SUPPORTING STATEMENT

Internal Revenue Service Form 2587, Application for Special Enrollment Examination OMB Control Number 1545-0949

1. CIRCUMSTANCES NECESSITATING COLLECTION OF INFORMATION

Section 10.4(a) of Treasury Department Circular No. 230, Regulations Governing the Practice of Attorneys, Certified Public Accountants, Enrolled Agents, Enrolled Actuaries and Appraisers before the Internal Revenue Service (31 CFR, Part 10), provides that enrollment to practice before the Internal Revenue Service may be granted to individuals who demonstrate special competence in tax matters by written examination administered by the Internal Revenue Service. This information is collected primarily electronically. Candidates can also provide information as hard copy or call it in over the telephone.

2. USE OF DATA

The information will be used by the Director, Return Preparer Office, to identify those individuals seeking to take the Special Enrollment Examination to establish eligibility for enrollment to practice before the Internal Revenue Service. Failure to collect such information will result in the Director, Return Preparer Office, being unable to determine the names and addresses of those individuals wishing to take the Special Enrollment Examination and to plan for the administration of the examination.

3. USE OF IMPROVED INFORMATION TECHNOLOGY TO REDUCE BURDEN

Form 2587 can be electronically filed through an IRS enrolled agent and by registering for the examination. Applicants have 3 ways to register; one which includes an on-line option through a third-party vendor (https://www.prometric.com/en-us/clients/SEE/Pages/landing.aspx), call/fax, or mail the completed form.

4. <u>EFFORTS TO IDENTIFY DUPLICATION</u>

The information obtained through this collection is unique and is not already available for use or adaptation from another source.

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

The collection of information requirement will not have a significant economic impact on a substantial number of small entities.

6. <u>CONSEQUENCES OF LESS FREQUENT COLLECTION ON FEDERAL PROGRAMS OR POLICY ACTIVITIES</u>

Consequences of less frequent collection on federal programs or policy activities would result in the Director of Practice being unable to determine the names and addresses of those individuals wishing to take the Special Enrollment Examination and to plan for the administration of the examination.

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

There are no special circumstances requiring data collection to be inconsistent with Guidelines in 5 CFR 1320.5(d)(2).

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

In response to the *Federal Register* notice (83 FR 17898) dated April 24, 2018, we received no comments during the comment period regarding Form 2587.

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

No payment or gift has been provided to any respondents.

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

A privacy impact assessment (PIA) has been conducted for information collected under this request and a Privacy Act System of Records notice (SORN) has been issued for this system under IRS 37.009 – Enrolled Agent. The Internal Revenue Service PIAs can be found at http://www.irs.gov/uac/Privacy-Impact-Assessments-PIA

Title 26 USC 6109 requires inclusion of identifying numbers in returns, statements, or other documents for securing proper identification of persons required to make such returns, statements, or documents and is the authority for social security numbers (SSNs) in IRS systems.

12. <u>ESTIMATED BURDEN OF INFORMATION COLLECTION</u>

The burden is as follows:

| | | Time per | Total |
|-----------|------------------|-----------------|--------------------|
| | <u>Responses</u> | <u>Response</u> | <u>Burden Hrs.</u> |
| Form 2587 | 11,000 | .10 hr. | 1,100 |

13. <u>ESTIMATED TOTAL ANNUAL COST BURDEN TO RESPONDENTS</u>

To ensure more accuracy and consistency across its information collections, IRS is currently in the process of revisiting the methodology it uses to estimate burden and costs. Once this methodology is complete, IRS will update this information collection to reflect a more precise estimate of burden and costs.

14. <u>ESTIMATED ANNUALIZED COST TO THE FEDERAL GOVERNMENT</u>

The primary cost to the government consists of the cost of printing this form. We estimate that the cost of printing the form is \$5,000.00.

15. REASONS FOR CHANGE IN BURDEN

Changes to the burden estimates were due to an arithmetical error in the previous time per response. Instead of 0.10 hours, the supporting statement erroneously reflected 1.0 hours per response. This resulted in 11,000 burden hours being requested instead of 1,100. The error has been corrected.

| Requested | | Program Change Due to Agency Discretion | _ | Change Due to Potential Violation of the PRA | Previously Approved |
|------------------------------|--------|---|--------|--|------------------------|
| Annual Number of Responses | 11,000 | 0 | 0 | 0 | 11,000 |
| Annual Time Burden (Hrs.) | 1,100 | 0 | -9,900 | 0 | 11,000 |

16. PLANS FOR TABULATION, STATISTICAL ANALYSIS AND PUBLICATION

There are no plans for tabulation, statistical analysis and publication.

17. REASONS WHY DISPLAYING THE OMB EXPIRATION DATE IS INAPPROPRIATE

We believe that displaying the OMB expiration date is inappropriate because it could cause confusion by leading taxpayers to believe that the form / regulation sunsets as of the expiration date. Taxpayers are not likely to be aware that the Service intends to request renewal of the OMB approval and obtain a new expiration date before the old one expires.

18. <u>EXCEPTIONS TO THE CERTIFICATION STATEMENT</u>

There are no exceptions to the certification statement.

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.