

**Taxpayer Advocate Service (TAS) Focus Group Interviews  
2019 IRS Tax Forums on Collection Due Process, Math Error, and Stat Notices  
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 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. *As an independent organization within the IRS, we help taxpayers resolve problems with the IRS and recommend changes that will prevent the problems.*

To fulfill our mission, we need insight into taxpayers' experiences with IRS processes and products. Topics will focus on experiences practitioners have with IRS notices. Tax preparers will discuss their opinions of existing notices, in addition to suggestions for future changes. This information is not readily available from existing data sources and it will help TAS better understand taxpayers' service and information needs pertaining to these topics.

**2. Purpose and Use of the Information Collection**

TAS is looking to understand participants' thoughts about three different topics related to IRS notices. One group will focus on practitioner's experiences dealing with IRS' collection due process notices. Another group will focus on the practitioner's experiences dealing with IRS' math error notices, and the third will focus on the IRS' statutory notices of deficiency. In each of these focus groups, participants will be asked about their understanding of the existing notice, as well as their thoughts regarding a redesigned notice which expresses and presents the information differently. TAS wants to conduct focus group interviews with tax professionals to gain insight into their experiences and understanding of these current IRS notices, as well as their thoughts on a potential redesign of these notices.

The focus groups findings will be combined with other organizational information to suggest ways to improve the IRS notices and will provide information on topics of interest for projects such as those included in the TAS Annual Report to Congress. Having the ability to anecdotally understand the level of understanding and clarity of the notices issued by the IRS is important to serve taxpayers and practitioners better. The feedback received will not establish change, however, it enables TAS to provide information to effectively meet taxpayer needs.

**3. Consideration Given to Information Technology**

TAS considered electronic options for this research but decided to collect the information in person to obtain more detailed and nuanced information. TAS decided in person groups were the best option for including most types of preparers at a relatively low cost.

#### **4. Duplication of Information**

We were unable to find any current research on our topics of study from a tax preparer's perspective. Our focus groups will gather information on tax practitioner's current opinions on the various notices, understanding of the notices and changes they would find beneficial. This timely, qualitative research will help identify issues of concern to tax professionals and their clients. No similar data are currently gathered or maintained by the Agency.

##### **Collection Due Process Notices – Understanding Procedures and Deadlines**

TAS is interested in tax practitioners' thoughts, experiences, and ideas about IRS collection due notices. This includes their understanding of the notices and the actions required in response to the notices. Specifically, we will review a notice and discuss the design, clarity, consequences of inaction and the rights of the taxpayer.

##### **Math Error Notices – Understanding and Taxpayer Burden**

TAS is interested in tax practitioner's thoughts and experiences, and ideas regarding IRS math error notices. This includes their understanding of the notices and any difficulty experienced in responding to the notices. Specifically, we will review a notice and discuss the design, clarity, and consequences of inaction.

##### **Statutory Notices of Deficiency – Exercising Your Rights**

TAS is interested in tax practitioner's thoughts and experiences, and ideas regarding statutory notices of deficiency. This includes their understanding of the notice and any difficulty experienced in responding to the notices. Specifically, we will review a notice and discuss the clarity, consequences of inaction and the rights of the taxpayer.

#### **5. Reducing the Burden on Small Entities**

Small business or other small entities are not targeted for these groups and will only be involved if they meet screening criteria and agree to participate. TAS will minimize the burden on them by reminding them that participation in the focus groups is voluntary.

#### **6. Consequences of Not Conducting Collection**

Without this feedback, TAS will not have timely perspectives and insights from tax practitioners concerning the IRS's notices. These topics are of concern to the National Taxpayer Advocate and she requires feedback from external stakeholders to understand concerns from those who receive and respond to the notices and need information to better understand their rights with the IRS.

## **7. Special Circumstances**

These focus group interviews differ from other pre-recruited groups in that there are no incentives paid to participants and potential participants are recruited in person.

## **8. Consultations with Persons Outside the Agency**

No consultations were held with persons outside the agency. Online searches did not identify any similar information available.

## **9. Payment or Gift**

No payment or gift will be provided to the participants.

## **10. Confidentiality**

TAS will provide privacy to the extent allowed by law. Personal or sensitive information will not be disclosed. Only first names will be used in interviews (first initial of last name will be used if there are duplicate names). We will also control official access to the information and will not allow public access to the information. TAS will not ask for any information that could be used to identify the taxpayers in the focus group interviews. TAS designed the moderator guides such that no personally identifiable information (PII) is captured.

TAS will ensure that privacy to the extent allowed by law and security of the aggregated results will receive the utmost attention. Public and official access to the information will be tightly controlled. Data security approaching level C-2 will be accomplished using the Windows XP/7 operating system.

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 by not using names in our report. Data will be maintained according to required record management guidelines.

