IRS RECRUITMENT, HIRING, AND TRAINING: The Lack of Sufficient and Highly Trained Employees Impedes Effective Tax Administration

WHY THIS IS A SERIOUS PROBLEM FOR TAXPAYERS

Taxpayers are experiencing delays in getting their returns processed and receiving their refunds. Their phone calls to the IRS often go unanswered. Budget cuts, an aging workforce, and often complicated hiring processes have left the IRS severely understaffed and unable to adequately recruit, hire, and train much-needed new employees. Inadequately trained IRS employees may give taxpayers incorrect information, make erroneous determinations, or record inaccurate information in IRS databases. Employees are outnumbered by taxpayers and their representatives as they deal with complex returns or audits. The ongoing problems surrounding recruitment and hiring compromise the IRS's ability to deliver tax benefits, provide taxpayer services, and collect revenue, which may cause the tax gap to widen, eroding confidence in the tax system and over time leading to noncompliance. As the single agency responsible for generating approximately 95 percent of the gross revenue for the federal government, the IRS's ability to attract, hire, and train employees is critical to maintaining operations, providing quality service, and protecting taxpayer rights.[1]

EXPLANATION OF THE PROBLEM

The IRS's budget was reduced by nearly 20 percent in inflation-adjusted dollars from 2010 to 2021.[2] In fiscal year (FY) 2020, the IRS had 75,773 full-time equivalent (FTE) positions, a decrease of about 20 percent from 94,711 FTE positions in FY 2010.[3] Between FY 2010 and FY 2020, the IRS lost over 33,000 full-time personnel, which included nearly 13,400 key enforcement personnel.[4] Over time as IRS staffing declined, the taxpayer population increased, and as changes were made in the tax laws, the tax gap increased. According to the Department of the Treasury, the gross tax gap – the difference between taxes paid and taxes owed – is estimated to have totaled about $580 billion in 2019, up from an estimated amount of nearly $440 billion in 2013, and is expected to rise to about $7 trillion by 2029 if left unaddressed.[5]

Over the past year, the IRS faced several staffing-related challenges. In FY 2021, largely due to the pandemic, the IRS saw the lowest telephone Level of Service (LOS) on record, which it must address through a combination of measures, including additional online capabilities and personnel.[6] Staffing challenges also impacted the filing season backlogs in the past year.[7] As the IRS Commissioner declared, "the status quo is untenable."[8] If the IRS is not adequately funded, it will face challenges in not only maintaining the status quo but also in attracting talent and training its employees, which is an unacceptable scenario.

Realizing the challenges the IRS faces, especially as it focuses on reducing the tax gap, the current administration plans to increase the IRS budget by nearly $80 billion over the next ten years.[9] With this possible new funding, the IRS is seeking to hire a significant number of new employees.[10] However, any new funding will not immediately solve the issues plaguing the IRS because the IRS will first need to recruit, hire, and train these new employees, who will require substantial training before they can contribute to the IRS's mission.[11] The IRS has recently made progress to address some of these challenges.[12] For example:

- In line with our prior recommendations, the IRS has hired a recruitment team of 22 staff members and plans to hire ten additional full-time dedicated recruiters. As of September 15, 2021, the

IRS had hired an additional 206 hiring support staff positions and external contractors to support employment operations;[13]
- In line with our prior recommendations, the IRS submitted two requests seeking Treasury's support in obtaining direct-hire authority from the Office of Personnel Management (OPM) to meet critical hiring needs. As of August 9, 2021, both requests were still under consideration at OPM;[14]
- In line with our prior recommendations, the IRS developed a legislative proposal to expand the streamlined critical pay authority beyond current authority given for certain information technology (IT) positions, and as of August 9, 2021, the proposal was awaiting consideration from the Department of the Treasury;[15]
- Effective October 1, 2021, the IRS's new collective bargaining agreement allows the IRS to announce certain entry-level positions externally without having to announce them internally first.[16] This change adopts a prior TAS recommendation and will allow the IRS to expand the number of applicants for jobs, more readily recruit from outside the agency, and speed up the hiring process;[17]
- The Human Capital Office (HCO) simplified the hiring announcement process by allowing for one announcement to be posted for positions in multiple areas and Business Operating Divisions (BODs) across the IRS;[18]
- For positions above entry-level, the IRS has streamlined the hiring process by limiting the time applicants have to respond to job offers and improving the rating and ranking processes;[19] and
- The IRS has implemented USA Staffing (USAS),[20] a new OPM application aimed at improving federal hiring, tracking, and reporting processes, which will replace the previous application, Career Connector.[21]

The Most Serious Problems discussed in this report are the direct result of the IRS's lack of sufficient staffing and training. These continued deficiencies have manifested themselves in all aspects of IRS operations and are negatively affecting taxpayers and tax administration. From pre-filing services to return processing and exam and collection activities, taxpayers are not receiving the level of service they need and deserve. The IRS can and must improve internal hiring and recruitment processes. Even if the IRS perfects its internal processes, external limitations on the IRS still pose challenges difficult to overcome without additional support and flexibilities provided to the IRS by Congress, the Department of the Treasury, OPM, and the National Treasury Employees Union (NTEU). Once the IRS hires employees, they will need significant training. The IRS will need sustained multiyear funding and more hiring flexibilities.

ANALYSIS

The Human Capital Office Needs More Funding and Personnel to Meet Future Hiring and Training Needs and to Mitigate Potential Workforce Losses

IRS hiring is centralized under HCO, including staffing that supports hiring and training in IRS BODs. Despite recent hiring, HCO lacks the capacity to meet the projected increase in hiring and training requests over the next ten years.[22] Currently, HCO can process approximately 2,600 hiring actions each month.[23]

For comparison, Figure 2.2.1 outlines the hiring activities of the IRS over the past two fiscal years. While 2,600 hiring actions a month may seem like a lot, this number includes many types of activities beyond just hiring, including temporary promotions and reassignments. Factoring in that much of this hiring – like the over 11,000 positions that the IRS Wage and Investment (W&I) Division plans to fill in FY 2022 – needs to take place over a month or two to prepare for the filing season, the IRS simply does not have enough HCO staffing to meet its needs.[24]

As illustrated in Figure 2.2.1, in the past two fiscal years, the IRS lost 2,986 and 3,852 employees, respectively, due to retirement.[25] The IRS is already struggling with keeping up with the pace of attrition because the sum of separations and retirements is more than but still close to the number of IRS external hires.

FIGURE 2.2.1, IRS Human Capital Office Processing of Hires, Non-Retirement Separations, and Retirements for FYs 2020 and 2021[26]

	FY 2020	FY 2021
Total External Hires	11,274	12,420
Non-Retirement Separations	8,775	10,610
Retirements	2,986	3,852
Sum of Non-Retirement Separations and Retirements	11,761	14,462
Total Hires (Internal and External)	16,282	16,704

The IRS predicts that it will have 5,590 retirements within the next year.[27] It has 16,928 employees eligible to retire, which will increase to 19,825 employees eligible to retire next year.[28] These are all positions that will need to be filled to maintain the status quo in addition to any new hiring the IRS plans. The COVID-19 vaccine mandate will add to the hiring process as the IRS will need to validate vaccination statuses of new hires. Without additional resources, HCO likely cannot meet the IRS's hiring needs.

