



**Research, Analysis &  
Statistics**

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**Tax Policy Center**  
Urban Institute and Brookings Institution

**Advancing Tax Administration ■ June 19, 2014**

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# **An IRS-TPC Research Conference: Advancing Tax Administration**



**Research, Analysis &  
Statistics**

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# Welcome

**Eric Toder**

Institute Fellow: Urban Institute, and  
Co-Director: Urban-Brookings Tax Policy  
Center

**Rosemary Marcuss**

Director: IRS Office of Research, Analysis,  
and Statistics

**John A. Koskinen**

Commissioner of Internal Revenue



## Advancing Tax Administration ■ June 19, 2014

### Session 1: Taxpayer Compliance Costs and Tax Administration

**Moderator:**

***Brenda Schafer***

*IRS, RAS, Office of Research*

**Improving Form 1098T:** How a Revised Form Could Increase Take-Up, Improve Compliance and Lower Taxpayer Burden

***Deena Ackerman***

*Office of Tax Analysis, US Treasury*

**Convenience Is Necessary for Pension Participation by the Poor**

***Valrie Chambers***

*Texas A & M University – Corpus Christi*

**The Compliance Costs of IRS Post-Filing Processes**

***Ronald Hodge***

*IRS, RAS, Office of Research*

**Discussant:**

***Robert Weinberger***

*Aspen Institute Initiative on Financial Security*

# Improving Form 1098T

How a Revised Form could Increase Take-Up,  
Improve Compliance, and Lower Taxpayer

Burden

Deena Ackerman

Julie-Anne Cronin

Nick Turner

Office of Tax Analysis, US Treasury

The views and opinions expressed are those of the authors and do not necessarily represent official Treasury positions or policy. Comments are welcome, as are suggestions for improvements, and should be directed to the authors.

# Form 1098T is...

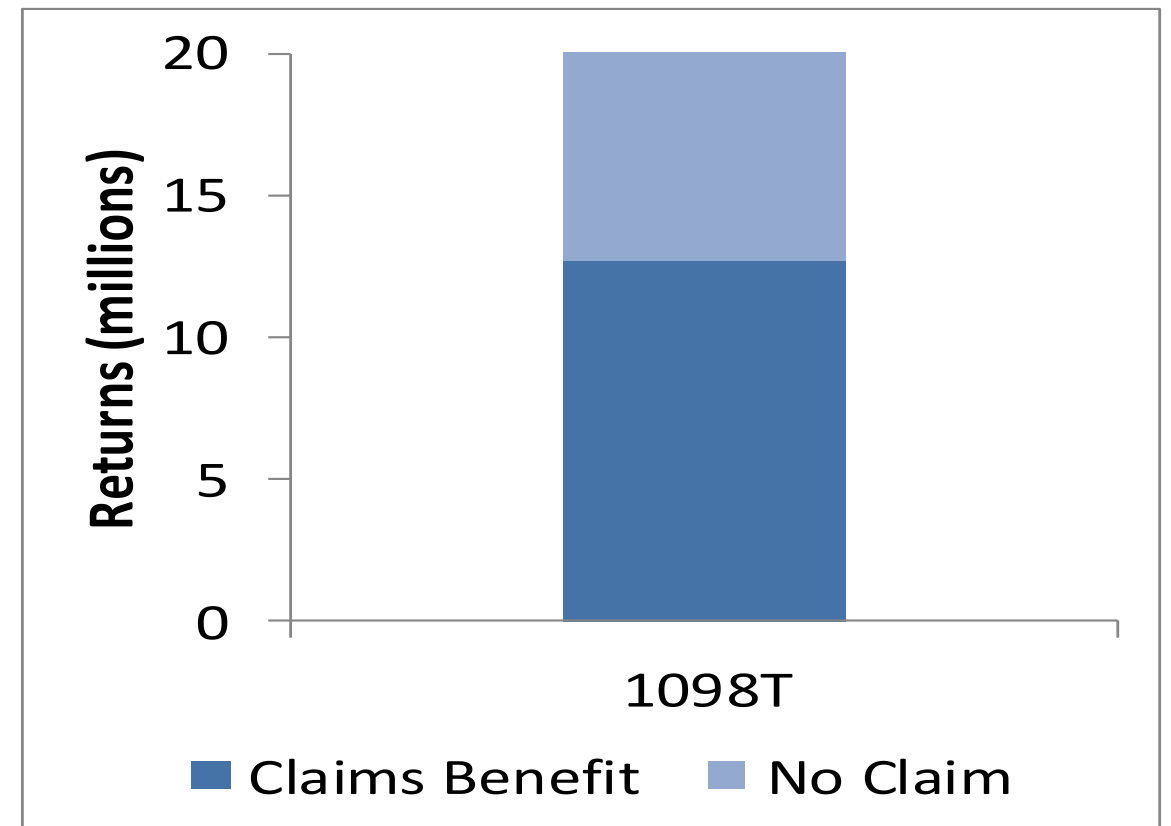
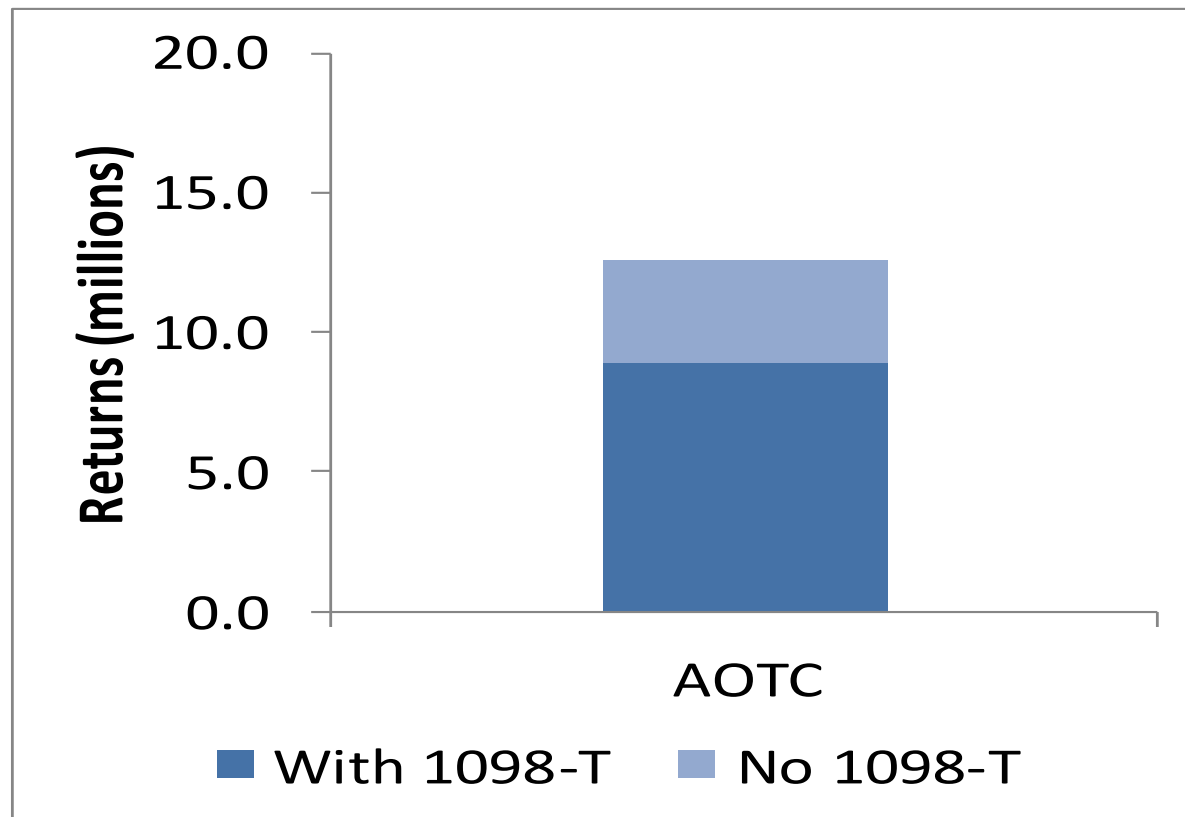
- Filed annually by nearly all post-secondary education institutions for most students.
- Used by IRS to verify education spending for education related tax benefits.
  - main or only source of information about student status, expenses and scholarships.
- Used by taxpayers to fill out Form 8863.
- Falls short of its potential.
  - Improvements could make this form more useful.

