

## TAS Employee Future State Discussion Analysis

TAS employees were asked to give their feedback, from an advocacy perspective, on how the IRS "Future State" plan may affect taxpayers and their ability to voluntarily comply with their tax obligations. This briefing provides an overview analysis and a compilation of the comments submitted.

### Background

The National Taxpayer Advocate requested all TAS employees participate in interactive discussions on the IRS plans for "Future State" and provide feedback on how they saw IRS Future State impacting taxpayers and their ability to voluntarily comply with their tax obligations. The meetings were scheduled and conducted in July, 2016.

To minimize official time, local meetings were held at the Local Taxpayer Advocate (LTA) level versus group level. Headquarter Directors determined if their employees would attend the local meeting in their post of duty or they would conduct a separate session for their own employees.

TAS leaders were provided a *TAS Future State Discussion Guide* to prepare for the discussion from an advocacy perspective. The guide included talking points to help lead the discussion and five questions, which included the [Individual Taxpayer Experience of the Future](#) and [Small Business Taxpayer Experience of the Future](#) vignettes, to ask employees to provide their feedback on.

An automated process (InfoPath form) was developed and instructions for submitting Future State Feedback on the five TAS questions were provided to TAS leaders via a Special Edition Managers Forum.

### Here are the five questions asked:

#1 - What services do you think IRS needs to provide to taxpayers today and in the future so they can comply with the tax laws?

#2 - What do you think the proposed scenarios will mean for you and your taxpayers?

#3 – Should online services supplement or actually replace telephone and face-to-face services?

#4 – How will taxpayers benefit by giving their preparers access to their online account?

#5 – Should IRS limit account access to Circular 230 preparers (attorneys, CPAs, enrolled agents, enrolled retirement plan agents)?

## **Future State Discussion Analysis Overview**

### **Future State Question 1**

What services do you think the IRS needs to provide to the taxpayers today and in the future so they can comply with the tax laws?

The top three suggestions were:

1. Taxpayer Assistance Centers, specifically providing Walk-In Assistance
2. Provide Telephone Assistance
3. Provide a Live Chat Feature

### **Future State Question 2**

Let's start out by discussing [IRS's plan for the future](#), what do you think this proposed scenario will mean for you and your taxpayers?

Overall top trends indicated:

1. Concern for taxpayer access to computers and computer skill issues,
2. Identity theft concerns,
3. The vignettes were too simple(to be realistic), and
4. Need for continued personal interaction with the IRS.

### **Future State Question 3**

Should online services supplement or actually replace telephone and face-to-face services?

The IRS must have many options in order to service all taxpayers due to various factors including age, education, understanding of tax issues, access to the internet, and others.

An overall majority of employee responses indicate online services should supplement not replace telephone and face-to-face services. They also indicated all services and transactions are not equally suited to online delivery. Online services will be most useful for the following:

- Filing returns;
- Viewing account information;
- Ordering transcripts;
- Making payments, including estimated tax payments;

- Monitoring refunds and balance due amounts; and
- Establishing installment agreements.

Online services will be least useful for:

- Processing issues, and
- Examination issues.

#### **Future State Question 4**

How do you think taxpayers will benefit by giving their preparers access to their online account?

While TAS employees could identify some benefits to the taxpayers, there was an overall expression of resistance to accepting this privilege by the preparers. There was much concern regarding identity theft opportunities, lack of regulations over practitioners, and concern for the taxpayers.

#### **Future State Question 5**

Should IRS limit account access to Circular 230 preparers (attorneys, CPAs, enrolled agents, enrolled retirement plan agents)?

The comments were mixed. Overall the answer was yes, but additional comments were included. (See the Question 5 analysis results later in this document for more details)

### **TAS Employee Feedback Analysis Results**

#### **Future State Question 1**

What services do you think the IRS needs to provide to the taxpayers today and in the future so they can comply with the tax laws?

#### ***Q1 Analysis Results***

The top three suggestions were:

1. Taxpayer Assistance Centers, specifically providing Walk-In Assistance
2. Provide Telephone Assistance
3. Provide a Live Chat Feature

*The Future State meetings were conducted in group settings, responses may be from one employee or a group of employees. Responses are included in the chart below.*

<b>Q1. Responses</b>	<b># of similar responses</b>
Apps – interactive	1
Apps - Mobile Apps - voice control	1
Balance online and face-to-face services	1
Better Individual Taxpayer Identification Number (ITIN) service	1
Better search engine on IRS.gov	1
Bilingual – website	1
Call-back system	7
Cell phone capability	3
Collection - eliminate Private Debt Collection (PDC)	1
Computer - provide computer access	1
Computer Issues - access to a computer and lack of computer skills	14
Computer security	7
Debit card options	1
Delay filing tax returns	1
Delay refunds	1
Education	2
Education - more education for immigrants, elderly, etc.	1
Education - Small Business Workshop	3
Education - video links	1
Education - You Tube videos	2
Education and outreach	9
Email options	4
Enhance online filing	2
Expand online services	3
Extend IRS hours	3
Face-to-face assistance	7
Frequently Asked Questions on web or online	2
Forms - online friendly forms	1
Forms and Publications - provide ways to secure	1
Free File for all	2
High School Education	6
Increasing staff	1
Interface Social Security and States	1
Kiosk	4
Language - increase help for those with language barriers	1
LITC (Low Income Tax Clinics)	1
Live Chat feature	18
Mobil bus for tax assistance	1

More efile options	1
More money for TAS	1
More vignettes	1
More ways to pay online - Direct Debit Installment Agreement	1
Notice and letter clarity	2
Online - need immediate response	1
Online Security issues	1
Online Services - increase services	5
Online taxpayer account access	4
Phone Assistance - provide phone assistance	21
Phone Assistance - provide quicker	2
Phone Assistance - less wait time	1
Preparers - certify preparers	1
Problem Solving Days	1
Provide extensive Q&A online	1
Provide tax law year round	2
Public Service Announcements	1
Publication 17 availability	1
Quicker response to letters	1
Simpler Tax Code	5
Staffing - assign staffing for phones	1
Staffing - human beings instead of automated services	2
Staffing - more Customer Service Representatives for tax law	1
Staffing - more phone assistance	1
Staffing - more staffing on phones	1
Staffing - shift phone site employees to Taxpayer Assistance Center	2
State of the Art software development	1
Stiffer penalties for fraudulent preparers	1
Taxpayer Assistance Centers (TAC) - accept cash payments	4
TAC - additional staffing	2
TAC - eliminate appoints	4
TAC - expand appointments	1
TAC - expand assistance	1
TAC - expand TAC services	1
TAC - more assistance	3
TAC - provide tax prep	6
TAC - provide walk-in assistance	21
TAC - tax prep in TAC	1
Tax Law assistance	6
Tax Law question hotline	1
Tax Preparation - low income	1

Taxpayers can scan and upload document	1
Third Party concerns	1
Toll Free	1
Toll Free - reduce phone wait time	1
Training - better training for Customer Service Representatives	1
Training - improve Interactive Tax Law Assistant	1
VITA - advertise Volunteer Income Tax Assistance (VITA)	1
VITA - expand VITA	5
Voice Prompts - search for toll free assistance	1
Virtual Service Delivery (VSD)	1
Web cam	1
Website improvement	1
Work with Immigration	1
<b>TOTAL</b>	<b>251</b>

## Future State Question 2

Let's start out by discussing IRS's plan for the future, what do you think this proposed scenario will mean for you and your taxpayers?

### Q2 Analysis Results

Overall top trends indicated:

1. Concern for taxpayer access to computers and computer skill issues,
2. Identity theft concerns,
3. The vignettes were too simple(to be realistic), and
4. Need for continued personal interaction with the IRS.

*The Future State meetings were conducted in group settings, responses may be from one employee or a group of employees. Responses included the following:*

- A taxpayer could wonder while using the computer, did IRS hold the return, or was it processed. Is it an amended return or a corrected return to the one I already submitted? What happens if people don't check their computers for IRS notices? This could also cut jobs.
- A voluntary system that is accurate needs to have people to ask questions.
- Again, most business taxpayers will have the same experience as 'Bennett'. The ability to verify deposits and returns via a secure online account would be extremely helpful in resolving missing payments/deposits, obtaining transcripts, checking on refunds. However, if there is a problem with any of these, the

taxpayer needs to be able to instant message/chat with an assistor. Audits may be problematic because of the large number of documents that taxpayers would be requested to scan/email to auditor. All IRS systems need to work on daily update/daily processing.

