Supporting Statement Internal Revenue Service

Form 4506-A, Request for a Copy of Exempt or Political Organization IRS Form Form 4506-B, Request for a Copy of Exempt Organization IRS Application or Letter

OMB Control Number 1545-0495

1. CIRCUMSTANCES NECESSITATING COLLECTION OF INFORMATION

Internal Revenue Code (IRC) section 6104 states that if an organization described in IRC sections 501(c) or 501(d) is exempt from taxation under IRC section 501(a) for any taxable year or a political organization is exempt from taxation under IRC section 527 for any taxable year, the application for exemption is open for public inspection. This includes all supporting statements, any letter or other documents issued by the IRS concerning the application, and certain annual returns of the organization.

Form 4506-A is used by the public to request a copy of an exempt or political organization's return, report, or notice. Form 4506-B is used by the public to request a copy of an exempt organization's exemption application or letter issued by the IRS.

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

The information is used by the IRS to identify, locate, and provide the documents or information requested by the public in accordance with the provisions of IRC section 6104.

3. USE OF IMPROVED INFORMATION TECHNOLOGY TO REDUCE BURDEN

Electronic filing of Form 4506-B is currently available.

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

There is no burden on small businesses or entities by this collection due to the inapplicability of the authorizing statue to this type of entity.

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

A less frequent collection will not enable the IRS to respond to requests for documents or information related to exempt and political organizations in accordance with IRC section 6104 and could result in the IRS being unable to meet its mission.

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

We received no comments during the public comment period in response to the Federal Register notice (86 FR 46089), dated August 17, 2021.

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

No payment or gift has been provided to any respondents.

10. <u>ASSURANCE OF CONFIDENTIALITY OF RESPONSES</u>

Generally, tax returns and tax return information are confidential as required by 26 U.S.C. 6103.

11. JUSTIFICATION OF SENSITIVE QUESTIONS

A privacy impact assessment (PIA) has been conducted for information collected under this request as part of the "Business Master File (BMF) system and a Privacy Act System of Records notice (SORN) has been issued for this system under Treasury/IRS 24.046- CADE Business Master File; Treasury/IRS 50.222 Tax Exempt/Government Entities TE/GE Case Management Records; and Treasury/IRS 34.037 - IRS Audit Trail and Security Records System. The Internal Revenue Service PIAs can be found at https://www.irs.gov/privacy-disclosure/privacy-impact-assessments-pia.

Title 26 U.S.C. 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>

IRC section 6104 requires certain exempt or political organizations to make their returns, reports, notices, and exempt applications available for public inspection. The IRS anticipate that there will be 20,000 respondents annually, for a total estimated burden of 19,400 hours annually. The estimated burden for all respondents is shown below.

Authority	Description	# of Respondents	# Responses per Respondent	Annual Responses	Hours per Response	Total Burden Hours
IRC 6104	Form 4506-A	8,000	1	8,000	.97	7,760
IRC 6104	Form 4506-B	12,000	1	12,000	.97	11,640
Totals		20,000		20,000		19,400

The following regulations impose no additional burden. Please continue to assign OMB number 1545-0495 to these regulations.

301.6104(a)-1 301.6104(a)-5 301.6104(a)-6

We have reviewed these regulations and determined that the reporting requirements contained in them are entirely reflected on the form. The justification appearing in item 1 of the supporting statement applies both to these regulations and to both forms.

13. ESTIMATED TOTAL ANNUAL COST BURDEN TO RESPONDENTS

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

14. ESTIMATED ANNUALIZED COST TO THE FEDERAL GOVERNMENT

The Federal Government cost estimate is based on a model that considers the following three cost factors for each information product: aggregate labor costs for development, including annualized startup expenses, operating and maintenance expenses, and distribution of the product that collects the information. These costs do not include any activities such as taxpayer assistance and enforcement.

The government computes cost using a multi-step process. First, the government creates a weighted factor for the level of effort to create each information collection product based on variables, such as complexity, number of pages, type of product, and frequency of revision. Second, the total costs associated with developing the product such as labor cost, and operating expenses associated with the downstream impact such as support functions, are added together to obtain the aggregated total cost. Then, the aggregated total cost and factor are multiplied together to obtain the aggregated cost per product. Lastly, the aggregated cost per product is added to the cost of shipping and printing each product to IRS offices, National Distribution Center, libraries, and other outlets. The result is the government cost estimate per product.

The government cost estimate for this collection is summarized in the table below.

					Government Cost				
	Aggregate Cost per		Printing and		Estimate per				
<u>Product</u>	Product (factor applied)		<u>Distribution</u>		<u>Product</u>				
Form 4506-A	\$17,560		\$0		\$17,560				
Form 4506-A Instructions	\$4,390		\$0		\$4,390				
Grand Total	\$21,950		\$0		\$21,950				
Table costs are based on 2021 actuals obtained from IRS Chief Financial Office and Media and Publications									
* New product costs will be included in the next collection update.									

15. REASONS FOR CHANGE IN BURDEN

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

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

The IRS believes that displaying the OMB expiration date is inappropriate because it could cause confusion by leading taxpayers to believe that the forms sunset as of the expiration date. Taxpayers are not likely to be aware that the IRS 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.