



December 2024

DIRECT FILE

IRS Successfully Piloted Online Tax Filing but Opportunities Exist to Expand Access

GAO Highlights

Highlights of [GAO-25-106933](#), a report to congressional committees

Why GAO Did This Study

IRS is offering a new online service called Direct File to assist individual taxpayers in preparing and filing a tax return. IRS intends for Direct File to make it easier to claim tax benefits and improve digital services consistent with legal authorities to provide taxpayer services. The Inflation Reduction Act of 2022 (IRA) directed IRS to study and report on a potential government-run online filing system. IRA also included a provision for GAO to oversee the use of IRA funds. GAO's objectives were to (1) describe IRS's Direct File pilot; (2) evaluate how IRS applied leading practices for pilot design to inform next steps; (3) evaluate IRS's efforts to expand the scope of Direct File; and (4) compare the online filing services provided by selected foreign and territorial taxing jurisdictions to IRS's. GAO reviewed IRS documents, interviewed IRS officials, and compiled case studies of online filing systems in six countries and Puerto Rico.

What GAO Recommends

GAO is making four recommendations to IRS, including improving coordination among relevant offices to ensure the recruitment of customer support employees, opening Direct File to all eligible taxpayers in the future, and identifying additional data that could be prepopulated in Direct File and testing its accuracy. IRS agreed with three of our recommendations. IRS neither agreed nor disagreed with our recommendation to continue coordinating with state revenue agencies to expand access to Direct File and, as necessary, take steps to ensure the availability of the federal Direct File program to eligible taxpayers in all states.

View [GAO-25-106933](#). For more information, contact James R. McTigue, Jr. at (202) 512-6806 or mctiguej@gao.gov.

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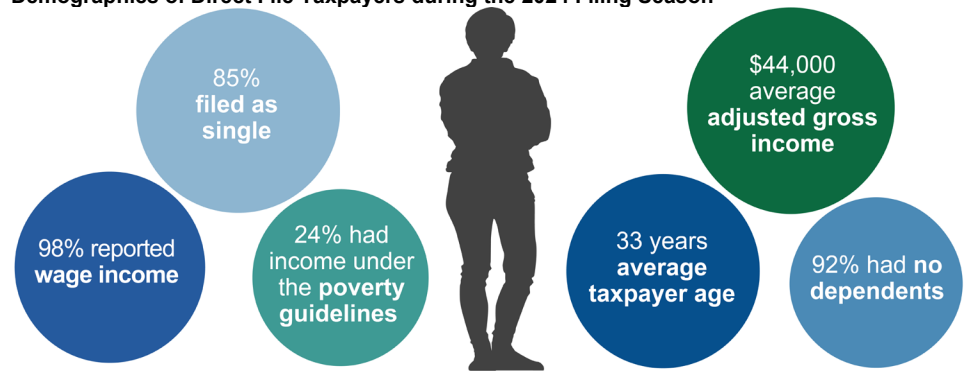
DIRECT FILE

IRS Successfully Piloted Online Tax Filing but Opportunities Exist to Expand Access

What GAO Found

The Internal Revenue Service (IRS) successfully piloted Direct File from February to April 2024 for taxpayers with simple tax situations residing in one of 12 states. Direct File used interview-style questions to guide taxpayers through preparing a return on an IRS website at no cost to the taxpayer. IRS accepted 140,803 Direct File returns which helped many taxpayers with lower incomes fulfill their filing obligations. Taxpayers reported that Direct File was an easier tax preparation method than they had previously used, a factor that contributed to IRS's decision to make Direct File permanent.

Demographics of Direct File Taxpayers during the 2024 Filing Season



Source: Internal Revenue Service; Image from Rawpixel/stock.adobe.com. | GAO-25-106933

GAO found that IRS followed leading practices in piloting Direct File. These included identifying learning objectives and collecting relevant data such as customer service requests. IRS also identified lessons learned, such as how to develop website content more efficiently. IRS continues to determine staffing needs for a newly established Direct File Office.

IRS is planning to expand the scope of taxpayers who can use Direct File in 2025 by adding support for the premium tax credit for health insurance and other tax provisions and by allowing residents of an additional 12 states to use the federal Direct File system. However, GAO found that IRS is behind schedule in recruiting and training customer service representatives for the 2025 filing season due in part to insufficient coordination among IRS offices. Additionally, IRS limits participation in Direct File to taxpayers who live in certain states, which facilitates coordination between federal and state tax filing. However, GAO found that IRS could face challenges in reaching agreements with all states, which raises equity concerns for taxpayers unable to access Direct File due to where they live.

GAO found that selected foreign and territorial revenue agencies prepopulate tax returns with information already on file, such as wages reported by employers. IRS began offering limited prepopulation in April 2024 during the pilot. IRS officials told GAO that they are considering additional prepopulation of taxpayer data but are still in the early stages of planning. Identifying additional data for prepopulation in Direct File and developing a plan for testing its accuracy could enable IRS to reduce taxpayer burden.

Contents

Letter		1
	Background	3
	IRS Successfully Piloted Its Direct File System and Taxpayers Reported Generally Positive Experiences	6
	IRS Followed Leading Practices for Pilot Design while Continuing to Integrate Direct File with Related Taxpayer Services	14
	IRS Efforts to Expand Direct File Could Face Challenges Related to Customer Support and Serving Additional Taxpayers	21
	Selected Revenue Agencies Do More to Leverage Government Information to Save Taxpayers Time and Reduce Errors	30
	Conclusions	36
	Recommendations for Executive Action	36
	Agency Comments and our Evaluation	37
Appendix I	Online Filing in Other Jurisdictions	41
Appendix II	Comments from the Internal Revenue Service	55
Appendix III	GAO Contact and Staff Acknowledgments	60
Table		
	Table 1: Implementation Decisions of States Participating in the IRS's 2024 Direct File Pilot	13
Figures		
	Figure 1: Direct File Returns Accepted during IRS's 2024 Filing Season Pilot	7
	Figure 2: Demographics of Direct File Taxpayers during the 2024 Filing Season	8
	Figure 3: Taxpayers Participating in the Limited 2024 Federal Direct File Pilot by State and Participation Rate	12
	Figure 4: Alignment of IRS Direct File Pilot with GAO Leading Practices for Pilot Program Design	14
	Figure 5: How IRS's Direct File Explains Refundable and Nonrefundable Tax Credits	19

Figure 6: Planned Availability of Federal Direct File by State in 2025 (as of October 2024)	25
Figure 7: Prepopulation of Tax Information in Selected Jurisdictions as of 2024	30
Figure 8: Timelines for Tax Filing and Certain Information Reporting in Australia and the United States	34

Abbreviations

CSR	Customer Service Representative
IRA	Inflation Reduction Act of 2022
IRS	Internal Revenue Service
OECD	Organisation for Economic Co-operation and Development
USDA	U.S. Department of Agriculture

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December 19, 2024

Report to Congressional Committees

The Internal Revenue Service (IRS) is offering a new online service called Direct File to assist individual taxpayers in preparing and electronically filing their tax returns at no cost. IRS designed Direct File to save taxpayers time and money, make it easier to claim tax benefits, and reduce paper returns. IRS also stated that Direct File is consistent with its authorities under the Internal Revenue Code to provide taxpayer services and will accelerate the agency's efforts to improve digital services and allow it to test customer service innovations.¹ IRS piloted the Direct File program, which is now permanent, during the 2024 filing season.²

The Inflation Reduction Act of 2022 (IRA) provided IRS tens of billions of dollars to improve taxpayer service and achieve other objectives, such as expanding enforcement.³ The act includes a provision for GAO to oversee the distribution and use of IRA funds, including funds related to Direct File.⁴ This report is part of a body of work in response to this provision. This report (1) describes the development and results of IRS's Direct File pilot; (2) evaluates how IRS applied leading practices for pilot design to inform next steps for Direct File; (3) evaluates IRS's efforts to expand the scope of Direct File; and (4) compares IRS's online filing services with those provided by selected foreign and territorial taxing jurisdictions to inform future planning for Direct File.

To describe how IRS prepared for the Direct File pilot and its results, we reviewed IRS planning documents such as internal briefings, reviewed an

¹CQ, *Senate Finance Committee Holds Hearing on Fiscal Year 2025 Internal Revenue Service Budget Request*, CQ Congressional Transcripts (Apr. 16, 2024). As of December 13, 2024, the committee report has not yet been published in the *Congressional Record*.

²Internal Revenue Service, *IRS Makes Direct File a Permanent Option to File Federal Tax Returns; Expanded Access for More Taxpayers Planned for the 2025 Filing Season*, IR-2024-151 (Washington, D.C.: May 30, 2024).

³The IRA appropriated \$79.4 billion for IRS. Pub. L. No. 117-169, § 10301, 136 Stat. 1818, 1831–1832 (2022). In June 2023, the Fiscal Responsibility Act of 2023 rescinded about \$1.4 billion of amounts appropriated for IRS by the IRA. Pub. L. No. 118-5, div. B, tit. II, § 251, 137 Stat. 10, 30-31 (2023). In March 2024, Congress rescinded \$20.2 billion from the original amount that had been provided for enforcement activities. Pub. L. No. 118-47, div. B, § 640, div. D, § 530, 138 Stat. 460, 572, 708 (2024).

⁴Pub. L. No. 117-169, tit. VII, § 70004, 136. Stat. at 2087.

“after action” report and other IRS analyses describing the taxpayers who participated in the pilot, and interviewed IRS and state revenue officials from Arizona, California, Massachusetts, New York, and Washington.⁵

To evaluate the extent to which IRS applied leading practices for pilot design, we compared IRS plans for analyzing the performance of Direct File against five leading practices for pilot design identified in our prior work: 1) establish objectives; 2) clearly articulate a methodology and data gathering strategy; 3) identify criteria or standards for identifying lessons about the pilot to inform decisions about scalability; 4) develop a detailed data-analysis plan to track the pilot program’s implementation and performance and evaluate results; and 5) ensure appropriate two-way stakeholder communication and input at all stages of the pilot project.⁶ These practices remain relevant for IRS to inform decisions about next steps for Direct File.

To evaluate IRS’s efforts to expand the scope of Direct File to serve more taxpayers we reviewed IRS plans and interviewed Direct File officials. We compared the recruitment of customer service representatives against relevant guidelines for customer service by federal agencies and an IRS strategic goal for improving the availability and accessibility of customer service.⁷ We compared IRS’s efforts to coordinate Direct File with state income tax filing against a goal IRS has established for eventually making Direct File a nationwide program, IRS’s mission statement to provide America’s taxpayers with top-quality service by helping them understand and meet their tax responsibilities and enforce the law with integrity and fairness to all, and criteria we identified in our prior work for a good tax system.⁸ We reviewed IRS estimates of how many additional taxpayers

⁵Department of the Treasury, Internal Revenue Service, *IRS Direct File Pilot Program: Filing Season 2024 After Action Report*, Publication 5969 (Washington, D.C.: May 3, 2024).

⁶GAO, *DATA Act: Section 5 Pilot Design Issues Need to Be Addressed to Meet Goal of Reducing Recipient Reporting Burden*, [GAO-16-438](#) (Washington, D.C.: Apr. 19, 2016). Internal IRS documents describe the agency’s plan for analyzing the performance of Direct File: *IRS Direct File: Pilot Evaluation Review* (Jan. 11, 2024); *Direct File 2024 Pilot Gating Criteria Plan v0.2*; and *Draft DF Metrics (00B)*.

⁷See Exec. Order No. 14058, *Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*, 86 Fed. Reg. 71365 (Dec. 16, 2021); and Internal Revenue Service, *Internal Revenue Service Inflation Reduction Act Strategic Operating Plan: FY2023–2031* (Washington, D.C.: Apr. 5, 2023).

⁸GAO, *Understanding the Tax Reform Debate: Background, Criteria, and Questions*, [GAO-05-1009SP](#) (Washington, D.C.: Sept. 1, 2005).

could be served if Direct File could support additional tax situations and assessed the extent to which IRS is using taxpayer research to prioritize which tax provisions to add.

To inform the further expansion of Direct File's capabilities we also compared IRS's program to online filing services provided by foreign and territorial revenue agencies. We used Organisation for Economic Co-operation and Development (OECD) data to identify countries whose revenue agencies provide online tax filing programs and have tax systems with certain similarities to the U.S. system.⁹ We also considered relevant reports related to online tax filing systems by the countries' national audit offices and language considerations. We selected Australia, Belgium, Estonia, France, Ireland, and New Zealand for review. We also selected Puerto Rico, a U.S. territory, due to its advanced online filing system. We reviewed each revenue agency's online filing capabilities and the extent to which taxpayer information is prepopulated and interviewed officials to understand the benefits of each system and challenges they experienced, if any. We assessed IRS's plans for prepopulating Direct File returns against an IRS strategic objective intended to make filing easier by providing taxpayers access to data IRS collected.¹⁰

We conducted this performance audit from July 2023 to December 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

IRS has long encouraged taxpayers to file electronically but had not provided its own online service for doing so until the Direct File pilot in 2024. Direct File is a question-and-answer-based service that allows taxpayers to prepare and file their federal taxes directly on an IRS

⁹Using OECD data, we identified countries where a large proportion of the workforce files personal income tax returns. We considered countries where the ratio of taxpayers to workers was 0.90 or above, which is comparable to the U.S. ratio of 1.02 in 2021. We also identified countries where more than 80 percent of personal income tax returns are filed electronically, which is comparable to the U.S. where IRS estimated that 90 percent of individual taxpayers filed electronically in 2021. We excluded countries with reported 100 percent electronic filing rates because of the possibility that electronic filing was required.

¹⁰Internal Revenue Service, *Internal Revenue Service Inflation Reduction Act Strategic Operating Plan: FY2023–2031* (Washington, D.C.: Apr. 5, 2023).

website (<https://directfile.irs.gov>) for free. It also integrates with several state online filing systems, allowing taxpayers to file their state taxes after their federal return. In the past, taxpayers could only file their taxes electronically through a private sector company's software, often at a cost. Some taxpayers, those making \$79,000 or less in 2024, were eligible to file electronically for free through Free File, a program provided by IRS and a consortium of tax preparation companies. We previously found that IRS was heavily reliant on two large companies that left the Free File program in recent years and that participation was low for eligible taxpayers. We recommended that IRS work with relevant stakeholders to develop additional options for free online tax filing that would reflect current guidelines for federal digital services and that IRS examine the benefits and costs of the Free File agreement in the context of its long-term plans for online service.¹¹

In 2022, Congress appropriated \$15 million for IRS to study and report on a potential direct electronic filing system including the potential cost and taxpayer opinions regarding such a system.¹² In May 2023, IRS reported that the annual costs for such a program could range from \$64 million to \$249 million depending on the number of taxpayers served and the complexity of tax situations supported with the report noting uncertainty in estimating the costs of a novel system. We previously evaluated IRS's initial cost and benefit estimates and identified opportunities for improvement, including IRS's use of best practices for cost and benefit estimation and its use of more complete estimates to inform future decisions about the program.¹³ IRS has recently provided updated cost information which we will describe below. Twenty-eight percent of taxpayers surveyed by IRS responded that they would be "very interested" in a potential direct filing system and 45 percent said they would be "somewhat interested." Seventeen percent responded that they would "not be very interested" and 11 percent responded they were "not

¹¹GAO, *IRS Free File Program: IRS Should Develop Additional Options for Taxpayers to File for Free*, [GAO-22-105236](#) (Washington, D.C.: Apr. 28, 2022) and *Tax Administration: Taxpayer Input Could Strengthen IRS's Online Services*, [GAO-20-71](#) (Washington, D.C.: Dec. 19, 2019).

