

**MSP
#9****OUTREACH AND EDUCATION: The IRS Is Making Commendable Strides to Develop Digitized Taxpayer Services, But It Must Do More to Maintain and Improve Traditional Outreach and Education Initiatives to Meet the Needs of U.S. Taxpayers****RESPONSIBLE OFFICIALS**

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TAXPAYER RIGHTS IMPACTED¹

- *The Right to Be Informed*
- *The Right to Quality Service*

DEFINITION OF PROBLEM

The IRS has held a longstanding position that taxpayer outreach and education is essential to voluntary compliance.² Yet, it continues to shift outreach and education responsibilities to third-party partners. In addition, the IRS is increasingly relying on digital channels to distribute outreach and education information.³ While digital distribution channels and leveraging third-party partners may enable the IRS to reach large taxpayer populations in a cost-effective manner, it still leaves significant populations of taxpayers behind.⁴ It also eliminates the two-way exchange, and in conjunction with the trend away from geographic presence in the taxpayer communities, results in a one-way, filtered, education strategy as well as a remote, impersonal IRS.

- 1 See Taxpayer Bill of Rights (TBOR), www.TaxpayerAdvocate.irs.gov/taxpayer-rights. The rights contained in the TBOR are now listed in the Internal Revenue Code (IRC). See Consolidated Appropriations Act, 2016, Pub. L. No. 114-113, Division Q, Title IV, § 401(a) (2015) (codified at IRC § 7803(a)(3)).
- 2 See, e.g., Internal Revenue Manual (IRM) 1.2.19.1.8(2), *Policy Statement 11-93 (Formerly P-1-181)* (July 24, 1989).
- 3 See, e.g., IRS Small Business Week Tax Tip 2017-01, *IRS Promotes Specialized Online Services during Small Business Week* (Apr. 28, 2017); Wage & Investment Research, *Facilitating Access to Convenient & Efficient IRS Service: W&I Web-First Conjoint Study* (May 11, 2016).
- 4 In its response to the TAS fact check, the IRS stated that it is “relying more on digital channels since many taxpayers, particularly younger ones, rely on these for their information.” IRS response to TAS fact check (Nov. 20, 2017). While we agree that younger generations are more receptive to online channels, we encourage the IRS to give due consideration to the information needs of those taxpayers without access to digital channels. See Most Serious Problem: *Online Accounts: The IRS’s Focus on Online Service Delivery Does Not Adequately Take into Account the Widely Divergent Needs and Preferences of the U.S. Taxpayer Population*, *supra*; Research Study: *A Further Exploration of Taxpayers’ Varying Abilities and Attitudes Toward IRS Options for Fulfilling Common Taxpayer Service Needs*, vol. 2, *infra*; National Taxpayer Advocate 2016 Annual Report to Congress, vol. 2, 1-30 (Research Study: *Taxpayers’ Varying Abilities and Attitudes Toward IRS Taxpayer Service: The Effect of IRS Service Delivery Choices on Different Demographic Groups*).

A successful outreach strategy is both cost-effective and substantively effective. The IRS appears to have designed its outreach strategy in reaction to cost concerns.⁵ However, if it does not develop a research-based outreach strategy, the IRS may not be conducting its outreach initiatives in the most effective manner. To be effective, the outreach and education must (1) include content addressing the taxpayers' information needs, (2) clearly state the message in language the target audience can understand, and (3) use a distribution channel the target recipient can access. Accordingly, the IRS must conduct research as well as review the findings of TAS research to understand the information needs of the diverse taxpayer populations.⁶

In addition to formal research, an effective way to gain an understanding of the information needs of the various diverse local communities is to have a geographic presence (*i.e.*, at least one employee living in or touring through the state or geographic region) rather than generalize the information needs of the entire U.S. taxpayer population from afar. Unfortunately, the IRS outreach functions did not have local presence in about one-third of the states. Specifically, for fiscal year (FY) 2017, the IRS Office of Communications and Liaison (C&L) Stakeholder Liaison (SL) function had 105 employees assigned to various outreach activities in over 33 states and the District of Columbia.⁷

