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Public Comment TAS IRS Future State Public Forum
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Introduction

On behalf of National Disability Institute, I offer the following remarks and recommendations in response to the invitation to comment on the IRS Future State plan.

National Disability Institute (NDI) was established eleven years ago as a nonprofit research and development organization to harness the power of public and private sector collaboration to build a better economic future for people across the spectrum of disabilities and their families. Through public education, pioneering demonstration projects, public policy research and development and customized training and technical assistance activities, NDI continues to change thinking and behavior at an individual and systems level that has resulted in people with disabilities improving their financial capability and economic stability.

NDI, since 2004, led the Real Economic Impact Tour, now the REI Network, a national program designed to build disability inclusive tax access and education strategies within the community based Volunteer Income Tax Assistance (VITA) networks.¹ NDI would not have led this work without the partnership with the IRS Stakeholders Partnerships, Education and Communication (SPEC) over that past 12 years.

SPEC was developed for the purpose of providing education to individual taxpayers to assist them in complying with tax laws. Prior to its stand-up in 2000, IRS was focused primarily on processing tax returns, collecting taxes due and examining tax returns. Although taxpayer education was provided, it was managed by a management system where compliance and enforcement was the primary objective. There was a significant reorganization of IRS in 2000 in response to very public congressional inquiries on IRS "abuses" of taxpayers in the late 1990s. As a result several new operation divisions with new chains of command were

¹ The VITA Program offers free tax help to low- to moderate-income (generally, \$49,000 and below) people who cannot prepare their own tax returns. Certified volunteers sponsored by various organizations receive training to help prepare basic tax returns in communities across the country. VITA sites are generally located at community and neighborhood centers, libraries, schools, shopping malls, and other convenient locations. Most locations also offer free electronic filing. To locate the nearest VITA site, call 1-800-906-9887 or check this partial [VITA site list](#) online. (This list does not include every VITA site.)

created. One of these divisions was the Wage and Investment Division that was targeted with providing both compliance and education services to individual taxpayers. Corporations and non-profits would have their own divisions in the IRS to deal with them. This was a change in how the IRS had been structured for many years where both compliance and educational services were provided to all these groups at the local level. As such, SPEC was created under the vision that taxpayers would do the correct thing and comply if they had access to information to help them do the right thing. In addition, the Office of the Tax Payer Advocate was established to represent to Congress the education rights, responsibilities and tax code challenges of low income and ESL taxpayers. The Low Income Tax Clinics were created to ensure the fairness and integrity of the tax system for taxpayers who are low income or speak English as a second language:

- By providing *pro bono* representation on their behalf in tax disputes with the IRS;
- By educating them about their rights and responsibilities as taxpayers; and
- By identifying and advocating for issues that impact low-income taxpayers.

An LITC must provide services for free or for no more than a nominal fee.

LITC grants come from appropriated funds. Although these grants partially fund LITCs, the clinics, their employees and their volunteers operate independently from the IRS. Examples of qualifying organizations include:

- Clinical programs at accredited law, business or accounting schools whose students represent low-income taxpayers in tax disputes with the IRS; and
- Organizations exempt from tax under Internal Revenue Code Section 501(a) whose employees and volunteers represent low income taxpayers in tax disputes with the IRS.²

Today, in 2015, the fact that 98% of all tax revenue collected by the IRS is paid voluntarily and less than two percent is collected through direct enforcement actions³ for individual taxpayers (2015 Annual Report to Congress TAS) is an amazing outcome of this important transformation - IRS made in the late 1990's. Many of the challenges raised by Congress in the late 1990s continue to plague American taxpayers and are heightened because of the growth of technology. Issues such as revenue protection and identify theft are listed as most serious problems (TAS 2015 Report to Congress) that directly impact taxpayers with disabilities and low income taxpayers.