The IRS Needs to Shorten Hiring Time to Expeditiously Bring on New Employees

Besides the lack of sufficient resources, the current hiring process remains lengthy and burdensome. OPM has set a time-to-hire goal – measured by the number of days that elapse after a request to hire is sent to an agency's Human Resources function until the day of a new employee's entrance on duty – of 80 calendar days.[29] The IRS is competing for talent with the private sector, and a hiring process with a goal of taking more than ten weeks is too lengthy to allow the IRS to be competitive.[30] The IRS's overall hiring process consists of five phases, and the IRS has set up goals for the number of days in each phase.[31] The IRS's time-to-hire actually averaged about 88 days in FY 2021 (about 94 days when hiring external candidates), which is beyond the OPM goal but a significant improvement over the 120 days in FY 2019.[32]

Applicants can see from the USAJOBS platform whether the agency received their application, whether they are eligible for the position, and whether the agency selected them – activities in Stages 3 and 4. Successful external candidates receive a tentative offer as part of Stage 5. The offer letter explains additional requirements the candidates need to fulfill, such as getting their fingerprints taken, and additional requirements the IRS fulfills, such as performing tax compliance checks, but neither the successful applicant nor the BOD can see from IRS databases or "dashboards" which parts of the Stage 5 activities have been carried out and which tasks remain.

The job announcements on USAJOBS, where OPM maintains a central database listing nearly every federal job opening and that is mandated for all agencies to use, can confuse applicants and often become cumbersome to interpret and navigate.[33] According to a March 2020 report by the National Commission on Military, National, and Public Service, compared to private sector job announcements, USAJOBS announcements use too much technical jargon that does not make sense to non-federal employees.[34]

Ultimately, the current hiring process remains lengthy and burdensome, and the IRS should study it to consider ways to reduce cycle times and delays.

The Human Capital Office Needs to Increase Automation and Digitization and Reduce Redundancy in the Hiring Process to Reduce Hiring Cycle Time and Delays

Despite the IRS's recent move to USAS as HCO's reporting and tracking system for hiring, the hiring process still requires a large amount of manual intervention. HCO should consider additional ways to standardize and automate its reports and parts of the hiring process that require an HCO employee to move the process to

the next stage. For example, HCO should provide more real-time automated data with enough detail so IRS hiring officials can easily see which candidates are at which stages. Some manual steps can be automated, such as sending emails or text messages. HCO needs to develop more data-gathering capabilities such as workforce planning and competitive analysis, analysis of hiring trends, and predictive analytics for recruitment of the applicant pool.

There are redundant tasks that HCO needs to eliminate from the process. The IRS often requalifies a candidate for the same job series every time the candidate applies to that job series but in separate locations. The IRS should explore opportunities around developing a process to qualify an applicant for a specific job series only once every year or few years. Once a candidate is qualified for that specific job series, the IRS could place applicants on a "pre-qualified" list for that series that will expire after a set time.[35]

The IRS Will Need Additional Hiring Flexibilities and Should Consider Seeking Office of Personnel Management Approval for Special Pay Rates

One of the best ways to expedite the current hiring process is to allow the IRS additional flexibilities in hiring that bypass some of the most time-consuming and frustrating parts of the hiring process. A new draft policy from OPM allows federal agencies to strategically recruit more students to paid positions in the federal government while in school, with the possibility of later converting them to permanent jobs in the same federal agencies.[36] Students who graduated within the last two years can compete outside of the competitive process for positions that pay up to a General Schedule (GS)-11 salary. This is a good start in allowing the IRS to recruit younger applicants, but alone it will not be enough for the IRS, especially given that the IRS also needs highly trained individuals who may be in the middle or later phase of their career.

OPM serves a crucial role in the IRS hiring process. Its support is necessary to maximize IRS hiring capacity by:

- Ensuring systemic capabilities will meet demand (in OPM's capacity as owner of the USAS program); and
- Providing a full range of hiring authorities and flexibilities (as allowed under OPM statutory authority).

Additionally, the IRS could take steps that would ease the burden on HCO employees by advocating with OPM for electronic signature approval for health benefit forms.

Pursuant to 5 U.S.C. Section 3304(a)(3), OPM may determine that a severe shortage of candidates exists or that there is a critical hiring need to fill certain positions and use direct-hire authority to address that need. Direct-hire authority refers to hiring individuals into the Competitive Civil Service (GS-15 and below or equivalent) in permanent or nonpermanent positions by bypassing some of the hiring processes to allow for quicker hiring.[37] HCO and IRS BODs work together to request direct-hire authority.[38] First, they must seek approval from the Department of the Treasury, then from OPM, and finally from the Office of Management and Budget (OMB).[39] The process can be lengthy.[40] On March 15, 2021, and May 14, 2021, the IRS submitted two requests for direct-hire authority, but these requests had not been approved as of December 15, 2021.[41]

The IRS has also sought to expand its streamlined critical pay authority, which is the authority to fix the rate of basic pay for one or more positions at a rate higher than the rate that would otherwise be payable for the position to other positions beyond IT.[42] OPM and OMB are considering this request.[43] This would be helpful as the IRS looks to hire not only inexperienced employees but also mid-level and senior-level professionals from the private sector who can lead teams.[44]

In addition to continuing to seek direct-hire authority and streamlined critical pay authority, the IRS should request that OPM exercise its authority to establish higher rates of basic pay – special rates – for a group or

category of GS positions to address existing or likely significant handicaps in recruiting or retaining well-qualified employees.[45] OPM may establish special rates for nearly any category of employee, *i.e.*, by series, specialty, grade level, and/or geographic area. This would allow the IRS to offer more competitive pay and help recruit more applicants for positions with a critical hiring need.

Additionally, the IRS should work with Treasury to advocate for a Department of Homeland Security policy change to allow agencies to permanently inspect documents that demonstrate employment eligibility to work in the United States virtually rather than in person.

The IRS should also continue to request that Congress provide the IRS permanent funding to increase HCO's authorized staffing plan to cover workload throughout the entire employment lifecycle, including securing funding to transfer knowledge from employees scheduled to retire, when needed.[46]

The IRS should advocate that Congress help make the IRS a more attractive employer by adding the IRS to the statutory list of agencies allowed to have certain positions outside of the GS pay scale to better compete with the private sector.[47] Similar to certain federal bank regulatory agencies such as the Securities and Exchange Commission and the Consumer Financial Protection Bureau, the IRS's unique role in collecting federal revenue would make it a perfect candidate to have certain positions placed on the special pay scale, making it a more attractive employer for certain highly technical positions that need specific experience or qualifications.