ANALYSIS OF PROBLEM

The IRS Centralized Outreach Activities for Individual Taxpayers and Small Businesses

In April 2017, the IRS transferred the SL function of Small Business/Self-Employed (SB/SE) to C&L. There are now several key outreach functions located in C&L:⁸

1. **National Public Liaison (NPL):** NPL promotes and strengthens relationships with external partners and solicits ideas on emerging issues, IRS initiatives, policies, procedures, and guidance.
2. **Stakeholder Liaison (SL):** Provides outreach and education through partnerships with tax professional organizations, industry associations, and government agencies. SL collaborates with these partners to maintain relationships and conduct meetings or events in-person, by phone or email, and through virtual web conferencing. SL also communicates by tweets and provides fact sheets and news releases to partners, who can distribute the material to their members, clients, and constituents.

5 IRS response to TAS fact check (Nov. 20, 2017). The National Taxpayer Advocate previously raised concerns about the dwindling resources allocated to outreach and education since the IRS Restructuring and Reform Act of 1998 (RRA 98). See, e.g., National Taxpayer Advocate 2012 Annual Report to Congress (Most Serious Problem: *The IRS is Substantially Reducing Both the Amount and Scope of Its Direct Education and Outreach to Taxpayers and Does Not Measure the Effectiveness of its Remaining Outreach Activities, Thereby Risking Increased Noncompliance*).

6 See Literature Review: *Fostering Taxpayer Engagement Through Geographic Presence*, vol. 2, *infra*.

7 IRS response to TAS information request (Oct. 13, 2017). In response to TAS's information request for the number of outreach employees assigned to each state, territory, and the District of Columbia, the IRS responded that Communication & Liaison (C&L) had 105 employees assigned to outreach activities spread over 33 states and the District of Columbia. However, the IRS response to fact check stated that these numbers only account for Small Business/Self-Employed (SB/SE) Stakeholder Liaison (SL) employees. Therefore, we do not have details regarding any additional outreach employees. IRS response to TAS fact check (Nov. 20, 2017).

8 In response to the TAS information request, the IRS provided that C&L has two key outreach organizations: National Public Liaison (NPL) and Stakeholder Liaison (SL). IRS response to TAS information request (Oct. 13, 2017). However, in the response to a TAS fact check, C&L stated that outreach is performed by the following C&L organizations in addition to NPL and SL: (1) the Office of Communications (including Media Relations and Social Media) and (2) the Office of Legislative Affairs (including the branch dealing with local congressional offices). However, we did not receive details about the outreach activities performed by and resources allocated to these functions. IRS response to TAS fact check (Nov. 20, 2017).

3. **Tax, Outreach, Partnership, and Education:** C&L recently launched this new branch to focus on building relationships with organizations outside the traditional tax communities.

The following chart summarizes the in-person and virtual outreach events conducted by both NPL and SL in C&L.

FIGURE 1.9.1, FY 2017 Face-to-Face and Virtual Outreach Events Conducted by C&L NPL and SL⁹

C&L Outreach Activity	Number of Events	FY 2017 Direct Face-to-Face Participants	FY 2017 Digital Participants
NPL: Tax Forums	5	12,621	N/A
SL: Practitioner Virtual Events	215	N/A	48,133
SL: Practitioner Face-to-Face Events	673	58,106	N/A
SL: Industry Virtual Events	80	N/A	4,759
SL: Industry Face-to-Face Events	238	15,198	N/A
SL: Web Conferencing Outreach Events	31	N/A	33,469
Total	1,242	85,925	86,361