- Allow taxpayers to email with IRS.
- Some taxpayers if they were “directed” on the right way to use the site could possibly use the online site. This new way of communicating would reduce the number of taxpayers I see since some of the nonresponse and “lost” work would be eliminated by the taxpayer being able to adjust or make changes to their own accounts.
- Are some taxpayers more reliant than others on the IRS for service (e.g., low income, disables, Limited English Proficiency (LEP)? What services do these taxpayers need and how should the IRS deliver these services? Why? Should the IRS specifically address this issue (some taxpayers need more help from IRS) in its planning and policies? If so, how?
- As a positive, my team felt that the proposed scenarios mentioned a “self-correct” option, and that this could be a bonus to promoting voluntary compliance, especially if it would allow for penalty avoidance.
- As it is proposed, Future State will mean that TAS will likely get the overflow contacts/questions from toll free callers or taxpayers unable to get into a TAC office to ask account or tax-related questions.
- As of now, we can't even set up some kind of secure way to email with our taxpayers.
- Based on the fact that the site for taxpayers to order their transcripts was breached and the system shut down. Will this cause more instances of this happening, also with the preparers having access to the site, there may be more preparer fraud.
- Before implementing the future state initiative, online accounts should be good for VERY simple issue opportunity.
- Best model – have our own IRS free e-file (instead of directing people to commercial sites). If you get stuck or have a question, have text chat and phone support available. If there were programming or software errors or glitches, we would know immediately who is affected and could take corrective steps or communicate with the customer to secure needed information.
- Both the Internal Revenue Code (IRC) and Court decisions require notice by mail or by personal service at a last known address (the Internal Revenue Manual (IRM) also contains notice requirements, but those can be changed internally).
- Bring back tax assistors.
- Taxpayers who are tech savvy could easily use the online account site but for the elderly, it wouldn't be beneficial and they still need face-to-face help.

- Call LITC or AARP for help assisting these taxpayers.
- Clarification is needed on when taxpayer's can make adjustments to their returns.
- Computer system downtime – more \$ in budget for it.
- Concern; how the Identity Theft cases will be worked.
- Concerns about 3P representatives being able to access taxpayer accounts.
- Concerns with the human element being removed. Very Impersonal.
- Congressional aides re influx of taxpayers with issues (ensure Congress aware).
- Consider expanding VITA services to be year round.
- Consider whether the taxpayer account system can be designed to provide automatic selection of TAS cases.
- Correspondence that is easy to read (i.e.; bulleted).
- Could result in quicker refunds impact.
- Could our customers do this? Some, yes. Many others do not have computers or internet access, other than smart phones, or may not be able to respond to the IRS subsequent communication.
- Create You Tube for visual training - step by step direction.
- Customers expect instant results, not 4 – 6 weeks later.
- Data breaches can make people recalcitrant to use it.
- Disclosure to ensure we are truly dealing with the taxpayer.
- Do we have any say in the future proposed changes? It's not something that we voted for or against, but our concerns will be filtered up.
- Do you see the services you/your clients need reflected in the materials the IRS has published about the evolving future state vision? If not, what else would you like to see explained?
- Due to fraud concerns, allow access with pin and request no notification through mobile device.
- Due to the electronic nature of the scenario, it could cause situations where the burden of interacting with the IRS is pushed from the older generation to the younger generation since they generally have stronger skills to work through the logistics of the electronic processes.
- Ease of access to answers online.
- Easy understandable information/explanations.
- Elderly and low income taxpayers will need telephone &/or walk-in services to resolve tax issues. The inability for this demographic to obtain assistance could result in additional TAS cases. Many do not have computer access and would have to hire someone to help them if they had to set up an account, which could create a hardship on their already limited income.
- Elderly, disabled, low income taxpayers or those with mental health issues who already have difficulty dealing with IRS would have even more difficulty.

- Elderly, limited English proficiency and disabled are more reliant on IRS services. Yes IRS should plan around these groups to meet their needs, particularly as our population ages (baby boomers). Low income groups could be identified with prior year income or tax return data that is already available. Account coding could systemically populate to identify low income or elderly taxpayers.
- Electronic services are ideal for those with such skills. However, it is important to provide options to customers without the skills, knowledge or financial means (cost of computers and internet) to take advantage of electronic services.
- Employees fear a reduction of workforce, but most likely will increase need for employees who have IT/Tech support experience.
- Employment taxes could be included in an App that would send an automatic reminder to pay, which would include links with employment tax procedures and instructions.
- Enable a Live Chat capability. (disclosure verification ability was questioned)
- Even if the budget allowed, the IRS track record for technology upgrades and maintenance is not good.
- Everyone does not have computers.
- Everyone doesn't have access to a computer to do their taxes on line this will burden the taxpayer.
- Expand Free File/VITA sites, etc. set up sites at malls and raise income level for free filing.
- Face-to-face assistance with those with hardships, elderly, disabled, outreach to those in need.
- Felt there were points where the taxpayer would want to speak with the IRS.
- Financially, how would the IRS even pay for the computer/programming upgrades needed to provide this type of service?
- Fix the existing system.
- Following this proposal most interactions by taxpayers would be through the computer and their on line account. Another option for interaction would be through a third party first and then passed on to the IRS. Would TAS have access to this online interaction? Right now TAS does not use electronic communications, but in some cases it would make communicating easier.
- For someone attempting to prepare their own return for the first time, they really do need to understand the tax software and tax laws.
- For the new generations, eventually will be a good approach; however for the current taxpayer it will be detrimental especially for rural areas. It appears all decisions are made assuming everyone has easy access to the internet, and is fully capable of working issues on line. The scenario makes it look easy, but tax issues are more complex.

- For the tech savvy taxpayers they could access online resources for tax law questions but for the non-tech savvy the IRS needs to extend the April 15th timeframe to ask tax questions at least through 10/15 of every year.
- For the younger tech-savvy generations, this will be a positive option for getting account information and ensuring the account information is accurate. However, for our “kupuna” (elderly), and for the large population and number of households with no computer access, this may cause additional problems.
- For this process to work, IRS must change the way they do business.
- For those who are willing to prepare their own returns, the individuals need to be able to understand the tax software!
- Glossary of terms is needed to help taxpayers with online questions.
- Going total automated may scare taxpayers, especially those not proficient with computers.
- Have the ability for the taxpayer to leave their phone number to get a call back.
- Hearing impaired taxpayer’s may prefer interacting online, and low income may not have a computer, or limited English taxpayer’s would need to converse in their preferred language. Yes, the IRS should specifically address these issues in its planning and policies.
- How is the IRS going to prevent security breaches with all of this additional access to taxpayer data? Is it safe to allow so much IRS data directly into 3rd party software?
- How specific are they going to be? The scenarios talked about simple questions but how about more complex situations? What if the taxpayer does not understand what is been communicated to them? Would they have an option to seek more information? An improvement would be to have a "live chat" button so they can specific questions when the IRS does not address their specific situation or when the taxpayer does not understand the answer. Another option would be to have a button somewhere where the taxpayer can click and get someone on the line to ask and clarify answers. Again, what about senior citizens or people that do not have access to computers? We see some confusion and perhaps more cases coming to TAS for answers.
- However, there was a concern that these online notices could appear as threats of audits which may never be followed up on. This concern goes to taxpayers' trust in the government.
- I believe TAS telephone inquiries will increase because taxpayers will try to use the IRS proposed solution of doing everything online and taxpayers will get frustrated and call TAS for help because TAS will be the only ones answering a telephone.
- ID Theft will increase due to online account access.
- If IRS is not able to answer the 800 line it must have a call back feature.

- If questions can be answered online, maybe the answers will be more consistent.
- If taxpayer gets the wrong department when they call into toll free numbers, the phone assistants can use that opportunity to educate the caller about the capability of IRS.gov – future site.
- If the IRS is leaning toward electronic assistance, then the taxpayers should have the ability to download a withholding or estimated tax payment calculator app. For the individuals who are unable to have internet access, they can contact the call center on this specific day where ALL CSRs will only answer tax law questions related to withholding and the requirement to make estimated tax payments.
- If the personal accounts are to be used to provide taxpayer notice, a comprehensive look at the current requirements should be undertaken. If the accounts are not used to provide notice and/or not everyone has an account, the current system will need to be maintained. A dual system, while necessary, is neither efficient nor cost effective.
- If there is some sort of serious system wide breach or shut down, all services would be shut down, and without the employees and training to deal with the issues, it could be a disaster.
- Improve ESL services with, more staff/pubs/forms/letters where taxpayers call.
- In the example, many times IRS will address the issue at hand, not all issues.
- In the future state, TAS should be permitted to deal with taxpayers through their personal accounts as they will be secure and provide an additional communication route with the taxpayer.
- Increase in identity theft is a real concern for taxpayers and TAS.
- Increase internet (cyber) security.
- Increased authentication is needed along with the ability to reconcile third party access after one year.
- Increased work for TAS.
- Increased workload for TAS, the future state online services will not be able to handle complex and multiple issues; no right to appeal/protest.
- Individual: clarify what process will be followed if taxpayer is in "pre-audit" phase (notifications provided?); possible links to TAS on the individual account or someone to contact (on line assistance).
- Instructions and explanations need to be put into layman's terminology.
- IRS budget won't support hiring additional technical support contact reps.
- IRS could provide online or face-to-face tax return prep training.
- IRS did not provide a realistic scenario. For example, most IRS correspondences are not clear and are difficult to understand.

