

SUPPORTING STATEMENT

Internal Revenue Service (IRS)

Form 8945

PTIN Supplemental Application for U.S. Citizens Without a Social Security Number

Due to Conscientious Religious Objection

OMB Control Number 1545-2188

1. CIRCUMSTANCES NECESSITATING COLLECTION OF INFORMATION

Internal Revenue Code Section 6109, in order to get a Preparer Tax Identification Number (PTIN), a person must establish their identity. Most individuals applying for a PTIN have a Social Security Number (SSN) and will provide that number as part of the application process. However, U.S. residents that have a conscientious religious objection to getting a social security number will not have an SSN to provide. Form 8945 was created to enable those religious objectors to provide the necessary information and documentation that will be provided to establish their identity in lieu of providing an SSN.

2. USE OF DATA

The information will be used by the IRS to establish the citizenship and identity of U.S. citizens submitting a PTIN application who are conscientious religious objectors to having an SSN.

3. USE OF IMPROVED INFORMATION TECHNOLOGY TO REDUCE BURDEN

Since identity documents must be submitted with this form, the form must be mailed in. The required documents cannot be submitted electronically.

4. EFFORTS TO IDENTIFY DUPLICATION

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 are no small entities affected by this collection. The collection of information requirement will not have a significant economic impact due to the inapplicability of the authorizing statute under section 6109 to this type of entity.

6. CONSEQUENCES OF LESS FREQUENT COLLECTION ON FEDERAL PROGRAMS OR POLICY ACTIVITIES

A less frequent collection of taxes and tax information could adversely affect the tax preparer effectiveness to receive a PTIN. If the tax preparer does not have an SSN, filing this form allows the filer to meet the requirements to be a paid preparer and allows the preparer to prepare returns for compensation.

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. CONSULTATION WITH INDIVIDUALS OUTSIDE OF THE AGENCY ON AVAILABILITY OF DATA, FREQUENCY OF COLLECTION, CLARITY OF INSTRUCTIONS AND FORMS, AND DATA ELEMENTS

In response to the *Federal Register* notice dated March 26, 2024 (89 FR 21175), we received no comments during the comment period regarding Form 8945.

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 as part of the “Information Returns Processing (IRP),” “Return Preparer Database (RPD)” and Privacy Act System of Records notices (SORN) has been issued for these systems under IRS 22.061– Information Return Master File (IRMF); IRS 24.030– Customer Account Data Engine Master File; IRS 34.037–IRS Audit Trail and Security Records System. 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. ESTIMATED BURDEN OF INFORMATION COLLECTION

Form 8945 was created to enable those religious objectors to provide the necessary information and documentation that will be provided to establish their identity in lieu of providing an SSN. The burden estimate is as follows:

Authority	Description	# of Respondents	# Responses per Respondent	Annual Responses	Hours per Response	Total Burden
26 USC 6109	Form 8945	500	1	500	7.18	3,590
Totals		500				3,590

13. ESTIMATED TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no capital or start-up costs associated with this information collection. However, the figure of \$20 as the maximum cost of obtaining a notary seal if tax preparer chooses to notarize their supporting documents. This means that the notary public can set their own fees, but the highest notary fee in states that regulate it is \$20. Importantly, these are maximum costs. Many financial institutions perform these services for their customers for free, and many notaries set their fees below the allowed maximums.

The maximum cost of obtaining a notary seal (\$20) x number of responses (500) = \$10,000. \$10,000 x 25% = \$2,500

14. ESTIMATED ANNUALIZED COST TO THE FEDERAL GOVERNMENT

Cost estimate for product development 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. The costs to the federal government will vary depending on whether the IRS will incur printing or copying costs for all

the materials. These costs do not include any activities such as taxpayer assistance and enforcement. The IRS estimates have determined that the cost of developing, printing, distribution and overhead for the form is \$15,045.

15. REASONS FOR CHANGE IN BURDEN

There are no changes to the burden estimates previously approved by OMB. This submission is for renewal purposes only.

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 sunsets as of the expiration date. Taxpayers are not likely to be aware that the IRS intends to request renewal of OMB approval and obtain a new expiration date before the old one expires.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

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.