With the exception of Stakeholder Partnerships, Education and Communication (SPEC) in the Wage and Investment (W&I) Division, which is completely dedicated to the Volunteer Income Tax Assistance (VITA) and Tax Counseling for the Elderly (TCE) programs, the IRS centralized most outreach functions for individuals and small businesses in C&L.¹⁰ The centralized outreach function in C&L bears ultimate responsibility, whether conducted directly or through leveraged partnerships, for helping approximately 151 million individual taxpayers and 62 million small business taxpayers understand and comply with their tax filing and payment obligations.¹¹ Despite the diverse taxpayer population for which C&L is responsible, the organization allocates only 105 employees to conduct outreach and education. Furthermore, dedicated outreach and education staff are assigned in over 33 states and the District of Columbia, leaving approximately 16 states and the territories of Guam, Puerto Rico and the

- 9 IRS response to TAS information request (Oct. 13, 2017). By comparison, TAS Local Taxpayer Advocates conducted over 4,700 local outreach activities during fiscal year (FY) 2017, accounting for nearly 16,000 hours during the fiscal year, despite having numerous other duties as managers of the TAS local offices. Their efforts reached over 875,000 taxpayers and tax professionals through various outlets including local radio and television. TAS Office of Communications, Stakeholder Liaison, and Online Services, *National Completed Events Summary for 2017* (Oct. 27, 2017).
- 10 IRS response to TAS information request (Oct. 13, 2017). The following organizations maintain a separate outreach function: Tax Exempt/Government Entities Division (TE/GE), Large Business and International Division (LBI), Return Preparer Office (RPO), the Office of Appeals, Criminal Investigation Division (CI), and TAS. IRS response to TAS fact check (Nov. 20, 2017).
- 11 IRS, *2016 Data Book*, Table 2, <https://www.irs.gov/pub/irs-soi/16datbk.pdf>; IRS response to TAS fact check (Nov. 20, 2017); IRS response to TAS fact check (Dec. 15, 2016).

U.S. Virgin Islands without any dedicated outreach staff.¹² C&L allocates \$12.1 million of its budget to direct labor costs of employees in NPL and SL to conduct outreach and education activities.¹³

The IRS Outreach and Education Staff Needs Geographic Presence to Effectively Perform Its Government Function

Before 1998, the IRS was organized into 43 geographically defined districts and service centers.¹⁴ In addition, the IRS encouraged its staff to perform face-to-face outreach by accepting invitations to speaking events and participating in conferences.¹⁵ The previous IRS structure and outreach policy evidences that the organization realized the importance of geographic presence and face-to-face outreach.

Geographic presence among outreach and education staff is vital to understanding the local economy and culture. For example, the IRS may not understand the information needs of natural disaster victims in Puerto Rico or the U.S. Virgin Islands, unless it has employees, preferably C&L employees assigned to outreach activities, on the ground and in the community. These employees can hear firsthand the local issues and concerns of the community. In addition, by engaging with the community, they will gain familiarity with the local norms and understand the best channels to deliver messages. Community engagement places the IRS in the best position to communicate targeted messages on issues relevant to that particular population, as opposed to general messages that are too vague for anyone to see themselves reflected in the information presented.

Accordingly, the IRS should not shift a majority of its outreach and education responsibilities to third-party partners. Relying on partners to deliver the message benefits the IRS because it is a convenient and efficient way to reach a large number of taxpayers. In addition, communicating through third-party partners is crucial when there is a lack of trust in the IRS. For example, the IRS may have a difficult time getting undocumented workers to participate in outreach events and, for these taxpayers, the IRS could use third-party partners as intermediaries. However, in most cases, relying on partners is not as beneficial as actually going out and talking with taxpayers, preparers, and other representatives to really

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12 IRS response to TAS information request (Oct. 13, 2017). The geographic outreach data provided in the IRS response to TAS information request does not include in-person speeches given by IRS employees who are not dedicated outreach employees. IRS response to TAS fact check (Nov. 20, 2017).