What is unique about SPEC was the vision that information that would help the individual taxpayers would not come directly from IRS or SPEC but would come through trusted partners at the local level that had long standing relationships with individuals. Since 2000 SPEC created 60 national partnerships and over 4,000 local Community Based Partnerships (2016 data) at the local level made up of community organizations working together to

² www.taxpayeradvocate.irs.gov

³ Taxpayer Advocate Service 2015 Annual report to Congress – Volume One Preface Page xi

provide tax education, assistance and related asset development strategies for low-income taxpayers. Educational outreach on EITC and expansion of VITA services has seen rapid growth since the creation of SPEC and its attempt to build a full diversity model.

President George H.W. Bush signed into law the Americans with Disabilities Act (ADA) that stated the importance of economic self-sufficiency for Americans with disabilities. The findings statement of the ADA articulates our nation’s proper goals regarding individuals with disabilities which is to “assure equality of opportunity, full participation, independent living, and ***economic self-sufficiency*** (emphasis added) for such individuals.” NDI knew that access to free and trustworthy tax preparation services and education would be the gateway to a better economic future for millions of taxpayers with disabilities. Since 2004, NDI’s partnership with SPEC, and hundreds of community-based VITA partners, increased the number of taxpayers with disabilities accessing free tax assistance from six to fourteen percent. This was done because of Congress’ vision that information delivered to the individual taxpayer (in-person, on the phone, or virtually) would create positive outcomes and charged a federal agency with the task. Even though not perfect, access for taxpayers with disabilities to the world of tax preparation was forever changed because of this important partnership.

Future State Market Assumptions

This comment brief is a response to the IRS Future State and the importance of building an inclusive, universally designed road ahead with specific focus on taxpayers with and without disabilities that utilize IRS’ Volunteer Income Tax Assistance Program (VITA) and/or the Earned Income Tax Credit⁴. The taxpayer market segment addressed in this comment – disability and low moderate income (LMI) has not fully adopted broadband services in the home and use other electronic services such as mobile and/or smart phones, tablets, iPads, desk tops, at a lower rate compared to other taxpayers thus impacting their ability to transition to a virtual platform without education, training, and free access to broadband technology and electronics. This is not a small population of taxpayers. It is estimated that about 6 million taxpayers use VITA, Tax Counseling for the Elderly (TCE), Facilitated Self Assist (FSA) and the Free File Network, and another 19 or 20 million taxpayers are eligible to participate but are not aware of the programs. We know that 27.5 million taxpayers received the EITC in 2014.

As IRS moves forward on this journey, it is imperative that the Future State developers design tools that meet the access, as well as socioeconomic needs, of users with different abilities. It is impossible to cover these needs in this short testimony but this brief does

⁴ EITC, Earned Income Tax Credit, is a benefit for working people who have low-income. A tax credit means more money in your pocket. It reduces the amount of tax you owe and may also give you a refund. IRS 2016.

include more detailed information about the needs of this market segment. There are millions of taxpayers with Adjusted Gross Incomes of \$60,000 or less that are eligible for many of the free tax services – as mentioned above - that will require some in-person or phone call assistance before they can transition into a major Future State virtual tax account. We know that about 20% are taxpayers with a disability or a family member in the household with a disability. Currently we are serving about 14% taxpayers with disabilities accessing the VITA network of services. The Future State information shared to date does not present strategies that address this market.

We know from the Taxpayer Advocate 2015 Report to Congress, that IRS collected \$2.8 trillion dollars (net of returns) that represents 47% individual returns, with 45% of the individual returns from taxpayers with Adjusted Gross Incomes within 250% of the Federal Poverty Level (FPL). This is our population (low moderate income (LMI) and disability) and represents a major tax compliant constituency.

We support and agree with the Future State that doing “business as usual” needs to change for taxpayers, but ask that strategies be developed for the millions of taxpayers that are caught in the digital divide (no access, low income, disability). Taxpayers with restricted use to the broadband experience are falling further and further behind as schools, businesses, government benefit programs, all assume access when in fact that is not the case.