¹²Pub. L. No. 117-169, § 10301(1)(B), 136 Stat. at 1832.

¹³GAO, *IRS Direct File: Actions Needed during Pilot to Improve Information on Costs and Benefits*, [GAO-24-107236](#) (Washington, D.C.: Apr. 9, 2024).

interested.”¹⁴ The Deputy Secretary of the Treasury directed IRS in May 2023 to pilot a direct filing system during the 2024 filing season.

IRS launched its Direct File pilot in February 2024. Taxpayers had to meet the following eligibility criteria to participate in the pilot:

- Income sources were limited to wages, Social Security, unemployment benefits, and interest income of \$1,500 or less.
- Taxpayers could only claim the Earned Income Tax Credit, the Child Tax Credit, and the Credit for Other Dependents and deduct student loan interest and educator expenses. Taxpayers also had to take the standard deduction or additional standard deduction for elderly or blind taxpayers.
- Taxpayers had to reside in one of 12 states: Arizona, California, Florida, Massachusetts, New Hampshire, New York, Nevada, South Dakota, Tennessee, Texas, Washington, and Wyoming.

IRS integrated Direct File with its Modernized e-File system allowing Direct File returns to be processed in the same manner as returns submitted through other electronic means. IRS uses the same authentication process for Direct File as certain other IRS online services for individual taxpayers and requires participating taxpayers to provide a photo of an identity document, such as a driver’s license, and a picture of themselves before the taxpayer was allowed to use Direct File.¹⁵ The pilot closed in April 2024 at the end of the filing season.

¹⁴IRS’s 2022 taxpayer experience survey queried 4,219 individual taxpayers who filed a 2021 federal tax return, which IRS described as a representative sample. IRS stated that the percentages do not add up to 100 due to rounding. IRS did not report the sampling error for the survey results. In a 2023 report, the Treasury Inspector General for Tax Administration expressed concern that IRS’s survey methodology potentially overstated interest in a direct filing option. See *Inflation Reduction Act: Assessment of a Free and Electronic Direct Filing Tax Return System*, 2024-408-002 (Washington, D.C.: Oct. 2, 2023).

¹⁵Internal Revenue Service, *New identity verification process to access certain IRS online tools and services*, FS-2021-15 (Nov. 17, 2021).

IRS Successfully Piloted Its Direct File System and Taxpayers Reported Generally Positive Experiences

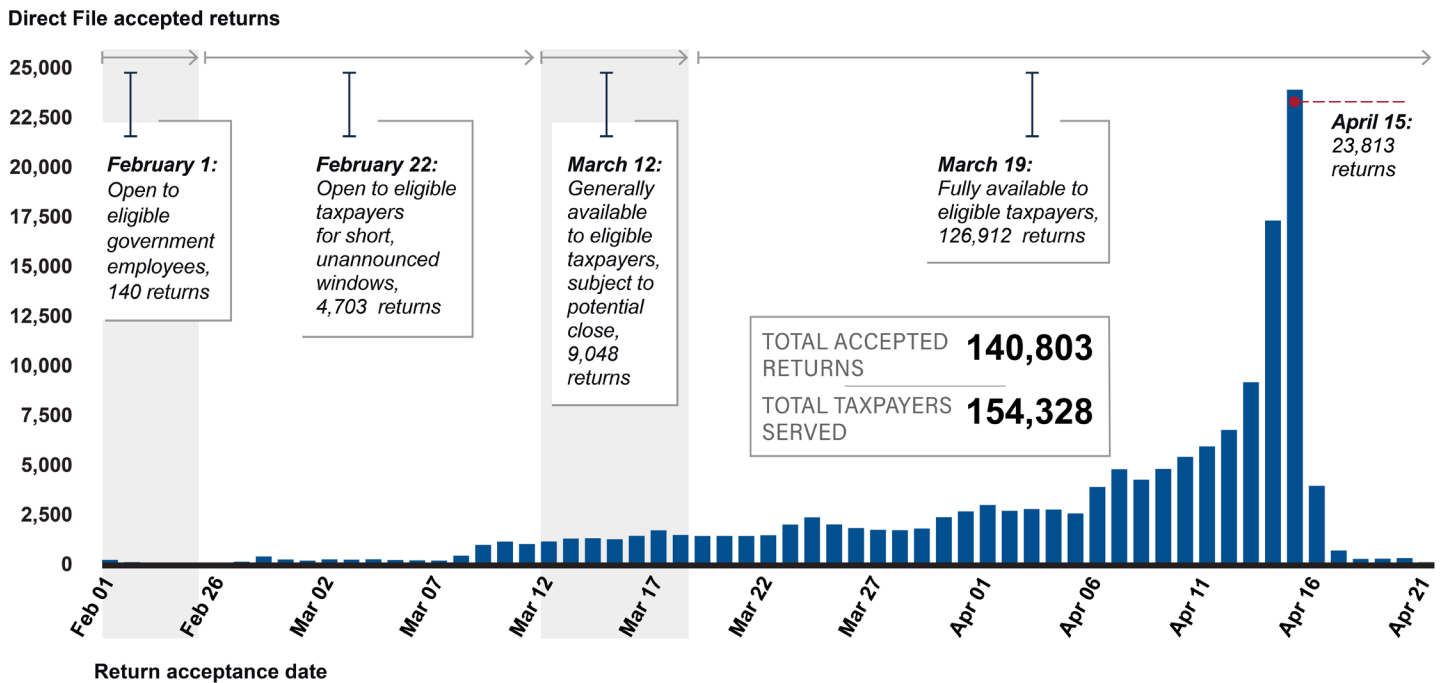
IRS accepted 140,803 tax returns during the 2024 pilot of Direct File. IRS designed the Direct File pilot to limit participation to ensure the system worked as designed. For example, during the first phase of the pilot, IRS invited government employees who met the eligibility criteria to use Direct File. After confirming that these taxpayers were able to file federal and state returns, IRS gradually opened Direct File to other eligible taxpayers through the end of the filing season. This allowed IRS to obtain sufficient data to evaluate the program.

Prior to opening Direct File to the public, IRS designed safeguards for the system. For example, IRS could temporarily close Direct File if user demand grew too rapidly. However, the system was able to meet demand, and Direct File remained open through the end of the filing season. IRS also reported that Direct File experienced little unexpected downtime during the pilot. IRS ended the Direct File pilot shortly after the tax filing deadline in April 2024.¹⁶ Figure 1 shows the number of returns IRS accepted during each phase of the pilot.¹⁷

¹⁶IRS provided time for taxpayers whose returns had been rejected to resubmit their returns. IRS officials said that these taxpayers had until April 20 to file a timely return.

¹⁷A tax return can summarize more than one taxpayer's situation if, for example, a married couple files a joint return. IRS determined that additional taxpayers were included on accepted Direct File returns, meaning that a total of 154,328 taxpayers fulfilled their filing obligations through the Direct File pilot.

Figure 1: Direct File Returns Accepted during IRS's 2024 Filing Season Pilot



Source: GAO analysis of Internal Revenue Service (IRS) data. | GAO-25-106933

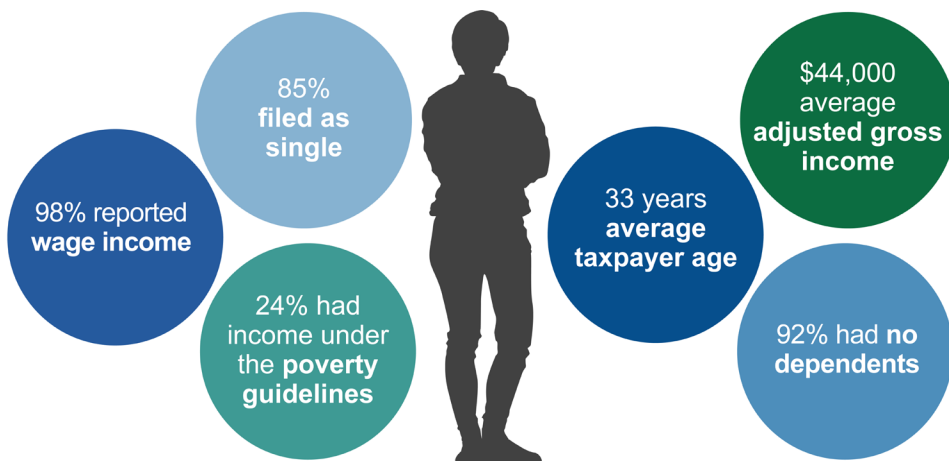
Notes: We consolidated the acceptance date of returns during the first phase to protect the confidentiality of taxpayer information. The number of taxpayers served exceeded the number of returns because married taxpayers filing jointly could use Direct File.

IRS analyzed participation in the Direct File pilot and found that taxpayers with lower incomes used Direct File to fulfill their tax filing obligations. For example, 24 percent of Direct File taxpayers reported adjusted gross incomes below the federal poverty guidelines for 2023, as shown in figure 2.¹⁸ Through the pilot, IRS also sought to assist taxpayers in claiming certain tax credits for which they were eligible. IRS found that approximately 15 percent of pilot participants claimed one or more tax credits, with the largest numbers claiming the Earned Income Tax Credit (with average payments to the taxpayer of \$900) and Child Tax Credit

¹⁸IRS's analysis considered federal poverty guidelines and family size when estimating Direct File taxpayers living below the poverty line. According to IRS, its analysis included data from 96 percent of Direct File taxpayers.

and Credit for Other Dependents (with average payments to the taxpayer of \$2,000).¹⁹

Figure 2: Demographics of Direct File Taxpayers during the 2024 Filing Season



Source: Internal Revenue Service; Image from Rawpixel/stock.adobe.com. | GAO-25-106933

Following the pilot, IRS conducted additional geographic analysis using U.S. Department of Agriculture (USDA) data to determine that 80 percent of taxpayers who participated in the pilot lived in urban areas, 5 percent lived in suburban areas, 3 percent lived in large rural areas, and 2 percent lived in small towns and rural areas.²⁰

The taxpayers who used Direct File were generally satisfied with the system. More than 15,000 taxpayers completed a customer experience survey after participating in the pilot. Ninety percent of those who completed the survey ranked their experience using Direct File as excellent or above average and 86 percent said their experience

¹⁹IRS reported that 8.6 percent of pilot participants claimed the Earned Income Tax Credit, 7.6 percent the Child Tax Credit or Credit for Other Dependents, and 1.5 percent the Additional Child Tax Credit.

²⁰The remaining 9 percent live in areas not designated by USDA as urban or rural. IRS stated that USDA used Census Bureau data to classify ZIP codes as rural or urban using 2010 Census data. IRS states that 2020 Census data will be available for this analysis in the fall of 2024. These percentages do not add to 100 due to rounding.

increased their trust in IRS.²¹ IRS cited these survey results as one of the most important reasons for its decision to make Direct File a permanent program. IRS's survey also found that most pilot participants said Direct File was "much easier" compared to the person's filing experience the prior year. IRS also estimated that 4 percent of pilot participants had previously filed on paper. This suggests that Direct File is potentially helping persuade some paper filers to switch to electronic filing, which has been a long-standing goal for Congress and IRS. IRS research officials told us in September 2024 that they are analyzing responses from another survey to estimate the compliance burden for taxpayers. They designed a methodology to compare Direct File taxpayers to other taxpayers residing in the same states to estimate how much time it took taxpayers to file a tax return using the question-and-answer format of Direct File, compared to other filing methods.²²

Cost

Because of its limited scope, the Direct File pilot cost less than the \$64 million to \$249 million IRS had estimated a Direct File system might cost in its 2023 report to Congress. IRS's pilot focused on helping taxpayers with simple tax situations and residing in 12 states, which was a narrower scope than assumed in the report to Congress.

IRS tracked the costs of the pilot and estimated that the agency spent \$13 million on the Direct File pilot. Of the total amount, \$10.6 million funded technology and product development and \$2.4 million funded operational costs, such as customer service.²³ IRS also received assistance from another federal agency, the U.S. Digital Service, which used its own appropriated funds during the 2024 pilot to research a Direct File system, develop a prototype of the system, design work for IRS, and other tasks. IRS estimated that the annualized cost of the U.S. Digital

²¹IRS used the General Services Administration's Touchpoints application for collecting customer experience feedback to build the survey. IRS reported that 15,082 taxpayers responded, which was a response rate of 13 percent. The questions were in English or Spanish. Not all pilot participants were able to participate in the survey because it was not available until March 19, 2024.

²²IRS officials said they surveyed 5,000 taxpayers who used Direct File. They also said they surveyed taxpayers who used another filing method and had a mailing address in a state selected for the 2024 pilot. They reported 821 responses from Direct File taxpayers and are analyzing those responses. As of September 2024, they reported 2,791 responses from taxpayers who used other filing methods, and that survey will remain open through May 2025.

²³IRS's "after action" report states that these cost figures are through April 20, 2024. IRS also reported spending an additional \$11.6 million preparing the report for Congress on Direct File.

Service's assistance was an additional \$7.2 million.²⁴ In sum, according to IRS data, the Direct File pilot cost the federal government about \$20.2 million.

IRS is in the process of addressing a recommendation we made in April 2024 to use the cost data collected during the pilot and leading practices to estimate how much Direct File may cost during the 2025 filing season.²⁵ As of October 2024, IRS officials told us they were continuing to update that estimate for the 2025 filing season and that the Office of the Chief Financial Officer is working on a consolidated estimate to include product development and customer service costs.

In December 2024, IRS officials provided an updated estimate of expected product development costs for Direct File for the 2025 filing season. IRS expects these costs to range from \$34.7 million to \$42.5 million with 920,000 to 3.7 million taxpayers expected to use Direct File.²⁶ However, IRS stated that costs for customer support, general operations, and other potential costs are not included. IRS officials had previously described broader agency efforts to improve cost estimation. In October 2024, IRS's Deputy Commissioner reported that officials are working to align cost estimating policies and procedures with best practices by September 2025 and that these improved processes will be used in future Direct File cost estimates. We will continue to monitor IRS's efforts to address our recommendation more fully.