13 In response to TAS's request for the IRS's overall outreach budget, the IRS responded that \$12.1 million of C&L's budget was allocated to outreach activities. IRS response to TAS information request (Oct. 13, 2017). However, in its response to the TAS fact check, the IRS stated that the \$12.1 million figure only applies to labor costs of employees in NPL and SL. IRS response to TAS fact check (Nov. 20, 2017).

14 S. Rep. No. 105-174, 9 (1998); Joint Committee on Taxation, *General Explanation of Tax Legislation Enacted in 1998*, JCS-6-98 16-17 (1998); IRS Pub. 3349, *Modernizing America's Tax Agency 1-10* (Apr. 2000), <https://www.irs.gov/pub/irs-utl/27877d00.pdf>.

15 IRM 1.2.19.1.8, *Policy Statement 1-181* (Jul. 24, 1989).

However, in most cases, relying on partners is not as beneficial as actually going out and talking with taxpayers, preparers, and other representatives to really understand where confusion lies, how to develop better publications and materials, and what national messages need to be modified or reinforced.

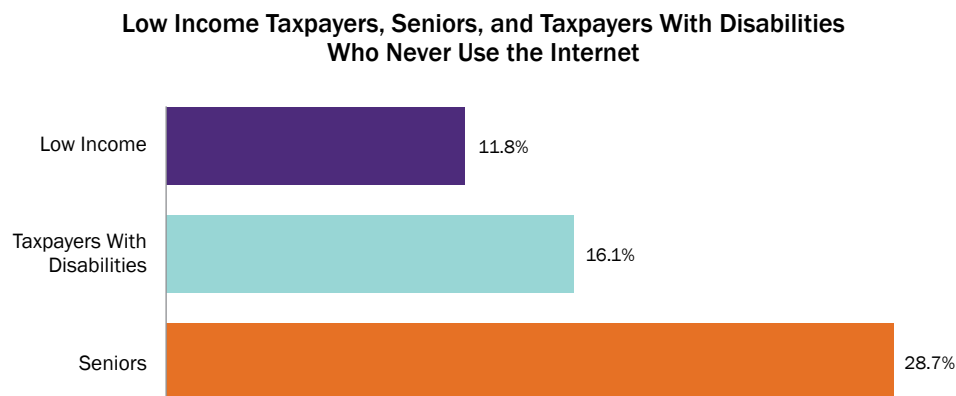
understand where confusion lies, how to develop better publications and materials, and what national messages need to be modified or reinforced.

Given That Tax Administration Relies on Voluntary Compliance, It Is Incumbent on the IRS to Conduct and Evaluate Research Into Taxpayer Information Needs

To give taxpayers what they need, when they need it, and in a manner they can access, the IRS must conduct and evaluate research into taxpayer information needs. In 2016 and 2017, TAS conducted a nationwide survey of U.S. taxpayers about their needs, preferences, and experiences with IRS taxpayer service conducted entirely by telephone (landline and cell phone).¹⁶ Without evaluating the results from this type of research, the IRS is developing an outreach strategy that may miss the mark and negatively impact taxpayer compliance.

For example, the 2016 and 2017 TAS survey found that about 28 percent of taxpayers do not have broadband access, which translates to over 41 million taxpayers without this type of access, particularly an issue in the vulnerable populations including low income taxpayers, seniors and taxpayers with disabilities. The following chart illustrates the percentages of the respondents in the vulnerable populations who never use the internet:¹⁷

FIGURE 1.9.2, Percentages of Low Income Taxpayers, Seniors, and Taxpayers with Disabilities Who Never Use the Internet.



¹⁶ See Research Study: *A Further Exploration of Taxpayers' Varying Abilities and Attitudes Toward IRS Options for Fulfilling Common Taxpayer Service Needs*, vol. 2, *infra*; National Taxpayer Advocate 2016 Annual Report to Congress, vol. 2, 1-30 (Research Study: *Taxpayers' Varying Abilities and Attitudes Toward IRS Taxpayer Service: The Effect of IRS Service Delivery Choices on Different Demographic Groups*).