Commissioner Koskinen’s testimony to the U.S. Senate Finance Commission on February 10, 2016, stated that “the goal for future taxpayers experience is to improve and expand taxpayer services for all taxpayers, no matter what their circumstances.” It is imperative, that as IRS continues to design its Future State technology building blocks,⁵ it considers the preferences and characteristics, methods and communication channels utilized by EITC-eligible and taxpayers with disabilities.

As IRS designs the Future State “My IRS Account” similar to “My Social Security Account,” it is imperative that a tool is developed that is customized and personalized based on the taxpayer’s socioeconomic profile and experience. The work we have done with low to middle income (LMI) taxpayers with and without disabilities over the past 12 years demonstrates underutilization of free tax services and various credits. Taxpayers with disabilities with sensory (deaf and/or blind), physical, mental health, or developmental /cognitive challenges often experience barriers to access whether through inaccessible

⁵ Building Block: Virtual Taxpayer Assistance, Identify Authentication, Up-front Issue Identification, End-to-End Taxpayer Experience, and Analytics (Resource on Future State Planning).

technology/websites, complicated content, lack of interpreters, English as a Second Language, or tax volunteers and/or personnel unfamiliar with accommodation strategies for taxpayers with various abilities. Many taxpayers are still unaware of existing free tax services/locations and refundable credits available through the IRS Volunteer Income Assistance (VITA) and Tax Counseling for the Elderly (TCE) Program and Low-Income Tax Clinics.⁶

RECOMMENDATIONS FOR LAUNCHING THE TRANSFORMATIONAL JOURNEY FOR TAXPAYERS WITH LOW-INCOME WITH AND WITHOUT DISABILITIES

1) IRS Future State Develop Two Market Tracks for Transformation Blueprint: One for the online non-EITC Eligible Filer and the other for the EITC Eligible Filer.

The evolving expectations for the LMI taxpayer population with and without disabilities is not understood or reflected in the Future State. Most of the disability and LMI demographic do not use online channels referenced in the Future State, examples include online accounts with traditional financial institution, brokers or retailers. In addition, most Low-income taxpayers often do not own homes, have retirement accounts or savings. Rather, this demographic is much more likely to use the alternative finance industry now estimated to be well over a \$70 billion dollar industry.⁷

The Future State should include examples like it has produced in the shared info graphics of an **Individual Taxpayer Experience - Jane the Teacher at the Local Middle School Taxpayer** as well as **Bennett the Small Business Taxpayer**. What about **Larry the Hourly Service Worker Taxpayer** who has low literacy, or English as a Second Language, must access a public computer center or library but works two jobs, has a mental health condition and/or a mobility or sensory challenge, uses public transportation and receives a number of public benefits? He used to go to a local VITA site but it closed and the new one he found said IRS is now using a new software company⁸ so they have no prior returns on file and that he will have to go to IRS online and download them himself? He does not know how to do this or have access to a computer? What does his experience look like?

⁶ The VITA program originated in 1969 as a result of increased emphasis on taxpayer education programs after passage of the Tax Reform Act of 1969. There are 2,000 VITA/TCE sites and about 90,000 volunteers. The TCE program began with the Revenue Act of 1978, which authorized IRS to enter into cooperative agreements with organizations that provide tax help with federal income tax returns to persons age 60 and over. As the tax code continues to be more and more complicated it is essential that the IRS provide this critical service to the Low-middle income population. (IRS)

⁷ NDI research and analysis of critical data sets from the FDIC and FINRA Investment Education Foundation have resulted in the release of two groundbreaking reports in the last 18 months on the banking and economic status and financial behaviors of adults with disabilities (http://www.realeconomicimpact.org/doclisting.aspx#Ink_Reports%20and%20Publications).