# Education Benefits and 1098Ts

(Average of 2010 and 2011 returns)

**26% of returns claiming AOTC  
have no Form 1098T.**

**37% of returns<sup>1</sup> with 1098T claim  
no benefit.**



<sup>1</sup> Returns in income range for tuition deduction

# Return Characteristics By Presence of Form 1098T

| Characteristic                               | With Benefit No 1098T | With Benefit With 1098T | No Benefit With 1098T |
|----------------------------------------------|-----------------------|-------------------------|-----------------------|
| Student is Dependent                         | 23%                   | 48%                     | 51%                   |
| Average AGI (2011 dollars)                   | \$33,610              | \$53,136                | \$39,625              |
| Average balance due/refund (2011 dollars)    | -\$3,651              | -\$3,172                | -\$2,866              |
| Fraction w/ joint filing status              | 24%                   | 50%                     | 44%                   |
| Fraction w/ paid tax preparation             | 54%                   | 52%                     | 53%                   |
| Fraction of all returns with 1098T           |                       | 63%                     | 37%                   |
| Fraction of all returns with AOTC, LLC or TD | 26%                   | 74%                     |                       |

Note: The first two columns includes all returns with credits, regardless of income. The third column excludes returns with incomes in excess of the income limits for the tuition deduction.

# Information Reported on Form 1098T

## Summary Statistics (2011)

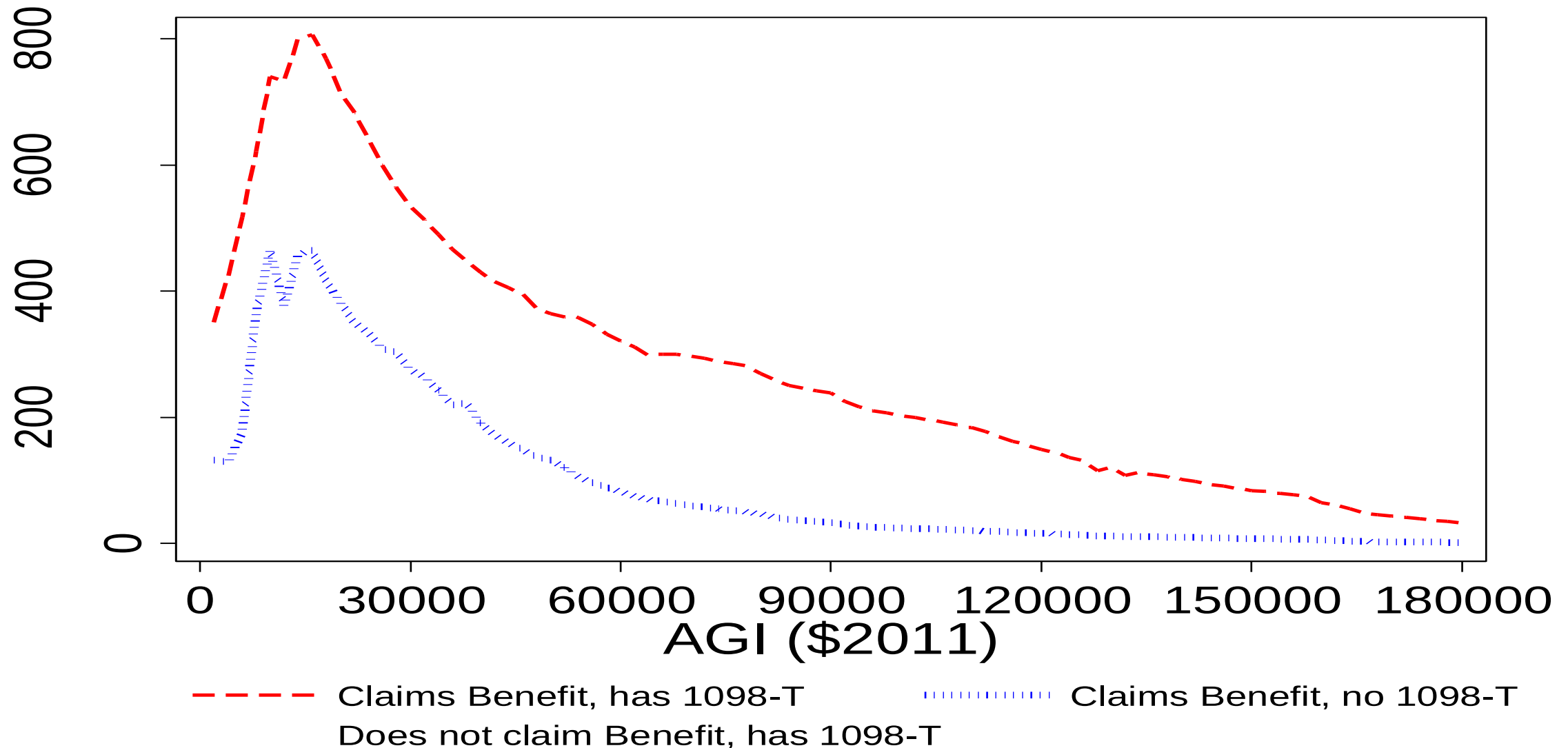
| Box                                         | Mean of Non-Zero Values | Percent with Non-Zero Value |
|---------------------------------------------|-------------------------|-----------------------------|
| 1. Payments Received                        | \$5,203                 | 19.1                        |
| 2. Payments Billed                          | \$23,650                | 76.1                        |
| 3. Change in Reporting Method               |                         | 2.4                         |
| 4. Prior year adjustments to Box 1 or Box 2 | \$1,284                 | 7.2                         |
| 5. Scholarships or Grants                   | \$5,664                 | 49.2                        |
| 6. Prior year adjustments to Box 5          | \$1,349                 | 1.5                         |
| 8. At least half time student               |                         | 80.7                        |
| 9. Graduate Student                         |                         | 13.7                        |
| 10. Insurance Contract Refund               | \$3,215                 | 0.1                         |