¹⁷ See Research Study: *A Further Exploration of Taxpayers' Varying Abilities and Attitudes Toward IRS Options for Fulfilling Common Taxpayer Service Needs*, vol. 2, *infra*.

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In addition, the survey found seniors and taxpayers with disabilities are not as confident in their ability to find information they are seeking on the internet as other taxpayers. They are more likely to report they are not able to find information and less likely to state they always find the information they are seeking. Therefore, as the IRS increasingly uses digital outreach channels to distribute information, the IRS outreach strategy should also include alternate distribution channels to reach those taxpayers without broadband access as well as vulnerable taxpayer populations.¹⁸

Before Focusing on Digital Outreach and Education, Review Research on How People Process Information They Read Digitally

Before the IRS prioritizes digital outreach and education, it should review research on how people process information they read digitally. Research has shown that people tend to engage in a greater use of short cuts (such as searching for keywords) when reading digital content. Not surprisingly, readers of digital content tend to become distracted and multitask.¹⁹

Face-to-face outreach events tend to involve the distribution of pamphlets and brochures. In comparison to digital distribution of information, research has shown that people mentally process information easier (*e.g.*, less cognitive effort to process) if they read it on paper. There is a physicality in reading on paper — people tend to remember where on a page they read a specific item and they understand how the information they are currently reading fits into the whole picture, because they can see where the current page is in relation to the entire publication.²⁰ Research has also found that people recall information better if read on paper.²¹

IRS Efforts to Educate Taxpayers About the IRS Phone Scam Did Not Reach Far Enough

A practical example of how digital outreach may not reach certain populations can be seen with outreach initiatives warning taxpayers about the IRS phone and email scams. The IRS has conducted extensive outreach and education, mainly through digital channels and leveraged partnerships, detailing the evolving scams, how to avoid becoming a victim, and information on where to report scams.²² Yet, these scams were raised as a serious problem at many, if not all, of the 12 National Taxpayer Advocate Public

18 See Research Study: *A Further Exploration of Taxpayers' Varying Abilities and Attitudes Toward IRS Options for Fulfilling Common Taxpayer Service Needs*, vol. 2, *infra*.

19 Anne Niccoli, *Paper or Tablet? Reading Recall and Comprehension*, *EDUCAUSE REVIEW*. (Sept. 28, 2015).

20 Ferris Jabr, *The Reading Brain in the Digital Age: The Science of Paper versus Screens*, *SCIENTIFIC AMERICAN* (Apr. 11, 2013); Roger Dooley, *Paper Beats Digital in Many Ways, According to Neuroscience*, *FORBES* (Sept. 16, 2015).

21 Roger Dooley, *Paper Beats Digital in Many Ways, According to Neuroscience*, *FORBES* (Sept. 16, 2015).

22 The IRS issued and posted news releases and alerts, delivered products in multiple languages via irs.gov, social media platforms, presentations at the IRS Nationwide Tax Forums, tax practitioner institutes, webinars, press events, Security Summit meetings and events, advisory board meetings, practitioner meetings, partner visits, industry meetings, state and local governments, congressional visits and congressional phone conferences that include sharing materials for external IRS partners to share with clients and taxpayers. All YouTube videos are close-captioned and the IRS has separate channels for multilingual and deaf taxpayers. IRS response to TAS fact check (Nov. 20, 2017). For two examples of digital products, see IRS, *Tax Scams/Consumer Alerts*, <https://www.irs.gov/uac/tax-scams-consumer-alerts> (visited May 23, 2017); IRS, *Scam Phone Calls Continue; IRS Identifies Five Easy Ways to Spot Suspicious Calls*, IR-2014-84 (Oct. 7, 2016).