Integrating State Returns

IRS officials identified the importance of coordinating with states at the start of the pilot because, according to IRS, many taxpayers expect to have a seamless experience filing their federal and state income tax returns at the same time. IRS invited all states to participate in the pilot. Five states signed agreements with IRS to join the 2024 pilot: Arizona, California, Massachusetts, New York, and Washington. These five state revenue agencies were responsible for developing or using an existing website taxpayers could use to prepare and file a state tax return after completing the federal return on Direct File. IRS did not fund these state

²⁴The U.S. Digital Service is part of the Executive Office of the President's Office of Management and Budget. IRS reimbursed the General Services Administration's Office of 18F within the Technology Transformation Services' Office of Client and Markets for assistance it provided.

²⁵[GAO-24-107236](#).

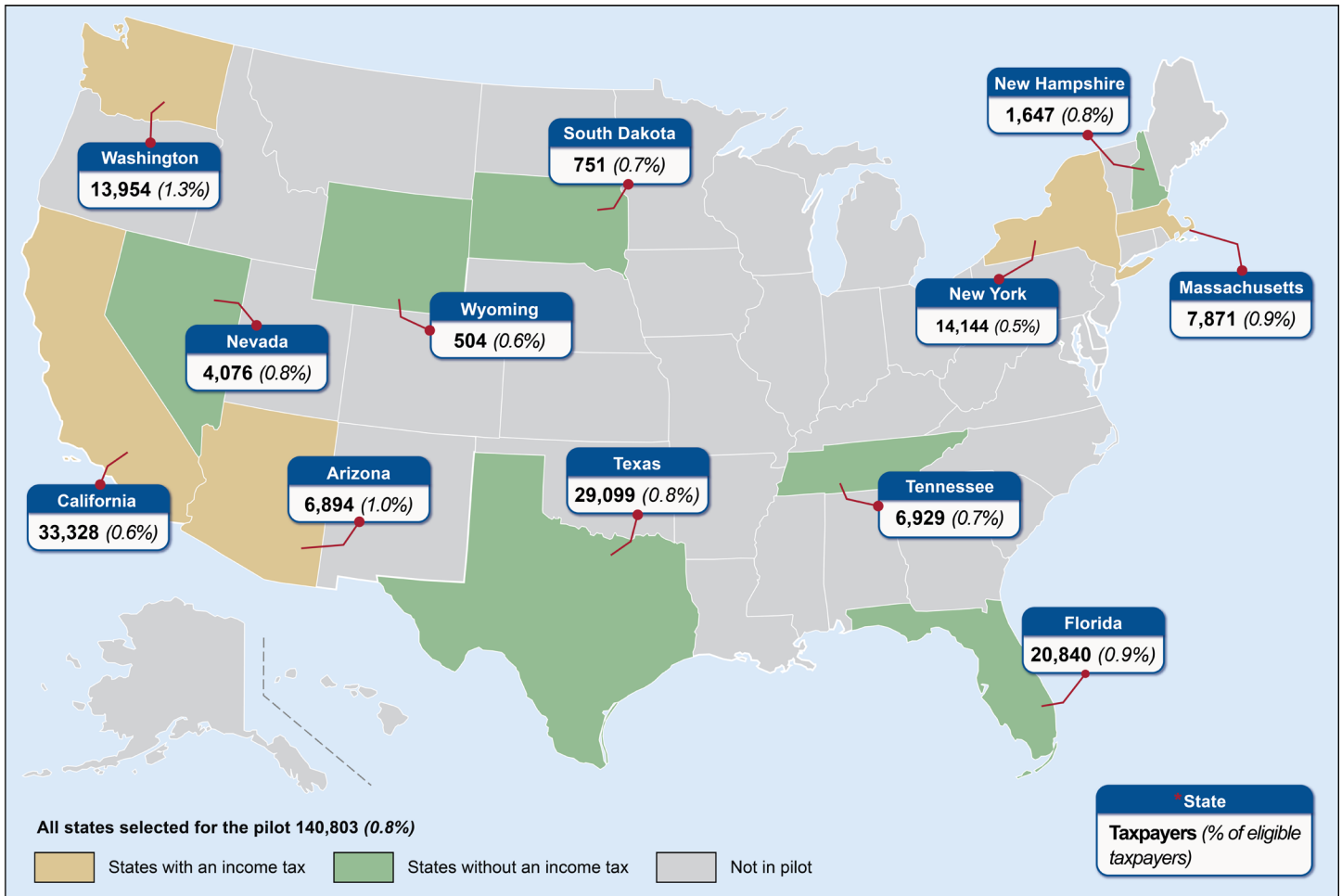
²⁶IRS notes that the number of Direct File users expected is not the same number of returns expected to be filed or accepted through Direct File.

tax filing websites; however, officials representing the state revenue agencies of Arizona, New York, and Massachusetts told us they received free assistance from a nongovernmental organization and a vendor. The Direct File pilot was only open to taxpayers in states that agreed to participate as well as taxpayers in seven of the eight states which do not tax income. Alaska does not tax income. IRS did not include Alaska residents in the pilot because that state's residents receive a type of income that the pilot did not support in 2024.²⁷

We found similar participation rates by state, as shown in figure 3. State revenue agency officials told us that some taxpayers had already filed their tax returns before IRS opened Direct File to the public. As described above, IRS limited the Direct File pilot to certain simple tax situations and the pilot was gradually opened to the public to mitigate technical risks.

²⁷The state shares mineral revenues with residents and those payments are taxable on the federal return.

Figure 3: Taxpayers Participating in the Limited 2024 Federal Direct File Pilot by State and Participation Rate



Source: GAO analysis of Internal Revenue Service data; GAO Map Resources (map) | GAO-25-106933

Notes: There were 766 returns filed in other states by taxpayers who moved to nonpilot states after the end of the 2023 tax year and service members with military addresses who are considered to reside in their home states. New Hampshire and Washington tax limited types of income. New Hampshire taxes interest and dividends exceeding \$2,400 and Washington taxes capital gains. We classify them differently on this map because New Hampshire residents with more than \$2,400 in interest or dividend income were not eligible for the 2024 federal Direct File pilot. In contrast, Washington residents could use a state filing tool to claim a working families tax credit with similar eligibility requirements as the federal Earned Income Tax Credit.

The Direct File pilot tested different approaches for transferring data from federal to state tax returns. Thirty-one states and the District of Columbia use federal adjusted gross income as the starting point for calculating

state taxable income.²⁸ IRS developed a technical process through which taxpayers could transfer data from the federal return to the state return, which can save taxpayers time and reduce the risk of errors. However, the Treasury Inspector General for Tax Administration found in a September 2024 report that IRS should have specified security requirements governing these data transfers in agreements IRS signed with state revenue agencies. IRS management agreed with the recommendations in that report and updated the agreements to reflect relevant federal guidelines.²⁹ State officials in Arizona, Massachusetts, and New York decided to integrate with Direct File and enable this data transfer. California and Washington officials told us they did not pursue data transfer because of timing and resource constraints. Direct File provided taxpayers in California a link to the state tax filing tool and taxpayers in Washington a link to the state’s website for claiming the state tax credit after they completed their federal return. Table 1 summarizes the decisions the participating states made during the 2024 pilot.

Table 1: Implementation Decisions of States Participating in the IRS’s 2024 Direct File Pilot

	Arizona	California	Massachusetts	New York	Washington
Entity that developed the state online filing tool	Nonprofit organization: Code for America	State revenue agency	Vendor: FAST Enterprises	Nonprofit organization: Code for America	Vendor: FAST Enterprises
New or existing online filing system	New	Existing	Existing	New	Existing (for claiming a state tax credit)
Data transferred from federal to state return	Yes	No	Yes	Yes	No

Source: GAO analysis of information provided by the Internal Revenue Service (IRS) and state revenue agencies. | GAO-25-106933

The officials we interviewed from the five states with filing requirements who worked with IRS during the 2024 pilot all told us that IRS was responsive and provided assistance, as needed. For example, IRS provided technical assistance such as providing updates on the tax situations supported by the federal Direct File system. IRS also helped

²⁸Federation of Tax Administrators, *State Personal Income Taxes: Federal Starting Points* (as of January 1, 2023) (Washington, D.C.: January 2023).

²⁹The Treasury Inspector General for Tax Administration cited National Institute of Standards and Technology guidance. See Treasury Inspector General for Tax Administration, *The Direct File Pilot Deployed Successfully; However, Security and Testing Improvements Are Needed*, 2024-200-050 (Washington, D.C.: Sept. 23, 2024).

states participating in the Direct File pilot describe the new system to their taxpayers.

IRS Followed Leading Practices for Pilot Design while Continuing to Integrate Direct File with Related Taxpayer Services

IRS Applied Several Leading Practices to Evaluate the Initial Performance of Direct File

IRS followed four of five leading practices for pilot design and continues to address a fifth leading practice as summarized in figure 4.

Figure 4: Alignment of IRS Direct File Pilot with GAO Leading Practices for Pilot Program Design

Leading Practice	Description of Leading Practice	Status
Measurable objectives	Establish well-defined, appropriate, clear, and measurable objectives.	Met
Assessment methodology	Clearly articulate an assessment methodology and data gathering strategy that addresses all components of the pilot program and includes key features of a sound plan. The strategy details the type and source of information necessary to evaluate the pilot, and methods for collecting that information.	Met
Stakeholder communication	Ensure appropriate two-way stakeholder communication and input occur at all stages of the pilot. Relevant stakeholders should be identified and involved.	Met
Data-analysis plan	Develop a detailed data-analysis plan that defines how the data collected will be analyzed to evaluate the pilot's implementation and performance.	Met
Scalability criteria	Identify criteria for identifying lessons about the pilot to inform decisions about scalability and whether and how to integrate pilot activities into overall efforts. Criteria should relate to the similarity or comparability of the pilot to the range of circumstances expected in full implementation.	Partially Met

Source: GAO analysis of Internal Revenue Service (IRS) information. | GAO-25-106933

Note: For purposes of this report, we define partially met as IRS having taken, or being in the process of taking, some, but not all, steps to meet the leading practice.

Establish well-defined, appropriate, clear, and measurable objectives. In May 2023, the Deputy Secretary of the Treasury directed IRS to test Direct File's functionality, collect feedback from taxpayers, and use lessons learned to inform growth of Direct File. To identify lessons learned, IRS identified 23 learning objectives or questions it planned to

answer using data from the pilot in January 2024. The questions were measurable and covered seven topics, including demand for customer service, the effects of Direct File on the behavior of taxpayers, and how fraud compares to existing filing options. For example, IRS sought to estimate how many employees it would need to answer the questions of taxpayers using Direct File.

For each question, IRS identified data it could collect, such as the number of taxpayers who contact customer support, which groups of taxpayers are using Direct File, and the number of Direct File returns that show characteristics of fraud and how they compare to other filing methods. We also found that the questions were generally appropriate, because IRS sought to learn about potential challenges identified in its 2023 report for Congress, such as how much customer support IRS might need to provide.³⁰

Clearly articulate an assessment methodology and data gathering strategy that addresses all components of the pilot program and includes key features of a sound plan. IRS designed a methodology and data gathering strategy by identifying metrics in January 2024 to obtain appropriate data to assess pilot performance and answer its learning objectives. For example, to address learning objectives about customer service, IRS identified metrics that would answer questions such as the number of taxpayers asking for assistance, the wait time for taxpayers, and the average time required to resolve taxpayer issues.

IRS also identified data sources for measuring each metric, as well as the IRS unit responsible for measurement. For example, IRS documentation shows that the Direct File team was responsible for assessing Taxpayer Services division data concerning potential fraud among Direct File returns.

IRS officials also developed a methodology for determining readiness to expand public access to Direct File during the pilot, such as monitoring demand for customer support and IRS's capacity to provide it. IRS called these points "gating criteria." On March 7, 2024, IRS officials briefed agency leadership on the status of these criteria. For example, they reported that the pilot was not having much effect on the overall demand for IRS customer service. IRS continued to track demand for customer

³⁰Department of the Treasury, Internal Revenue Service, *IRS Report to Congress: Inflation Reduction Act §10301(1)(B) IRS-run Direct e-File Tax Return System*, Publication 5788 (Washington, D.C.: May 16, 2023).

service from Direct File taxpayers, average wait times for taxpayers, and how satisfied taxpayers who sought assistance were with the customer service they received.

Ensure appropriate two-way stakeholder communication and input at all stages of the pilot project, including design, implementation, data gathering, and assessment. IRS engaged in two-way conversations with relevant stakeholders and taxpayers. In October 2023, IRS officials briefed congressional staff and stakeholders on its pilot plans. In November 2023, IRS officials identified federal and state agencies, congressional offices, nongovernmental organizations, media outlets, and other organizations with which IRS planned to work. IRS also identified time frames for partner organizations' outreach. As part of this effort, IRS drafted emails for partner organizations to publicize Direct File's availability.

IRS also responded to feedback from stakeholders and in some cases changed the pilot in response to their comments. IRS initially planned to include a pilot phase during which only eligible members of the public recruited by IRS's partner organizations would have received invitations to use Direct File. IRS cancelled this phase of the pilot in response to stakeholder concerns that the approach would involve significant effort and potentially cause confusion among taxpayers. IRS also stated that it considered input from stakeholders when evaluating the pilot's performance after the filing season.

IRS considered the experience of taxpayers during testing and the pilot to adjust the design of the Direct File system. For example, IRS observed that taxpayers made errors entering their adjusted gross incomes, causing their returns to be rejected. In response, IRS developed a process taxpayers could use to import their prior year adjusted gross income from another IRS service into Direct File. IRS's "after action" report stated that importing this information reduced taxpayer errors.

Develop a detailed data-analysis plan to track the pilot program's implementation and performance and evaluate the final results of the project and draw conclusions on whether, how, and when to integrate pilot activities into overall efforts. IRS collected extensive data during the pilot and prepared an "after action" report addressing many of the pilot learning objectives. IRS reports that it continues to analyze data from the pilot and plans to survey taxpayers to learn more.

In addition, IRS has reviewed the analysis it has already completed against the list of questions it planned to answer with the pilot to determine which questions remain and if they are still important to address. In October 2024, IRS officials reported completing most planned research related to the following learning objectives: (1) customer support; (2) state taxes; (3) identity, fraud, and equity; and (4) taxpayer interest in Direct File.³¹ IRS officials reported that they continue research related to the remaining learning objectives, which cover the accuracy of Direct File returns, the taxpayer experience, and one question related to what may prevent successful completion of a Direct File return.