# Challenges and Solutions

- **Challenge 1:** Not all students receive a 1098T.
- **Challenge 2:** Expenses cannot be determined using 1098T.
- **Challenge 3:** Incomplete reporting of scholarships
- **Challenge 4:** Cannot identify full-time students
- **Solutions:** Expand reporting, collect what IRS and taxpayers need for filing and administration

# AOTC Claims with and without a 1098T in 2010 and 2011



# Challenge 1: Not all students receive a Form 1098T

- **Solution:** Expand reporting to include most students.
  - Imposes little risk of noncompliance:
    - Full scholarship students
    - Group billing students
    - US students abroad
  - Consider options for those remaining:
    - Non degree students
    - Institutional noncompliance

Universal reporting would allow the IRS to identify all students, and by extension non-students.

# Challenge 2: Expenses cannot be determined using Form 1098T

- **Solution A:** Require reporting of tuition paid and not tuition billed (eliminate Box 2)
  - Moves reporting closer to the definition of qualifying expense for all credits.
  - FY2015 Administration Budget Proposal
- **Solution B:** Consider options for limiting expenses not known by the school
  - Present more information to students, cap expenses

Would make Form 8863 worksheets simpler, since taxpayers would have better information.

# Challenge 3: Scholarship reporting is incomplete, rules imprecise

Schools only report scholarships that they “administer and process.”

- **Solution A:** define *administered and processed* to be any scholarship paid via the school and
- **Solution B:** impose new reporting requirement on all organizations that provide scholarships directly to the student
  - New burden on scholarship providers
  - May improve accuracy of taxpayer claims.
  - FY2015 Administration Budget Proposal

# Challenge 4: Cannot identify full-time students

Child related benefits extend through 23 for full-time dependent students, but this is not reported.

- **Solution:** Expand checkboxes to include...
  - *full-time, part-time* in addition to *at least half-time*, and
  - indicator that student attended for required 5 month

May improve IRS' ability to confirm child dependency status and eligibility for benefits that rely on this.

# An improved 1098T could simplify a complex worksheet (Form 8863)

- Example 1 – clearer wording

- Line 24 on current 8863:

*Was the student enrolled at least half-time for at least one academic period that began in 2013 at an eligible educational institution in a program leading towards a postsecondary degree, certificate, or other recognized postsecondary education credential? (see instructions)*

- Improved Line 24:

*Is Box 8 checked?*

# An improved 1098T could simplify a complex worksheet (Form 8863) (cont)

- Example 2 – new worksheet guides taxpayer toward right allocation of expenses.
  - Nearly all required information is available on 1098T(s).
  - Simple questions based on this information can help identify taxpayers who may want to include scholarship funds in income in order to maximize tax credits.



**FIGURE 2: EXAMPLE OF A WORKSHEET FOR EXPENSES QUALIFYING FOR AOTC**

|        |                                                                         |                        |
|--------|-------------------------------------------------------------------------|------------------------|
| Line 1 | Payments for qualified tuition and fees                                 | <Box 1 of 1098T>       |
| Line 2 | Expenses for course related materials                                   | <provided by taxpayer> |
| Line 3 | Payments for qualified tuition and related expenses before scholarships | <Add lines 1 and 2>    |
| Line 4 | Scholarships                                                            | <Box 5 of 1098T>       |
| Line 6 | Payments for qualified tuition and related expenses net of scholarships | <Line 3 minus Line 4>  |
| Line 7 | Check only one box                                                      |                        |

- a. Line 6 is greater than or equal to \$4,000, ☐

**STOP**

Enter \$4,000 on line 27 of Form 8863.  
Do not include any scholarships in the student's gross income.

- b. Line 6 is less than \$4,000 and line 4 is zero ☐

**STOP**

Enter line 6 on line 27 of Form 8863

- c. Line 6 is less than \$4,000 and line 4 is not zero ☐

**STOP**

You may benefit from including some of the student's scholarships in the student's gross income. See instructions.

# Conclusions

- 1098T is the main 3<sup>rd</sup> party report about student status, student expenses, scholarship income. It helps students claim tax benefits.
- Four main changes to advance goals:
  - universal reporting, reporting of expense paid, not billed, reporting of all grants, identifications of full-time students.
- Changes could enable IRS to:
  - offer outreach and guidance to students
  - develop effective compliance initiatives

# Questions?

# The Saver's Credit: Money v. Convenience

VALRIE CHAMBERS

# The Saver's Credit

- Low-income taxpayers can increase their tax refund by saving: 1. As an exclusion/deduction **and** 2. By using the **Savers Credit** (IRC Sec. 25B).
  - Taxpayers must be  $\geq 18$  & not a full time student or dependent on another's return.
  - Credit can be claimed for *previous* tax year if funded by April 15<sup>th</sup>, (using Form 8888).
- Normal Example: Tax subsidy for saving  $\Rightarrow$  (10-15% FIT savings from exclusion/deduction + 50% savings from credit)  $\Rightarrow$  \$1 IRA costs taxpayer 35¢ in liquidity.
- Extreme Example: Tax subsidy for saving  $\Rightarrow$  (65% above, + up to 45% EIC could result in, essentially, a free IRA with no loss to liquidity).