The Human Capital Office Should Devote More Logistical Support and Resources to Recruitment Efforts

As the IRS looks to improve its hiring process, it similarly needs to strengthen its recruitment efforts to ensure it can find qualified candidates. HCO's Strategic Talent Analytics & Recruitment Solutions (STARS) is the part of HCO that provides support and resources to BODs to achieve recruitment goals.[48] Despite the challenges of the COVID-19 pandemic, the IRS held over 100 virtual information and recruitment events in FY 2021.[49] HCO also expanded partnerships with other agencies such as the Department of Defense's Military Spouse Program and the U.S. Department of Agriculture's Supplemental Nutrition Assistance Program participant program.[50] Under "Lifting Communities Up," the IRS plans to cultivate new opportunities for adults and students in underserved communities by partnering with state labor and human services officials to identify talent and design training programs for adult candidates, starting in the Mississippi Delta Region. Additionally, the IRS plans to develop a talent pipeline by partnering with colleges, universities (specifically focusing on historically black colleges or universities and other minority servicing institutions), and high schools to design training programs to prepare participants for IRS careers.[51] TAS commends the IRS's increased efforts in the recruitment arena but also believes there is room for improvement.

HCO should work with the IRS Next Office to develop a plan to use more data analytics to improve recruitment. Currently, BODs are taking the lead, but they cannot systematically recruit across the country for specific locations using data to predict supply and demand. The IRS's plan should be to directly target recruitment at specific locations where IRS jobs need to be filled using a data-driven approach to recruitment. For example, the IRS could create a pilot or proof of concept to assess the efficacy of using a data-driven model for need-based, skill-focused applicant recruitment that can be adapted to different geographic locations. BODs will benefit greatly in their long-term workforce planning if they have this additional data that allows the IRS to make predictions about hiring needs and the location of candidates. Instead of being reactive (*i.e.,* recruiting after there is a vacancy), the IRS can use this data to plan ahead and be proactive (*i.e.,* planning ahead using modeling techniques to predict future needs, future supply, and more targeted recruitment).

Additionally, the HCO STARS team should supply additional logistical support for BOD recruitment events. We heard from some BOD subject matter experts that they would benefit from more agencywide recruitment

events and from access to professional branding and marketing materials (*i.e.,* hiring booth display items and materials to distribute to applicants). BOD hiring officials would also benefit from additional awareness or communication about available hiring flexibilities and other resources to support their recruitment efforts. Providing routine hiring and recruitment related training to BOD hiring officials would dramatically improve the communication efforts between HCO and BODs and add efficiency in hiring and recruiting processes.[52] STARS should develop a communication plan or routine training to increase awareness among BOD hiring officials of available hiring flexibilities.

STARS should also collaborate with BODs to improve their external-facing career pages. These pages, geared toward applicants, should:

- Be easy to find and include opportunities for candidates to learn more about the agency, the posted position, the division, and their career ladder;
- Include employee testimonials or spotlights that allow candidates to connect with and identify with potential future colleagues; and
- Include a general FAQ section so applicants to IRS jobs can have questions answered before applying and include tailored responses with further information on IRS work culture and benefits and explain what to expect from the unique government hiring process. This will aid applicants in navigating the often-confusing job postings on USAJOBS with technical jargon that external candidates find unfamiliar.

These features will help the IRS with internet exposure and search engine optimization if these career pages are widely linked to announcements and job boards. As these pages receive multiple unique hits on the internet, pushing IRS career-related keywords further up in internet search engines, they can lay the groundwork for a more expansive IRS digital advertising strategy.

While the focus on recruiting entry-level employees is much-needed, there also needs to be an improved strategy for recruitment of mid-level and senior-level employees. Every employee is an IRS ambassador, and recruiting should be each employees' responsibility and honor to build the workforce of the future. The IRS should continue to leverage its relationships with professional organizations, focus on its brand development, and encourage current employees in assisting with hiring the right applicants via a referral payment plan – which would be a worthwhile investment for the IRS.[53] We encourage the IRS to increase these efforts whether or not additional funding becomes available. There may be many potential applicants in the IRS employees' networks. For the IRS to meet hiring demand, it must be able to recruit the right quality and quantity of applicants promptly, which requires that it share its vision for the future, improve its brand, and dramatically ramp up recruitment efforts.

The IRS Needs to Reexamine Its Training and Establish a First-Class Program

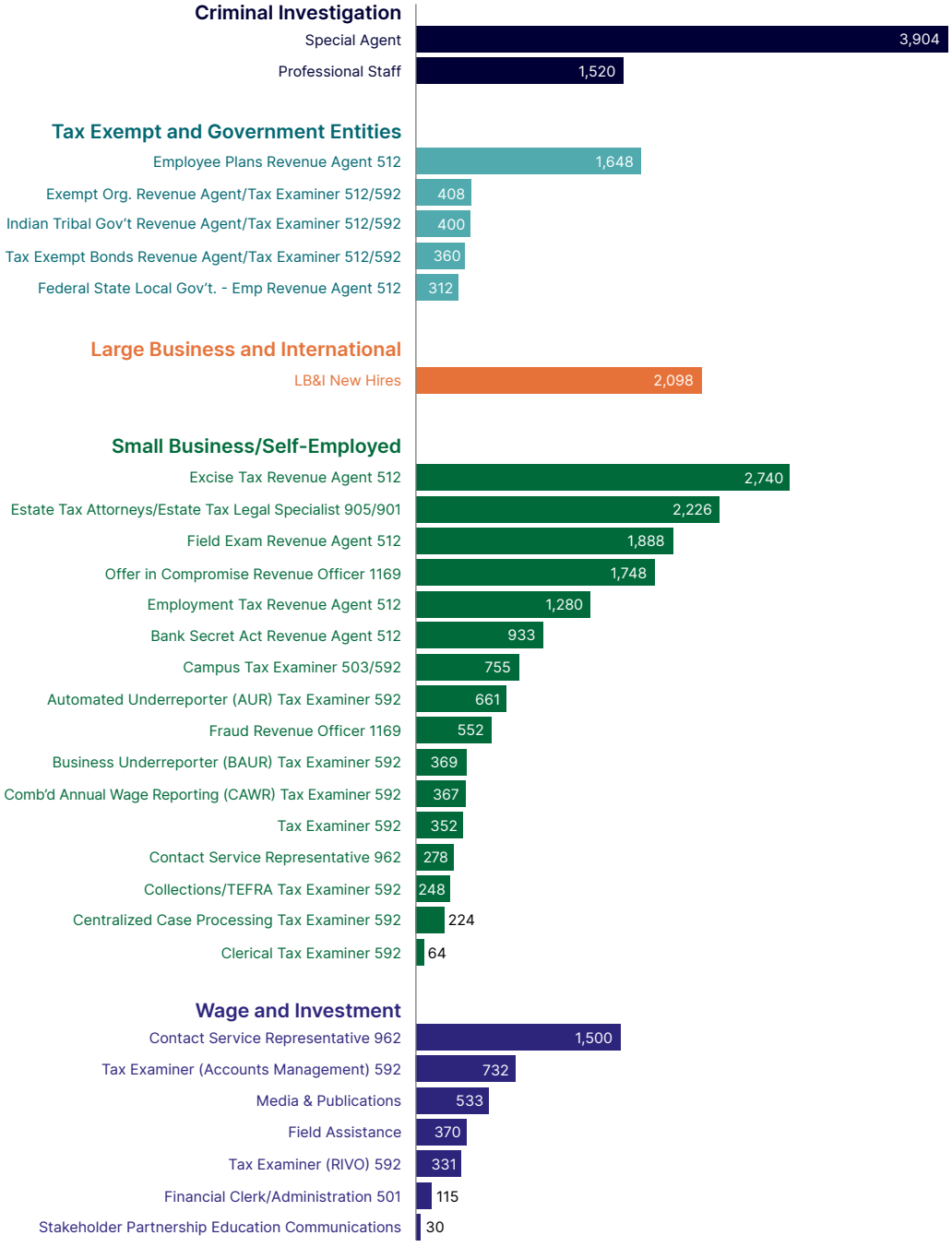
Once the IRS does hire, new employees are only as valuable as the timeliness and quality of training they receive. The IRS is in the process of developing and implementing a comprehensive training strategy as described in the IRS's Taxpayer First Act Report to Congress.[54] As the IRS develops its current training program, we recommend working with outside accounting firms, law firms, and other large organizations to exchange ideas and best practices. The revised training program should provide IRS employees a solid knowledge base and practical experience, and throughout their careers continue to develop their technical skills and provide career path options to grow and develop professionally.[55] As OMB notes, training and development are among the most critical areas that contribute to the success of an organization and its workforce in carrying out its mission.[56] IRS employees receive extensive training, which takes time and resources. We welcome and encourage the IRS revisiting the current training program and developing its employees with an eye toward the workforce and the IRS of the future. This should translate to providing quality service, being cognizant of taxpayer rights, and the desire to do the right thing for tax administration.