IRS identified specific questions under each topic and identified potential data sources it could use to answer them. For example, related to customer support, IRS surveyed Direct File taxpayers who sought assistance from a customer service representative (CSR) and found that taxpayers rated their satisfaction with the speed of the response the highest. However, IRS found that taxpayers were less satisfied with the quality of answers provided by CSRs. Based on these survey results, IRS officials characterized their overall customer support as a “C+,” although officials noted that feedback improved during the pilot.³² IRS’s “after action” report also identified opportunities for improvement, such as allowing IRS employees to see the screen of a taxpayer experiencing technical issues and helping employees adapt their communication styles from the phone to electronic chat. In October 2024, IRS announced in a news release that taxpayers would have the opportunity during the 2025 filing season to authenticate their respective identities before receiving assistance from an IRS employee, which would allow for more personalized assistance. The agency also stated that a “chatbot” would be available to answer questions from taxpayers regarding their eligibility to use Direct File.

IRS is continuing research related to certain pilot learning objectives and officials told us in October 2024 that they are planning additional research for fiscal year 2025. For example, IRS documents state that it is

³¹IRS officials reported that while they have completed research related to two of three questions related to identity, fraud, and equity, they continue to research the effects of Direct File’s identify proofing requirements on fraud and how these requirements may affect taxpayer access. IRS refers to the fourth category as Direct File’s “effect on the tax ecosystem.”

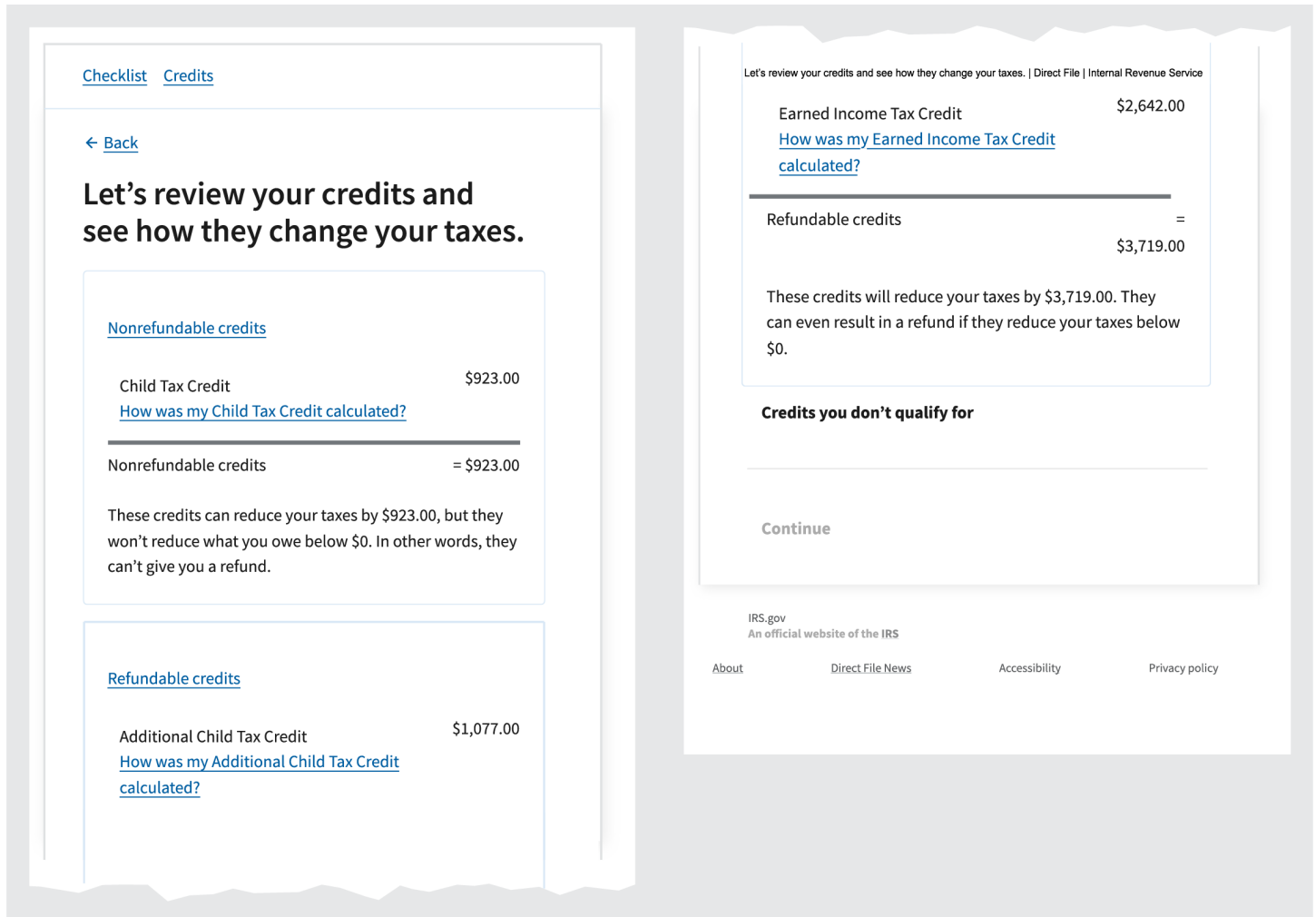
³²Taxpayers used a numerical scale to rate IRS’s performance in the survey. In discussing the results internally with the Commissioner in a March 28, 2024, briefing, IRS officials summarized their agency’s performance in this area as a “C+.”

examining the initial results to analyze the extent to which Direct File returns are amended compared to returns submitted by other means, which relates back to the pilot learning objective concerning accuracy. In October 2024, IRS officials provided us with a draft research plan for Direct File for fiscal year 2025.

Identify criteria or standards for identifying lessons about the pilot to inform decisions about scalability and whether, how, and when to integrate pilot activities into overall efforts. IRS used the pilot to identify lessons learned that could help expand the online content of the Direct File system to support a larger number of taxpayers with more complex tax situations. This will be important as officials seek to develop additional content for the 2025 filing season. However, IRS continues to address another portion of this leading practice for integrating the completed Direct File pilot into overall taxpayer service efforts. IRS recently reorganized a newly established Direct File Office and was continuing to update hiring plans for this office, as of October 2024.

For the pilot, IRS developed 350 screens of content to help taxpayers complete their returns and claim credits and deductions. Direct File does not require taxpayers to fill in tax forms, and instead uses interview style questions to obtain the necessary information required by the forms. In preparing for the pilot, IRS officials developed a style guide which emphasized using short words and clear writing. However, IRS officials also needed to ensure that the content and questions were accurately summarizing tax law. For example, we found that Direct File identifies tax credits for which the taxpayer is eligible based on their answers to the questions. Direct File also clearly explains refundable and nonrefundable tax credits to taxpayers as shown in figure 5.

Figure 5: How IRS's Direct File Explains Refundable and Nonrefundable Tax Credits



Source: GAO analysis of Internal Revenue Service (IRS) information. | GAO-25-106933

IRS officials told us that one lesson they learned was that interconnections among tax provisions made it difficult to develop pilot content but noted that the work completed during the pilot could potentially make it easier to develop additional content as the tax scope supported by Direct File expands. For example, they recognized that once they collected information about dependents for the Earned Income Tax Credit, that information could also help them determine the taxpayer's eligibility for the Child and Dependent Care Credit, if IRS

decided to add that credit to Direct File's scope. Nevertheless, IRS officials said one challenge they faced is that some taxpayers incorrectly assumed that certain tax situations would be supported in Direct File. For example, some taxpayers saw that Direct File supported the reporting of Social Security income and tried to use Direct File to report distributions from pensions and other income, which prompted additional demand for customer support. IRS officials told us in October 2024 that they anticipate developing approximately 285 additional screens of content for the 2025 filing season to support tax provisions they plan to add.

While IRS learned lessons that may help expand the Direct File system, this leading practice also calls for determining how to integrate pilot activities into overall efforts. Direct File officials told us that during the pilot they worked closely with many other IRS offices including Information Technology, Taxpayer Services, Privacy, Governmental Liaison and Disclosure, Counsel, and Online Services to develop the program. In addition, IRS's Direct File team worked with two other federal agencies during the pilot on design, engineering, user research, and other tasks: the U.S. Digital Service (part of the Executive Office of the President's Office of Management and Budget) and the General Services Administration.

IRS reorganized its Direct File efforts after completing the pilot. In July 2024, IRS established an independent Direct File Office, with the Direct File Chief reporting directly to the IRS Commissioner. IRS officials told us that they wanted to have product development and customer support within the same office. IRS stated in its "after action" report that collecting feedback from customer support representatives helped improve the taxpayer experience during the 2024 pilot.

As of October 2024, many details related to the Direct File office and its place within IRS were continuing to evolve. For example, IRS officials told us in October 2024 that they are working on updating their plans for hiring product development employees. IRS officials also reported that they continue working with other IRS offices which provide online services for taxpayers, such as using employees from the Office of Online Services to assist with Direct File. IRS officials continue to update plans related to customer support.³³ An October 10, 2024, briefing for the IRS Commissioner states that the long-term development of Direct File as an

³³Direct File officials said they are working on two additional requests for organizational changes.

office is a critical risk. Effective integration of the Direct File program with other IRS services would facilitate IRS's efforts to increase taxpayer access to the program over time and improve the taxpayer experience. As of October 2024, IRS continues to take steps to integrate pilot activities into overall efforts.

IRS Efforts to Expand Direct File Could Face Challenges Related to Customer Support and Serving Additional Taxpayers

IRS May Be Underprepared for Surges in Taxpayer Demand for Direct File because of Hiring Delays

IRS anticipates providing customer support to as many as 5 million taxpayers in Direct File for the 2025 filing season; however, delays in determining how to recruit CSRs to support this expansion mean that IRS may be underprepared during the 2025 filing season. During the 2024 pilot, Direct File used CSRs detailed from IRS's Taxpayer Services Division.³⁴ IRS's Direct File team signed an agreement with Taxpayer Services in October 2023, which stated that 400 CSRs would be trained to support taxpayers participating in the Direct File pilot. Under that agreement, the Direct File team was responsible for training the CSRs. The CSRs remained employees of Taxpayers Services and, during periods of lower demand for Direct File assistance, could be assigned by Taxpayer Services management to assist taxpayers with other issues. The agreement was limited to the 2024 pilot. Taxpayers needing assistance electronically chatted with a CSR and the CSR could call the taxpayer. During the 2024 pilot, IRS reported that CSRs generally responded quickly to taxpayer questions with an average response time of 1 minute.

In July 2024, Direct File officials told us they had decided to hire CSRs directly into the new Direct File office, rather than using CSRs detailed from Taxpayer Services or other IRS divisions for the 2025 filing season. Direct File officials told us that they planned to only hire current IRS employees because of their existing tax law knowledge and training. Direct File officials believe it is important for their office to contain both

³⁴The specific office was Customer Account Services.

customer support and the product team to promote feedback between the two groups.

On July 30, 2024, Direct File officials posted job announcements on the federal government hiring website (USAJOBS). The officials said the July posting would give them time to hire and train CSRs before the 2025 filing season, which will likely begin in late January 2025. However, IRS had removed the job announcement by August 6, 2024. Direct File officials told us that other IRS units were concerned about the CSR position description because it implied that CSRs hired for Direct File could be promoted to higher levels than other CSRs. Direct File officials said they had worked with IRS's Human Capital Office to revise the position description for CSRs, but were unable to coordinate the revised language with other relevant IRS units due to time constraints.

In October 2024, IRS decided on a new approach for recruiting CSRs, but faces challenges in training all CSRs before the filing season begins. On October 21, 2024, officials from Direct File and Taxpayer Services signed an agreement for Taxpayer Services' Account Management to provide 180 CSRs and 10 leads to support Direct File taxpayers during the 2025 filing season. CSRs will continue to use electronic chat to support Direct File taxpayers and, if necessary, can initiate a call to the taxpayer. The agreement states that due to time constraints, the CSRs will remain assigned to Taxpayer Services, a change from Direct File officials' earlier plan to recruit CSRs directly into their office. The agreement and other IRS documents we reviewed describe a short time frame for recruiting and training these employees. The agreement states that Taxpayer Services will send targeted solicitations to certain CSRs with a year of experience providing customer support or equivalent training and Direct File officials will provide training. An October 31, 2024, briefing for the Commissioner states that if selection of the CSRs proceeds as planned, IRS anticipates being able to train all CSRs and team leads by the end of January 2025. However, earlier briefings for the Commissioner describe potential challenges related to training. For example, an October 3, 2024, briefing for the Commissioner stated that it would be difficult to have CSRs trained by the beginning of the filing season and that it might take until mid-February to train all CSRs. Further, IRS officials told us that at the beginning of the filing season, the CSRs will not be familiar with the electronic chat used to support Direct File taxpayers. As a result, they anticipate it will take longer to answer taxpayer questions. The agreement applies only to the 2025 filing season.

IRS has also been using data collected during the pilot to inform estimates of how many CSRs may be needed. IRS estimated in May 2024 that the 400 CSRs trained during the 2024 pilot could have supported as many as 4.5 million taxpayers. To calculate this, IRS officials determined that approximately 10 percent of taxpayers sought assistance and on average it took 9 minutes to complete a chat with a taxpayer. IRS officials believe Direct File had more customer support than needed during the pilot, according to our review of IRS’s “after action” report and discussions with officials. IRS officials noted that in preparing for the pilot there were uncertainties about how much customer support might be needed. They said they wanted to be prepared during the pilot. Also, CSRs during the 2024 pilot were required to do other customer support work when there was less demand for Direct File support.

IRS has continued to update its CSR estimates. In an internal May 2024 briefing, IRS officials estimated that potentially 180 CSRs could support 5 million taxpayers during the 2025 filing season. IRS officials told us in September 2024 that they used a calculator intended to estimate call center staffing to refine their estimates for the 2025 filing season.³⁵ They believe it is an appropriate methodology because as described above the CSRs will be coming from IRS call centers and are expected to need time to become familiar with electronic chats. In October 2024, IRS officials told us they are working on further updates to their estimates. They also plan to use data collected during fiscal year 2025 to better predict customer support needs for future filing seasons. IRS has a strategic initiative to improve the availability and accessibility of customer service, including using data and analytics to project demand for customer service and allocate employees to meet demand.³⁶ Furthermore, Executive Order 14058 *Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government* states that agencies should promote coordination within and among their respective agencies concerning those customer life experiences that cut across agency or agency component responsibilities.³⁷ The absence of an agencywide coordinated plan to hire CSRs to support Direct File delayed recruitment and training of these employees, which may make it harder for taxpayers to obtain

³⁵The calculator was Erlang C model calculator.

³⁶Internal Revenue Service, *Internal Revenue Service Inflation Reduction Act Strategic Operating Plan: FY2023–2031* (Washington, D.C.: Apr. 5, 2023).