Forums held around the country in 2016. Many audience members noted that the IRS's message is not reaching taxpayers in their communities — many of them English as a Second Language (ESL) and Limited English Proficiency (LEP) taxpayers.²³

Therefore, despite the significant efforts by the IRS to distribute information on the topic, they still did not reach these ESL and LEP taxpayers. Without a local presence, the IRS does not necessarily consider language barriers or the most effective ways to communicate with certain taxpayer populations, such as working with community leaders and local trade and community organizations.

Outreach and Education Goes Beyond the Traditional Conveyance of Information and Should Be Part of Every Taxpayer Touch

To create an environment that encourages taxpayer trust and confidence, the IRS must change its culture from one that is enforcement-oriented to one that is service-oriented. In the related literature review in this report, there is discussion about the importance of the customer experience. Specifically, to build customer confidence, the organization must invest in the micro customer experience. This is the small, subtle, memorable, and affordable gesture that will resonate with customers for years.²⁴

In addition to using traditional methods to convey information, such as IRS news releases and the IRS official website, the IRS must take advantage of each and every taxpayer touch to educate taxpayers. Every time an IRS employee has direct contact with a taxpayer regarding an enforcement action, the employee should take the time to ensure that the taxpayer understands how to come into compliance and avoid making similar mistakes in the future, if applicable. Further, when taxpayers take the initiative to visit Taxpayer Assistance Centers (TACs), employees have the perfect opportunity to listen to taxpayers in their own communities and provide targeted information to address their particular needs. In many cases, the TAC employee will be able to read the taxpayer's expressions and determine whether the taxpayer is truly understanding the information provided. Finally, because local TAC employees are well-positioned to identify community-specific information needs, the IRS should have procedures for TAC employees to elevate local information needs to C&L, as deemed appropriate.

Conducting outreach through the use of mobile vans would promote listening, humanizes both the IRS and the taxpayers, and builds taxpayer trust in the IRS.

Mobile van units can also serve as an outreach and education presence in the community. The IRS would establish relationships with community leaders in the process of scheduling stops. In addition, when employees engage with the taxpayers who visit the mobile van, they can address account issues, or answer follow-up questions, or even connect taxpayers to a remote expert on a given topic.²⁵ Taxpayers also feel more at ease while they are on their own turf rather than in a traditional government building. Conducting outreach through the use of mobile vans would promote listening, humanizes both the IRS

23 For transcripts of the National Taxpayer Advocate's Public Forums, see <https://taxpayeradvocate.irs.gov/public-forums>.

24 See Literature Review: *Fostering Taxpayer Engagement Through Geographic Presence*, vol. 2, *infra*.

25 HM Revenue & Customs, *A New Service for Those Needing the Most Help*, GOV.UK (Feb. 12, 2014), <https://www.gov.uk/government/publications/issue-briefing-a-new-service-for-those-needing-the-most-help/a-new-service-for-those-needing-the-most-help>.

and the taxpayers, and builds taxpayer trust in the IRS.²⁶ In addition, through these interactions, IRS employees would gain valuable information about the limitations of vulnerable populations, such as seniors, low income, and taxpayers with disabilities.²⁷

Two-Way Communication Is Vital to Maintain Responsiveness

IRS digital outreach and education is currently a form of one-way messaging. In a vacuum, the IRS anticipates the information needs of taxpayers and drafts guidance to address these anticipated needs. However, there is no current method for taxpayers to comment on informal or “unpublished” guidance posted online (such as Tax Topics and Frequently Asked Questions or FAQs), ask more detailed questions, or present their own unique set of facts for a more tailored response.²⁸ In addition, the IRS does not have a sense of whether taxpayers are receiving or understanding the messages distributed through digital channels.