- IRS does not have a good track record with systems modernization and cyber security.
- IRS doesn't have adequate staffing so taxpayers will be skeptical about the type of services they will receive.
- IRS has negative feel so taxpayers will call TAS more.
- IRS IT abilities need to be kept up to date with current technology.
- IRS should provide virtual face-to-face help and support.
- IRS should send out a letter to all taxpayers. Use multiple types of outlets. (Outreaches, the news, newspapers, radio, etc.)
- IRS should supply Income based tax assistance and tax law question assistance for small businesses (right now they have nowhere to ask tax questions other than the private sector).
- IRS would have to provide a good tutorial available before starting self-service tax return prep.
- IRS's plan for the future will cause a burden to the elderly, disabled and low-income.
- Is it realistic that the exams will be "paperless"?
- It will force taxpayer to go to a preparer to get their returns done.
- It appears that the IRS plan is to move to either a mostly or totally online experience for taxpayers, with minimal IRS employee interaction. TAS cases would increase exponentially, because anyone who can't or won't deal with online accounts will call TAS.
- It is difficult to translate IRS jargon.
- It is good that taxpayers would be able to fix their own problems and the system should be re-prompting yes or no questions.
- It is very innovative for those with computers. What about those without computers?
- It means that it will be more cases in TAS. TAS will be assisting the taxpayer more. TAS will be providing and assisting taxpayers in finding someone that can assist them in tax preparation and general tax help.
- It should include a tutorial (video) on how to use the online account and other tools.
- It will be difficult for a lot of taxpayers to adjust, but with online tutorials, and some other assistance, they will get it in time. Overall placing things online can be more efficient in time.
- It will mean more cases in TAS. TAS will be working more taxpayers in solving their problem with the IRS. Taxpayers that do not have access to computers will have to find assistance that is affordable and trustworthy.
- It would appear the ability to eliminate account access would be very important.

- It would be a burden to may lower income and uneducated taxpayers.
- It would work well providing the taxpayer understands and responds to move if from one step to the next step. The taxpayer's rights might not be followed for all issues.
- Kiosk in every city with virtual options to assist taxpayers. (This way it doesn't matter where the IRS employee is located.) This would expand the times of availability.
- Local offices have almost no local tech support, so this would lead to even more problems.
- Low income people are being charged outrageous fees.
- Low income taxpayers don't understand, in theory this sounds great.
- Taxpayers may opt out of the system because they are either not comfortable with or don't have access to a computer.
- Maintain the TTDY relay service.
- Make the notice more clear, using examples of specific dates, rather than semi-weekly etc. The use of the term semi-weekly is confusing to many taxpayers, including IRS employees.
- Make website (IRS.gov) user friendly.
- Many of TAS' customer demographics are such that the valuable knowledge and assistance provided by reliable tax professionals is extremely limited.
- Many people will not conduct business that included their personal information on line.
- Many taxpayers do not trust IRS security systems. Currently, electronic filing continues to have problems.
- Many taxpayers in a higher age bracket will not want to use online services and will not be able to download information like Jane did in the scenario.
- More mobile phone apps.
- More toll free assisters are needed to answer the taxpayer's questions or take immediate actions on the account.
- More work. Taxpayers will be coming to TAS for assistance.
- Most taxpayers will not have the experience 'Jane' did in the vignette. The taxpayers who don't answer their email or understand what they are instructed to do for the online audit, will be lost if they cannot reach a customer service representative right away. There will always be a need for face-to-face video chat in real time via the taxpayer's computer or kiosk and live telephone assistors to answer questions. We compared this to the self-checkout in Walmart.
- Much of the need for contacting the IRS could be reduced if the IRS put more of their resources and efforts into improving the processing of returns, correspondence, and payments. Much of our business is taxpayers who have

responded to the IRS, or submitted documents that would resolve their issue, but those documents have controls assigned yet nobody taking any action.

- Must ensure secure online connections.
- My team was first concerned that more online use could result in more identity theft, or worsening of already existing identity theft. They wanted to make sure that authentication processes were strong, but noted that a high level of security could create a burden on taxpayers.
- Need clear understanding of return receipt and processing. This is where a 'tax chat' line would be beneficial to the taxpayer as well.
- Need more outreach on tax prep and information.
- Need to provide a "Live chat" session when taxpayer is online.
- Need to secure taxpayer trust in online access to IRS databases.
- Not everyone has a computer or access to a computer or online services. Many people are not tech savvy enough to perform online tasks. Rebuttal to this statement was that just about EVERYONE has a cell phone and many people do all of their business on their phone or tablet such as online banking, shopping, stock trading, etc.
- Not everyone is willing to do business online.
- Notices should be by both message in taxpayer's account and a non-specific email telling taxpayer there is a message in their account inbox. This timing issue. Taxpayer's account may be subject to examination or adjustment after the filing season. A taxpayer may not be accessing the account regularly so the taxpayer must receive some form of notice other than by message in their personal account box.
- On one end, it would decrease calls and staffing during the initial processing, but it could increase calls and staffing after processing because the taxpayer might need clarification of changes and adjustment to his/her account.
- Once a taxpayer received notification, they should be able to call for clarification or alternatives.
- One good thing about using the computer, you would be able to print off what is on the computer. If you're talking to someone on the phone, you have to write it down.
- One major concern is the timing of the receipt (or non-receipt) of third party data. Many taxpayer accounts will be difficult to resolve online as the information may not be available. Online accounts will have no effect on this issue (other than perhaps notifying the taxpayer earlier about the issue) without some better wage/information verification system.
- Online services only because tax preparers can be costly.
- Online services only could result in taxpayers' not filing tax returns at all which could cause them to be non-compliant.

- Open door to more identify theft (IDT) issues, scams, and hacks.
- People who are more reliant on IRS services.
- People who don't speak English, who don't know they have to file taxes cause they're foreign, people who are Ex-pats living in foreign countries have no one to help them.
- Permanent identifiers.
- Potentially more fraud and errors on taxpayer accounts. We foresee issues created because of the uncertainty of the taxpayer being knowledgeable to make the necessary adjustments to their account.
- Provide a system to allow taxpayers to prepare their returns at no cost.
- Provide walk-in service.
- Providing online services may possibly generate more IT problems and Identity Theft cases. The IRS will need to provide real-time IT services to the taxpayers and ensure all sensitive information is secured.
- Putting a business on notice of a potential audit, places burden on them and may be costly to the business in paying the CPA/POA.
- Require businesses to take a course (in coordination with the State) so they know what is required of them as a business owner.
- Security and hacking concerns.
- Security and hacking issues into personal tax accounts.
- Self-serve tax filing will be good for educated taxpayers.
- Self-service will bring down the number of calls to customer service.
- Should be a way to expedite the assessment. Often, money that is paid before the assessment is returned to the customer.
- Should the IRS specifically address the fact that some taxpayers need more help from the IRS in its planning and policies? If so, how?
- Should there be a help desk for IT-related problems that the taxpayers encounter.
- Some preparers take advantage of the students and low-income taxpayers. Preparers tell taxpayers that if they use them as a preparer they won't have to worry about the IRS coming after them on an audit and we know that is not always true. Preparers actually charge the taxpayers an additional fee during the preparation and electronic filing explaining that is a charge for them to handle any problems they may have with the IRS on their return. They claim they are taking the responsibility for the taxpayers return filed. The law still states that even if a preparer files the return, the taxpayer is liable for the information filed on that return.
- TAS initiative is to conduct outreach to schools (elementary, high school, college, etc.) to explain tax administration, compliance and the options available. If the

average taxpayer's perception of IRS is negative then average taxpayer's offspring will have a negative perception. We have an opportunity to change their perception through outreach.