# “More Is Better”

- <http://www.youtube.com/watch?v=48-tcRiBNj4>
- So, how many people take the saver's credit?
  - 2007 tax year: approx. 65.6% had a small enough AGI to qualify, but
  - Only 4.1% filed for the savers credit.
  - 2010: approx. 78.9% qualified, and 5.4% filed for the savers credit, for just over \$1 billion in credit on more than 6.1 million averaging \$204 for joint filers, \$165 for heads of household and \$122 for single filers (IRS 2012).
- Why don't more people take the saver's credit?
  - A1: They can't afford to save
  - A2: They don't know about the saver's credit



# Field Experiment

- Educate eligible taxpayers about pension deductions and Savers Credit.
- Control for the amount and plans that taxpayers have for refunds.
- **Hypothesis:** Counseled taxpayers due a refund will significantly increase their retirement savings.
  - Especially if their refund contains a windfall component.
- **RQ:** Ask qualifying taxpayers who do not increase their retirement savings, “why not?”



# Results

After education, the number choosing to save is:

A: 6% of those eligible for the Saver's Credit (3/51)

Why?

A1: I'm a bad teacher.

A2: In utility, low- to middle-income taxpayer time is worth more than (generally) several hundred dollars per hour.

A3: Setting up a savings account is too inconvenient.





# Field Experiment Results

Table 1: Results of VITA Counseling Field Test

|                                                                | Number          | Percent           |
|----------------------------------------------------------------|-----------------|-------------------|
| <b>Taxpayers Approached</b>                                    | 83              | <b>100%</b>       |
| <b>Less: Taxpayers ineligible for tax break</b>                | <del>(32)</del> | <del>(39%)</del>  |
| <b>Eligible Taxpayers Approached</b>                           | 51              | <b>61%</b>        |
| <b>Less: Increased/Opened (New) Pension Savings Account*</b>   | <del>(3)</del>  | <del>(4%)</del>   |
| <b>Eligible Taxpayers Declining Additional Pension Funding</b> | 48              | <b>57% (100%)</b> |
| <b>Reasons Taxpayers Did Not Want Additional Pensions:</b>     |                 |                   |
| <b>1. Happy with Savings/ Pension Maximized</b>                | 12              | <b>14% (25%)</b>  |
| <b>2. Inconvenient</b>                                         | 11              | <b>13% (23%)</b>  |
| <b>3. Destitute/Large Bills</b>                                | 10              | <b>12% (21%)</b>  |
| <b>4. Non-specific Reasons</b>                                 | 5               | <b>6% (11%)</b>   |

# Classroom Experiment

- With business students: education level  $\geq$  general population
- Extreme scenario, where saving actually pays
  - Control group, hypothetically choose: more money (\$1,370) or less (\$270)?
  - Treatment group, choose: more money with a 15 minute diversion or less with no diversion?
  - Students received extra credit “up to...” about 2.5% of their grade.
- Hypothesis: Control and Treatment group members will choose more \$.



Assume you are married filing jointly with no children and have \$2,000 in a bank savings account and currently have the following federal income tax results from the preliminary 1040:

|                                           |           |
|-------------------------------------------|-----------|
| Total Income                              | \$30,000  |
| IRA Deduction                             | 0         |
| Adjusted Gross Income                     | 30,000    |
| Less: Standard Deduction and 2 Exemptions | ( 18,700) |
| Taxable Income                            | 11,300    |
| Income Tax                                | 1,130     |
| Savers Credit                             | 0         |
| Tax Liability                             | 1,130     |
| Federal Income Tax Withholding            | 1,400     |
| Refund                                    | 270       |

Now assume you are eligible to make an IRA contribution and qualify for the savers credit. If you convert \$1,000 (half) of your savings account to an IRA, your preliminary 1040 federal income tax results would be:

|                                          |           |
|------------------------------------------|-----------|
| Total Income                             | \$30,000  |
| IRA Deduction                            | 1,000     |
| Adjusted Gross Income                    | 29,000    |
| Less: Standard Deduction and 1 Exemption | ( 18,700) |
| Taxable Income                           | 10,300    |
| Income Tax                               | 1,030     |
| Savers Credit                            | 1,000     |
| Tax Liability                            | 30        |
| Federal Income Tax Withholding           | 1,400     |
| Refund                                   | 1,370     |

Which would you rather do? Check one box:

- ☐ File the current return resulting in a \$ 270 refund, or
- ☐ Take out a \$1,000 IRA and file the income tax return resulting in a \$ 1,370 refund.

If you pick the second (\$1,370 refund) option, have Shay Lee in the Dean's suite of the OCNR building initial in the grey box here =>



# Classroom Experiment Results

**Table 2: Effect of Convenience on Students\***

| 2012 Control (No Box)     |       |       |       |                      |
|---------------------------|-------|-------|-------|----------------------|
|                           | Box 1 | Box 2 | Total |                      |
| Day                       | 3     | 21    | 24    |                      |
| Night                     | 0     | 22    | 22    |                      |
| Totals                    | 3     | 43    | 46    |                      |
|                           |       |       |       |                      |
| 2012 Treatment (Grey box) |       |       |       |                      |
|                           | Box 1 | Box 2 | Total | Box 2 w/<br>Initials |
| Day                       | 15    | 12    | 27    | 8                    |
| Night                     | 9     | 14    | 23    | 6                    |
| No Time                   | 0     | 1     | 1     | 1                    |
| Totals                    | 24    | 26    | 50    | 15                   |

\* Difference in total is significant at  $p \leq .05$ .

# Discussion

- **Field Experiment:** 11/83 (13%) cited the lack of convenience for not saving; 12 (14%) of the low-income taxpayers had enough savings.
- **Student Experiment:** Only 30% of the treatment group (v. 93% of control group) chose the higher refund *and* did the 15-minute paperwork to legitimately get the extra-credit, indicating that like in the field experiment,

• ***Even minor inconveniences matter.***



# Discussion

- Consistent with *Freakonomics*, people may act (predictably?) irrational.
- When self-control is exerted, people feel depleted and their next choice is a convenient one.
- They also shorten their time horizon: time slows down (Echo Wen Wan and Nidhi Agrawal, 2011).
  - A series of mental accounting studies show that MDs budget yearly, MBAs monthly, and taxicab drivers budget on a day-to-day basis. (“One Day at a Time” effect.)