To maintain trust in the agency, the IRS must be responsive to taxpayer needs. This includes needs particular to certain regions and localities. As an example, the Federal Emergency Management Agency (FEMA) has developed effective two-way communication lines with the local communities. To accomplish its mission, FEMA must distribute important disaster-related information to people who need it and must incorporate critical updates from individuals who are experiencing the changing situation on-the-ground. Because time is a fundamental factor in emergency management, FEMA must fully comprehend the full scope of the disaster. Accordingly, FEMA fully uses two-way communication, generally in the form of social media, to maintain responsiveness.²⁹

While the administration of a federally-declared disaster emergency response differs from tax administration, they both share the need to be responsive to the needs of local communities. The IRS must have a way to give and receive information that effectively tailors its outreach and education to address the particular facts and circumstances faced in that specific geographic area. The IRS has noted that it is evaluating new more efficient opportunities to expand two-way dialogue with taxpayers around the country.³⁰ We look forward to the implementation of new technology that would provide such capability, but we also caution the IRS that such technology should not replace actual geographic presence in the local communities.

26 TAS is planning to purchase or lease one or more mobile units in its outreach and disaster efforts in fiscal year (FY) 2018.

27 An example of the use of mobile vans in local communities to provide outreach and education in addition to the provision of traditional governmental services is the MVA mobile bus. See Maryland Department of Transportation, Motor Vehicle Administration, *MVA Bus Schedule*, <http://www.mva.maryland.gov/locations/bus.htm> (last visited Sept. 5, 2017).

28 See National Taxpayer Advocate Blog: *IRS Frequently Asked Questions Can Be a Trap for the Unwary* (Feb. 26, 2017), <https://taxpayeradvocate.irs.gov/news/irs-frequently-asked-questions-can-be-a-trap-for-the-unwary?category=TaxNews>.

29 *Understanding the Power of Social Media as a Tool in the Aftermath of Disasters*, hearing before the Senate Committee on Homeland Security and Governmental Affairs, Subcomm. on Disaster Recovery and Intergovernmental Affairs (May 4, 2011) (written statement of Craig Fugate, Administrator, Federal Emergency Management Agency); FEMA, *Social Media Provides Online Information and Resources for Survivors* (Oct. 10, 2017), <https://www.fema.gov/news-release/2017/10/10/social-media-provides-online-information-and-resources-survivors> (last visited Nov. 3, 2017); Dina Fine Maron, *How Social Media is Changing Disaster Response*, *Scientific American* (June 7, 2013), <https://www.scientificamerican.com/article/how-social-media-is-changing-disaster-response/> (last visited Nov. 3, 2017).

30 IRS response to TAS information request (Oct. 13, 2017).

An International Approach: Her Majesty's Revenue and Customs (HMRC)³¹

The IRS can learn from the experience of other taxing authorities in developing an effective outreach and education strategy that meets taxpayers' needs. In an effort to close the tax gap, Her Majesty's Revenue and Customs (HMRC) in the United Kingdom developed a research-based outreach strategy. In fact, the first of HMRC's eight key compliance activities states: "Identifying how to deal with customers in the most appropriate way. This ranges from educating them about their tax responsibilities to providing local help and support."³²

To provide more targeted and tailored service to taxpayers, HMRC commissioned research into the estimated 1.5 million customers who need extra help to get their taxes right. These customers included individuals who experienced a specific event in their lives (such as a family member's death or approaching retirement), or those with low literacy levels, medical conditions, or disabilities. HMRC used the research results to design a service strategy that is accessible to more taxpayers. HMRC trained its employees to identify when a customer needs extra help. Some of these customers may need extra help from a specialist over the phone, with arranged call-backs, and possibly face-to-face meetings. Others may need face-to-face support, delivered by a team of mobile advisors at convenient locations rather than fixed locations with limited opening times. Such locations include government offices, community buildings, and a person's own home.³³ HMRC also established improved working relationships with community organizations. HMRC's initiative allowed the agency to refine its personalized services by offering a select group of taxpayers the support that suits them best.³⁴ It also allowed HMRC to close all of its brick-and-mortar Enquiry Centres, even as it retained the ability to meet face-to-face with taxpayers based on their specific needs.