Overall, in each fiscal year 2015-2020, the IRS delivered between 3.6 and 4.6 *million* hours of training.[57] The cost of the training ranged from $31 million to $48 million.[58] It is a major investment in our employees, and it is important to deliver the best training possible. We are the IRS. We should have a first-class tax training program and set the bar for others to follow.

As demonstrated in Figure 2.2.2, the time – in both classroom-type training and on-the-job training – to train certain critical IRS positions is lengthy.[59]

FIGURE 2.2.2[60]

Training Hours Required for Certain IRS Employee Positions



As Figure 2.2.2 shows, new employees need substantial training before they can do their jobs.[61] For example, a W&I Customer Service Representative (Position Series 962) needs 1,500 hours of training. At 40 hours per week, this amounts to 37.5 weeks, or more than nine months. A Small Business/Self-Employed (SB/SE) Revenue Agent (Position Series 512) in Field Examination requires 1,888 hours of training, which amounts to almost a year. Beyond these core training requirements, it takes time for employees to develop into experienced employees – four to five years, for example, to train a new hire to become an experienced senior or expert Revenue Officer.[62] The practical implication of this is that even if the IRS hired 5,000 new employees on January 1, it would be months – and sometimes more than a year – for those employees to be trained. This is why the continued underfunding of the IRS has had such a detrimental effect and why consistent increased funding is necessary for taxpayers to see an improvement in service and for the IRS to dig out of the hole in which it currently finds itself.

> **Training is a major investment in our employees, and it is important to deliver the best training possible. We are the IRS. We should have a first-class tax training program and set the bar for others to follow.**

CONCLUSION AND RECOMMENDATIONS

Recruiting, hiring, and training employees takes time and requires continued multiyear funding. Under the administration's proposed budget increase for the IRS, IRS staffing would be more than doubled from current levels by 2031, according to the Congressional Budget Office.[63] The IRS will need to work hard to reach this level of staffing. HCO will need more resources to ramp up capacity to process more than the current level of 2,600 hiring request actions per month. Although there are process improvements the IRS can make on its own, the IRS still needs the help of stakeholders. To fairly and efficiently administer the tax laws and supply world-class customer service, the IRS will need additional support and flexibilities provided by Congress, the Department of the Treasury, OPM, and NTEU. Both Congress and OPM play key roles in assisting the IRS with improving its hiring and recruitment processes. With this continued support and improved internal efficiencies, over time the IRS can finally catch up to attrition, replenish the workforce losses incurred over the past decade, and recruit and "cultivate a well-equipped, diverse, flexible, and engaged workforce."[64]

Preliminary Administrative Recommendations to the IRS

The National Taxpayer Advocate recommends that:

1. HCO develop a process to qualify an applicant for a specific job series periodically, *e.g.,* only once every year, which allows applicants to update their information as needed while meeting the requirements of the series. Once qualified for that specific job series, the applicant can be placed on a "prequalified" list for that series that will expire after a set time period, instead of going through the qualification process repeatedly for positions in that series.
2. HCO continue to seek critical pay authority for additional positions beyond IT.
3. HCO continue to seek direct-hire authorities for critical positions to meet the demand of the hiring surge expected in FY 2022 and beyond, under the administration's proposal.[65]
4. HCO and IRS Next prepare and submit OPM Form 1397, Special Salary Rate Request Form, to request that OPM establish higher rates of basic pay or special rates for a group or category of GS positions.
5. HCO improve its communications strategy with BODs and with successful applicants to keep both informed of which activities have been completed and which remain for that applicant, throughout the hiring process.

6. HCO, in consultation with the IRS Next Office and other relevant IRS offices, develop a plan to use data analytics to improve IRS recruitment efforts.
7. The HCO STARS team supply more logistical support to BODs for recruitment events.
8. STARS collaborate with BODs to improve their external-facing career pages geared toward applicants to describe agency functions, job responsibilities, division roles, potential career ladders, and employee testimonials or spotlights.
9. HCO periodically administer short surveys ("pulse surveys") to employees to help ensure HCO is building the partnership it needs with other parts of the IRS to improve its hiring processes and successfully implement its new training strategy.
10. The IRS continue to work with OPM to maximize IRS hiring capacity by ensuring systemic capabilities will meet demand (in OPM's capacity as owner of the USAS program); by providing a full range of hiring authorities and flexibilities (as allowed under OPM statutory authority); and by advocating with OPM for electronic signature approval for health benefit forms.
11. The IRS continue to work with Treasury to advocate for a Department of Homeland Security policy change to allow agencies to permanently inspect I-9 documents virtually rather than in person.
12. The IRS continue to request Congress provide permanent funding to increase HCO's authorized staffing plan to cover workload throughout the entire employment lifecycle, including securing funding to dual encumbering positions to transferring knowledge from employees scheduled to retire, when needed.
13. In developing its training program, the IRS work with outside accounting firms, law firms, and other large organizations to learn best practices.

Legislative Recommendation to Congress

The National Taxpayer Advocate recommends that Congress:

1. Provide dedicated multiyear funding for IRS hiring, recruitment, and employee training so the IRS can replenish the workforce losses incurred over the past decade.[66] Congress should provide the IRS permanent funding to increase HCO's authorized staffing plan to cover workload throughout the entire employment lifecycle, including securing funding to dual encumber positions to transfer knowledge from employees scheduled to retire, when needed.