- Taken together, perhaps being poor and/or having taxes prepared is stressful, so people want to get as far away *as fast as they can* (minutes v. days).
- Also explains the popularity of refund anticipation loans in their day.
- ***This is important for CPAs with poorer clients and for public policy makers, because using the tax system to motivate poorer people may be less efficient than generally thought.***

# The Stress of Being Poor

- People in scarcity are more myopic and less able to make good choices due to “limited bandwidth,” which presents as both diminished intellectual capacity *and* depletion of self-control.
- Education is of limited use, but simplifying yields high returns. Convenience arguably simplifies.
- With less pension sponsorship, poorer taxpayers have both a greater need for private pension savings and a reduced ability to save.
- **Effective tax policies for retirement savings should: include accounts that are easy to set up, funded in times of financial excess (if any), and be funded at small, frequent interim deadlines.**



# MyRA

- Roth-style employer-facilitated pension for low-and middle-income t/ps in late 2014.
- Safe, Simple, Affordable
  - Guaranteed principal; variable interest; interest tax-free after age 59 1/2.
  - Online sign up  $\geq \$25$  &  $\geq \$5$ /paycheck automatically withheld; no fees.
  - Portable; can roll over to private sector. Principal withdrawn tax free.
- Attractive because:
  - Low entry; \$ is saved before it is seen. Savers commit to future withdrawals.
  - The principal is safe from market declines and fees, can withdraw tax-free
  - Presumably eligible for the Saver's Credit; reportable on standard W-2.
- Challenge: get employers to adopt & tax software to automatically calculate Saver's Credit.



# Further Research Questions

- Is it general financial stress (e.g. of being poorer) or specific financial stress (doing taxes) or an interaction effect that causes such short-term thinking?
- What can be done to mitigate short-term thinking?
  - Priming before the process?
  - Framing the question: would you rather have the largest take-home refund now or the largest wealth/asset base now?



# Other Discussion Points

- It is possible that the education on the Savers Credits and pension deductions increased savings for a subsequent year.
- The IRA deduction requires an account - which is a deterrent to the unbanked.
  - While an employee who funds pensions through payroll withholdings is eligible for the Savers Credit, the employer generally establishes the account.

# Conclusion

- How hard will low-income taxpayers work to increase their tax refund?
  - Not very hard.
- How hard will students work for extra credit? Only as hard as they must.
- Even minor inconveniences matter. This is important in designing tax and pension reform.
- **Effective tax policies for retirement savings should:**
  - **Include accounts that are easy to set up,**
  - **Be funded in times of financial excess (if any), and**
  - **Be funded at small, frequent interim deadlines.**



**Research, Analysis & Statistics**

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**OFFICE OF RESEARCH**

**The Compliance Costs of IRS Post-Filing Processes**

The content of this presentation is the opinion of the writer(s) and does not necessarily represent the opinion of the Internal Revenue Service



# The Compliance Costs of IRS Post-Filing Processes

Ronald Hodge, II  
John Guyton

# Overview

- Tax Administration Costs
  - Better measurement of tax administration costs will improve our understanding of factors that influence a tax system and its outputs
- Taxpayer Compliance Costs
  - Considerably larger than the budget of the tax administrator (Slemrod and Yitzhaki, 2002)
  - Typically discussed in terms of pre-filing and filing activities
  - Must also consider costs incurred after a tax return has been filed
  - Impractical to measure these costs directly, so they must be estimated

# Approach

- Gather data on the time and money spent resolving post-filing issues
  - Amended returns, Examination, Appeals or Collection
- Link survey responses to IRS administrative data on post-filing processes
- Develop taxpayer-level model of post-filing costs
- Apply model to a full year post-filing population to estimate associated compliance costs

# Survey

- Individual taxpayers who resolved a Tax Year 2008, 2009 or 2010 post-filing issue during calendar year 2011
  - Represents variation in post-filing issue types and cycle times
  - Accounts for ~83% of the individual income taxpayer post-filing issue resolutions in calendar year 2011
- Stratified random sample of 13,000 taxpayers
  - (1) Post-filing issue resolution
    - Issue type (Examination, Collection, Appeals or Amended Returns)
    - Issue complexity
  - (2) Original tax return characteristics
    - Return complexity and preparation method



# Model Development

- Log-linear micro-simulation model of taxpayer post-filing compliance costs
- Monetized time for each survey respondent using income information reported on the respondent's tax return
- Total compliance cost is equal to the monetized time and money spent resolving post-filing issues
- Dependent variable is the log of total compliance costs
- Independent variables represent:
  - At-filing characteristics
  - Post-filing characteristics
  - Collection-related resolutions

# Post-Filing Compliance Cost Coefficients

|                                         | Variable                                       | Estimate | T Statistic    |
|-----------------------------------------|------------------------------------------------|----------|----------------|
|                                         | Intercept                                      | 1.3569   | <b>5.4900</b>  |
| <b>At-Filing Return Characteristics</b> | Log Income                                     | 0.1800   | <b>7.6100</b>  |
|                                         | Medium Complexity Indicator                    | 0.2067   | <b>4.2800</b>  |
|                                         | High Complexity Indicator                      | 0.6103   | <b>8.3300</b>  |
|                                         | Paid Indicator                                 | 0.2097   | <b>2.8400</b>  |
|                                         | Software Indicator                             | -0.1301  | -1.6400        |
|                                         | Power of Attorney (At Filing)                  | 1.3225   | <b>8.1300</b>  |
| <b>Post-Filing Characteristics</b>      | Power of Attorney (Post-Filing)                | 1.0271   | <b>10.9900</b> |
|                                         | No Post-Filing Tax Assessed Indicator          | 0.4698   | <b>2.7500</b>  |
|                                         | Log Post-Filing Tax Assessments                | 0.0452   | <b>2.1100</b>  |
|                                         | Automated Underreporter Indicator              | 0.1525   | <b>2.3600</b>  |
|                                         | Log Administrative Costs - Examination         | 0.1886   | <b>10.6100</b> |
|                                         | Log Administrative Costs - Appeals             | 0.2095   | <b>2.9400</b>  |
|                                         | Amended Tax Return                             | 0.3808   | <b>4.8800</b>  |
|                                         | Balance Due Indicator                          | 0.9324   | <b>3.4800</b>  |
| <b>Collection Resolutions</b>           | Account Full Paid                              | -0.9732  | <b>-3.6900</b> |
|                                         | Installment Agreement Indicator                | 0.8103   | <b>3.1400</b>  |
|                                         | Offer in Compromise Indicator                  | 1.3370   | <b>4.5000</b>  |
|                                         | Collection Due Process Indicator               | 0.7938   | 1.9500         |
|                                         | Currently Not Collectible - Hardship Indicator | 0.0558   | 0.2700         |
|                                         | Lien Release Indicator                         | 0.2934   | 0.8600         |