- TAS will see more calls.
- Tax code should be in simpler terms.
- Taxpayer's don't respond to bad news when they receive notices, why would they attempt to address an on-line account issue that adversely affects them.
- Taxpayers may need the ability to scan, e-fax, and or upload documents which could certainly be problematic for low income taxpayers. Some type of self-service kiosks would seem to be mandatory with an attendant if needed.
- Taxpayers need human contact.
- Taxpayers need to speak to someone in person, perhaps have a PDF file to view immediately upload information the taxpayer would not be able to do. Work all "ready to be worked" cases daily in a team environment instead of assigning them to individual caseworkers. Many taxpayers don't want to trust transactions online because of identity theft. Senior citizens and low income taxpayers are more reliant on IRS face to face services. The services needed for seniors include VITA, AARP, paper IRS forms in post offices & libraries. Open kiosks in shopping centers and other high traffic areas to increase IRS presence without the overhead of a full office. Low income taxpayers have return preparation done by unenrolled tax preparer's under suspect circumstances. IRS should have inspections in the places in which they are preparing tax returns for instance delis, laundromats, used car dealerships. The prices are extremely high for tax returns to get done. Consider legislation to limit the prices, or stop the ones that are taking advantage of the taxpayers charging extremely high prices. Educate people more how to choose an honest tax preparer.
- Taxpayers should be able to access their account. If they should receive a notice they can view it and become familiar with it before calling the IRS. It could avoid unnecessary phone calls to IRS.
- Taxpayers who have been victims of identity theft, the proposed scenario does not help them.
- Taxpayers will need to know, for example, about tax law and how to complete certain forms. Insure user friendly/intuitive system with links to explain tax law questions.
- Teach the young, elementary grades (young minds absorb knowledge) to college age. The mature older generations do not want change.
- The ability for taxpayer's to correct items on their returns online and resubmit them without having to later deal with a Math Error notice or file a 1040X is excellent and will save the IRS/TAS a lot of time and money (1040X's still one of the top 3 TAS cases). This is great news!

- The change could be great for some people but are not appropriate for others.
- The complexity warrants more face-to-face and phone assistance.
- The example provided from the individual taxpayer's perspective is very simple, but what happens when the taxpayer has to send in correspondence to resolve their tax issue? Who will ensure that the information is reviewed, the return corrected and the refund issued timely?
- The Future State completely changes the expectations that the taxpaying public can have of the IRS. These taxpayers have always known they could come to an IRS walk-in office or call the IRS toll free line in order to have their questions answered. However, this is a change in the basic "contract" between the IRS and the taxpaying public. This means that some taxpayers will be comfortable and confident in their ability to understand the tax law and meet their obligations, while other taxpayers will likely feel "left behind" in the Future State.
- The IRS also may want to consider larger banks of self-service kiosks at the TACs where IRS employees could assist taxpayers to learn the tools they need to resolve their tax matters.
- The IRS plan will be fine for simple returns or questions. There needs to be a system for multiple exchanges between the IRS and taxpayers to resolve the issues. Online chat or a system similar to Intuit used by H&R Block would enable dialogue for timely resolution. There should be a line staffed by Integrity & Verification Operations (IVO) and Exam employees to assist taxpayers in resolving their issues and to correct their account.
- The IRS should add a section to the employment and estimated tax payments app, allowing the taxpayer to complete an estimated tax worksheet during enrollment. This app will help the taxpayer to track the fluctuation of income throughout the year, and calculate quarterly estimated tax payments based on those fluctuations. The IRS should create an alert system, via the cell phone app, to notify taxpayer when a payment is close to being due.
- The IRS will be faceless. A taxpayer's only interactions with a human at the IRS will be when there is an enforcement-type action taken with regard to the taxpayer's account. It will leave many taxpayers without basic services needed to comply with the tax system. On one hand, the described scenario might decrease calls and staffing during the initial processing but it could very easily increase calls and staffing after processing because the taxpayer requires clarification of changes and adjustment to his/her account. We have experienced numerous calls when the bar on the "Where's my refund" application changes unexpectedly.
- The need for the taxpayer to be Proactive is critical.
- The new system will be problematic for taxpayers with lower education, disabilities and no computer access.

- The online help and tools should be in plain, everyday English. IRS could have different tools written for professionals.
- The plan for the future would generally be very helpful except taxpayers that are disabled, elderly, low income and English not their first language, would most likely not have the same positive experiences. The future plan needs to address the needs of taxpayers that don't have access to the internet or do not feel secure in resolving their tax issues online.
- The proposed individual scenario is useful to individuals who have very simple income and expenses. However, for people who have non-traditional families and complicated finances the proposed scenario does not help taxpayers.
- The proposed scenario may cause new training and skills sets for the TAS employee and others to learn. An example is walking the customer through the self-help process.
- The proposed scenario will not be useful to individuals who do not have access to computers or do not have computer skills including the elderly, low income taxpayers, the disabled, and English as a second language taxpayer.
- The proposed scenarios would be wonderful as long as the issue of concern was a streamlined process in which the forms and processes were simplified issues such as just needing an installment agreement on one tax period and no others issues involved. The scenarios seem to be based on ideal situations in which the taxpayer is well versed on IRS issues and the use of computer systems. There needs to be options available when the taxpayer hits a wall. The taxpayer in one of the scenarios was able to reach out to someone else for help but what options are available for someone who does not have anyone to assist them?
- The proposal would be good for limited transactions, payments, receipt of return, refund information; guidance would have to be clear and very specific. We are concerned that the taxpayer would not research the notice issue without having all the answers or not understanding the notice and not receive credit the taxpayer is due.
- The result of reduced level of services to the public will result in a higher rate of non-tax compliance for the low income, small business owners, the sharing economy and elderly. Also these same customers may be subject to unscrupulous tax preparers and unreasonable tax prep fees.
- The taxpayer would be expected to conduct business with the IRS online. IRS needs to provide specific details regarding the future state. Information available is vague. IRS is not addressing taxpayer's who cannot navigate on line services or taxpayer's who do not want to use on-line services. For example, those individuals who are low income, disabled, elderly.
- The vignettes are realistic for younger generation. Use of smart phones for this generation to deal with online accounts is a norm.

- The vignettes presented assume all taxpayers are rational and reasonable.
- The vignettes we reviewed are unrealistic and unlikely that things would go this smoothly.
- There are a lot of steps left out of the vignette. There are several things that can go wrong.
- There are delays in processing. Changes aren't updated immediately to IDRS,
- There are many different education levels in the U.S. Online services are a one size fits all and cannot be tailored to the taxpayer's level.
- There could be kiosks within the community (library, etc.) for taxpayers to use for self-service.
- There needs to be outreach in high schools. There also needs to be assistance for immigrants, the elderly and the Native American population.
- There was an underlying concern for vulnerable taxpayers - low income, elderly, ESL, disabled, and other taxpayer populations their needs to be addressed in the planning, as we take our taxpayers as they come.
- There would be technical issues if a taxpayer has ID theft. If the fraud taxpayer files before the real taxpayer all the information that is needed to verify identity will be false therefore, the real taxpayer would not be able to create or use her online account. These issues if not addressed will cause a major rise in workload with TAS.
- These scenarios are "too clean" as most TAS cases are not this simple.
- These vignettes are not realistic for the low income or the elderly.
- They may be able to take on more complex issues in the future.
- This may help some of our taxpayers, but will not help many of them as their issues are more complex.
- This online service, while it can be good, it would be lacking for TAS low income and elderly taxpayers.
- This scenario assumes that a lot of processes will work as they should. It means that taxpayers who are unwilling or unable to do things on line will become non-compliant because they don't know what to do, can't get through to anyone to set up a payment plan or can't afford to pay someone to help them.
- This seems very confusing. Don't see general public using this.
- This work process will eliminate the time employees spend on the telephone and writing formal letters to the taxpayers. It would be a cost savings to the government in the form of mailing letters, telephone calls, and possible office space.
- To have the capacity to upload documents.
- Transparent expected timeframes.

- Unless putting this business on notice is very specific to what is needed, and timely resolution is made, the taxpayers right to finality is an issue.
- Vignettes not realistic.
- Vita - will need more of an emphasis on VITA.
- We are currently concerned about details for Balance Due Resolution as well as other account type adjustments accomplished online.
- We have quite a few taxpayers with low income, Earned Income Tax Credit (EITC), child tax credit, disabled, etc. Some people don't have computers. We need to provide face-to-face services for low income people and the elderly, and have forms available. TAC should probably have a couple of computers available so that taxpayers could use them. They should be able to assist taxpayers with minimal problems. A VITA site in an IRS building would be beneficial. Elderly people might not have computers, and don't understand the tax laws.
- We need service centers where customers can walk in for assistance.
- We need someone who can answer difficult tax law questions year round.
- We need the ability to receive secured documents via email.
- We need to know more detail of IRS' plan. The examples were too oversimplified to make a decision regarding this either way.
- We should provide these services to keep taxpayers compliant and for fraud prevention.
- What about 3rd Party Information?
- What about constituencies like the elderly, many of whom seem to prefer to talk to someone? Younger taxpayers like to use apps, but if there are delays or confusion, they too will get frustrated and discontinue with the online account and call the IRS. They prefer using text and email, which (so far) does not appear as an option in the Future State plan.
- What about International cases?
- What about low income and disabled? How could we deliver these services?
- What about taxpayers that file paper returns? Will "Free file" go away? What about taxpayers that don't want to pay for commercial software to file?
- What happens if you get a notice from the IRS, or an audit is underway, etc.? You would need a scanner and computer for an audit so that you could email additional information in for the audit; or for a notice. Some people can't afford computers or scanners. Would you want to do an Offer in Compromise (OIC) on the computer? Or would you rather do it over the phone? Most in the group would rather do it over the phone and talk to a live person.
- What happens to the taxpayer rights if a person doesn't go online timely to look at?