⁸ Fact Sheet VITA/TCE Transition to TaxSlayer Software May 2016

Or, what about an info graphic on **Mary the Waitress Taxpayer** who was recently diagnosed with PTSD and is a veteran, single Mom with two children (one with cerebral palsy) and is living in a homeless shelter? She has no access to prior documents needed for her filing and has a mobile phone with limited minutes. What would an info graphic look like for her – how would IRS connect her to other services/partners developed through its SPEC VITA/TCE/FSA networks and Low Income Tax Clinics to assist her in meeting her tax obligations? What is the Future State vision for taxpayers like Larry and Mary who rely heavily on the federal system of benefits to get by - all while working -and want to be a taxpayer in good standing?

SPEC's 4,000 community-based partners have built a strong network of tax, financial counseling/coaching, housing, debt/credit and public benefits assistance. These partners understand that the problem of hunger, housing or tax compliance is not solved by individual programs **but collectively**. It was the local community VITA program that offered credit checks, budget and debt counseling, and financial education assistance to the LMI and taxpayers with disabilities when there was none.

2) IRS Future State conduct more research on the profile and characteristics of LMI taxpayers with/without disabilities.

The only major survey data ever collected on the characteristics and profile of taxpayers with disabilities was conducted by IRS Wage & Investment Research in 2007 and 2010. These publications created precedence for other federal agencies as to the importance of data collection on disability and financial capability.

We know that asset limits to retain eligibility for SSI, Medicaid, and other federal public benefits result in a life sentence of poverty and pose powerful disincentives to work, improve income production, and savings – all resources to advance economic self-sufficiency. Many taxpayers are reluctant to file a tax return (if they did not have the requirement to file because of low income) and continue to miss out on available refundable credits.⁹

- 54 million Americans report a disability and 22 million families have a member with a disability.
- Taxpayers with disabilities - physical (58%) and mental health disabilities (31%) hearing (16%), and vision (16%) (IRS W&I Benchmark Survey 2010)

⁹ What we learned is that almost one in two adults with disabilities are unbanked or under banked and more than twice as likely to use methods of nonbank borrowing such as a pawn shop or payday lender paying excessive interest rates and driving them deeper into debt. Individuals with disabilities are twice as likely as their nondisabled peers not to have \$2,000 in an account to be used in case of emergencies.

- Age of disability - 56% were between the ages of 46 – 59 (prior to online tax preparation work that found users 35 years and under). Disability reflects an older taxpayer than the traditional VITA data that reflects taxpayers in their 30's
- Prefer paid preparer use (42% compared to 52% of taxpayers without a disability)
- 26% self-prepare and 12% use other (VITA)
- Adjusted Gross Income for taxpayers with disabilities using VITA is less than \$22,000
- Taxpayers with and without disabilities more aware of IRS forms and publications (70% and 75%) respectively and 22% used these forms (IRS W&I Benchmark Survey, 2010)
- 13% of taxpayers with disabilities used self-service channels such as tax software - non IRS resources – compared to 21% without disabilities (2010 IRS Benchmark Report)
- 35% of taxpayers with disabilities reported being aware of Taxpayer Assistance Centers and VITA services, yet only 6% reported using them

VITA Specific Issues

- IRS VITA software includes disability question – do you consider yourself or a family member to have a disability – first time asked are you disabled – no response – were concerned about # of characters – language matters – still an issue.
- The closing of walk-in tax services – now by appointment only - at the Taxpayers Assistance Centers caused great concern and confusion for taxpayers with sensory challenges. There was no notice or public information campaign that assured taxpayers with disabilities they could make an appointment.
- Challenges of providing accommodations that cost money. Many programs now require that deaf partners participate in their local VITA/EITC campaigns to provide free tax services to ensure that access issues are addressed. IRS VITA Grant does allow grantees to allocate resources for accommodations – for example webinars should be captioned, as well as accommodated for taxpayers using American Sign Language. Interactive Web chats and other conferencing features may not work for the deaf taxpayer or taxpayers who have speech or communication challenges. However, Marketing collateral, VITA/EITC websites, and materials all need to meet 508 compliance, and many still are not.