RESPONSIBLE OFFICIALS

Kevin McIver, IRS Human Capital Officer
Heather Maloy, Director, IRS Next Office

IRS COMMENTS

The IRS is committed to building a highly trained, engaged workforce to administer tax laws and provide fair and equitable services to our nation's taxpayers. As the Report notes, in FY 2021 we took several steps in anticipation of the significant hiring we expect to do over the next several years, including:

- Increasing staffing on our recruitment and employment teams.
- Negotiating additional flexibilities in our collective bargaining agreement with the National Treasury Employees Union that enable us to hire external candidates more quickly and effectively.

- Implementing USA Staffing, an online interface for applicants, hiring managers and HR professionals that will improve the job application experience, reduce the workload of staffing specialists, and deliver improved data analytics.
- Continuing to reduce our time-to-hire from approximately 120 days in FY 2020 to 88 days in FY 2021.

The IRS is developing strategies focused specifically on effecting transformative change in the areas of recruiting, hiring, and training. Regarding recruitment, we plan to deploy a comprehensive strategy that will help us attract the best candidates. We expect that this strategy will enable us to apply an enterprise approach to recruitment and make better use of data.

Our employees are the strength of the IRS and investments in their training and career advancement remains a significant overall priority. The Advocate calls on the IRS to aim for a "first-class program" for training our employees. Our vision in this area, which we believe meets that challenge, is a corporate university model, which we call the "IRS University" (IRSU). The IRSU will empower our workforce by equipping employees with the skills and tools needed to advance their careers, provide high-quality service to taxpayers, and ultimately enhance the taxpayer experience. The IRSU will be a modern and innovative learning organization focused on leveraging technology, promoting continuous learning, and providing developmental opportunities supporting our employees' career goals. We will use an industry-leading model to obtain relevant feedback from employees, taxpayers and key stakeholders and drive continuous improvement in IRS training and development activities. This year, we made great progress toward establishing the IRSU. For example, we hired personnel, acquired a new virtual learning platform, conducted environmental scans, and established a funding model.

For the next several years and beyond, our ability to recruit, hire, and train a world-class workforce will be critical to our success. We look forward to continuing to enhance collaboration across the IRS and continuing to expand and strengthen external partnerships to attract and retain the best and the brightest talent to support the IRS mission and improve efficiencies across the enterprise.

TAXPAYER ADVOCATE SERVICE COMMENTS

TAS appreciates and has noted the IRS's efforts to date. However, based on our analysis, including surveys of HCO customers from across the IRS, more needs to be done. Specifically, there is concern about the time it takes to bring a candidate on board, and customers also believe that improvements need to be made regarding HCO's communication and transparency with the BODs. We encourage the IRS to continue to improve its training program and develop its employees with an eye toward the workforce and the IRS of the future. TAS recommends the IRS use more data analytics to improve recruitment and consider additional ways to standardize and automate hiring reports. Additionally, TAS encourages the HCO STARS team to consider ways to provide additional logistical support for BOD recruitment events and to work with BODs to improve their external-facing career pages. Ultimately, as we stated, the IRS needs support from all stakeholders including OPM and Congress. Therefore, we encourage the IRS to continue to request that Congress and OPM provide the IRS additional hiring flexibilities as needed. Our administrative and legislative recommendations

are aimed at further strengthening IRS efforts and addressing all of these issues. TAS is aware that the IRS is still in the planning phase in some areas, and we are looking forward to reviewing IRS comprehensive strategies and the implementation of those strategies in the areas of recruiting, hiring, and training. TAS will continue to advocate with internal and external stakeholders that the IRS receive the support and flexibilities it needs to meet its hiring needs so it can better serve taxpayers. And TAS will continue to offer insight and collaborate with the IRS so the IRS can achieve its mission of providing quality service and protecting taxpayer rights.

RECOMMENDATIONS

Administrative Recommendations to the IRS

The National Taxpayer Advocate recommends that:

1. HCO explore opportunities around developing a process to qualify an applicant for a specific job series periodically, *e.g.,* only once every year, which allows applicants to update their information as needed while meeting the requirements of the series. Once qualified for that specific job series, the applicant can be placed on a "prequalified" list for that series that will expire after a set time period, instead of going through the qualification process repeatedly for positions in that series.
2. HCO continue to seek critical pay authority for additional positions beyond IT.
3. HCO continue to seek direct-hire authorities for critical positions to meet the demand of the hiring surge expected in FY 2022 and beyond, under the administration's proposal.[67]
4. HCO and IRS Next prepare and submit OPM Form 1397, Special Salary Rate Request Form, to request that OPM establish higher rates of basic pay or special rates for a group or category of GS positions.
5. HCO improve its communications strategy with BODs and with successful applicants to keep both informed of which activities have been completed and which remain for that applicant, throughout the hiring process.
6. HCO, in consultation with the IRS Next Office and other relevant IRS offices, develop a plan to use data analytics to improve IRS recruitment efforts.
7. HCO STARS supply more additional logistical support to BODs for recruitment events than is already being provided, including more agencywide recruitment events and access to additional professional branding and marketing materials (*i.e.,* hiring booth display items and materials to distribute to applicants).
8. HCO STARS collaborate with BODs to improve their external-facing career pages geared toward applicants to describe agency functions, job responsibilities, division roles, potential career ladders, and employee testimonials or spotlights.
9. HCO periodically administer short surveys ("pulse surveys") to employees to help ensure HCO is building the partnership it needs with other parts of the IRS to improve its hiring processes and successfully implement its new training strategy.
10. The IRS continue to work with OPM to maximize IRS hiring capacity by ensuring systemic capabilities will meet demand (in OPM's capacity as owner of the USAS program); by providing a full range of hiring authorities and flexibilities (as allowed under OPM statutory authority); and by advocating with OPM for electronic signature approval for health benefit forms.
11. The IRS continue to work with Treasury to advocate for a Department of Homeland Security policy change to allow agencies to permanently inspect I-9 documents virtually rather than in person.

12. The IRS continue to request Congress provide permanent funding to increase HCO's authorized staffing plan to cover workload throughout the entire employment lifecycle, including securing funding to dual encumber positions to transfer knowledge from employees scheduled to retire, when needed.
13. The IRS, in developing its training program, work with outside accounting firms, law firms, and other large organizations to learn best practices.

Legislative Recommendation to Congress

The National Taxpayer Advocate recommends that Congress:

1. Provide dedicated multiyear funding for IRS hiring, recruitment, and employee training so the IRS can replenish the workforce losses incurred over the past decade and build the workforce of the future to provide best in class tax administration and provide quality service.[68] Congress should provide the IRS permanent funding to increase HCO's authorized staffing plan to cover workload throughout the entire employment lifecycle, including securing funding to dual encumber positions to transfer knowledge from employees scheduled to retire, when needed.