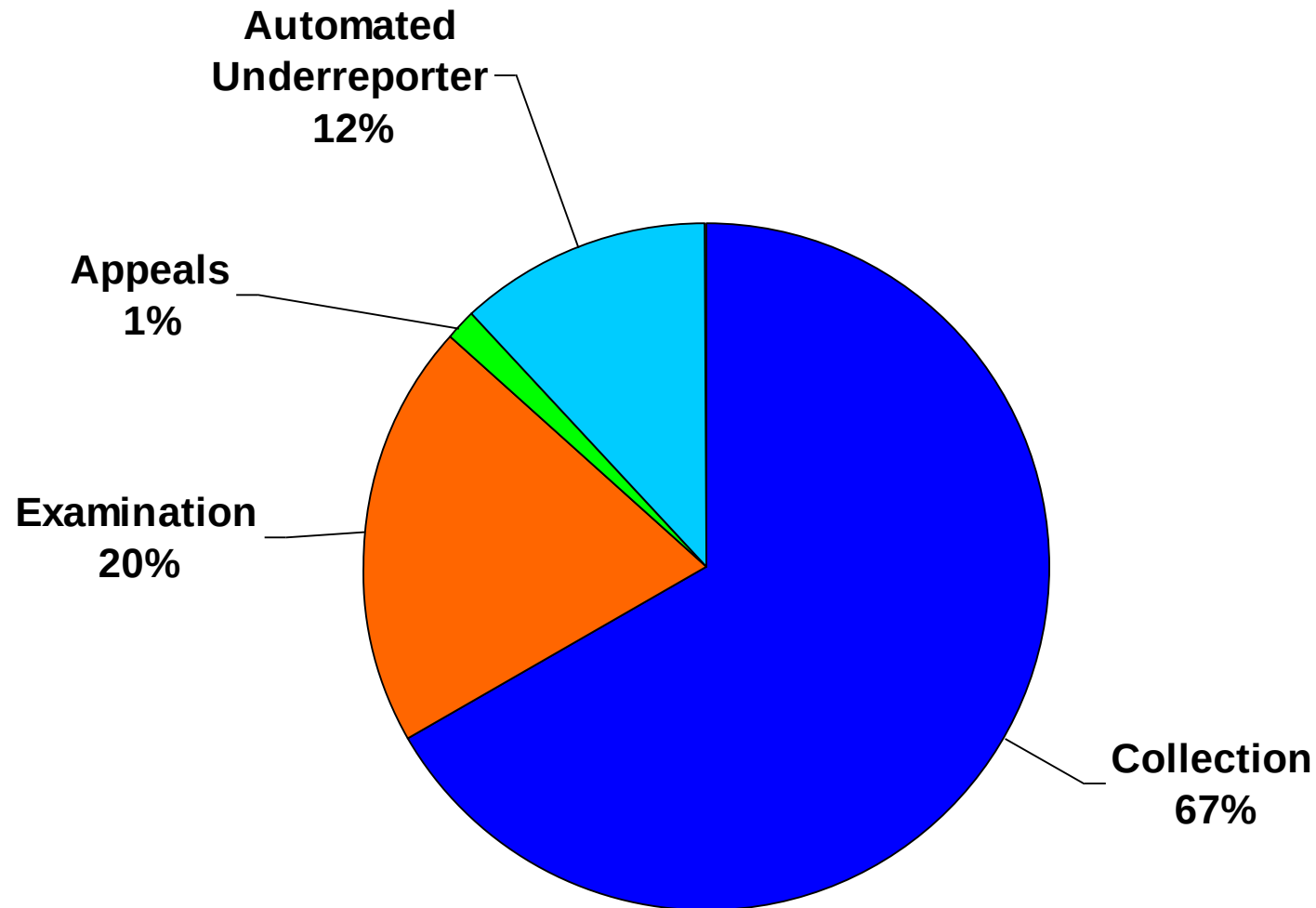
Adj. R<sup>2</sup> = 0.424

# Post-Filing Compliance Costs – By Originating Function

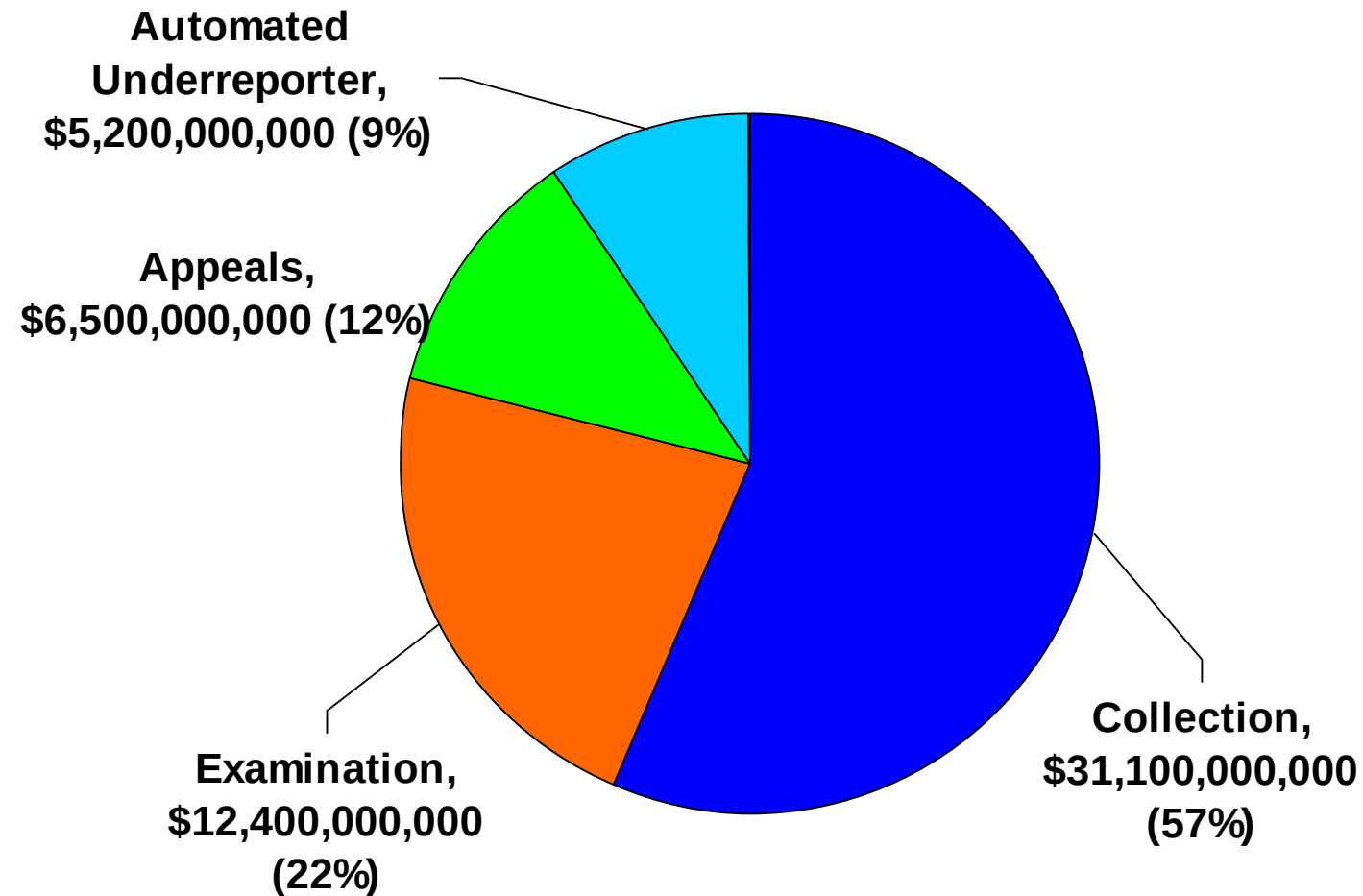
## Post-Filing Compliance Cost Estimates (CY 2011 Full Population)

