



October 28, 2026

The Honorable Mike Johnson
Speaker of the House
U.S. House of Representatives
Washington, DC 20515

Re: Support for the Taxpayer Assistance and Service Act and clarification of Section 504

Dear Speaker Johnson:

On behalf of the National Association of Tax Professionals (NATP) and the 24,000 tax professionals we serve, I write in direct response to the letter submitted by a group of organizations challenging Section 504 of the bipartisan Taxpayer Assistance and Service (TAS) Act. NATP strongly supports the TAS Act. We disagree with that letter's characterization of Section 504 and its projected impact on independent tax preparers, and we write to address those claims. Unlike the organizations signing the opposition letter, NATP directly represents the tax professionals who would be affected by Section 504.

NATP represents credentialed and noncredentialed tax professionals, including sole practitioners, independent preparers and owners of small, family-run tax practices serving individuals and businesses across the country. In fact, 87% of NATP members are small-business owners, and approximately half are noncredentialed. These are the very practitioners often described as “mom-and-pop” tax businesses. We understand firsthand the financial and operational pressures they face and the importance of protecting their ability to serve clients without unnecessary regulatory burdens.

Continuing education matters for every tax preparer, regardless of credentials or years of experience. Preparers who keep current with tax law support accurate returns, help taxpayers claim the tax credits, deductions and other benefits approved by Congress for which they are eligible and support the independent practices taxpayers rely on.

Section 504 provides a flexible approach to continuing education.

The opposition letter describes Section 504 as a licensing regime that requires independent preparers to complete 18 hours of continuing education each year. The proposed framework differs in several important respects.

Section 504 does not establish a new entrance examination for PTIN renewal. The legislation provides for education requirements of up to 18 hours annually, rather than imposing a universal 18-hour mandate. The framework is intended to accommodate differing circumstances and avoid duplicative requirements for practitioners already subject to qualifying professional or state requirements.

Education requirements should recognize the learning practitioners already complete while helping them stay current with changes that affect their clients.

PTIN registration and e-file suitability requirements serve different purposes.

The letter argues that the current PTIN system already screens preparers through criminal background and suitability checks. However, it conflates requirements for individual PTIN holders with those governing electronic filing providers.

A PTIN identifies a paid preparer; it does not, by itself, establish competency or demonstrate that the preparer has satisfied the suitability requirements applicable to an authorized IRS e-file provider.

Small-business impact estimates should reflect the proposed requirements.

The opposition letter estimates that Section 504 could force 100,000 or more independent preparers out of business. Its state-by-state estimates assume that every affected preparer would need 18 additional hours of education, rather than accounting for the flexibility described above. Those estimates do not show that the proposal would cause the predicted closures.

States such as California and Oregon already maintain continuing education requirements for certain tax preparers while supporting established independent preparation markets. Their experience demonstrates that education requirements and independent tax practices can coexist.

NATP would oppose unnecessarily burdensome requirements that restrict practitioners' ability to serve clients. However, in today's marketplace, continuing education is widely available at affordable rates, so meeting reasonable requirements is relatively inexpensive. Implementation should still account for the financial and scheduling demands small practices face.

Taxpayer protection requires more than criminal penalties.

The opposition letter suggests that existing criminal laws and financial penalties adequately address preparer misconduct. But criminal enforcement and basic professional competency serve different purposes.

Errors can occur regardless of a preparer's credentials, and they may or may not necessarily involve intentional misconduct. Yet an inaccurate return can leave a taxpayer facing unexpected liabilities, penalties, interest or delayed refunds. Continuing education helps all preparers keep their knowledge current; penalties address misconduct after it occurs.

The TAS Act is not partisan. It reflects bipartisan work by Senate Finance Committee Chairman Mike Crapo and Ranking Member Ron Wyden, received a 26-1 committee vote and passed the Senate by unanimous consent.

We urge the House to pass the Taxpayer Assistance and Service Act and consider Section 504 based on its proposed requirements and their practical effects on taxpayers and preparers.

NATP welcomes the opportunity to share the experience of our credentialed and noncredentialed members as the House considers this legislation, including how to implement education requirements without creating unnecessary barriers to practice.

Sincerely,

A handwritten signature in black ink that reads "Scott R. Artman". The signature is written in a cursive, flowing style.

Scott Artman, CPA, CGMA
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