- Many free tax preparation sites are held in older buildings such as community centers, churches which may not be physically accessible to some individuals with disabilities. Best practice adopted in early 2005 was the insertion of the international disability symbol on local VITA/EITC location information indicating if a site was wheelchair accessible.
- Communities continue to ask for disability etiquette and accommodation trainings. NDI created an e-learning course that is available for VITA/EITC volunteers doing tax preparation to learn about working with taxpayers of all abilities.
- IRS Alternative Media Center provides alternative tax forms and services for blind and deaf taxpayers.

3) IRS Future State consider the research on the challenges and use of broadband by LMI and disability market and its impact on tax filing compliance for this market.

Low Income Online Use

- A vast majority of industries – both public and private – assume online access capability today that shuts out the LMI and disability user. Connect Chicago¹⁰ found that access to high speed internet at a Public Computer Center is strongly associated with greater economic development for communities, job applications, work and school success. It found that smart phone use does not replace the lack of high internet access and that mobile-only users have lower digital skill levels than people with access to a desk top computer. Of the eighty thousand people that used computers at the Public Computer Centers, more than one third had incomes of \$10,000 or less, with an average wait time of two thirds of an hour to use the computer compared to three hours at a public library - which is a problem for an LMI user for whom time is money.

Disability and Online Use

- 54% of people with disabilities report using the internet compared to 81% of people without a disability and the U.S. Census Data found internet use slightly

¹⁰ The Broadband Tech Opportunity Program (BTOP) and Public Computer Centers (PCC) grants came about after the 2008 financial crisis and were part of the American Recovery and Reinvestment Act (ARRA). Unfortunately, the resources supporting these initiatives are disappearing. It is recommended that IRS Future State consider such research and what it means for taxpayers.

- lower for both – with disability at 48% compared to 74% for people without disabilities.¹¹
- 18% of taxpayers and 20% veterans with disabilities used an online do-it-yourself tax filing tool with AGI's less than \$22,000 and average age less than 35 years old.¹²

Older Adults and Online Use

- 86% of all adults go online, 59% seniors 65+
- 6 in 10 seniors now go online and just half are broadband users
- 77% have a cell phone compared to 91% of all Americans
- 41% do not use internet at all
- 53% no broadband access in home and 23% do not use cell phones
- seniors more likely to own a tablet or e-book reader than smartphone; ¼ of seniors use online social network¹³
- 70 million Americans or more will be 55+ years and older –any will still be working and filing taxes.

4) Provide Congress with briefing on the needs of the LMI and disability taxpayer market segment, the impact of the ongoing budget cuts to IRS and the state of non-profits providing VITA/TCE/FSA across the country.

We understand that the complexity of administrating existing and new laws and credits that benefit LMI and taxpayers with disabilities that require in-person and on the phone time.

We understand these services require resources and ask Congress to consider the following:

- If an IRS in-person tax assistance service costs \$60 or a tax assistance call \$50 per inquiry (as referenced by the Commissioner in testimony to Senate) what is the cost estimated to the taxpayer who because of no fault of his own cannot access information that will facilitate filing in a timely manner? What is the cost of non-compliance for the taxpayer who depends on public transportation, has limited English, lack of broadband service, limited minutes on mobile phone (waiting is not possible), lack of accessible technology (requires a screen reader if blind, an

¹¹ Disability in the Digital Age (2012, by Pew Research Center's Internet & American Life Project) – Focuses on Americans with disabilities and their internet activities associated with health care. <http://www.pewinternet.org/2012/08/06/disability-in-the-digital-age/>

¹² MyFreeTaxes (2009 to present)– an in-person or do-it yourself free tax software for both state and federal returns project funded by Walmart Foundation and led by UWW, NDI and GII an H&R Block platform that allowed taxpayers with AGI's of \$62,500 or under receive free tax assistance. Help line/call centers across the country and online chat services.