| Case Type                  | Population | Average Compliance Cost | Median Compliance Cost | Total Compliance Costs |
|----------------------------|------------|-------------------------|------------------------|------------------------|
| AUR                        | 3,867,000  | \$225                   | \$90                   | \$870,000,000          |
| Amended                    | 1,168,000  | \$440                   | \$125                  | \$514,000,000          |
| Collection                 | 5,845,000  | \$470                   | \$155                  | \$2,747,000,000        |
| Correspondence Examination | 823,000    | \$500                   | \$155                  | \$412,000,000          |
| Field Examination          | 137,000    | \$4,670                 | \$915                  | \$640,000,000          |

# Individual Taxpayer Post-Filing Compliance Costs by Enforcement Function - 2011



# Fiscal Year 2011 Enforcement Revenue by Function – All Taxpayer Types



# Pre-Filing, Filing and Post-Filing Compliance Costs for Taxpayers with Post-Filing Activity

## Estimates of Post-Filing Compliance Costs for Taxpayers Resolving a Post-Filing Issue in 2011

|       | Population | Average Compliance Cost | Median Compliance Cost | Total Compliance Cost |
|-------|------------|-------------------------|------------------------|-----------------------|
| Total | 11,977,000 | \$455                   | \$130                  | \$5,450,000,000       |

## Estimates of Pre-Filing & Filing Compliance Costs for Taxpayers Resolving a Post-Filing Issue in 2011

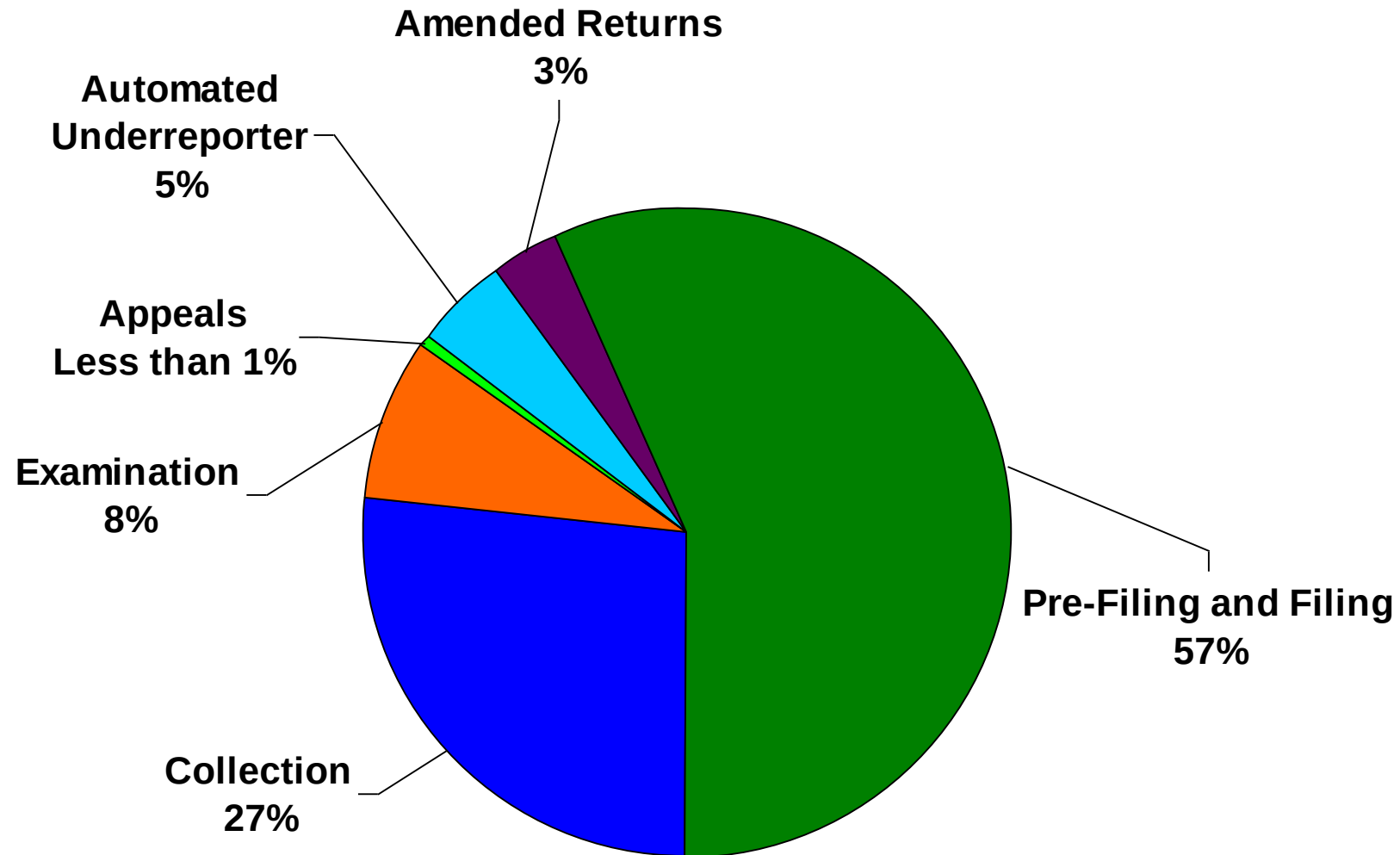
|       | Population | Average Compliance Cost | Median Compliance Cost | Total Compliance Cost |
|-------|------------|-------------------------|------------------------|-----------------------|
| Total | 11,977,000 | \$615                   | \$230                  | \$7,366,000,000       |