## **11. Sensitive Nature**

We will not collect sensitive information and participants may decline to answer if they are uncomfortable providing specific information. Participation is voluntary, and individuals may decline the invitation to participate in the group.

## 12. Burden of Information Collection

Participant screening at the tax forums is a bit different than other venues or studies. Recruiting takes place the day before or the day of the groups. First, potential participants are asked if they are interested in participating in a focus group on the topic. If an individual expresses interest, they are provided more details and information and screened as needed. Each topic will require additional screening for familiarity with the notices. The table below breaks out the time requirements by topic. A total of fifteen focus group sessions, five for each issue – Collection Due Process Notices, Math Error Notices, and Statutory Notice of Deficiency Notices. TAS will recruit as many as 16 qualified individuals for each group –  $15 \times 16 = 240$  total recruits; with the expectation that no more than 12 recruits will timely arrive at the prearranged location and ultimately participate in the groups –  $15 \times 12 = 180$  total participants. We estimate that 25 percent of those asked if they are interested will agree to attend, or a total of 960 persons will have to be contacted to reach the 240 total qualified recruits.

Contact time to determine interest is 2 minutes or  $960 \times 2 = 1,920$  minutes / 60 minutes = 32 burden hours.

We estimate another 2 minutes to determine interested individuals experience with each notice and qualifications or  $240 \times 2 = 480$  minutes / 60 minutes = 8 burden hours.

Additionally, it will take 5 minutes to remind confirmed participants of the focus group and provide directions or  $240$  (80 per topic)  $\times 5 = 1,200$  minutes / 60 minutes = 20 burden hours.

The 180 participants will result in 160 burden hours ( $180 \times 80$  minutes of focus group discussion time = 14,400 minutes / 60 = 240).

Total burden hours:  $32 + 8 + 20 + 240 = \underline{300}$ .

Type of Collection	Number of Respondents CDP Notices	Number of Respondents - Math Error Notices	Estimated Burden	
			Number of Respondents - SNOD Notices	Time (in minutes)
Find interested, potential participants	320	320	320	2
Screening for notice experience	80	80	80	2
Share location/time information	80	80	80	5
Focus group discussion time	60	60	60	80
<b>Total Burden Minutes</b>				

### **13. Costs to Respondents**

The only cost to respondents is their time required to get to the location and participate in the group.

### **14. Costs to Federal Government**

The estimated cost of the fifteen focus groups in this package of three topics is \$17,752 for the moderator and scribe. This includes travel costs & expenses for the tax forums.

### **15. Reason for Change**

This is a new data collection and it does not request changes to a prior approval.

### **16. Tabulation of Results, Schedule, Analysis Plans**

Once OMB approval is received and the tax forums are underway, potential participants will be contacted in person. We expect it will take approximately six months to field, administer, and summarize focus group findings.

Interviews will be summarized after each focus group and compiled into a final report no later than the end of December 2019. The final report will be a summary of key data findings by topic based on the discussions generated in the focus group interviews. This information will be used to report on preparers' views and opinions of the various collection due process, math error, and statutory notice of deficiency notices. The information will also be used in conjunction with other internal IRS data to suggest improvements to these specific processes as appropriate.

### **17. Display of OMB Approval Date**

We prefer not to display the OMB Approval date. However, we will add the OMB approval date if preferred once we receive it.

### **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

These activities comply with the requirements in 5 CFR 1320.9.

### **19. Data Collection Date**

July through September 2019.

## **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. This research is qualitative and thus cannot be generalized to the population.

### **1. Universe and Respondent Selection**

TAS will recruit from tax preparers attending the tax forums. Recruiters will attempt to get a variety of preparers with experience with math error notices, collection due process notices and statutory notice of deficiency notices to participate in the focus groups.

### **2. Procedures for Collecting Information**

Participants will be screened and balanced using the appropriate characteristics for the focus group topic and include gender, tax preparer type, experience level. Minimal information will be collected during this screening process to report to OMB in the summary report.

Recruiters will inform potential participants of the focus group topics and ask if they are interested in the topic, provide additional information about the focus groups, and ask qualified individuals to attend and participate in the focus group. We will recruit 16 qualified participants, with the expectation being that no more than 12 will show up at the group site and participate per group.

### **3. Methods to Maximize Response**

We will strive to maximize response and cooperation rates among those potential participants by: (1) providing the topic and scheduled meeting time before recruiting participants; (2) by offering qualified persons the opportunity to voice their opinions on the identified topic, and (3) scheduling the groups during lunch periods or times that do not conflict with the most popular sessions.

### **4. Testing of Procedures**

Because of prior tax forum experience, procedures will not require testing.

### **5. Contacts for Statistical Aspects and Data Collection**

Since focus groups are a form of qualitative research, statistical requirements are minimal. TAS Research will provide support needed for this endeavor.

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