¹³ Older Adults and Technology Use (2014, by Pew Research Center's Internet & American Life Project) <http://www.pewinternet.org/2014/04/03/older-adults-and-technology-use/>

- ASL interpreter if deaf), inflexible work schedule or limited knowledge of the free services in their communities? Along with the cost of service to IRS, Congress must require there be a cost of service to the taxpayer. Who will pick-up these cost of services given the current funding environment that continues to cut the IRS budget and the community-based VITA/EITC/TCE partners serving this market?
- Funding for existing VITA/EITC/TCE tax work continues to decline as does the volunteer programs. Foundations continue to look for the new next big thing in giving – as there is little or no room for a corporate value proposition that sustains work for the poor. Historically, most non-profits do not generate self-sustaining income without investors and business models. Although impact investing is on the horizon - it has had little impact on the non-profits serving this demographic. We do not have much in the line of longitudinal outcome data because no one has funded the research. Seldom are poor people or people with disabilities asked their opinion or asked to fill out a survey. The non-profits are being held accountable for outcomes and not just outputs when in fact much of the work we are doing in the tax and financial capability space is maintenance to support and protect that low income taxpayer and her family. We do that through promoting the largest anti-poverty program in the history of the U.S. – the EITC that lifted over 5 million taxpayers out of poverty in 2015. If Congress continues to reduce IRS support of this work who will help? What will happen to the millions of taxpayers that need these credits and assistance to survive? This is so much more than just a tax return and how it gets filed - it means paying bills, getting a prescription filled, or keeping the lights on for one more month for millions of American taxpayers.
 - Walmart, the world’s largest corporation has invested nearly \$40 million dollars in the development and implementation of the first ever online, do it yourself, free, state or federal tax filing tool for eligible taxpayers that created market competition and has served millions of taxpayers with and without disabilities. This type of support and long-term investment is not the norm. Although this work has served many taxpayers, the online do-it-yourself tool is still way underutilized. What can we learn from this pilot?
 - Consider developing a Taxpayer Technology Set Aside similar to Tax Aide for the Elderly that provides ongoing resources for communities to adopt and work side-by-side IRS Future State to imbed online capability for taxpayers needing assistance?

- Remind Congress when the stimulus plan came out several years back, IRS was told to tap all its community-based VITA partners to implement. Believe me, this was not an easy task, not to mention Congress provided no additional resources. Once again, IRS had a base to go to that did indeed put the word out.
- IRS disability research in 2010 recommended that tax software become compatible with the needs of taxpayer with disabilities.

5) Listen to the voices of taxpayers with disabilities.

- 2006 NDI's TAXFacts Campaign Report Educating Democracy: Tax and financial service needs of working Americans with disabilities. Profile of the utilization and demographics of the tax filing and financial service activities of the EITC eligible workers with disabilities.
- Focus Group attendees were asked to say something to the Commissioner of IRS W&I regarding their experience in the focus groups (Boston, MA, Wichita, Kansas, New York City, NY, and West Palm Beach, FL

COMMENTS OF TAXPAYERS TO COMMISSIONER IRS W&I 2006 Focus Groups

- "I would like to know how to do my own taxes. Some day you know, the services we are talking about may not be available for me anymore."
- "We never have the opportunity to know stuff like this. Thank you."
- "Please simplify tax filing. We do not understand the forms, questions and procedures. There are a lot of bright people here and none of us can figure it out."
- "I didn't file my taxes for ten years because it would cost me my health care. I believed that for years."
- "Most false information out there about taxes and benefits we don't know is false. People need to know what is true and what is not true. Sometimes word of mouth is not always true."
- "We need advocacy from the IRS and others. If we go into a bank or credit union by ourselves they don't talk to you. Minorities are treated differently and people on SSI are treated differently."
- "I would like to thank him for the VITA program."