Endnotes

1 *The 2019 Tax Filing Season and the 21st Century IRS*: *Hearing Before the S. Finance Comm.*, 116th Cong. (Apr. 10, 2019) (statement of Charles P. Rettig, Commissioner, Internal Revenue).
2 IRS response to TAS information request (Dec. 17, 2021).
3 These figures exclude seasonal and part-time employees. FTE is defined by the IRS as the total number of regular straight-time hours worked (*i.e.*, not including overtime or holiday hours) by employees divided by the number of compensable hours applicable to each fiscal year. This excludes positions funded by reimbursements from other federal agencies and private entities for services performed for these external parties. *See* IRS, 2020 Data Book, Table 31: Collections, Costs, Personnel, and U.S. Population, Fiscal Years 1990-2020 (Oct. 2020).
4 IRS, Management's Discussion and Analysis, Fiscal Year 2020. *See also* IRS, Fiscal Year 2021 Financial Report 99 (Nov. 2021), https://www.irs.gov/pub/irs-pdf/p5456.pdf.
5 United States Department of the Treasury, *The American Families Plan Tax Compliance Agenda* 1-4 (May 2021). The tax gap figures are estimates by the IRS and the Department of Treasury.
6 IRS, Fiscal Year 2021 Financial Report 10 (Nov. 2021), https://www.irs.gov/pub/irs-pdf/p5456.pdf.
7 *Id.* at 94.
8 Charles Rettig, *Opinion*: *IRS Commissioner*: *We Desperately Need Resources So the Agency Can Serve You and Our Country*, Wash. Post (Nov. 11, 2021), https://www.washingtonpost.com/opinions/2021/11/11/irs-commissioner-we-desperately-need-resources-so-agency-can-serve-you-our-country/.
9 *See* Congressional Budget Office (CBO), *Estimated Revenue Effects of Increased Funding for the Internal Revenue Service in H.R. 5376, the Build Back Better Act* (Nov. 18, 2021), https://www.cbo.gov/system/files/2021-11/57620-IRS.pdf. *See also* United States Department of the Treasury, *The American Families Plan Tax Compliance Agenda* (May 2021); CBO, *The Effects of Increased Funding for the IRS*, https://www.cbo.gov/publication/57444 (Sept. 2, 2021).
10 *The IRS's Fiscal Year 2022 Budget*: *Hearing Before the S. Comm. on Finance*, 117th Cong. at 52:26 (June 8, 2021) (statement of Charles P. Rettig, Commissioner, Internal Revenue), https://www.finance.senate.gov/hearings/the-irss-fiscal-year-2022-budget (noting the need to replace more than 50,000 IRS employees expected to be lost through attrition within the next six years and to expand and train the IRS workforce).
11 For example, it takes almost a year of training before a newly hired IRS revenue agent is qualified to begin basic casework. IRS response to TAS information request (Oct. 15, 2021).
12 National Taxpayer Advocate 2020 Annual Report to Congress 12-27 (Most Serious Problem: *IRS Recruitment, Hiring, and Retention*: *Quality Taxpayer Service and Protection of Taxpayer Rights Are Directly Linked to the IRS's Need to Improve Its Recruitment, Hiring, and Retention Strategies*).
13 HCO Email Response Providing Status Update on Corrective Actions Taken (Regarding the 2020 Recruitment, Retention, and Hiring MSP Recommendations) (Sept. 30, 2021) (on file with TAS). *See also* National Taxpayer Advocate 2020 Annual Report to Congress 12-27 (Most Serious Problem: *IRS Recruitment, Hiring, and Employee Retention*: *Quality Taxpayer Service and Protection of Taxpayer Rights Are Directly Linked to the IRS's Need to Improve Its Recruitment, Hiring, and Retention Strategies*).
14 HCO Email Response Providing Status Update on Corrective Actions Taken (Regarding the 2020 Recruitment, Retention, and Hiring MSP Recommendations) (Sept. 30, 2021) (on file with TAS); IRS responses to TAS information requests (Aug. 13, 2021; Aug. 17, 2021). *See also* National Taxpayer Advocate 2020 Annual Report to Congress 12-27 (Most Serious Problem: *IRS Recruitment, Hiring, and Employee Retention*: *Quality Taxpayer Service and Protection of Taxpayer Rights Are Directly Linked to the IRS's Need to Improve Its Recruitment, Hiring, and Retention Strategies*). The current version of the House-approved Build Back Better Act (H.R. 5376)

contains helpful hiring authorities that will assist IRS hiring efforts. *See* Build Back Better Act, H.R. 5376, 117th Cong., § 138401, at 1930 (2021), https://rules.house.gov/sites/democrats.rules.house.gov/files/BILLS-117HR5376RH-RCP117-18.pdf.

15 HCO Email Response Providing Status Update on Corrective Actions Taken (Regarding the 2020 Recruitment, Retention, and Hiring MSP Recommendations) (Sept. 30, 2021) (on file with TAS); IRS responses to TAS information requests (Aug. 13, 2021; Aug. 17, 2021). *See also* National Taxpayer Advocate 2020 Annual Report to Congress 12-27 (Most Serious Problem: *IRS Recruitment, Hiring, and Employee Retention*: *Quality Taxpayer Service and Protection of Taxpayer Rights Are Directly Linked to the IRS's Need to Improve Its Recruitment, Hiring, and Retention Strategies*).

16 The 2022 National Agreement is the collective bargaining agreement between the IRS and National Treasury Employees Union (NTEU). Internal announcements are job announcements only employees within the IRS can apply for if they meet the qualifications whereas external announcements are open to anybody who qualifies. *See* Article 13, 2022 National Agreement, IRS and NTEU (Oct. 1, 2021), http://nteuchapter72.org/wp-content/uploads/2021/10/2022-National-Agreement.pdf (pre-publication proof).

17 National Taxpayer Advocate 2020 Annual Report to Congress 12-27 (Most Serious Problem: *IRS Recruitment, Hiring, and Retention*: *Quality Taxpayer Service and Protection of Taxpayer Rights Are Directly Linked to the IRS's Need to Improve Its Recruitment, Hiring, and Retention Strategies*).

18 IRS responses to TAS information requests (Aug. 17, 2021; Sept. 8, 2021). In the past, one applicant could apply to multiple open announcements for similar positions, forcing the IRS to review the same applicants and potentially make multiple job offers for the same type of position to the same applicant, thereby increasing the application declination rate.

19 HCO Email Response Providing Status Update on Corrective Actions Taken (Regarding the 2020 Recruitment, Retention, and Hiring MSP Recommendations) (Sept. 30, 2021) (on file with TAS).

20 USAS is the federal government's integrated talent acquisition system used by more than 70 agencies to recruit, evaluate, assess, certify, select, and onboard candidates. OPM, *Services for Agencies, Technology Systems*, https://www.opm.gov/services-for-agencies/technology-systems/usa-staffing/ (last visited Oct. 19, 2021). USAS provides daily workload management reports and stores data within the system. HCO plans to expand USAS capabilities by allowing for interconnections with other systems to assist with the flow of information between systems and improve reporting capability. IRS response to TAS information request (Aug. 17, 2021).

21 IRS responses to TAS information requests (Aug. 13, 2021; Sept. 8, 2021).

22 HCO has hired 206 hiring specialists and hiring support staff since July 26, 2021, and had 404 specialists on board as of July 26, 2021. IRS response to TAS information request (Aug. 13, 2021).