³⁷86 Fed. Reg. at 71365.

prompt and high-quality assistance with Direct File in 2025 and future filing seasons.

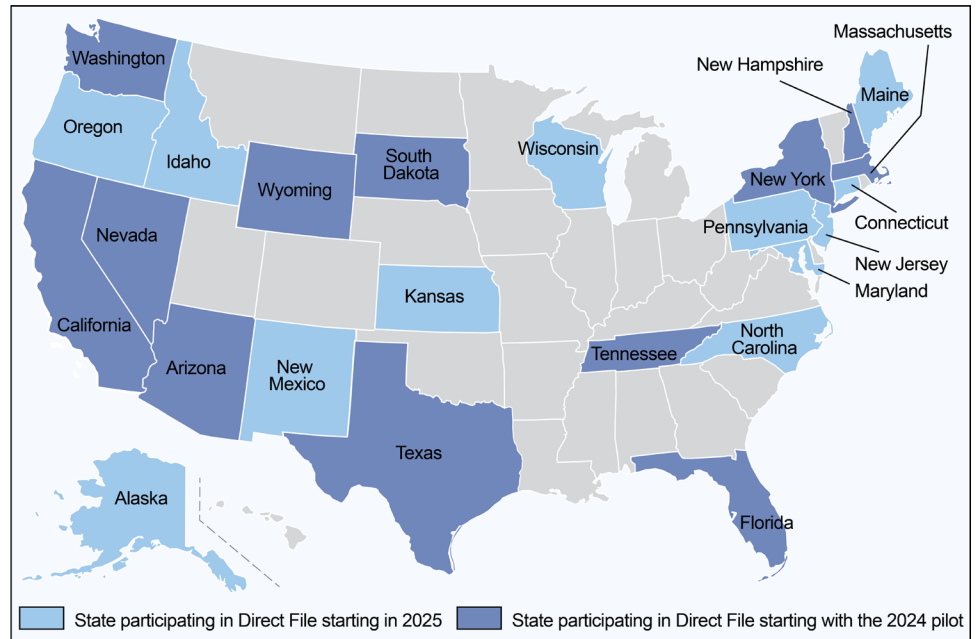
IRS's Approach for Expanding Direct File Could Limit Its Availability to Taxpayers in Certain States

IRS is making Direct File available to taxpayers in additional states during the 2025 filing season, which is part of a recently established IRS goal of eventually making Direct File available nationwide. As of October 3, 2024, IRS reached agreements with 11 additional state revenue agencies, which will make Direct File available to taxpayers in 24 states, as shown in figure 6. Sixty-two percent of individual taxpayers live in states that will be included in Direct File in 2025. An IRS news release said that additional states may join Direct File in 2025 and several states plan to join in 2026 or have expressed interest in joining.³⁸ We also found in our discussions with state officials who participated in the 2024 pilot that their agencies' costs were minimal. Arizona and New York officials told us that Code for America, a nonprofit organization, built their websites using donor funds. Massachusetts received assistance from FAST Enterprises, a software vendor which wanted to gain experience with online filing, and California had an existing system. Washington officials said they used existing resources for the 2024 pilot and anticipate receiving assistance from FAST Enterprises when they pursue full integration with Direct File in 2026. Code for America and FAST officials told us they are assisting additional states. Code for America announced in October 2024 that it is assisting Idaho, Maryland, New Jersey, and North Carolina with participating in Direct File in 2025 and continuing to assist Arizona.³⁹ FAST Enterprises officials told us that they are assisting New Mexico, Oregon, Pennsylvania, and Wisconsin, and one additional state they are not authorized to identify publicly. They also continue to assist Massachusetts.

³⁸Internal Revenue Service, *IRS Direct File set to expand availability in a dozen new states and cover wider range of tax situations for the 2025 tax filing season*, IR-2024-258 (Oct. 3, 2024).

³⁹Code for America stated that for the 2025 filing season New York officials will take over the tax filing tool Code for America built for the 2024 pilot. See Code for America, *Code for America's File Your State Taxes Program Expands to Four New States* (Oct. 3, 2024).

Figure 6: Planned Availability of Federal Direct File by State in 2025 (as of October 2024)



Source: Internal Revenue Service; GAO Map Resources (map). | GAO-25-106933

IRS officials describe potential challenges to eventually making Direct File available nationwide. IRS briefing slides from August 2024 state that Direct File will likely reach more than 40 states, but there are states not presently able to offer an online filing service. We found that state revenue agencies with their own online filing systems can integrate these systems with the federal Direct File program. Our analysis found that of the 21 states with such systems not included in the 2024 pilot, IRS has already reached agreement to include nine in Direct File for 2025.⁴⁰ As IRS and California demonstrated during the 2024 pilot, IRS can provide a link to the state website even if the state is not able to participate in IRS's data transfer. However, technical challenges may still exist for these state agencies, such as states needing to upgrade older state online filing systems, according to IRS officials.

⁴⁰For purposes of this analysis, we include the District of Columbia as one agency with an online filing service.

IRS noted that not all state revenue agencies may have the capacity to participate in Direct File. We interviewed officials from six state revenue agencies that will not be participating in Direct File in 2025.⁴¹ Multiple officials expressed openness to eventual participation but were concerned about the low number of users during the 2024 pilot. Officials from one state also noted that taxpayers have other filing options. Officials from another state said that usage of the state's existing online filing tool for state returns was low. Some officials from non-participating states we interviewed also said that their agencies are balancing multiple priorities, such as implementing recently passed legislation. Even if state revenue agencies are willing to join, they may need approval from their governors or legislatures to participate in Direct File.

We found that a critical decision for IRS is whether to continue to offer Direct File only in income tax states where IRS has an agreement with the state revenue agency, to allow state and federal taxes to be filed together. IRS officials told us in October 2024 that the taxpayer experience is better when the person can file a federal and state return together. IRS also wants to ensure taxpayers who use the federal Direct File system fulfill their state tax obligations. As such, IRS officials also told us that they want to reach agreement with as many states as possible as they expand Direct File. However, a state need not participate for IRS to allow taxpayers to file their federal taxes on irs.gov. State returns could be filed separately in whatever manner the taxpayer chooses. Conditioning the availability of Direct File on state filing systems could reduce the opportunity for all taxpayers to benefit from Direct File. We have previously reported that a good tax system should be equitable.⁴² Not allowing taxpayers in all states to use Direct File to meet their federal tax obligations is inconsistent with IRS's mission to provide America's taxpayers with top-quality service by helping them understand and meet their tax responsibilities and enforce the law with integrity and fairness to all.

During the pilot, there were already situations when taxpayers eligible to use Direct File for the federal return were not eligible to use their state systems. For example, while IRS allowed first-time filers to use Direct

⁴¹We interviewed state officials participating in the annual meeting of the Federation of Tax Administrators held in Long Beach, California in June 2024. Due to the varying experiences of the state officials we spoke with, we do not enumerate officials' responses in the report.

⁴²[GAO-05-1009SP](#).

File, California and Massachusetts did not allow these filers to use their states' systems. Officials from these states told us they did not allow first-time filers for security reasons.

As IRS works with states to expand Direct File's geographic scope in 2025 and 2026, some states may decide not to participate in Direct File. For taxpayers living in these states, IRS will need to decide whether to allow all taxpayers to access Direct File, regardless of whether they can also file their state return through a state online filing system linked to IRS's Direct File. By allowing taxpayers from all states to use Direct File for their federal taxes, regardless of whether or not their state reaches an agreement with IRS to facilitate Direct File users' filing of state taxes, IRS will ensure equitable treatment of taxpayers.

IRS Has Not Fully Leveraged Research to Prioritize Supporting Taxpayers with More Complex Tax Situations

IRS is seeking to gradually expand Direct File's scope to support the most common tax situations with a focus on assisting working families, according to an announcement in October 2024.⁴³

IRS continues to use four criteria, identified during the pilot to inform potential expansions of Direct File.

- **Prevalence.** How many additional taxpayers would be eligible?
- **Complexity.** What level of effort would be required by IRS to implement it?
- **Ease of explanation.** Would it make it easier for taxpayers to understand whether they are eligible?
- **Customer support.** Would it affect the demand for customer support or require additional training?

IRS announced in October 2024 that it will add support for the following tax provisions for 2025, in addition to the tax provisions already supported during the 2024 pilot:

- **Credits.** IRS will allow taxpayers with the Child and Dependent Care Tax Credit, Premium Tax Credit, Credit for the Elderly and Disabled, and Retirement Savings Contribution Credits to use Direct File. Adding support for the Premium Tax Credit will assist taxpayers who purchase health insurance through exchanges, which had presented

⁴³Internal Revenue Service, *IRS Direct File set to expand availability in a dozen new states and cover wider range of tax situations for the 2025 tax filing season*, IR-2024-258 (Oct. 3, 2024).

challenges during the 2024 pilot because taxpayers who received this credit were unable to use Direct File.

- **Deductions.** IRS will allow taxpayers with Health Savings Accounts to use Direct File. These accounts are available to taxpayers with high-deductible health insurance. Contributions to these accounts may be deductible from taxable income.
- **Additional types of income.** IRS will allow taxpayers reporting interest income over \$1,500 and certain retirement income to use Direct File. IRS will allow Alaska taxpayers who must report their share of the state's minerals royalty payments as income under federal tax law to use Direct File.

According to IRS estimates, about 21.7 million taxpayers in the 24 states expected to participate in 2025 would have been eligible for Direct File if the same tax situations were supported as during the 2024 pilot. With IRS's decision to expand Direct File to support the additional tax situations described above, 30.3 million taxpayers will be eligible for the program (a 39 percent increase).

While IRS officials considered including support for tax returns involving individual retirement accounts in 2025, they decided to focus on adding support for the Premium Tax Credit and Health Savings Accounts instead. In our discussions, IRS officials described supporting taxpayers with health insurance purchased through the exchanges as an example of addressing a gap in the scope of the Direct File pilot.

IRS officials told us they may add additional tax provisions in future years:

- **Education credits.** IRS is considering eventually adding the American Opportunity Tax Credit and the Lifetime Learning Credit.
- **Various other income.** IRS is considering adding support for dividends, gambling winnings, jury duty pay, scholarship income, and railroad benefits.
- **Self-employed and gig economy workers.** Starting in the 2026 filing season, Direct File may support self-employed and gig economy workers, according to a September 19, 2024, briefing of the IRS Commissioner. IRS officials said the changes needed to support

these taxpayers will be complex because of the multiple forms these taxpayers may use.⁴⁴

We identified opportunities for IRS to survey taxpayers to help prioritize expansions of Direct File. Specifically, IRS has not recently researched which groups of taxpayers would be most interested in using Direct File nor the tax situations with which they need assistance. IRS's 2022 taxpayer experience survey asked taxpayers about a hypothetical direct filing system, but did not ask them to describe the tax provisions they anticipated claiming.

In September 2024, IRS officials described plans to include some questions related to Direct File in an updated taxpayer experience survey, including taxpayers' impressions of Direct File and how they heard about it. IRS officials told us in October 2024 that in addition to this survey, they plan other research, such as user research, that they believe can help inform decisions concerning which tax provisions to add to Direct File. However, IRS's survey is not asking taxpayers about which additional tax situations Direct File should support. IRS stated in its strategic operating plan that the agency will study taxpayer preferences for Direct File services. Further, learning more about what taxpayers want from Direct File is consistent with a 2021 executive order stating that agencies should continually improve their understanding of their customers.⁴⁵ With further research, IRS can help ensure it spends time and resources on additional capabilities which will serve taxpayer needs. IRS will be better positioned to add capabilities to Direct File that will meet IRS's goals of having a Direct File system that is cost effective and meets the needs of taxpayers.

⁴⁴For example, the Form 1099-K is used to report payments from platforms like rideshare apps and online marketplaces, and Schedule SE is used to calculate the tax due from self-employment. Some self-employed and gig economy workers may also need to file a Schedule C—used to report income or loss from business operated as a sole proprietor—but IRS officials told us they may not be able to support this form during filing season 2026.

⁴⁵Exec. Order No.14058, 86 Fed. Reg. at 71358.

Selected Revenue Agencies Do More to Leverage Government Information to Save Taxpayers Time and Reduce Errors

Direct File requires more manual data entry by the taxpayer compared to online filing systems used in the six countries and one U.S. territory we reviewed.⁴⁶ For example, we found these jurisdictions' revenue agencies prepopulate personal information about the taxpayer and income information, as shown in figure 7.⁴⁷

Figure 7: Prepopulation of Tax Information in Selected Jurisdictions as of 2024

Jurisdiction	Taxpayer personal information	Wages and salary	Pensions	Interest and Dividends
Australia	✓	✓	✓	✓
Belgium	✓	✓	✓	—
Estonia	✓	✓	✓	✓
France	✓	✓	✓	✓
Ireland	✓	✓	✓	—
New Zealand	✓	✓	✓	✓
Puerto Rico	✓	✓	✓	✓
United States (IRS)	— ^a	—	—	—

✓ Taxpayer's information prepopulated to the extent data are available. — No or limited prepopulation.

Source: GAO analysis of information from selected revenue agencies. | GAO-25-106933

^aIRS enabled prepopulation of prior year adjusted gross income during the Direct File pilot.

IRS officials told us that prepopulating taxpayer data in Direct File would enhance the taxpayer experience, yet Direct File does not yet allow for the prepopulation of data to the same extent as the other online tax filing systems we reviewed. IRS officials told us that due to the short time frame for the pilot they could not design the system to prepopulate data for Direct File in 2024. In April 2024, IRS officials modified Direct File to allow taxpayers to import their prior year adjusted gross income from

⁴⁶The examples we describe of prepopulation in other jurisdictions and any related descriptions of their tax laws are generally based on our review of relevant governmental guidance from publications and websites. In several instances, revenue agency officials provided additional information, which we attribute.

⁴⁷While agencies use different terms, such as prefilling, for purposes of this report we use prepopulate.

another IRS online service to try to reduce a common error they had observed during the pilot. This is one example of how Direct File can leverage prepopulation. In addition, during the pilot, Direct File allowed taxpayers to transfer data from a completed federal return to the states' online filing systems, allowing for some prepopulation in state returns.

Prepopulation can save taxpayers time and reduce errors. OECD described prepopulation as “one of the significant innovations in tax return process design over the last two decades.”⁴⁸

Personal information. The seven revenue agencies we reviewed all prepopulate some personal information about taxpayers, although the specifics vary depending on how the data are collected and laws and regulations concerning privacy. For example, Belgian residents must report a change of address within 8 workdays. Address changes are updated in a national register. Belgium prepares and sends what are commonly known as proposed simplified returns for taxpayers with simple tax situations, and Belgian officials told us they use the address data to help prepopulate the returns.