APPENDIX

Deaf Taxpayers

DIVERSE MODES OF COMMUNICATION: The d/Deaf, deaf-blind and hard-of-hearing community is incredibly diverse in preferred mode of communication. While some individuals rely on hearing aids, speech and/or lip-reading, others rely on any combination of these modes in addition to American Sign Language, Signed English or other sign language. Still, others rely solely on American Sign Language. This diversity of communication modes means that there must be equally diverse ways to access services and technology.

ENGLISH VS. AMERICAN SIGN LANGUAGE: ASL (American Sign Language) is a complete, unique language developed by deaf people, for deaf people and is used in its purest form by people who are Deaf. Being its own language, it not only has its own vocabulary, but also its own grammar that differs from English. As a result, individuals whose primary language is ASL may use English as a secondary language. Just as there is tremendous diversity of communication preferences in the d/Deaf community, there is varied language acquisition. This greatly affects the fluency level in English by this diverse community from little fluency and reading level to on par with hearing peers.

LACK OF ADA AWARENESS ON HIRING QUALIFIED INTERPRETERS: Many are unaware of the legal requirements under the Americans with Disabilities Act around hiring qualified interpreters for equal communication access for deaf/hard-of-hearing. For others who are aware of providing interpreters as a reasonable accommodation under ADA, still many refuse to pay interpreter costs. As a result, a large amount of deaf individuals do not receive equal communication access to diversified community services, including to tax preparation. In addition, the free tax preparation model typically is volunteer-based and does not have sufficient funds dedicated to accommodations. This model, again, does not account for paying sign language interpreters.

VIDEO RELAY SERVICES & REMOTE SIGN LANGUAGE: Video Relay Service (VRS) is a form of Telecommunications Relay Service that enables people who are deaf and with hearing disabilities that use American Sign Language (ASL) to communicate with voice telephone users through video equipment, rather than through typed text. Video equipment links the VRS user with an operator – called a “communications assistant” (CA) – so that the VRS user and the CA can see and communicate with each other in signed conversation. Because the conversation between the VRS user and the CA flows much more quickly than with a text-based TRS call, VRS has become an enormously popular form of TRS. It is the most used telecommunications in the ASL community, as the TTY is antiquated. There are unlimited potentials for using confidential video relay across services for the deaf community.

BLIND/LOW VISION

Persons who are blind/low vision often face challenges when Web content is not compatible with screen readers and appropriate text tags on graphics, links, forms or tables are missing. IRS Alternative Media Center in DC – produce an array of talking tax forms, captioned videos for deaf taxpayers, large print, Braille and other services.

Not all individuals who are blind or low visions use screen readers and so may need additional assistance in completing tax forms. (For example, a reader or assistance with keyboard)

Screen Reader User Survey (2015, WebAim): Specific information on screen reader, browser, and operating system used. Although this mostly focuses on blind and low vision users, a large minority of participants surveyed reported multiple disabilities.

<http://webaim.org/projects/screenreadersurvey6/>

Developmental/Intellectual Disabilities (ID)¹⁴

Wehmeyer *et al.* (2004) note that touch screen interfaces (e.g., tablets) may be better alternatives to point and click options because it would be easier for the individual to see a cause and effect relationship between action (*i.e.*, pressing the screen) and reaction (*i.e.*, taking the individual to the desired web page).

Addressing impairments in language and communication ability, Keskinen, Heimonen, Turunen, Rajaniemi and Kauppinen, (2012) report on the efficacy of a picture based instant messenger service called SymbolChat. The fully customizable software is based on touch-screen input and speech output. The prototype application was evaluated by nine adult users with varying degrees of ID and their support workers. Findings suggest that users can express themselves in spontaneous communication even without prior training in the use of symbols. This suggests that although much of the web may be off limits or will require a high level of adaptation or support to use, specialized software can be designed to effectively meet the needs of the ID community.