23 IRS response to TAS information request (Nov. 8, 2021).

24 IRS, W&I, FY 2021 Q4 Business Performance Review (BPR) 8 (2021).

25 IRS responses to TAS information requests (Aug. 13, 2021; Aug. 17, 2021; Sept. 8, 2021; Nov. 8, 2021). Moreover, on Sept. 9, 2021, President Biden mandated COVID-19 vaccinations as a condition of employment for all federal employees. The White House, *Executive Order 14043* (Sept. 9, 2021), https://www.whitehouse.gov/briefing-room/presidential-actions/2021/09/09/executive-order-on-requiring-coronavirus-disease-2019-vaccination-for-federal-employees/. *See also* OPM, *Guidance on Enforcing Coronavirus Disease 2019 Vaccination Requirement for Federal Employees – Executive Order 14043* (Oct. 1, 2021), https://chcoc.gov/sites/default/files/Director-Memo-on-Enforcement-of-Vaccine-Requirements_0.pdf. Although a White House press release from November 2021 shows almost 92 percent of Treasury employees are vaccinated and over 98 percent have complied with the mandate (through vaccination or seeking an exemption), this figure does not take into account the number of employees who retired early or left the public sector. *See* White House, Briefing Room, *Update on Implementation of COVID-19 Vaccination Requirement for Federal Employees* (Nov. 24, 2021), https://www.whitehouse.gov/omb/briefing-room/2021/11/24/update-on-implementation-of-covid-19-vaccination-requirement-for-federal-employees/.

26 The data in this figure is derived from the HCO Human Capital Data Management & Technology Database and includes all employees, including permanent, temporary, and seasonal. IRS responses to TAS information requests (Aug. 13, 2021; Oct. 29, 2021; Nov. 8, 2021; Dec. 15, 2021). For hires external to the IRS for FY 2021, the IRS FY 2021 Financial Report states that "as of September 30, 2021, the IRS hired more employees than in any of the previous five years, with over 10,700 new external hires." This figure differs from the figure provided by HCO because it includes transactions of all employee types for the entire Fiscal Year 2021. IRS, Fiscal Year 2021 Financial Report 14 (Nov. 2021), https://www.irs.gov/pub/irs-pdf/p5456.pdf. The data still shows the difficulty the IRS faces with keeping up with the pace of attrition despite its best efforts.

27 IRS, IRS Workforce Retirement Insight (last visited Oct. 27, 2021) (Internal IRS Database).

28 *Id.*

29 Erich Wagner, *OPM Announces Adjustments to Annual Time-to-Hire Metrics*, GovExec (Feb. 26, 2020) https://www.govexec.com/management/2020/02/opm-announces-adjustments-annual-time-hire-metrics/163361/. *See also* OPM, *Memorandum*: *Time-to-Hire Reporting Requirements* (Feb. 25, 2020), https://www.chcoc.gov/content/time-hire-reporting-requirements-1; Chief Human Capital Officers Counsel, *Updated Instructions for Reporting Annual Time-to-Hire (T2H)* 3 (Dec. 2019), https://chcoc.gov/sites/default/files/Time-to-Hire%20Instructions.pdf.

30 According to a 2015 study by Glassdoor Economic Research, the public sector had among the longest interview processes, with an average of 53.8 days whereas sectors with the shortest interview processes were restaurants and bars with an average of 10.2 days, private security with an average of 11.6 days, and supermarket retail positions with an average of 12.3 days. *See* Andrew Chamberlain, *How Long Does It Take to Hire? Interview Duration in 25 Countries*, Glassdoor, https://www.glassdoor.com/research/time-to-hire-in-25-countries/ (last visited Nov. 21, 2021). This study was done in 2015, and the labor market has since changed, including due to the recent pandemic. Nevertheless, it shows that public sector hiring has historically taken longer than private sector hiring.

31 HCO, *5 Phase Strategic Hiring Model* (Oct. 2021).

32 IRS responses to TAS information requests (Aug. 13, 2021; Nov. 8, 2021). For FY 2020, data is from October 1, 2019, to September 30, 2020. For FY 2021, data is from October 1, 2020, to September 30, 2021.

33 Andrew Eversden, *Commission Calls USAJOBS Listings 'Unintelligible' in Drive to Reform Hiring Process*, Federal Times (Mar. 25, 2020), https://www.federaltimes.com/management/career/2020/03/25/commission-calls-usajobs-listings-unintelligible-in-drive-to-reform-hiring-process/.

34 National Commission on Military, National, and Public Service, *Inspired to Serve*: *Final Report of the National Commission on Military, National, and Public Service* (Mar. 2020), https://hasbrouck.org/draft/FOIA/Final-Report.pdf. The National Commission on Military, National, and Public Service is a U.S. temporary federal agency established by the National Defense Authorization Act for FY 2017. *See* Pub. L. No. 114–328 (Dec. 23, 2016), https://www.govinfo.gov/content/pkg/PLAW-114publ328/pdf/PLAW-114publ328.pdf#page=132.

See also Andrew Eversden, *Commission Calls USAJOBS Listings 'Unintelligible' in Drive to Reform Hiring Process*, Federal Times (Mar. 25, 2020), https://www.federaltimes.com/management/career/2020/03/25/commission-calls-usajobs-listings-unintelligible-in-drive-to-reform-hiring-process/.

35 As applicants gain additional experience, they can qualify for higher graded positions.

36 OPM, *Interim Rule*: *Hiring Authority for College Graduates,* Federal Register (Nov. 5, 2021), https://public-inspection.federalregister.gov/2021-23871.pdf. This new authority has a cap based on a percentage of the number of interns hired the previous year. HCO will work to use this authority when available. IRS response to TAS information request (Nov. 8, 2021).

37 *See* 5 C.F.R. § 337.202 for the definition of direct-hire authority. As one federal agency website explains, direct-hire authority "expedites hiring by eliminating rating and ranking, veterans' preference, as well as typical selection procedures. All applicants who meet the minimum qualification requirements will be referred to the hiring manager for consideration and may be selected." Department of the Interior, *Direct Hire Authority Quick Reference Guide*, https://www.doi.gov/sites/doi.gov/files/direct-hire-authority-quick-reference-guide.pdf (updated May 4, 2021).

38 IRS responses to TAS information requests (Aug. 13, 2021; Aug. 17, 2021).

39 *Id.*

40 *Id.*

41 IRS response to TAS information request (Dec. 15, 2021).

42 Critical pay authority is an authority provided under 5 U.S.C. 5377 and 5 C.F.R. § 535. Section 2103 of the Taxpayer First Act, titled *Streamlined Critical Pay Authority for Information Technology Positions*, reinstated streamlined critical pay authority for positions in IRS IT operations (which had lapsed in 2013) until Sept. 30, 2025. This section also allows the IRS to pay recruitment, retention, relocation incentives, and performance bonuses to streamlined critical pay appointees in positions in IT operations. *See* IRC § 7812.