Certain life events can have tax implications both in the U.S. and in the jurisdictions reviewed. For example, New Zealand's government provides parents an online system for registering a child's birth. Parents can also use that system to apply for “Best Start” payments that are delivered by the revenue agency. Benefit information is then prepopulated in the online filing system to help the parents who receive tax benefits file their income tax return.

Wages and salary. Similar to IRS, all jurisdictions reviewed withhold taxes from wage income. The other revenue agencies' online filing systems show taxpayer income reported by employers and amounts of taxes withheld. However, revenue agency officials told us they generally have less data regarding the income of self-employed taxpayers, such as platform workers or independent contractors, and income earned from foreign sources.⁴⁹ IRS did not seek to import wage or salary data during the 2024 Direct File pilot. According to a July 2024 IRS internal

⁴⁸Organisation for Economic Co-operation and Development, *Tax Administration 2023: Comparative Information on OECD and other Advanced and Emerging Economies*, OECD Publishing (Paris: 2023).

⁴⁹In Australia, foreign income can be prepopulated if it is reported by the employer to the Australian Taxation Office.

document, IRS sought to isolate Direct File from other IRS systems during the 2024 pilot. Information concerning wages and withheld federal taxes could potentially be added to Direct File in the future, according to the IRS document.

Pensions. The jurisdictions we reviewed prepopulate payments of pensions and government retirement benefits into a taxpayer's income tax return. For example, Ireland's revenue agency prepopulates pension income using information from another Irish government agency.

Interest and investment income. The jurisdictions we reviewed vary as to whether they prepopulate this information. Estonia prepopulates income from interest, dividends, and capital gains from domestic sources. Conversely, Belgium has faced challenges prepopulating this information because banks' reporting requirements for interest paid do not correspond with individual taxpayers' reporting requirements for interest income, according to Belgian officials.

The jurisdictions we reviewed also prepopulate some taxpayer expense information to help individuals claim tax credits or deductions. In Estonia, donations, training expenses, and mortgage interest are prepopulated. Belgium prepopulates childcare expenses among others. In Australia, union or professional association fees (which may be tax deductible) can be prepopulated when they are paid through an employer. Ireland's revenue agency provides an app that taxpayers can use to document certain health care expenses, which are then prepopulated into the return. However, revenue agencies do not always have access to the relevant data. For example, some countries reviewed prepopulate no or limited data for charitable giving, requiring taxpayers to track and enter details of their charitable giving.

Prepopulating provides various benefits, including increased accuracy and reduced compliance burden for taxpayers; however, prepopulating also presents various challenges related to the following:

Accuracy of information. Data from wages are generally reliable, according to officials; however, some information that taxpayers need to file their returns, such as from foreign sources and certain investment income, may be subject to change or incomplete. For data available to IRS, officials believe prepopulation would likely increase return accuracy for Direct File and its limited use during the 2024 pilot reduced a common error related to prior year adjusted gross income.

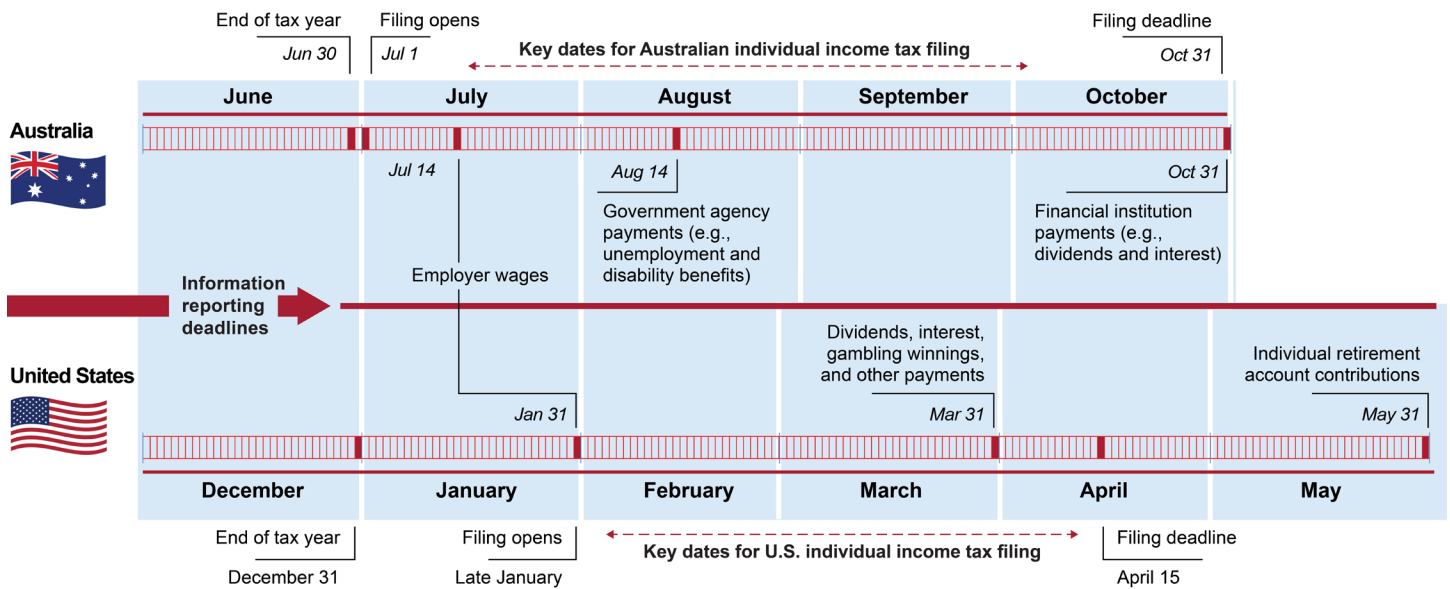
Correcting potential prepopulation errors. Errors can occur in prepopulated tax data. All jurisdictions we reviewed allow the taxpayer to make changes to prepopulated data, though the process varies. In some countries, such as Estonia, the taxpayer can correct an item on the prepopulated tax return. In contrast, in New Zealand, the revenue agency may ask for proof when the taxpayer changes prepopulated information. For certain information, like wages, revenue agency officials told us it is best if taxpayers correct errors at the source (e.g., the employer). Australia allows the taxpayer to correct prepopulated information on the return, but for certain high-confidence prepopulated information the taxpayer may be required to add an explanation.

Taxpayers could potentially change the prior year adjusted gross income prepopulated during the 2024 pilot. In October 2024, IRS officials told us that they are considering piloting various forms of prepopulation but planning is in the early stages. While the IRS documents we reviewed do not address how taxpayers could correct errors if Direct File were to do more prepopulation, U.S. taxpayers have the right to challenge IRS's position and to pay no more than the correct amount.⁵⁰

Timing of data used for prepopulation. The jurisdictions we reviewed have had challenges related to the timing of the receipt, processing, and use of data for prepopulating. For example, Australian officials noted that some taxpayers prepare and file tax returns before prepopulated data are available. Prepopulated data become available in Australia at different times during the filing season. Officials told us many entities provide data well before reporting deadlines, which are shown in figure 8.

⁵⁰IRS summarizes these rights in Department of the Treasury, Internal Revenue Service, *Your Rights as a Taxpayer*, Publication 1 (Washington, D.C.: September 2017).

Figure 8: Timelines for Tax Filing and Certain Information Reporting in Australia and the United States



Source: GAO analysis of information from the Australian Taxation Office and the Internal Revenue Service; picoStudio/stock.adobe flag (icons). | GAO-25-106933

The experience of Australia’s revenue agency is relevant for IRS, because in both countries many taxpayers are owed refunds. This means that taxpayers may file early to obtain their refunds before some information is available for prepopulation. However, in Australia, data are usually available for prepopulation within a few days after they are reported. Australian officials told us that they advise taxpayers to wait if they prefer to have more of their returns prepopulated.

Employers in the U.S. must submit W-2s documenting wages paid by January 31, and IRS generally begins accepting individual income tax returns in late January. That means that IRS could potentially prepopulate wages paid and taxes withheld early in the filing season. However, other information reporting deadlines are later. For example, financial institutions report taxpayers’ contributions to individual retirement accounts and distributions from health savings accounts by May 31. IRS is planning to add support to Direct File for health savings accounts during the 2025 filing season. In considering how to prepopulate Direct File returns, IRS officials analyzed when IRS receives various information returns in July 2024. IRS officials concluded from their analysis that not all data may become available at the same time. IRS officials said in October 2024 that they anticipate potential technical and customer experience

challenges, such as handling incomplete data and ensuring the taxpayer remains responsible for the accuracy of the return. They plan to address these challenges by using the same methods they used in the pilot, such as identifying learning objectives, starting small, and conducting testing and taxpayer user research.

IRS research found that some taxpayers would prefer IRS to prepopulate more information into Direct File returns. This was one of the most common requests IRS received from pilot participants, according to the Direct File “after action” report. IRS research conducted before the pilot produced similar findings. According to the 2022 taxpayer experience survey, 85 percent of respondents said that having prepopulated forms is a somewhat or very important aspect of tax filing software.

Some Direct File pilot participants also commented that they wanted IRS to alert them to potential errors before they file their returns. IRS could potentially provide this alert, according to an IRS internal document from July 2024. Hypothetically, IRS could prompt taxpayers who reported interest from a bank in the previous year to report interest during the tax year. We found that Australian tax officials take this concept a step further and use analytics to compare taxpayers to other taxpayers with similar tax situations. This allows the Australian tax agency to alert taxpayers in their online filing system of potential errors before the person files the return.

IRS’s Inflation Reduction Act strategic operating plan states that “providing taxpayers and authorized tax professionals with the option to begin tax returns using data the IRS already has will make the filing process easier.”⁵¹ IRS’s “after action” report for the Direct File pilot reiterates that the agency has a strategic goal of giving taxpayers access to their information to make tax filing easier.

IRS has not yet identified which data have the strongest potential for prepopulation or outlined a plan for testing expanded prepopulation in Direct File. IRS officials said they are in the early stages of planning next steps related to prepopulation. The experience of other jurisdictions helps to demonstrate the benefits and challenges posed by prepopulation, such as taxpayer convenience and increased accuracy and the challenges of

⁵¹Internal Revenue Service, *Internal Revenue Service Inflation Reduction Act Strategic Operating Plan: FY2023–2031* (Washington, D.C.: Apr. 5, 2023). The initiative also states that the information will be provided in a format that can interact directly with return preparation software.

when data may become available. Without identifying which data could be prepopulated in Direct File returns, IRS risks not achieving its strategic goal of providing taxpayers the option to begin returns with the data IRS already has about them. Without developing a plan for testing the accuracy of data prepopulation and its effect on the taxpayer experience, IRS risks not meeting its goals for improving the taxpayer experience and may miss opportunities to reduce common errors.

Conclusions

IRS quickly developed and piloted a Direct File system which worked largely as intended. Through the pilot, IRS identified potential ways to expand Direct File. Participating taxpayers generally thought that Direct File was easier to use than the method they had previously used. IRS also gained experience with new customer support technology and built collaborative relationships with several state revenue agencies. To achieve this, IRS followed leading practices for designing pilot projects that included starting with a small number of taxpayers to mitigate technical risks, listening to taxpayers and clearly explaining complex tax law, and demonstrating flexibility in working with several state revenue agencies.

While IRS learned important lessons from the pilot, IRS has not fully addressed risks that could hamper its efforts to maintain and improve the quality of customer support. IRS may not be able to repeat the generally quick responses to taxpayer questions if officials from different offices do not collaborate more effectively on recruiting customer support employees. While IRS officials have made rapid progress in coordinating with additional state revenue agencies to join Direct File, they ultimately will need to decide if or when to open the program and its benefits to taxpayers in all states. IRS also faces challenges in helping taxpayers with more complex tax situations, underscoring the need for additional research. The experiences of other jurisdictions with online filing systems show there are opportunities for IRS to prepopulate more data to reduce errors and improve the taxpayer experience.

Recommendations for Executive Action

We are making the following four recommendations to IRS:

The Commissioner of Internal Revenue should ensure relevant officials collaborate on recruiting and training customer service representatives for Direct File and document an annual process for recruiting and training employees. (Recommendation 1)

The Commissioner of Internal Revenue should continue to coordinate with state revenue agencies to expand taxpayer access to Direct File and,

as necessary, take steps to ensure the availability of the federal Direct File program to eligible taxpayers in all states. (Recommendation 2)

The Commissioner of Internal Revenue should ensure IRS's planned research on potential Direct File users includes research questions that will allow the agency to collect data that can be used to prioritize the development of new capabilities for Direct File. (Recommendation 3)

The Commissioner of Internal Revenue should identify additional data that could be prepopulated in Direct File returns and develop a plan for testing the accuracy of prepopulating the data and its effect on the taxpayer experience. (Recommendation 4)

Agency Comments and our Evaluation

We provided a draft of this report to IRS for review and comment. IRS agreed with three of four recommendations. In its comments, reproduced in appendix II, IRS described its plans for providing annual and as-needed training for Direct File CSRs. IRS also stated that it will conduct user research to help prioritize the development of new capabilities within Direct File and that it agrees that taxpayers should be able to choose if they would like to use information IRS has to prepopulate their returns. IRS neither agreed nor disagreed with our fourth recommendation to continue coordinating with state revenue agencies to expand access to Direct File and, as necessary, take steps to ensure the availability of the federal Direct File program to eligible taxpayers in all states. However, IRS expressed concern about opening Direct File to all eligible taxpayers nationwide, stating that such an approach could negatively affect the taxpayer experience and might require state revenue agencies to follow up with taxpayers who did not file state tax returns.

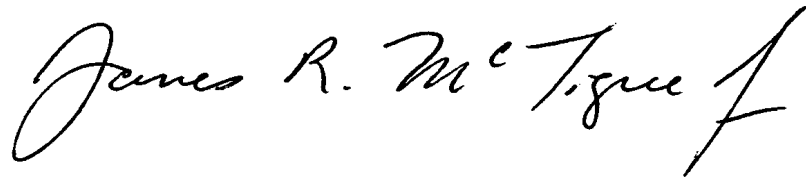
We agree that IRS should continue to pursue agreements with state revenue agencies to enhance the taxpayer experience, but this should not limit taxpayer access to a federal program if the taxpayer lives in a state that has not reached agreement with IRS. Further, if IRS were to allow all eligible taxpayers to file federal taxes through Direct File, it would not limit any existing way for taxpayers to file their state taxes; no existing paths to meeting state tax obligations would be closed off by IRS offering Direct File nationwide. IRS also provided technical comments, which we incorporated as appropriate.