- What happens when the taxpayer does not agree with the digital notification that she does not qualify the EITC? Would she be able to call the IRS for assistance? Will there be enough staffing to handle the large quantity of calls and how long of a timeframe would it be to resolve her disagreement with the IRS?
- What happens when the taxpayer needs to complete an amended return but can't afford to pay a preparer?
- When choosing a 3rd party software provider from the site the IRS needs to identify up front which ones are free services and which ones will charge a fee.
- When preparing tax returns online, have interview questions built into the software guiding the taxpayer with their tax preparation. Similar Turbo tax.
- When the taxpayer is electronically notified that there is an error that needs correcting the message must be much more specific, detailed than the current IRS letters.
- While the proposed scenario paints a picture of clean case processing being accomplished only online by the taxpayer and/or paid representative, it's unrealistic to expect processing to go this smoothly. The result will be an increased level of frustration and a lower rate of voluntary compliance.
- While the taxpayer in the scenario appeared to be computer savvy, many taxpayers may not be able to navigate the process due to lack of computers or lack of knowledge. This taxpayer received the proper notifications because she had a computer available. Many taxpayers use systems in libraries and other shared systems that allow access. Because the shared systems are used by many people, it may not be in the taxpayer's best interest to receive private information there. The IRS should make systems available (possibly kiosks) in a private area, where taxpayers can use them to address issues.
- Will not work for stolen identity situations.
- Will services be provided in other languages?
- Will TAS be able to see if taxpayer has an on line account? Is there an indicator? Re: virtual exams, right to present your case in front of someone. Will there be an opportunity to video chat, kiosk or other method to conduct the virtual examination with a face to face aspect?
- Will this system be able to assist in math errors? If so, how long would it take for the IRS to resolve? And once resolved, would the ASER reflect the date the taxpayer filed or would it be when the math error was completed.
- With all the online - how do we keep this information secure? That info will be out there and available in systems!!!
- With TAC appointment only, taxpayers will come to TAS.
- With the scenario, what if knowledge of documents needed and forward movement into filing your refund is limited. Will these online services guide

taxpayers through the process? Will taxpayers be able to chat or talk to a live IRS agent to assist while filing their return? Maybe provide a toll-free number for the taxpayer to call. What if you taxpayer don't have attachment availability, what other options will the taxpayer have?

- Won't affect the taxpayers TAS sees because of lower income, education, and no resources.
- Would like options with face-to-face and telephone services. If we're going to interact with email, how are we going to know if it's a scam or it truly is the IRS? The IRS has been telling taxpayers for years that they will only contact a taxpayer by certified mail. Then, how do we turn their thinking around to now IRS will send you a notice by email?
- Yes - some taxpayers are more reliant than others on the IRS for service low income, disables, limited English.
- You can't replace verbal communication and excel in voluntary compliance, nor customer service.
- Younger and tech savvy individuals will make great use of the online accounts, but less technically sophisticated taxpayers and those who don't trust the government to secure their data will not use the system and will require telephone or face-to-face interaction.
- Younger taxpayers and computer savvy taxpayers will be able to use the services and file by themselves.

### **Future State Question #3**

Should online services supplement or actually replace telephone and face-to-face services?

### ***Q3 Analysis Results***

The IRS must have many options in order to service all taxpayers due to various factors including: age, education, understanding of tax issues, access to the internet, and others.

An overall majority of responses indicate online services should supplement not replace telephone and face-to-face services. They also indicated all services and transactions are not equally suited to online delivery. Online services will be most useful for the following:

- Filing returns;
- Viewing account information;
- Ordering transcripts;

- Making payments, including estimated tax payments;
- Monitoring refunds and balance due amounts; and
- Establishing installment agreements.

Online services will be least useful for:

- Processing issues, and
- Examination issues.

*The Future State meetings were conducted in group settings, responses may be from one employee or a group of employees. Responses included the following:*

- 1040X template that pre-populates column A.
- 2848 expiration (least useful). Person could return access without an expiration date.
- Additional drawbacks: some forms still can't be filed online. Also audits, there is already difficulty getting campus exam to accept data that is not a piece of papers, i.e., thumb drive.
- All services and transactions are NOT equally suited to online delivery. Face-to-face services should supplement electronic services to ensure no segment of society is left out of the future state process.
- All services and transactions are not equally suited to online delivery because everyone is not using technology. There are some who are challenged with literacy issues and rely on IRS for competent technical issues. In addition, some taxpayers have complex issues that they need to discuss with someone. Online services can include: transcripts, payments, and installment agreements.
- All services and transactions are not the same and have to be handled uniquely. Some are simple and can be resolved quickly and possibly online. Others are more complex and require much attention which can't be achieved online.
- All services are not equal: some people need to be face-to-face with someone to gain a clear understanding of what is needed.
- Audits – especially alternate documentation.
- Based on our years of experience not all online services are equally suited. And again one of the biggest factors remains the customers savvy with on line services and access to the internet. TAS exists not only because there are IRS errors and delays but also because there is a group of customers who can't for various reasons work thru the complexity of the existing system. Having said that TAS can only service so many.
- Calls will increase due to taxpayer frustration of the new online system.

- CAs who interact with many taxpayers who have no English speaking skills or very limited English speaking skills (and don't understand English). These are the taxpayer's that will eventually be harmed the most if telephone and face-to-face services are eliminated.
- Certain areas, such as in Hawaii, will encounter multiple language and ethnic barriers.
- Certain transactions may be helpful using online services such as tax payments, ES payments, and Federal Tax Deposit (FTD) payments. The more complex tax issues may not have the ability to resolve via online and this is where the IRS' reduced staffing creates a burden to the taxpayer.
- Clean/easy returns very suitable to online delivery, also more suitable for sophisticated or computer literate customers.
- Complicated issues may be better serviced with phone, and online interactions. Phone work will not be replaced, but the more simple online answers readily available will allow Customer Service to resolve issues that are more complicated.
- Different generations have different needs and wants regarding their contact preferences.
- Do like the portal where the taxpayers can submit a question on line and a response is given. However, what is the turnaround time? Does the person giving the answer have the knowledge to discuss with the taxpayer? The downside – taxpayers may use this service as an avenue to vent about IRS or argue whether the answer is correct, or even complain about the government and the tax system. Hopefully, the instructions for using this are clear to prevent this.
- Do not see it replacing telephone and face to face, but it should be available. All services and transactions are not equally suited to online delivery. There are blackout limitations. Consistency and service issues. Fiscal filers' decedent cannot file electronically.
- Doesn't address multiple issues all at the same time at least it appear that way.
- Electronic audit like Bennett? There is NO way to avoid discussing things with the taxpayer. If adjustments are proposed and the taxpayer doesn't understand their rights can be violated. If the taxpayer has to use a computer to go to a webpage and pull the Pubs they need what if they don't have access to computer?
- Email / electronic reminders (filing due dates, payments due).
- Employees didn't mind online services being used as an option but didn't feel it should be used as a replacement as some taxpayers have no computers or are unable to understand.
- Employees' unanimously stated "No" to both questions.

- Equipment shutting down due to the age of the system and equipment.
- Everyone agrees it should be an alternative and a supplement.
- Everyone agrees that the online services should be a supplement option for taxpayers. It should not replace telephone and face to face services. Someone like Jane - who as a teacher is college educated this would work. This example is more a generational issues. Younger taxpayer wants this type of communication (online accounts). If you are doing everything online like a young person then its email me this and then text me. There needs to be a balance!!!!
- Exam big in this area better if we implemented in Collections, because Exam requires supporting documents.
- Exams are not the best way online, neither are notices. Collections are probably not best either online, especially levy or seizures or foreclosures where the taxpayer is about to experience some type of imminent hazard. What happens if the taxpayer does not access the online account for months or only once a year? Since IRS sent notices and changes and they didn't respond....do they get assessed and told - we notified you and not our issue that you didn't access your account timely to ensure your rights were protected?
- Existing services offered should continue to be offered: availability to pay online set up IAs, filing extensions and "Where's my Refund?" Maybe add letting taxpayer's provide missing information (ERS) online or making simple math error corrections online such as verify the correct SSN for their dependents.
- Expansion of some online payment options such as F1120 should be feasible.
- Explain notices taxpayers receive.
- Face-to-face or phone calls are the best methods of interaction with taxpayers.
- Financial analysis.
- For people that don't have access, elderly, disabled, or just don't trust the system or know how to navigate through the system.
- General walk-thru of common letters.
- Get account balance / payoff.
- Get copies of notices.
- Going into the future there may be an ability to fully supplement, however, the public needs choices.
- How is this going to work? How will the information be delivered to the taxpayers and preparers? Is this a way of replacing people? What affects or reactions will taxpayers have using the new system? Will they be able to use the new system successfully? What are the security risks? Who will really benefit? Has the Service considered low income families who do not have internet services or computers systems? Will prepares have background check to stop preparer fraud?