# Pre-Filing, Filing and Post-Filing Compliance Costs for Taxpayers with Post-Filing Activity

## Comparison of Pre-filing/Filing and Post-Filing Compliance Costs [Select Case Types]

| Initial Post-Filing Case Type | Average Pre-filing and Filing Compliance Cost | Average Post-Filing Compliance Cost |
|-------------------------------|-----------------------------------------------|-------------------------------------|
| Automated Underreporter       | \$455                                         | \$225                               |
| Correspondence Examination    | \$600                                         | \$500                               |
| Office Examination            | \$1,125                                       | \$2,105                             |
| Field Examination             | \$3,705                                       | \$4,670                             |
| Amended Return                | \$880                                         | \$440                               |

# Total Compliance Costs for Taxpayers with Post-Filing Activity - 2011





# Individual Income Tax Compliance Costs and Total Revenue Collected – Enforcement versus Non-Enforcement

| Activity                                                 | Allocation of Compliance Costs (in Billions) | Allocation of Compliance Costs |
|----------------------------------------------------------|----------------------------------------------|--------------------------------|
| Pre-Filing and Filing TY 2010 and Amended Returns CY2011 | \$53.4 + \$0.4 = \$53.8                      | 91%                            |
| Post-Filing Enforcement CY 2011                          | \$5.2                                        | 9%                             |
| Total (TY 2010/CY 2011)                                  | \$59.0                                       | 100%                           |

# Individual Income Tax Compliance Costs and Total Revenue Collected – Enforcement versus Non-Enforcement

| Revenue Source                                   | Revenue (in Billions) | Allocation of Revenue |
|--------------------------------------------------|-----------------------|-----------------------|
| Voluntary Compliance and Non-Enforcement Revenue | \$1,944               | 97%                   |
| Enforcement Revenue (2)                          | \$55                  | 3%                    |
| Total Net Revenue (1)                            | \$1,999               | 100%                  |

# The Path Forward of Post-Filing Compliance Cost Modeling

- Enhance what-if modeling capability and planning support
- Extend post-filing compliance cost modeling
  - Other taxpayer types
  - Other tax types
- Increased integration of compliance cost modeling with other aspects of tax administration research:
  - Taxpayer needs
  - Compliance outcomes
  - Enforcement treatments
  - Administrative costs
  - Revenue collection

# **Taxpayer Compliance Costs and Tax Administration**

**IRS-TPC Research Conference  
Session 1 Comments  
Robert Weinberger  
June 19, 2014**

# Papers

- 1. Improving Form 1098T (Education Benefits)**
- 2. Increasing Pension Participation of the Poor**
- 3. Measuring Post-Filing Compliance Costs**

# 1. Education Benefits

Hard to understand and compare, let alone optimize

1. Hope Scholarship Tax Credit
2. Lifetime Learning Credit
3. American Opportunity Tax Credit
4. Tuition & Fees Deduction
5. Scholarship/Fellowship Exclusion
6. Extended Dependent Exemption
7. Expanded EITC Eligibility
8. Education Savings Accounts
9. Deduction for Interest on Education Loans

# Education Benefits

- 1098T: student status, expenses, scholarships
- Many who get the form don't claim benefits; many who claim benefits don't get the form
- More info needed to determine eligibility, ease compliance, and optimize benefits
- Revision would improve outreach, utilization, and enforcement

# Education Benefits

- Paper is well written, clear, convincing
- Focused on mechanics of compliance
- Also might consider broadening scope
  - Policy objectives
  - Reform proposals
  - Measuring non-compliance
  - Measuring underutilization
  - Role of assisted preparation
  - Software optimizing tools



## 2. Poor Pension Participation

- Asks Why don't the poor save (more)?
- Examines several hypotheses
- Rejects as “acute oversimplification” that they can't afford to
- Instead finds “convenience” is key
- Conclusions more suggestive than definitive

# Poor Pension Participation

Some issues --

- Premise: Taxpayers expect a refund amount and are more likely to save for retirement if it's higher
- Hypothesis: Counseled taxpayers will significantly increase savings
- Study design, sample size
- Setting: VITA, credit union
- Comparability: low-income TPs and students

# Poor Pension Participation

Multiple factors:

- Knowledge
  - Trust
  - Available money
  - Emotional ability
  - Adequate incentives
  - Program, product design
- > Convenience



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# 3. Post-Filing Compliance Costs

- Paper builds well on earlier research
- Uses logical categorization, segmentation
  - Return complexity, prep method, issue complexity
  - IRS treatment: exam, appeals, collection
- Defensible survey, modeling, analysis
- Assertions appropriately qualified
- Addresses issues—How representative? etc.

# Post-Filing Compliance Costs

Key takeaways:

- 11.4M of 145M filers resolve issues later (<8%)
  - Across all taxpayers, pre-filing/filing costs average \$373 and post-filing costs average \$400
  - For post-filers, 60% of costs are pre-file/filing (\$640)
  - 45% of post-filers have collection issues; = 61% of their compliance costs
- Overall compliance costs split 91%/9% between pre-filing, filing, and amending returns and post-filing enforcement

# Post-Filing Compliance Costs

Suggestions --

- Explain monetization methodology
- Validate with CPAs, national preparers
- Correlate with NRP, DIF: Where is the greatest bang for the buck?
- Break out EITC





## Advancing Tax Administration ■ June 19, 2014

### Session 1: Taxpayer Compliance Costs and Tax Administration

**Moderator:**

***Brenda Schafer***

*IRS, RAS, Office of Research*

**Improving Form 1098T:** How a Revised Form Could Increase Take-Up, Improve Compliance and Lower Taxpayer Burden

***Deena Ackerman***

*Office of Tax Analysis, US Treasury*

**Convenience Is Necessary for Pension Participation by the Poor**

***Valrie Chambers***

*Texas A & M University – Corpus Christi*

**The Compliance Costs of IRS Post-Filing Processes**

***Ronald Hodge***

*IRS, RAS, Office of Research*

**Discussant:**

***Robert Weinberger***

*Aspen Institute Initiative on Financial Security*