We also provided relevant sections to state revenue agencies which participated in the 2024 Direct File pilot, the revenue agencies described in our case studies, and Code for America and FAST Enterprises officials. Officials representing revenue agencies in Arizona, California,

Massachusetts, New York, and Washington; officials representing Australia, Belgium, Estonia, France, and New Zealand; and officials representing Code for America and FAST Enterprises provided technical comments, which were incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees, the Commissioner of the IRS, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-6806 or mctiguej@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.

A handwritten signature in black ink that reads "James R. McTigue, Jr." with a stylized flourish at the end.

James R. McTigue, Jr.
Director, Strategic Issues
Tax Policy and Administration

List of Committees

The Honorable Chris Van Hollen
Chair
The Honorable Bill Hagerty
Ranking Member
Subcommittee on Financial Services and General Government
Committee on Appropriations
United States Senate

The Honorable Ron Wyden
Chairman
The Honorable Mike Crapo
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Committee on Finance
United States Senate

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Committee on Oversight and Accountability
House of Representatives

The Honorable Jason Smith
Chairman
The Honorable Richard Neal
Ranking Member
Committee on Ways and Means
House of Representatives

Appendix I: Online Filing in Other Jurisdictions

In this appendix, we describe the capabilities of each jurisdiction's online tax filing system and provide relevant background information concerning, at a high level, filing requirements and ways that taxpayers can file a return. This information is based on our review of information available on the governments' official websites and interviews with revenue agency officials from Australia, Belgium, Estonia, France, Ireland, New Zealand, and Puerto Rico.

Online Tax Filing in Australia



Responsible agency: Australian Taxation Office (ATO)
Tax filing service name: myTax
Population: 26,966,789 (2023)
Number of personal income returns filed: 15,535,395 (2022)
Number of personal income returns filed in myTax: 5,657,970 (2022)
Supported platforms for myTax: Desktops and mobile devices

Australian tax system. Individual taxpayers generally must file an income tax return if tax was withheld from payments made to them during the income year, and for certain other reasons. Employers generally withhold tax on wages paid to employees. Other payments, such as for investments and pensions, may also be subject to withholding. ATO officials described the tax code as complex. Taxpayers may claim deductions and credits for expenses related to health care, education, work-related transportation, and retirement contributions.

Overview of Online Filing Offered by ATO

ATO introduced online filing in 1999 and developed the myTax service in 2014. myTax initially supported the simplest tax situations and ATO expanded its capabilities over the next 3 years. Most individual taxpayers are now eligible to use myTax, and the service allows taxpayers to file prior year returns and amended returns. Taxpayers may also file on paper or hire a tax agent.

Hypothetical example of filing a personal income tax return in myTax

	Income	Tax withheld
Salary, wages, allowances, tips, bonuses etc.		
Big Building Company	\$48,899.00	\$5,567.00
Interest		
BIG BANK	\$65.22	\$0.00

Source: Australian Taxation Office. | GAO-25-106933

Prepopulation. myTax contains a range of prepopulated information, including:

- **Taxpayer personal information.** Name, address, and date of birth are prepopulated using data from prior tax returns and other information collected by ATO.

-
- **Income information.** Salary and wages, government pensions, interest, dividends, and certain foreign income are prepopulated using data reported by employers, government agencies, and financial institutions.
 - **Expense information.** Health insurance expenditures, contributions to retirement savings accounts, and certain union or professional association fees are prepopulated using data reported by third parties, including health funds, financial institutions, and employers, and by records uploaded by the taxpayer. ATO also provides taxpayers the *myDeductions* tool, with which taxpayers can use their phones to document relevant expenses and upload them to their tax returns.

Taxpayers may edit the prepopulated data. However, ATO may request an explanation for why the prepopulated data are incorrect, contact the taxpayer to discuss the change, or amend the tax return if ATO has high confidence in the prepopulated data. ATO uses “nearest neighbor” data analytics methods to compare a taxpayer’s return to taxpayers with similar tax situations and myTax alerts taxpayers to potential errors.

Online Tax Filing in Belgium

Responsible agency: Federal Public Service Finance (FPS Finance)

Tax filing service name: Tax-on-web, Proposed Simplified Returns

Population: 11,763,650 (2024)

Number of personal income returns filed: 7,531,768 (2023)

Number of personal income returns filed in Tax-on-web: 3,423,475 (2023)

Number of proposed simplified returns prepared by FPS Finance: 3,856,959 (2023)

Supported platforms for Tax-on-web and proposed simplified returns: Desktops



Belgian tax system. FPS Finance prepares tax returns for certain taxpayers with simple tax situations. Otherwise, all Belgian residents 18 or older and those under 18 with certain income must prepare and file a tax return. Officials described the tax system as complex, with over 800 provisions on the individual income tax return.

Overview of Online Filing Offered by FPS Finance

Belgium launched Tax-on-web in 2003. Taxpayers who prepare their own return can use Tax-on-web in Dutch, French, or German. Taxpayers spend on average 20 minutes filing their online return, according to officials. In 2023, 1,920,991 taxpayers used the system to prepare their own returns.

Two additional versions of Tax-on-web are used by FPS Finance employees and accountants to prepare and file returns for taxpayers. In 2023, they used these two Tax-on-web versions to file returns for an additional 227,091 and 1,275,393 taxpayers, respectively. In total, 45.5 percent of individual returns were filed through Tax-on-web in 2023. Taxpayers may also file on paper, which accounted for 3.3 percent of returns in 2023.

Prepopulation. FPS Finance prepopulates a broad range of information into taxpayers' returns on Tax-on-web. Approximately 40 percent of Belgium's over 800 individual income tax provisions can be prepopulated for the 2024 assessment year, according to officials. Officials told us prepopulated information includes:

- **Taxpayer personal information.** Identification data, address, marital status, and dependent children or relatives are prepopulated using data from a Belgian national government database.
- **Income information.** Salary and wages, retirement income, and unemployment and sickness benefits are prepopulated using data submitted by employers and other payors.
- **Expense information.** Certain expenses, such as donations and childcare expenses, are prepopulated using data submitted by charitable organizations and childcare providers, when available.

Certain types of income from property, self-employment or company director's income, and foreign income may not be completely prepopulated for reasons including FPS Finance receiving this information at a later date.

Simplified filing for simple tax situations. Not all taxpayers in Belgium need to prepare their own tax returns. FPS Finance prepares proposed simplified tax returns for some taxpayers, whom the Belgian Court of Audit describes as mainly pensioners, recipients of social allowances, or low-income earners. If the proposed simplified returns are correct and complete, taxpayers do not have to respond, and the returns will automatically be considered accepted. Taxpayers can modify their proposed simplified returns online by using Tax-on-web or on paper. In 2023, FPS Finance prepared 3,856,959 proposed simplified returns, accounting for 51.2 percent of individual returns.

Online Tax Filing in Estonia

Responsible agency: Estonian Tax and Customs Board (MTA)
Tax filing service name: e-MTA
Population: 1,374,687 (2024)
Number of personal income returns filed: About 800,000, according to officials
Percent of personal income returns filed in e-MTA: 97%, according to officials
Supported platforms for e-MTA: Desktops and mobile devices



Estonian tax system. Estonian residents must file a tax return if they owe additional taxes or have certain types of income, such as from sole proprietorships, among other reasons. MTA officials described the tax system as simple. For tax year 2024, Estonia levied a 20 percent flat tax on income above a set threshold and six types of expenses were deductible.

Overview of Online Filing Offered by MTA

Estonia introduced online income tax filing in 1999, according to officials. They explained all Estonian residents are eligible to file income taxes using e-MTA, and most do. Approximately one-third of taxpayers in recent years review and confirm their return with just a few mouse clicks within e-MTA, according to officials. e-MTA is available in Estonian, Russian, and English. Taxpayers may also file on paper or seek assistance from a government employee.

Hypothetical example of filing an income tax return in e-MTA

Income tax return 2023
Here you can submit your 2023 income tax return.

[Download PDF](#)

Unfinished Your income tax return is unfinished.

1 **Income and deductions** 2 Submission 3 Finished

Country of tax residency: Estonia ⓘ

Income received in Estonia	Total: 22 623,56 €
Income that is taken into account only in the calculation of basic exemption	Total: 0,00 €
Income received abroad	Total: 0,00 €
Deductions	Total: 358,78 €

I wish to declare business income

[More activities](#) [Forward](#)

Source: Estonian Tax and Customs Board (MTA). | GAO-25-106933

Prepopulation. e-MTA prepopulates a range of information, including:

- **Taxpayer personal information.** Estonian citizens can use their state-issued digital identity to authenticate their identity, file their tax returns, and access other government services.
- **Income information.** Salary and wages, retirement income, interest, dividends, capital gains, sickness benefits, rental income, and gains from the sale of real estate are prepopulated using data from employers, financial institutions, and other government agencies.
- **Expense information.** Donations, training expenses, mortgage interest, unemployment insurance premiums, and retirement contributions are prepopulated using data from charitable organizations, financial institutions, and employers.

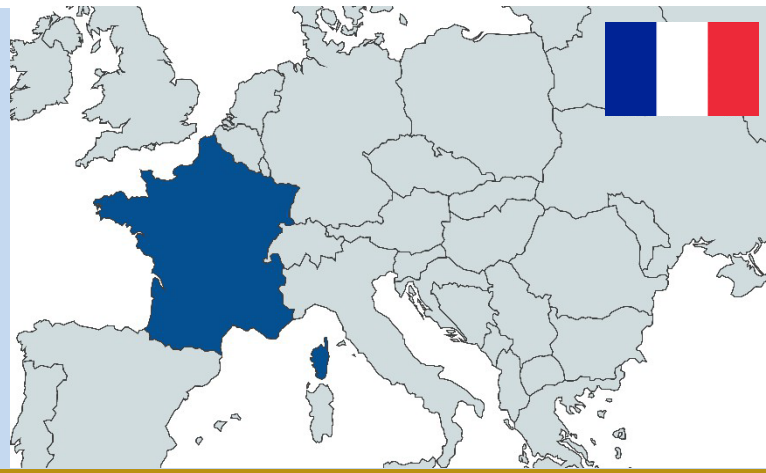
MTA does not prepopulate foreign income, deductible expenses paid in foreign countries, or individuals' business income. For example, officials said income from platform work cannot be prepopulated because information is reported too late. This includes income from ride-sharing or renting an apartment through an app.

Other data can be prepopulated if taxpayers send a data report from their banks to MTA. These data include contributions to and payments from investment accounts.

MTA officials told us in November 2024 that they anticipate some future changes in prepopulation due to tax law changes.

Online Tax Filing in France

Responsible agency: Public Finances General Directorate (DGFiP)
Tax filing service name: Declare My Income (*Déclarer mes revenus*)
Population: 68,373,433 (2024)
Number of households filing personal income returns: 40.7 million (2023)
Number of personal income returns filed electronically: 29.6 million (2023)
Number of automatic income tax returns: 10.8 million (2023)
Supported platforms: Desktops and mobile devices



French tax system. Individuals with income in France generally file an income tax return each year. Employers generally withhold estimated taxes from employees' wages. The withholding rate is based on information from taxpayers' previous year tax returns and filing status, such as married or single, which taxpayers can update in their accounts at impots.gouv.fr. The amount withheld is calculated to match the taxpayer's estimated tax liability. Officials described the personal income tax system as complex, particularly for high-income taxpayers. Taxpayers may claim deductions and credits for certain expenses, including those related to childcare, education, donations to charitable organizations, housing, and employing domestic staff.

Overview of Online Filing Offered by DGFiP

DGFiP introduced online filing in 2002 and has expanded capabilities over time. Most taxpayers can file at impots.gouv.fr, except for taxpayers with certain complex situations. According to officials, the tool provides links to explanatory text, tax rules, and laws to help taxpayers understand requirements. The tool also alerts taxpayers to potential errors by comparing taxpayers' entries to other information. Taxpayers may add explanatory notes to provide additional details on their situation, according to officials. Taxpayers who do not use the system have other options, such as filing on paper or working with an accountant to file.

Hypothetical example of France's Declare My Income filing tool

The screenshot shows a mobile application interface for tax filing. At the top, there are navigation options: 'Retour' (back) and 'Quitter' (quit). The main heading is 'Revenus'. To the right, it indicates 'Etape suivante : Charges' (Next step: Charges) with a progress indicator '2/4'. Below this, there is a section for 'Revenus de MARTIN DUPONT' with an edit icon. Underneath, a table lists income items:

Code	Description	Amount	Action
1AJ	Salaires	35 528 €	
	Retenue à la source	3 422 €	▼

Below the table is a section for 'Autres Revenus' (Other Revenues) with the text 'Vous pouvez déclarer d'autres revenus.' (You can declare other revenues.) and a button with a plus sign and the text 'Ajouter un autre revenu' (Add another revenue).

Source: France Direction générale des Finances publiques (DGFiP). | GAO-25-106933

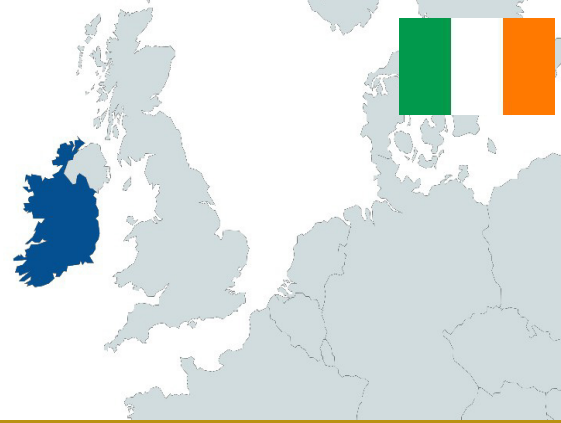
Prepopulation. DGFIP prepopulates a range of information in the Declare My Income tool, including:

- **Taxpayer personal information.** Name, address, and filing status are prepopulated using data previously reported by the taxpayer to DGFIP.
- **Income information.** Salary and wages, retirement income, investment income, and unemployment and sickness compensation are prepopulated using data submitted by employers and other payors.
- **Expense information.** Certain expenses, such as the amounts paid to childcare providers and domestic staff, are prepopulated using data reported to DGFIP.

Taxpayers are to review prepopulated information for accuracy, and if needed they can make changes. If a taxpayer identifies an error after filing, the return can be modified before the filing deadline.

Simplified filing for simple tax situations. If a taxpayer's only income is from sources reported to DGFIP, the taxpayer may receive an automatic, fully prepopulated tax return. The taxpayer does not need to respond if the information is complete and correct. If a taxpayer needs to modify the return, they may use the online filing system or file by paper. For example, taxpayers may need to modify their return to report income from renting lodging, officials said.