- How many taxpayers have the technology to do virtual? Only 9 locations available for virtual interaction through the IRS virtual program.
- However for account issues, stolen ID, things like that, online services are not going to work, usually nothing is a simple online fix. Even the fact that many taxpayers just don't understand the notices they receive, they want to speak with someone. Perhaps a video chat option could be provided.
- However, online services should only be supplemental services. As the web based system is being developed and implemented, there will be a transitional timeframe where quirks/bugs have to be worked out. Phone and walk-in services will be imperative during that timeframe to ensure taxpayers are receiving necessary services for tax compliance. Phones and walk-in sites will always be beneficial for low income and elderly who can't afford to pay someone to go online for them and they don't personally have access to a computer or smartphone. TAS sees numerous taxpayers who have trusted an unqualified individual with their tax information which resulted in their Personally Identifiable Information (PII) being compromised and many times in IDT. These cases could possibly escalate, if low income and elderly need to hire additional assistance with required online accounts to resolve issues.
- I believe taxpayers giving preparers access to their online account could prevent delays taxpayers experience with the IRS responding to inquiries. Preparers have to prepare correspondence, charge taxpayers for every letter they prepare, and then mail it to the IRS where it is loaded into either Correspondence Imaging System (CIS) or placed on a shelf waiting for an IRS employee to work it. A lot of Customer Service Representatives answer telephone calls and process paperwork but when the telephones are ringing, the paperwork is placed on hold. During filing season, the correspondence cases are placed on hold for 120 – 180 days due to low resources to process it. The IRS correspondence inventories skyrocket up over hundreds of thousands. If a preparer could access the taxpayers account online, they could make the changes to the return if needed, the IRS computer would process it, and it could be resolved in 2 – 4 weeks instead of 6 months.
- I don't feel that online services should supplement or actually replace telephone and face-to-face services because not every working American who needs to file their taxes and comply with the tax codes can afford a computer. Some families work long hours for low pay and it takes all they make to budget their household and feed their families so having a computer and paying for the internet is not an option in their household.
- ID Theft taxpayers wouldn't want to use online services and may not trust any electronic interaction.

- If a person is going to do their return online then they need guidance on what they are supposed to do. Online services should be available definitely. But self-driven (which is typical of younger people) can get the taxpayer into trouble. The person has to be involved and aware of what they are doing.
- If people don't have an online presences then what are they supposed too?
- If security can be maintained, online transcripts lend themselves to this approach.
- If you don't understand the problem, you will not know how to respond or what questions to ask e.g. everything
- In addition to a concern with complex tax issues or vulnerable populations, my team had concerns about issues with document submission – not currently accepted via email. It would be necessary to have online security, storage, and an infrastructure that would allow for ease of access to these items.
- Increase in identity theft issues.
- Individuals, who are ESL, speak different languages and need interpreters or they need to speak to someone live because everything is foreign to them. These individual have the same rights and responsibilities as others in filing their taxes.
- Initial application for OIC and Innocent Spouse.
- Initiate refund trace / get copy of cashed refund check.
- International taxpayers face additional challenges created by time zones. The former R Mail program gave them (and all taxpayers) an avenue to email the IRS questions. Online services will benefit International taxpayers greatly in addition to having the ability to talk to a live person while interacting with their account (like Fidelity or Amazon referenced in question 1).
- IRS should develop online applications similar to private sector websites used for verifying account transactions, making payments and requesting actions. With this it is very important that taxpayers have an option to "contact a representative" or "live chat" if they have ANY questions during their online session. IRS also has to provide an immediate response to the inquiry or requested action, so taxpayers will know whether the online session achieved their goal(s).
- IRS should still allow face-to-face interaction.
- It has been proven by TAS processed cases that Examination has conducted audits on small business or self-employed taxpayers through correspondence and the taxpayers have suffered economic and systemic hardships. By working TAS cases, I have identified that taxpayers responded to audits with a large volume of receipts and correspondence and Exam still assessed a deficiency without even reviewing the taxpayer's response. The IRS system automatically sends the taxpayer the balance due notice, taxpayer tries to reach IRS by

telephone and correspondence and still cannot get a response from IRS. Then IRS elevates their account to ACS who files a lien and levy without ever trying to help the taxpayer first. Once TAS gets the case, we pull the IRS docs, locate the correspondence that substantiated the taxpayer's response to the audit, send the OAR to Exam and have the audit reversed. Levies and liens are filed, levy payments are received, and then after the reconsideration of the audit is completed, the levy payments are refunded back to the taxpayer. Unfortunately, by this time the damage is done.

- It is helpful that taxpayers could get the balance of what they owe. Review online payments. Initiate a refund trace online.
- It's a tool but can't replace other ways to communicate - cannot replace face-to-face or phone.
- Least useful for: processing issues, exam issues
- Live chat online for basic information.
- Locate misapplied payment.
- Low Income taxpayers may not have access to secure computers (example must depend on Library supplied or other public source equipment) or don't trust computers. Online will be problematic when there is a lot of "back and forth" to resolve a case
- Making payments.
- Many services such as balance/refund inquiries, applying for collection compliance options such as Installment agreements, and general questions can be replaced with online services completely; or at least reduced to needing a lesser staff by providing assistance in the form of live chat.
- Many taxpayers & tax professionals use the online systems available to them now; however, there will still be a need for IRS to provide real time assistance with questions. Not all services and transactions are equally suited to online delivery as explained above.
- Many taxpayers with lower education level can't read and understand the letters they get (team member experience working walk in).
- More complex math error notice explanations.
- More, and year-around, phone assistants needed.
- Most useful for: refunds, IAs, filing taxes, estimated tax payments.
- New York State has a great website – suggested as a model.
- No secondary issues.
- No services currently handled by phone or face-to-face should be replaced by online accounts, as not all taxpayers have and/or want online access. Online services are most useful for quick and easy requests for information or services (check on balance due, low dollar instalment agreements, transcript requests). However, online services are least useful more complex requests and questions

as they often require human interaction to achieve the correct result. There is also concern about taxpayers trying to make complex adjustments to their returns online, and potentially making unintended errors that the IRS and/or TAS will have to come back later to correct. (I.e. in our attempt at efficiency do we create more work cleaning up unintended errors)?

- No! There are too many people who still need help. Know CPAs who still need help. Could maybe work for 30% of those we see. Maybe it could be a supplemental, but not replace contact. Older taxpayers are not comfortable using electronic services.
- No, all services are not suited for online delivery and the option to speak to a representative should always remain open for those taxpayers who are elderly, low income, or otherwise do not have access to electronic monitoring/communication.
- No, IRS needs to be smart about what tax issues can be handled through on line and others need face to face contact or phone for resolution.
- Not all services and transactions are suited for online delivery. Circumstances in which would be the least useful are; balance due disputes, levy/lien issues, identity theft issues, non-streamlined installment agreements, and taxpayers with multiple issues in multiple tax periods.
- Not all services are suited to online delivery.
- Not everyone has access to or the tech savvy to use computers.
- Not everyone has access to the internet, smart phone, or is comfortable using online service due to hacking or security concerns.
- Not everyone has access to the internet. Majority of lower income taxpayers do not have access to the internet and if they do it is through their smartphone. The elderly don't have access to the internet nor do they have the knowledge on how to use the computer.
- Not suited online experience.
- Not useful for people with complex returns, victims of ID theft, elderly and disabled individuals, etc.
- Not useful: elderly and some of the disabled, or those who do not have computer access.
- Obtaining forms.
- OIC is a program that could have an automated system for taxpayers to use. This would help cut down on the back and forth letters from OIC and the taxpayers.
- Online account services will have limitations when there are certain conditions on their accounts, such as restricted interest and penalties requiring contact to the IRS for account balances. That creates an inequity of services that's available for everyone and that could create frustration and reduces faith in the Service.

