participants will be contacted for the focus groups. It should take approximately 1 – 2 months to recruit, conduct, and report the findings for the focus group interviews. We would like to begin recruiting participants as soon as the data collection on the two related surveys are complete – around October or November 2018.

17. Display of OMB Approval Date

IRS is seeking approval to not display the expiration date for OMB approval, as this is a one-time, limited-duration collection.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.

19. Data Collection Date

October through November 2018.

B. STATISTICAL METHODS

The primary purpose of these collections will be for internal management purposes; there are currently no plans to publish the summary reports from this research.

1. Universe and Respondent Selection

TAS will recruit Individual Taxpayers who in the past 2-3 years have met the TAS qualifying criteria, but have not sought TAS assistance. The populations of interest include the key Underserved segments where TAS may provide the greatest impact, such as surviving widows or low-income families or single taxpayers. Participants will be screened by telephone such that we have 20 potential Underserved participants, of which 16 individuals will join the focus group discussion.

2. Procedures for Collecting Information

All potential focus group participants will be telephoned/called by trained telephone interviewers operating from the contractor's national telephone interviewing center in East Rutherford, NJ. This center operates from 10 a.m. to 12 midnight to allow for 10 a.m. to 9 p.m. calling hours in each US continental time zone. Potential respondents will be selected from a Random Digit Dialing (RDD) list of computer-generated telephone numbers in working telephone exchanges across the US. The vendor will provide the RDD list. This RDD list will include a representative proportion of cell phones (60-65%) and landlines (35-40%). Cell phone users will be called with different dialing equipment from landline users in compliance with the FCC's standing regulations regarding calling cell phones vs. landlines. The contractor's telephone interviewing staff will screen focus group candidates and identify potential respondents per screening criteria. The telephone numbers of potential respondents will be dialed up to 5 times in order to establish contact with a potential respondent, with most of these dialings resulting in non-contact (number busy, voice-mail, non-working, etc.). After the first live contact with a potential respondent, interviewers will request their participation in the focus group. If they agree, they will be screened for qualification and if qualified, invited to participate in the focus group interview. If they do not agree/refuse, they will be recontacted by a more senior interviewer who will also try to include them in the study. If they then refuse again, this person will be recorded in call records as a refusal and not contacted again.

3. Methods to Maximize Response

The contractor will strive to maximize response and cooperation rates among Telephone survey respondents who they call by: (1) using up to 5 attempts at live contact; (2) and by using more senior interviewers to try to convert refusals to participants.

4. Testing of Procedures

Because of vendor experience, procedures will not require testing.

5. Contacts for Statistical Aspects and Data Collection

Several contacts will be available for assistance with the statistical requirements. TAS Research will provide analysts with expertise in statistics to assist this effort. The vendor (contractor) will provide experts with knowledge of statistics as well.

Primary Contact: Carol Hatch, TAS Research, 501 396-5954 or carol.m.hatch@irs.gov

Secondary Contact: Jeff Wilson, TAS Research, 317 685-7673 or jeff.a.wilson@irs.gov