Online Tax Filing in Ireland



Responsible agency: Office of the Revenue Commissioners (Revenue)

Tax filing service name: Submit Your Income Tax Return tool in Pay As You Earn (PAYE) Services

Population: 5,281,600 (2023)

Number of personal income returns filed with the tool: Almost 1.4 million (2022)

Supported platforms for the tool: Desktops

Ireland's tax system. Employees in Ireland generally pay tax through Pay As You Earn (PAYE), through which employers withhold estimated taxes from wages and retirement income throughout the year. Taxpayers may claim deductions and credits for expenses such as childcare, health care, and education. Many taxpayers have simple filing obligations, Revenue officials said.

Filing obligations in Ireland. Taxpayers are required to file an income tax return if they have taxable income that is not subject to PAYE, if they wish to claim credits or deductions, and for other reasons. PAYE taxpayers can use the online filing tool in PAYE Services to complete their tax return. PAYE taxpayers can also use PAYE Services to update their information to ensure they are paying the correct amount of taxes through PAYE, for example, if they take a second job.

Other taxpayers, such as those who are self-employed or whose only, or main, source of income is rental or investment income, generally file an annual return using a different tax form and filing system. There were about 870,000 of these taxpayers in 2023.

Overview of Online Filing Offered by Revenue

The Submit Your Income Tax Return tool in PAYE Services was introduced in 2005 to improve customer service for PAYE taxpayers, according to officials. It is available in English or Irish. Taxpayers can submit amended returns using the system, officials said. Taxpayers may also file on paper or use an accountant.

Hypothetical example of the Submit Your Income Tax Return tool



Patrick's personal details



PPS number

Date of birth (dd/mm/yyyy)

01/05/1990

Civil status

Single

Did your civil status change in 2022?

Yes

No

Source: Office of the Revenue Commissioners (Ireland). | GAO-25-106933

Prepopulation. The Submit Your Income Tax Return tool prepopulates a broad range of information, including:

- **Taxpayer personal information.** Name, address, birthdate, civil status, and number of dependent children are prepopulated using information previously collected by Revenue.
- **Income information.** Salaries and wages are prepopulated using information that employers report to Revenue. Pension and benefit income are prepopulated using information from another Irish government agency, the Department of Social Protection.
- **Expense information.** Health expenses are prepopulated using information taxpayers collect. For example, taxpayers may use an app provided by Revenue to photograph and upload receipts to help fill in the tax return.

Online Tax Filing in New Zealand

Responsible agency: Inland Revenue
Tax filing service name: myIR
Population: 4,993,923 (2023)
Number of personal income returns filed: 4.88 million (2023)
Percent of returns filed electronically: 99.8 percent (2023)
Supported platforms for myIR: Desktops and mobile devices



New Zealand tax system. Inland Revenue implemented a pay-as-you-earn withholding system in 2000, according to officials. Taxpayers who receive income only from wages, salaries, or investments generally do not need to file an income tax return if their taxes were withheld. Instead, Inland Revenue sends an assessment letter with income and tax details. These taxpayers may only deduct specified insurance premiums, certain investment commissions, and the cost of tax preparation. If taxpayers receive income not already taxed, such as self-employment income or rental income, they generally must file returns. Taxpayers can claim certain credits, such as for charitable donations.

Overview of Online Filing Offered by Inland Revenue

Taxpayers filing an income tax return may use Inland Revenue’s online system, myIR. The system identifies the tax situations relevant to the taxpayer based on information Inland Revenue has received. If needed, taxpayers may select additional tax situations. Taxpayers can use myIR to amend their returns, make a payment, or set up installment payments.

Many taxpayers file through intermediaries, such as accountants who use tax software, Inland Revenue officials said. These tax software companies receive access to an application programming interface (API) that allows them to submit returns to Inland Revenue. Taxpayers may also file on paper.

New Zealand’s online filing system: myIR



Source: New Zealand Inland Revenue. | GAO-25-106933

Prepopulation. myIR prepopulates a range of prepopulated information, including:

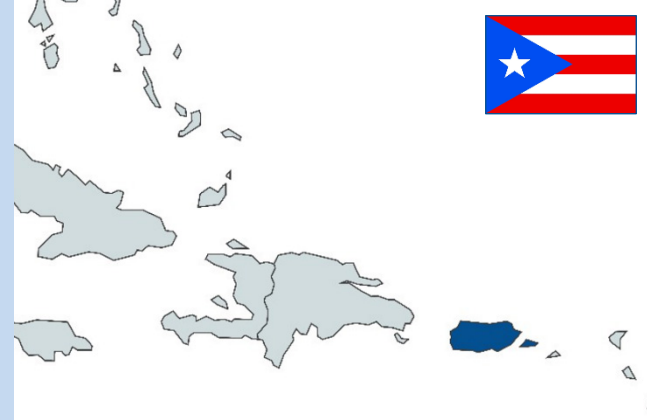
- **Taxpayer personal information.** Name, address, and bank account number are available for taxpayers to update via myIR.
- **Income information.** Salary and wages, retirement income, interest, dividends, accident compensation, and government payments, such as unemployment benefits, are prepopulated from information reported to Inland Revenue by employers and other payors.

Inland Revenue officials told us they can change prepopulated information for the taxpayer, but taxpayers may be asked to provide documentation, which they can upload to myIR. For certain information, like wages, revenue agency officials told us it is best if the taxpayers correct errors at the source (e.g., the employer).

Online Tax Filing in Puerto Rico



Responsible agency: Department of Treasury (Hacienda)
Tax filing service name: Unified Internal Revenue System (SURI)
Population: 3,205,691 (2023)
Personal income returns filed electronically: About 1,210,000 (2023), according to officials
Personal income returns filed in SURI: About 260,000 (2023), according to officials
Supported platforms for SURI: Desktops and mobile devices



Puerto Rican tax system. All taxpayers in Puerto Rico with a net positive income must file a personal income tax return with Puerto Rico unless their taxes were fully withheld. Puerto Rico residents are generally exempt from U.S. federal income tax on income earned in Puerto Rico. Similar to the federal income tax, Puerto Rico taxpayers may claim deductions and credits for many expenses, such as mortgage interest, medical expenses, charitable donations, and education. Hacienda officials described the Puerto Rican tax code as complex.

Overview of Online Filing Offered by Hacienda

Puerto Rico deployed SURI for income tax filing in 2020, and it is available in Spanish and English. SURI accommodates all individual income tax situations, though, according to officials, taxpayers with complex returns may prefer another option, such as working with an accountant. SURI allows taxpayers to amend returns and view all information returns that Hacienda received about them.

Individual taxpayers must file their income tax return electronically. Taxpayers may also file using commercial tax software certified by Hacienda or obtain in-person assistance from agency employees.

Accessing taxpayer personal information in Puerto Rico’s online tax filing system

The screenshot shows the SURI (SISTEMA UNIFICADO DE RENTAS INTERNAS) interface. At the top, there is a search bar for the taxpayer's name. Below that is a section for selecting the filing period, with a dropdown menu set to '31-dic-2022' and a 'Búsqueda' button. The next section is for selecting W-2 and informational forms, with instructions to select the form to print. Below this is a table of forms:

Seleccionar	Tipo de formulario	Periodo de radic.	Fecha de radica.	Retenedor	Nombre	Instrucciones
<input checked="" type="checkbox"/>	Informativo 4807/A	31 dic-2022	19 ene-2023	Institución Financiera	Nombre del Contribuyente	Acceder a instrucciones
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At the bottom, there is a section for printing options, with a dropdown menu set to 'Sí' and an 'Imprimir' button.

Source: Departamento de Hacienda de Puerto Rico. | GAO-25-106933

Prepopulation. Taxpayers can prepopulate their tax return within SURI by selecting information returns on file, such as those reporting wages. Hacienda officials said examples of prepopulated information include:

-
- **Taxpayer personal information.** Name, address, and Social Security number are prepopulated using information previously reported to Hacienda.
 - **Income information.** Wages and salary, retirement income, interest, dividends, and self-employment income are prepopulated using information returns filed by employers and other payors.

Hacienda officials told us they do not prepopulate information about a taxpayer's spouse or dependents to protect their privacy.

Appendix II: Comments from the Internal Revenue Service



DEPUTY COMMISSIONER

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

December 13, 2024

Mr. James R. McTigue, Jr.
Director, Tax Policy and Administration
U.S. Government Accountability Office
441 G Street, N.W.
Washington, DC 20548

Dear Mr. McTigue:

Thank you for the opportunity to review and comment on the Government Accountability Office's (GAO) draft report titled, *Direct File: IRS Successfully Piloted Online Tax Filing but Opportunities Exist to Expand Access* (GAO-25-106933). We thank GAO for acknowledging our adherence to GAO's Leading Practices for Pilot Program Design. We also acknowledge GAO's recognition of the success of the pilot, and of our continued efforts to expand and improve Direct File for the 2025 filing season and beyond in accordance with the Administration's direction.

Direct File is a first-of-its-kind project for both the IRS and the federal government more broadly. Unlike other government technology projects, Direct File is one of several options available to taxpayers in fulfilling their legal requirement to file their federal income tax return. The IRS was tasked with implementing the Direct File pilot without the benefit of established data or models on which to base our pilot. Largely for this reason, the Direct File pilot was intentionally built with a limited scope. It was designed to confront the three core operational challenges identified in the May 2023 Report to Congress¹:

1. Developing an accessible, accurate, and secure technology product that would meet taxpayer expectations.
2. Providing robust and integrated customer support.
3. Facilitating the filing of state and local income taxes.

The many accomplishments included in the report required significant collaboration among stakeholders across both federal and state government as well as with our private sector partners. Within the span of less than one year, the IRS was able to

¹ IRS. IRS Report to Congress: Inflation Reduction Act §10301(1)(B) IRS-run Direct e-File Tax Return System. <https://www.irs.gov/pub/irs-pdf/p5788.pdf>

successfully create an electronic filing option for taxpayers to file their federal tax return for free, directly with the IRS. During the 2024 filing season limited Direct File pilot:

- More than 3.3 million taxpayers accessed the Eligibility Checker to see if they could use Direct File.
- More than 423,000 taxpayers logged into Direct File.
- More than 140,000 taxpayers submitted accepted returns.
- Approximately \$90 million in tax refunds were issued.
- Approximately \$35 million in tax balances due was collected.

We acknowledge GAO's interest in seeing Direct File offered nationwide with expanded eligibility for taxpayers with more complex tax situations, and your recognition of the challenges we continue to explore in the expansion of Direct File. The complex and nuanced nature of our nation's tax laws require careful thought and consideration before support for any additional tax provision can be added to Direct File to ensure nothing compromises its accuracy or useability for taxpayers.

It also remains important that Direct File continue to support taxpayers in fulfilling their state tax obligations. We know from our research that this integration is something taxpayers want. Opening Direct File to all taxpayers regardless of whether their state partners with Direct File potentially leaves millions of taxpayers without a clear path to meeting their state tax obligations. Such an approach would potentially be a very difficult and unwelcome experience for taxpayers, with the further potential to negatively impact states who may then have to expend resources to follow up with taxpayers who failed to file their state tax return.

As discussed in your report, the Direct File team had initially hoped to hire Customer Service Representatives (CSRs) directly into the Direct File organization for the upcoming 2025 filing season; however, after further consideration and discussions across the agency we decided to shift our approach. In October 2024, Direct File and the IRS's Taxpayer Services Division signed a Memorandum of Agreement for the 2025 filing season. Taxpayer Services will provide a total of 190 CSRs and Lead CSRs to support taxpayers who have questions regarding tax law and e-filing their taxes directly with the IRS through Direct File. This collaboration ensures the IRS is on track to have trained assistors available to support the up to five million Direct File related taxpayer inquiries expected in the 2025 filing season.

We recognize much work remains to fully maximize Direct File's potential benefits to taxpayers and the IRS. We remain committed to continuous improvement and thank GAO for their insight and recommendations on actions we can take to further improve Direct File.

**Appendix II: Comments from the Internal
Revenue Service**

3

Our responses to your specific recommendations are enclosed. If you have any questions, please contact Bridget Roberts, Chief, Direct File, at (202) 317-4212.

Sincerely,

Douglas W. O'Donnell

Digitally signed by Douglas W.
O'Donnell
Date: 2024.12.13 09:06:23 -05'00'

Douglas W. O'Donnell
Deputy Commissioner

Enclosure

Appendix II: Comments from the Internal Revenue Service

Enclosure

Recommendations for Executive Action

We are making the following four recommendations to IRS:

RECOMMENDATION 1

The Commissioner of Internal Revenue should ensure relevant officials collaborate on recruiting and training customer service representatives for Direct File and document an annual process for recruiting and training employees.

COMMENTS:

We agree with the recommendation. The Human Capital Office partnered with all Business Operating Division stakeholders, including Direct File, Taxpayer Services Division, Small Business/Self-Employment, and Information Technology to facilitate the creation of position descriptions, resource sharing, and long-term staffing plans for the Direct File office. Instructional Systems Specialist from IRS University (IRSU) worked with Direct File subject matter experts to develop a basic training course for the Direct File Customer Service Representatives (CSRs) Pilot that ran February to April 2024. After the Pilot, Direct File partnered with IRSU to create more comprehensive training course materials for Direct File CSRs for the upcoming filing season. IRSU Taxpayer Services Academy has agreed to partner with the Direct File team to provide on-going (annual and as-needed) training content development and improvement services.

RECOMMENDATION 2

The Commissioner of Internal Revenue should continue to coordinate with state revenue agencies to expand taxpayer access to Direct File and, as necessary, take steps to ensure the availability of the federal Direct File program to eligible taxpayers in all states.

COMMENTS:

We acknowledge the recommendation and will continue to evaluate opportunities to continue working with state governments and exploring ways to expand access to Direct File.

RECOMMENDATION 3

The Commissioner of Internal Revenue should ensure IRS's planned research on potential Direct File users includes research questions that will allow the agency to collect data that can be used to prioritize the development of new capabilities for Direct File.

COMMENTS:

We agree with the recommendation.

Appendix II: Comments from the Internal Revenue Service

2

RECOMMENDATION 4

The Commissioner of Internal Revenue should identify additional data that could be prepopulated in Direct File returns and develop a plan for testing the accuracy of prepopulating the data and its effect on the taxpayer experience.

COMMENTS:

We agree with the recommendation as an option for taxpayers to choose if they prefer to use their data supplied by 3rd parties.

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

James R. McTigue, Jr., (202) 512-6806 or mctiguej@gao.gov.

Staff Acknowledgments

In addition to the individual named above, Tara Carter (Assistant Director), Michael O'Neill (Analyst in Charge), Adrian Arcoleo, Joshua Brownstein, Virginia Chanley, Abigail Loxton, Dan Mahoney, Rob Gebhart, Maggie Meinhardt, Jesse Mitchell, Robert Robinson, Andrew J. Stephens, and Sarah Steele Wilson made key contributions to this report.

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