Information from IRS Website

Complexity of tax law weighs heavily on the many Americans with low incomes and disabilities. As such, here are the tax benefits that they may be eligible for, but don't always claim. (Tax Benefits for Taxpayers with Disabilities word doc)

¹⁴ Internet Access by People with Intellectual Disabilities (2013, Future Internet Journal) General discussion of internet use and strategies for web designers to use when considering ID. www.mdpi.com/1999-5903/5/3/376/pdf

Tax Benefits and Free Tax Preparation for Taxpayers with Disabilities

Taxpayers with disabilities and parents of children with disabilities may qualify for a number of IRS tax credits and benefits. Listed below are seven tax credits and other benefits which are available if you or someone else listed on your federal tax return has disability. In addition, there are several options where people with disabilities can get their taxes prepared and electronically filed for free.

Standard Deduction Taxpayers who are legally blind may be entitled to a higher standard deduction on their tax return.

Gross Income Certain disability-related payments, Veterans Administration disability benefits, and Supplemental Security Income are excluded from gross income.

Impairment-Related Work Expenses Employees who have a physical or mental disability limiting their employment may be able to claim business expenses in connection with their workplace. The expenses must be necessary for the taxpayer to work.

Credit for the Elderly or Disabled This credit is generally available to certain taxpayers who are 65 and older as well as to certain disabled taxpayers who are younger than 65 and are retired on permanent and total disability.

Medical Expenses If you itemize your deductions using Form 1040, Schedule A, you may be able to deduct medical expenses. See IRS Publication 502, Medical and Dental Expenses.

Earned Income Tax Credit EITC is available to taxpayers with disabilities as well as to the parents of a child with a disability. If you retired on disability, taxable benefits you receive under your employer's disability retirement plan are considered earned income until you reach minimum retirement age. The EITC is a tax credit that not only reduces a taxpayer's tax liability but may also result in a refund. Many working individuals with a disability who have no qualifying children, but are older than 25 and younger than 65 do -- in fact -- qualify for EITC. Additionally, if the taxpayer's child has a disability, the age limitation for the EITC is waived. The EITC has no effect on certain public benefits. Any refund you receive because of the EITC will not be considered income when determining whether you are eligible for benefit programs such as Supplemental Security Income and Medicaid.

Child or Dependent Care Credit Taxpayers who pay someone to care for their dependent or spouse so they can work or look for work may be entitled to claim this credit. There is no age limit if the taxpayer's spouse or dependent is unable to care for themselves.

For more information on tax credits and benefits available to taxpayers with disabilities, see Publication 3966, Living and Working with Disabilities or Publication 907, Tax Highlights for Persons with Disabilities, available on the IRS website at www.irs.gov or by calling 800-TAX-FORM (800-829-3676).

Trained community volunteers may help with special credits, such as Earned Income Tax Credit, Child Tax Credit, and Credit for the Elderly or Disabled. In addition to free tax return preparation assistance, most sites also offer free electronic filing (e-filing). Individuals taking advantage of the e-file program will receive their refunds in half the time compared to returns filed on paper – even faster when tax refunds are deposited directly into one's bank account.

Also, here is information about VITA and tax counseling (free services) available to taxpayers (Tax Benefits for Taxpayers with Disabilities word doc)

Volunteer Income Tax Assistance Program

Tax Counseling for the ElderlyThe TCE Program provides free tax help to people aged 60 and older. Trained volunteers from non-profit organizations provide free tax counseling and basic income tax return preparation for senior citizens. Volunteers who provide tax counseling are often retired individuals associated with non-profit organizations that receive grants from the IRS. As part of the IRS-sponsored TCE Program, AARP offers the Tax-Aide counseling program at more than 7,000 sites nationwide during the filing season. Trained and certified AARP Tax-Aide volunteer counselors help people of low-to-middle income with special attention to those age 60 and older.

For more information on TCE, call 1-800-829-1040. To locate the nearest AARP Tax-Aide site, call 1-888-227-7669 or visit [AARP's website](http://www.aarp.org).