The IRS services strategy appears to have the same end goal as HMRC — efficiently use outreach resources to "free up" resources to effectively provide personalized services to the population who actually need more help. However, the IRS has not conducted research to determine how to best support its diverse taxpayer base. Moreover, the IRS has significantly reduced the scope, coverage, and availability of face-to-face assistance over the last decade.³⁵ Therefore, without any relevant data on taxpayer information needs, the IRS has little basis to justify its substantial shift toward digital outreach and education and almost complete reliance on third-party intermediaries to deliver outreach and education.

31 HM Revenue & Customs, Issue Briefing, *Helping Those Who Need It Most* (March 2013), <https://www.gov.uk/government/publications/helping-those-who-need-it-most>; HM Revenue & Customs, Issue Briefing, *Our Approach to Tax Compliance* (Sept. 2012).

32 HM Revenue & Customs, Issue Briefing, *Our Approach to Tax Compliance* (Sept. 2012).

33 HM Revenue & Customs, *A New Service for Those Needing the Most Help*, GOV.UK (Feb. 12, 2014), <https://www.gov.uk/government/publications/issue-briefing-a-new-service-for-those-needing-the-most-help/a-new-service-for-those-needing-the-most-help>; Nick Huber, AccountingWEB, *HMRC to Close Walk-in Tax Enquiry Centres* (Feb. 12, 2014).

34 HM Revenue & Customs, Issue Briefing, *Helping Those Who Need It Most* (Mar. 2013); HM Revenue & Customs, *A New Service for Those Needing the Most Help* (Feb. 12, 2014), <https://www.gov.uk/government/publications/issue-briefing-a-new-service-for-those-needing-the-most-help/a-new-service-for-those-needing-the-most-help> (last visited Sept. 5, 2017).

35 See Most Serious Problem: *Taxpayer Assistance Centers (TACs): Cuts to IRS Walk-In Sites Have Left the IRS With a Substantially Reduced Community Presence and Have Impaired the Ability of Taxpayers to Receive In-Person Assistance*, *infra*; National Taxpayer Advocate 2016 Annual Report to Congress 86-97 (Most Serious Problem: *Geographic Focus: The IRS Lacks an Adequate Local Presence in Communities, Thereby Limiting Its Ability to Meet the Needs of Specific Taxpayer Populations and Improve Voluntary Compliance*); National Taxpayer Advocate 2014 Annual Report to Congress 31-45 (Most Serious Problem: *IRS Local Presence: The Lack of a Cross-Functional Geographic Footprint Impedes the IRS's Ability to Improve Voluntary Compliance and Effectively Address Noncompliance*).

CONCLUSION

To protect the taxpayer's right to be informed, the IRS must develop a research-based outreach and education strategy. Not all taxpayers have the same information needs. The most effective way to understand the information needs of the various diverse local communities is to have geographic presence rather than generalize the information needs of the entire U.S. taxpayer population from afar. Both the IRS and taxpayers are harmed if they cannot engage in two-way conversations, ideally in the form of a face-to-face meeting, because both parties have so much to learn from each other.

RECOMMENDATIONS

The National Taxpayer Advocate recommends that the IRS:

1. Conduct research into the outreach and education needs of taxpayers, broken down by various demographics.
2. Evaluate and implement two-way digital communication models into the outreach and education strategy (instead of one-way messaging).
3. Incorporate into the IRS outreach and education strategy the findings of TAS research on taxpayers' varying abilities and attitudes toward IRS taxpayer service, as well as the needs and preferences of low income and Hispanic taxpayers, and the recommendations from the National Taxpayer Advocate's 2016 Public Forums.
4. Assign at least one employee to conduct outreach activities in each state, territory, and the District of Columbia (and who resides in that state, territory, or district) and provide each employee with sufficient resources to travel and engage in regular face-to-face communications with taxpayers throughout the state.
5. Establish a program in which the IRS provides various services, including traditional face-to-face outreach and education, through the use of mobile taxpayer assistance stations (vans) in rural and underserved communities.