To: U.S. House of Representatives
From: National Taxpayers Union and Undersigned Organizations
Re: Support Comprehensive Bipartisan IRS Reforms
Date: November 2, 2026

Dear Members of Congress:

We, the undersigned organizations who share a common belief in the well-being of everyday taxpayers, write in support of H.R. 5349, the Taxpayer Assistance and Service (TAS) Act.

This low-cost legislative package will improve tax administration, strengthen taxpayer rights, and create a more stable system of tax compliance. Critically, it also protects taxpayers from fraud. The TAS Act is a rare bipartisan bill that is both broad in scope and meaningful in impact, and we strongly encourage its passage and enactment before the end of the year.

TAS Act Combines Numerous Bills Already Passed by the House

The revised TAS Act legislative text, which passed by unanimous consent in the U.S Senate on September 30, 2026, includes key elements championed by tax professionals, organizations focused on taxpayer rights, and the National Taxpayer Advocate at the IRS. The whole U.S. House of Representatives or the House Ways and Means Committee have already passed nearly a dozen of the TAS Act provisions this term.[1]

TAS Act Has No Occupational Licensing Mandate

The organizations on this letter oppose new occupational licensing mandates, but TAS contains no such mandate. NTU Foundation's Joe Bishop-Henchman is one of three co-plaintiffs challenging the IRS's paid tax preparer licensing fee as excessive, and helped advise the landmark case *Loving v. IRS* that invalidated the IRS's paid preparer licensing scheme in 2014.2 There, the IRS sought the power to license all paid tax preparers and impose examination requirements, annual fees, and arbitrarily limit entry into the profession.

In helping advise on the TAS Act provisions on paid tax preparers, Bishop-Henchman notes that the TAS Act actually **prohibits** the IRS from doing these things.

Instead, the TAS Act sets a **maximum** of **no more than** 18 hours of annual continuing education (from any CE provider) for non-credentialed paid tax preparers, along with a tax compliance check and a criminal background check. The Treasury Department is directed to set the actual number of hours, and to set a higher (but still no more than 18 hours total) requirement for non-credential paid tax preparers who submit returns containing errors or fraud.

The IRS is prohibited from requiring continuing education from paid tax preparers who already satisfy a state credential or are attorneys or accountants to avoid duplicating requirements on those who already must complete dozens of hours of continuing education as part of their profession.[3] Of note, 72,000 paid tax preparers each year already complete 18 hours of

[1] These include the National Taxpayer Advocate Enhancement Act (H.R. 997), the Fair and Accountable IRS Reviews Act (H.R. 5346), and the Taxpayer Notification and Privacy Act (H.R. 6496). Several other important elements of the TAS Act were passed by both chambers and signed into law after the bill's initial release as a discussion draft, including the IRS Math and Taxpayer Help Act (P. L. 119-39).
[2] *Steele, et al. v. IRS*, D.D.C. No. 1:14-cv-01523; *Loving v. IRS*, 742 F.3d 1013 (D.C. Cir. 2014); Joe Bishop-Henchman, "Pressured by Lawsuit, IRS Further Lowers Fee on Paid Tax Preparers," NTUF, Oct. 7, 2025, https://www.ntu.org/foundation/detail/pressured-by-lawsuit-irs-further-lowers-fee-on-paid-tax-preparers.
[3] Most accountants in the United States must complete 80 hours of continuing education every two years, and most attorneys in the United States must complete 8 to 45 hours of continuing education per renewal period. *See*, *e.g.*, Accounting Tools, "CPE Requirements by State," https://www.accountingtools.com/state-cpe-requirements; Lawline, "CLE Requirements for Attorneys," https://www.lawline.com/requirements/cle. Four states (California, Maryland, New York, and Oregon) require continuing education of tax preparers of between 16 to 30 hours per renewal period, among other requirements.

continuing education voluntarily under the IRS Annual Filing Season Program to obtain that knowledge-based credential, and many hundreds of thousands more take refresher training of some kind to keep up with the many tax changes that occur each year.[4]

Rather than imposing a new occupational licensing mandate, **the TAS Act explicitly limits the IRS's regulatory authority** and allows only a continuing education requirement that focuses on protecting taxpayers from errors and fraud and does not duplicate existing practices.

TAS Act Closes Loopholes to Stop Fraud Against Taxpayers

In addition to addressing common injustices faced by taxpayers dealing with the IRS, the TAS Act combats the most egregious forms of willful tax fraud that harm taxpayers and waste federal resources. Tax fraud costs up to $304 billion annually according to the Government Accountability Office.[5] During the 2026 tax filing season, the IRS identified **896,000 suspected fraudulently filed tax returns and 2.6 million suspected cases of identity theft**.[6] Improper payments for refundable tax credits total **$28 billion per year**, caused by some combination of taxpayer (or tax preparer) confusion and deliberate fraud.[7] The IRS consistently identifies "ghost preparers," another individual preparing taxpayers' returns without identifying themselves or using stolen credentials, a key source of fraud enabling bad actors to skirt responsibility while leaving taxpayers with the consequences of their fraud.[8] In tax year 2023, watchdogs identified 47 ghost preparers who filed over **6,000 tax returns requesting $94 million in faulty refunds**, money that taxpayers were left on the hook for.[9]