43 Currently, the IRS has one Senior Executive Service (SES) position designated under critical pay authority. The IRS has requested critical pay authority designations for an additional six positions. IRS response to TAS information request (Aug. 17, 2021).

44 *See The IRS's Fiscal Year 2022 Budget*: *Hearing Before the S. Comm. on Finance*, 117th Cong. at 2:19:04 (2021) (statement of Charles P. Rettig, Commissioner, Internal Revenue), https://www.finance.senate.gov/hearings/the-irss-fiscal-year-2022-budget. The current version of the House-approved Build Back Better Act (H.R. 5376) does contain helpful hiring authorities that will assist IRS hiring efforts. *See* Build Back Better Act, H.R. 5376, 117th Cong., § 138401(b), at 1930 (Nov. 3, 2021), https://rules.house.gov/sites/democrats.rules.house.gov/files/BILLS-117HR5376RH-RCP117-18.pdf.

45 OPM, Special Rates, https://apps.opm.gov/SpecialRates/srsrequest.aspx (last visited Nov. 15, 2021). Under (5 U.S.C. § 9509), the Secretary of the Treasury is authorized to establish broad banding pay and classification systems covering all or any portion of the IRS workforce under the GS pay system. The IRS already has in place several different pay flexibilities, including the IRS Payband System for all management positions and Special Rate Schedules for Information Technology Management and General Engineer positions. TAS's recommendation is in addition to current available hiring authorities.

46 The IRS accomplishes this by "dual encumbering," meaning an individual is appointed to a position already occupied by an incumbent.

47 *See* 12 U.S.C. § 1833b. *See* Charles Rossotti and Ronald Sanders, *Shrinking the Tax Gap Requires a Renewed IRS Workforce*, GovExec (Aug. 3, 2021), https://www.govexec.com/workforce/2021/08/shrinking-tax-gap-requires-renewed-irs-workforce/184239/, for more information about this proposal.

48 IRS responses to TAS information requests (Aug. 13, 2021; Aug. 17, 2021).

49 IRS response to TAS information request (Sept. 8, 2021).

50 *Id.*

51 IRS response to TAS information request (Nov. 5, 2021).

52 Of course, this is a separate matter concerning the need for HCO to improve training efforts for new hires and current employees. Once an employee is hired, the employee still needs to go through a training process to be able to competently perform his or her assigned duties.

53 After talks with the NTEU, the IRS is currently working on creating a Referral Bonus Program to enhance recruitment efforts for hard-to-fill positions by encouraging existing employees to leverage their networks to identify high quality job candidates.

54 IRS, Taxpayer First Act Report to Congress (Jan. 2021), https://www.irs.gov/pub/irs-pdf/p5426.pdf. The Taxpayer First Act, Pub. L. No. 116-25, § 2402, 133 Stat. 1014 (2019) required that the Commissioner of Internal Revenue submit to Congress a written report providing a comprehensive training strategy for employees of the IRS.

55 Meeting Between National Public Liaison Participants and TAS on the topics of IRS Training, IRS Hiring and Recruitment, and IRS Transparency (Nov. 9, 2021).

56 *See* OPM Training and Development Policy Wiki, https://www.opm.gov/WIKI/training/Index.aspx (last visited Nov. 24, 2021).

57 The IRS delivered 4,352,393; 4,184,414; 4,622,817; 4,025,362; 3,632,008; and 4,311,927 hours of training in FYs 2015-2020, respectively. Included in this training were 370,351; 395,307; 394,131; 404,950; 270,730; and 330,964 hours of mandatory briefings for FYs 2015-2020, respectively. IRS response to TAS information request (Oct. 20, 2021). Mandatory briefings, required of all employees, cover topics such as information systems and physical facilities security, unauthorized access awareness, the Federal Employee Antidiscrimination and Retaliation Act of 2002, and rules relating to records management, privacy, and information protection and disclosure. In addition, some operating divisions conducted some training that was not recorded in HCO's Servicewide Training Events Tracking System, such as information sharing sessions, informal workshops during group meetings, lunch and learn sessions, information workshops, or refresher training based on the manager's assessment of particularized needs of a group of his or her employees. IRS responses to TAS information requests (Oct. 15, 2021; Oct. 17, 2021; Oct. 20, 2021; Oct. 26, 2021).

58 The cost of the training was $36,514,760; $34,059,475; $37,459,978; $36,384,795; $48,197,023; and $30,974,779 for FYs 2015-2020, respectively. IRS responses to TAS information requests (Oct. 15, 2021; Oct. 17, 2021; Oct. 18, 2021; Oct. 20, 2021; Oct. 26, 2021).

59 IRS responses to TAS information requests (Oct. 15, 2021; Oct. 17, 2021; Oct. 18, 2021; Oct. 20, 2021; Oct. 26, 2021).

60 This data includes both classroom and on-the-job (OJT) training. IRS responses to TAS information requests (Oct. 15, 2021; Oct. 17, 2021; Oct. 18, 2021; Oct. 20, 2021).

61 For many positions, a substantial amount of training (or even most of the training) is OJT. IRM 6.410.1.2.1, Definitions (Oct. 30, 2016) describes OJT as "a structured program designed to provide practice of job duties under the supervision of an on-the-job instructor, usually following formal classroom training in a specific discipline." As Commissioner Rettig noted, part of the IRS's hiring strategy is to hire not only inexperienced employees but also mid-level and senior-level professionals from the private sector who can lead

teams. *The IRS's Fiscal Year 2022 Budget*: *Hearing Before the S. Comm. on Finance*, 117th Cong. at 2:19:04 (2021) (statement of Charles P. Rettig, Commissioner, Internal Revenue), https://www.finance.senate.gov/hearings/the-irss-fiscal-year-2022-budget.

62 Government Accountability Office (GAO), GAO 19-176, *Strategic Human Capital Management is Needed to Address Serious Risks to IRS's Mission* 25 (2019).

63 CBO, *The Effects of Increased Funding for the IRS*, https://www.cbo.gov/publication/57444 (Sept. 2, 2021).

64 IRS, Strategic Plan Fiscal Year (FY) 2018-2022, at 7, https://www.irs.gov/pub/irs-pdf/p3744.pdf.

65 *See* U.S. Department of the Treasury, *The American Families Plan Tax Compliance Agenda* (May 2021).

66 *See* National Taxpayer Advocate 2022 Purple Book: *Compilation of Legislative Recommendations to Strengthen Taxpayer Rights and Improve Tax Administration* 3 (*Revamp the IRS Budget Structure and Provide Sufficient Funding to Improve the Taxpayer Experience and Modernize the IRS's Information Technology Systems*).

67 *See* U.S. Department of the Treasury, *The American Families Plan Tax Compliance Agenda* (May 2021).

68 *See* National Taxpayer Advocate 2022 Purple Book: *Compilation of Legislative Recommendations to Strengthen Taxpayer Rights and Improve Tax Administration* 3 (*Revamp the IRS Budget Structure and Provide Sufficient Funding to Improve the Taxpayer Experience and Modernize the IRS's Information Technology Systems*).