- Online account services could be useful for transcripts, streamlined IAs, payments (which are currently available online), but with an account there would be a trail which the taxpayer and IRS could both view. It would also be beneficial for the taxpayer to be able to submit tax questions and receive feedback/answers. Additionally, online accounts could result in quicker resolution, especially if the taxpayer is able to attach the case resolution documents to their account.
- Online activities should only supplement telephone and face-to-face services. Many of the issues TAS deals with demonstrate that the taxpayers' issues are too complex to be resolved on their own.
- Online assistance should be supplement but not replace a live person.
- Online customer chat could be the most useful to help navigate through the website. Also provide a shut off option to the assistance provided.
- Online services are great for taxpayer with some knowledge of taxes, computer skills and people comfortable with online services.
- Online services are least useful for ID theft (photo ID required); EITC need dialogue to draw out info from taxpayer; Preparer Misconduct cases.
- Online services are not always an effective form of communication with or for disabled people. The system will need to be compatible (or at least accommodate) reading software for the visually impaired (e.g., JAWS, etc.) or closed captioning for the hearing impaired (this is intended as only two of many examples). Consistent with this, the IRS should provide special access to and assistance at self-help sites in locations easily accessible to the disabled.
- Online services are NOT suitable for issues that need substantial review and research / analysis of complex and atypical situations that are difficult to explain, or for issues that will require supporting documentation and innovative resolution options.
- Online services are not useful to address specific questions a taxpayer may have regarding their accounts that is why telephone and face to face services are still needed. The main problem here is the many thousands or millions of taxpayers who either do not have access to the Internet or cannot navigate on the Internet.
- Online services are only suited for answering basic questions and establishing streamline IA, making payments, getting transcripts and forms and perhaps account balances. There are many other issues that require more details such as non-streamline IAs, answering more complex questions, releasing liens/levys.
- Online services can only supplement, not replace telephone and face-to-face service. We work here, and it can still take hours to research some issues. Sometimes telephone service is like doing a medical diagnosis over the phone. Even with online services & ATMs, you still need to see a bank teller once or twice a year.

- Online services can provide automated answers to easy questions. However, multiple issues cannot be addressed or accomplished with online services.
- Online services can supplement telephone and face-to-face services. However, online services should not replace telephone and face-to-face services. Taxpayer's individual situations are far more complicated than the scenarios that the IRS considers on its website and publications.
- Online services could be useful for the most basic things; checking refunds and online i/a's for example. Also simple IVO cases could be resolved this way.
- Online services least useful in collection issues which need human involvement, answering complex tax law questions for taxpayers, provide better notices that are more specific to each taxpayer's issue (less generic), in exam audits where the taxpayer is required to provide documentation, etc. The visual access to the online account needs to be updated to a more user friendly format. Concerned about security and fraud.
- Online services should absolutely only supplement telephone or face to face. It is totally unrealistic to expect 100% of taxpayer to be able to deal with online services, and many issues don't lend themselves to online services.
- Online services should be a supplement, only. There is no replacement for the traditional forms of customer service to resolve a problem - especially a complex problem or a problem from a vulnerable taxpayer.
- Online services should be only a supplement and additional option for services. It should not totally replace telephone and face-to-face services.
- Online services should be supplemental.
- Online services should definitely be a supplement as opposed to being the primary service.
- Online services should never be the only option for taxpayer to communicate with the taxpayers. We feel that this system should only supplement but never replace. We even feel that online services should have either a "chat button" or a call back button to give the taxpayers the option to ask questions when unsure of what they are doing with their account. Online service is definitely not for all services. There are many services where the taxpayers need to talk or explain things in their specific situation that would change an IRS decision.
- Online services should not replace telephone and face-to-face services. Online services should be an additional option for individuals who are comfortable with doing transactions online. Someone like Jane (VIGNETTE) - who as a teacher is college educated this would work. This example is more a generational issue. Younger taxpayer wants this type of communication. If you are doing everything online like a young person then its email me this and then text me. There needs to be a balance!!!!

- Online services should not replace the telephone or face-to-face service it be made available to the taxpayers that want it. No all taxpayers have access to computers and mobile devices. Most taxpayers do not trust those methods due to fraud. There are blackouts, limitations and it various in consistency. Fiscal filers and decedent taxpayers cannot file electronically.
- Online services should only supplement the taxpayers' experiences with the IRS and not replace interaction with an IRS employee. It is very important taxpayers have the option of utilizing online services and/or interacting with the IRS.
- Online services should supplement and not replace telephone and face to face services. Not all services and transactions are equally suited to online delivery.
- Online services should supplement not substitute for telephone and face-to-face services. All services and transactions are not equally suited for online delivery. Taxpayers are at different education levels. And regardless of education, even the best educated struggle with our tax laws—for example, the Iowa TAS office has experience with physicians who are well educated but who don't understand tax concepts. Taxpayers want to talk to a human when there is an issue with their tax account. They do not want to input into a computer system and wait for a response.
- Online services should supplement phone and face-to-face services; could not replace all services. Low income customers frequently are not online, do not have access.
- Online services should supplement telephone and face to face services. Online services are most useful for obtaining refund information and getting transcripts.
- Online services should supplement telephone and face-to-face services. Online services would be most useful for requesting account transcripts, establishing Streamline IAs, submit requested documentation and requesting the status of an account. The "Where's My Refund" Tool needs to be updated to actually provide the current status of the refund. The online system would provide an audit trail of accesses and history so that the next employee has background on the case. Online services are least useful on tax law questions without the ability of the taxpayer to ask additional questions.
- Online services should supplement telephone and face-to-face services, not replace the services. Online services will be most useful for transcripts, checking balances, making payments, installment agreements, and amended tax returns. Online services will be least useful for Identity theft issues.
- Online services should supplement telephone and face-to-face services, but NOT replace them. Taxpayers should have the choice whether to attempt online account processing themselves, hire a paid professional or seek direct assistance from a live IRS employee (either in-person or over the telephone). It is

unfair and inequitable to require taxpayers, who are not computer savvy to pay for online equipment or professional 3rd party assistance.

- Online services should supplement telephone and face-to-face services. All online services will not meet the customers' needs and expectations.
- Online services should supplement telephone and face-to-face services because not all taxpayers are computer savvy and/or have access to the internet.
- Online services should supplement, not replace, telephone and face-to-face services. Clearly, there are services and transactions that are suited to online delivery, but some that are not, such as cash payments. There are also people who either prefers not to interact online, or the situation is not conducive to resolution through online delivery (too complex, issue clarification requires some back-and-forth probing, etc.).
- Online services will be most useful to be able to view information, make payments, find out balance due amounts.
- Online services will be most useful to be able to view information, make payments, find out balance due amounts.
- Online services will enhance overall IRS customer service; but, not replace it. Online services will be most helpful to prevent all law questions coming in at the same time. It would allow for answers that are more consistent. Paying on line will free up phone calls about simple payment issues. Was my payment received? How much do I owe? It would allow taxpayers to set up an installment agreement with minimum IRS interaction. IRS could let them know their exam response was received, or if more information is needed. Taxpayer's could answer their own questions if interactive programs are developed. Resolve taxpayer's simple quick answers.
- Online services will not be a fix all because the elderly and low income taxpayers will not be able to use online services. They either cannot afford computers or do not understand how to use one.
- Online services would be most useful for transcripts, free file, simple IAs, penalty abatement and email.
- Online should enhance services but not replace them.
- Other concerns – how to protect against ID theft with increase in online services offered.
- Our Group agreed that online services are great, but only in addition to more traditional telephone and face-to-face service. Research has shown that even the most tech-savvy customers will still need to speak with a live person for certain transactions. In addition, due to the complexity of the tax code there will be many taxpayers who have issues that are too complicated to fix online. We thought it best if IRS starts out with very simple online account transactions and then add in more complicated items only after they have perfected the process

with the simpler issues. Also-as we mentioned previously, there are still millions of taxpayers who do not conduct any business online either due to lack of equipment, lack of knowledge/training or security concerns. They still have to file and pay their taxes and will always need telephone and/or face-to-face service from the IRS.