The TAS Act includes several commonsense provisions to target fraud aggressively with robust penalties for the worst abuses. The Preventing Tax Fraud and Identity Theft Act (S. 5133), a bipartisan bill incorporated into the TAS Act, would move the filing deadline for certain information returns from March 31 to January 31, allowing the IRS to verify information before refunds are sent. The bill would stop ghost preparers by increasing the existing $65-per-failure penalty to $250-per-failure for preparers who do not sign returns they prepared, including instances where a preparer has misled taxpayers by recording an invalid identification number. The TAS Act also elevates the severity of this abuse by creating criminal penalties for preparers who willfully obscure or omit their preparer identification—a major deterrence effort to protect against tax-related malfeasance by those who would take advantage of hardworking Americans.

TAS Act Advances Long-Overdue Reforms for Taxpayers

Taxpayers face a multitude of challenges complying with overly complex tax laws, which are then exacerbated by an inefficient system of tax administration. The TAS Act includes several reforms that will upgrade taxpayer service, which lags far behind the customer service typically provided by the private sector. It also directly addresses serious injustices faced by taxpayers by improving the justice system available to them and cracking down on IRS abuses of power.

These include:

- **Technology Modernization.** The TAS Act requires technological upgrades that will dramatically improve tax filers' experience and improve transparency. These include digitizing tax returns, creating a customer service "dashboard" that indicates wait times, better integrating taxpayer correspondence in online accounts, and requiring the IRS

[4] Internal Revenue Service, "Tax Professional Management Office federal tax return preparer statistics," https://www.irs.gov/tax-professionals/tax-professional-management-office-federal-tax-return-preparer-statistics.
[5] U.S. Government Accountability Office, "Tax Fraud: The Federal Government Loses an Estimated $116 Billion to $304 Billion Annually," (2026), https://www.gao.gov/products/gao-26-107810.
[6] National Taxpayer Advocate, "Objectives Report to Congress: Fiscal Year 2027," (2026), https://www.taxpayeradvocate.irs.gov/reports/2027-objectives-report-to-congress/full-report-27/.
[7] William McBride & Andrew Lautz, "How Much Does the U.S. Government Lose to Tax Fraud," Tax Foundation, Oct. 27, 2026, https://taxfoundation.org/blog/how-much-does-the-us-government-lose-to-tax-fraud.
[8] Rachel Loren, "Americans for Tax Reform Supports The Taxpayer Assistance and Service Act," Americans for Tax Reform, Oct. 6, 2026, https://atr.org/americans-for-tax-reform-supports-the-taxpayer-assistance-and-service-act/.
[9] Treasury Inspector General for Tax Administration, "The IRS Must Do More to Address Noncompliance and Potential Misconduct With Return Preparers," (2026), https://www.tigta.gov/sites/default/files/100/2027ier001fr.pdf.

webpage to track refunds.

- **Protecting Taxpayer Rights.** Currently, taxpayers disputing IRS claims must navigate confusing and burdensome channels through the Tax Court, often tipping the scale in favor of the government. The TAS Act offers numerous remedies, including more options to challenge collections, flexibility in filing deadlines, and affirmative authority of judges to order refunds. The TAS Act also strengthens both the IRS's Independent Office of Appeals (which is intended to help resolve disputes without the need for litigation) and the National Taxpayer Advocate (which serves as an independent voice for taxpayers within the Service).

- **Whistleblower Protections.** Whistleblowers provide valuable information that pinpoints compliance problems far better than other enforcement tactics. The TAS Act makes this tool more effective by allowing the Tax Court a "second look" at whistleblower awards, requiring the IRS to pay interest on them when overdue, and protecting whistleblower anonymity.

- **Additional Safeguards.** The TAS Act implements numerous safeguards against harmful practices and protects the most vulnerable taxpayers. This includes reinforcing the current law requirement for supervisory approval for penalties, applying the "mailbox rule" of proof for timely filing to electronic payments, and extending the time period within which taxpayers can request the return of money that has been wrongfully levied. While some provisions in the TAS Act affect only a subset of taxpayers, these safeguards will prevent some of the most egregious harms of the current system. Many of these provisions are the direct result of constituent casework issues being raised across members' personal offices.

- **Amplified Accountability.** Congress can, and should, exercise more oversight of IRS management and operations. A series of new reports required under the TAS Act, such as identifying sources of complexity in the Tax Code, will improve transparency at the IRS and provide lawmakers with higher-quality analyses to make informed policy decisions. This bill also requires the IRS to report on its own implementation of several important provisions, which will provide accountability around longstanding objectives that have thus far made lackluster progress, such as technology modernization.

The TAS Act represents progress for taxpayers that is as important as the IRS Restructuring and Reform Act (RRA) of 1998 and the Taxpayer First Act (TFA) of 2019. Indeed, adopting the entirety of the legislation would help to fulfill the promises that RRA and TFA made to taxpayers. This is an unmissable opportunity for lasting, meaningful improvements for taxpayers.

We urge the House of Representatives to work toward enactment of the TAS Act this year, without delay.

Sincerely,

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