- Payment plans.
- Penalty abatement request should be available online.
- Penalty abatement requests under first time abate and reasonable cause (other types of abatement requests could provide list of docs needed and specific instructions for how taxpayer can submit request if it needs to be in writing).
- Phone and face-to-face service should remain primary contact for taxpayers. Online account access should remain secondary.
- Probe.
- Professionals even want to have someone to speak with.
- Provide answers for a specific and complex issue.
- Public service announcements.
- Refund notices need explanation.
- Rural areas don't have access to web.
- Scrambled SSN's, IDT, ID verification, mixed entity, IDRS reading/understanding.
- Security breach is something taxpayers worry about. They are told to protect their identity and tax information, yet IRS wants them to put it all out there on cyber space. With the recent problem with transcripts, who could blame them? How can they be assured their personal and private information will be protected?
- See Question #1 feedback.
- Services that could be effectively delivered online.
- Services that would not be effectively delivered online.
- Should "walk" the taxpayer through the return and refund process and provide follow-up dates for each step in the process.
- Should give taxpayer heads up that clarification and/or more info may be needed; and letters may/will be forthcoming from the IRS.
- Should not replace: Example - eliminating tax preparation has forced uneducated taxpayer to go to unscrupulous preparers vs TAC.
- Should show the taxpayer where their tax return is in the process.
- Simple Examinations could be conducted online.
- Simple math error notices.
- Simplify online payment systems.
- Solution: If an amended return is necessary, the exact issue, and a link to an Amended Return and instructions is linked to the on-line account. If additional

information is necessary to correct the return, than we agree that they can attach the information necessary to the return and make it a CIS case. Either by using, E-Fax or ability to attach directly to the online account.

- Some issues are far too complex to fix using an on-line service; even virtual chat doesn't replace all the key people necessary to correct account, as TAS knows by all the OARs it requires to fix one case at times.
- Some math errors such as dependent SSN, EITC recertification, missing forms, and missing signatures might all lend themselves to the online approach.
- Some taxpayers have a pc, but do not have internet access.
- Some taxpayers would use online services, but not everything for security reasons. Generationally, some stuff just isn't suited for online services. Trust with the IRS could be an issue also.
- Something that is easy and fast.
- Still need the ability to speak with a person, especially in hardship situations.
- Straight forward issues such as checking on refunds, obtaining transcripts and setting up payment plans.
- Streamline Installment Agreement.
- Submission and tracking of amended returns lend themselves to an on line application. However, they certainly do not lend themselves to a "self-serve" approach where it is processed and approved on line due to the high potential for fraud by other entities than the taxpayer.
- Submitting injured spouse allocation post-filing.
- Supplement, never replace.
- Supplement only. Read the MSP #1 by NTA - too many people still use telephone and face-to-face services. All services are based on the issue being dealt with and cannot be place in one customer service basket in the name of convenience.
- Supplement. (4)
- Taking face-to-face opportunities away entirely increases the risk for identity theft.
- Tax law conversations.
- Tax law explanation.
- Tax law questions are less suited for online services as decision trees embedded in software will increasingly compound based on complexity and may lead a taxpayer to realize that they need to actually speak with someone ("what do they mean by modified AGI?").
- Tax Software can be manipulated to what the taxpayer wants to file. This creates problems such as math errors, audits and filing more 1040X's.

- Taxes are daunting for most taxpayers. They depend on their preparer or applications such as Turbo tax to be correct. When something happens, the taxpayer needs to talk to someone who can help.
- Taxpayers frequently ask for transcripts, but are not confident about requesting transcripts due to data breaches. IRS need to give taxpayers confidence that their not providing PII and other information. IRS could build the taxpayers confidence by having good encryption and backup plan.
- Taxpayers need a live person to be able to answer their questions especially when the taxpayer is faced with levies. Taxpayers need immediate and informative responses to their questions.
- Taxpayers should be able to pick up the phone and call the IRS and have their issued resolved. All CSR's should be able to perform at the same level across the nation. The IRS should try to limit the numerous 4442's that are being done on the toll free lines.
- Taxpayers should be able to set up an Installment Agreement (IA) on line even with delinquent returns. If there is a reason an online IA cannot be done the system needs to provide the taxpayer with an explanation.
- Taxpayers should be able to walk in and make payments and or request transcripts.
- Taxpayers want interaction with IRS employees. Online service will benefit more of the technology incline population.
- Tech savvy people who understand taxes and the language used by the IRS.
- Texting and emailing should be an option to communicate with taxpayers.
- The examples we discussed seemed to come from a "perfect world." Homeless veterans, PTSD, etc. are example of taxpayers that may not benefit from the online services.
- The group agreed that online services should supplement existing services. While online transcripts have reduced walk-in traffic, this should be seen as an opportunity to increase walk-in services in other areas, especially with the advent of ACA. Instead, we fear that it seen as a ways to justify reducing staff rather than as an opportunity to increase service availability.
- The group agreed that the most useful tool that could replace face-to-face and phone interaction would be an IRS app for smart phones. The app would be particularly useful for resolving balance due accounts and permitting streamlined payment options; this would also give taxpayers a regular account of their account balances. The app could also verify filing, the payment of refunds, and handle some basic disputes through secured messaging. The group did not believe an IRS app would be helpful for tax advice or offers in compromise.
- The IRS needs to looks at statistical information to understand the various populations they are providing the services. Many individuals, based on

educational levels, can't read or understand the letters they get, so they need the ability to go into a TAC or make a call to talk with a live person to walk through what is being asked or provided.

- The IRS should alert businesses via email/text when they have a tax return/payment/deposit due and they should include information on what the penalty is for late filing and late paying. That would encourage voluntary compliance ahead of time instead of waiting until it is too late.
- The IRS should include a tool on their website where a person can determine their tax status by following prompts and selecting their circumstances. This tool would offer informational “options” for potential future changes to their circumstances and list how these changes can or would change their tax status. (This would minimize need for forms/publications).
- The IRS should utilize the savings realized by online applications and invest in front-line customer service to taxpayers. The most effective use of these resources would be to re-staff TAC offices for taxpayers that may not have access or familiarity with computer applications.
- The low income taxpayers, elderly who have always filed paper returns, disabled whether hearing impaired or visual impaired, etc., need assurance by a “live” person their issue has or will be corrected and given a phone number to contact that IRS employee.
- The negatives given were: increase in ID theft/Fraud, increase in fees charged to taxpayers by preparers, and a possible increase in unauthorized changes to taxpayer's accounts. The positive given were: Third party can handle tax issues.
- The online services should supplement but not replace face-to-face and phone contact. We have to keep in mind segments of the population that are not computer savvy, such as much of the elderly population. Being able to get transcript and balance due information online would be useful. However, online would probably not be as useful for getting answers to technical questions.
- The online service should not be the replacement for telephone and face-to-face service for all issues because the employee may lose the ability to probe and analyze. Every taxpayer will not have full access to computers in order to interact with the IRS. They may lack the knowledge of the tax laws, processes, and procedures in order to formulate the correct question or research the correct topic. Some of the lower income taxpayers may not always have the information needed to pass the security checks to get into the online service.
- The online services are great for issues such as requesting transcripts, checking on the status of a refund, or checking the status of a submitted inquiry. The "appointment only" option should be an option but not a replacement for face-to-face service unless taxpayers are able to get an appointment right away. Thirty

days or more to wait on an appointment would not be acceptable since the general public is anxious to resolve their issue upon receipt of IRS notices.

- The online services should only supplement, not replace, telephone and face-to-face service. All services are not equally suited to online delivery. The taxpayer may be able to secure a transcript, get a balance due amount or set up and Installment Agreement, but if they've received a notice they do not understand they need to speak with a person. It could be a math error notice, a CP2000 they do not understand or they are a victim of ID Theft and they want to speak with a person.
- The online services should start as a supplement, and slowly introduce different products. The new generations will be able to understand it better and now they do most of their stuff online. However, at this point we still have a very large population that is not familiar with online services.
- The online tools should only supplement telephone or face-to-face contact. Many of our taxpayers would not be served by the online services. The elderly, uneducated, no experience with the internet or online services, etc. would either not use them or give up trying. Also the time that it might take to maneuver the system, might cause many to give up trying.
- The only question was will tax accounts be in other languages besides English?
- The primary concern for TAS' customer base is that it is comprised of people in all walks and stages of life. The online system might benefit the younger generation and the "techies" that feel quite familiar with a computer, however, there is a portion of society, older folks, disabled and taxpayers speaking a 2nd language which would impact their utilization of the online services. This may actually hinder compliance and drive taxpayers' further down the rabbit hole.
- The tax law system that was placed on the website is very helpful; however, many taxpayers are unaware that this program exists.
- The taxpaying public would require significant development of online skills in order for ALL taxpayers to be able to have all their needs met in a strictly online environment. Therefore, online services should only supplement the other avenues that taxpayers can pursue to get the information and answers needed. In addition, even the savviest online users may need other methods of contact because not all issues are equal in the ability to be handled online. For example, obviously getting a refund status is very different from a complex question on a schedule attached to a tax form.
- There are many companies that are already using the online system; however, you set yourself to having your personal information possibly be compromised by hackers and ID-thieves.
- There aren't any online services that should completely replace face-to-face. There are on line services that should be added or expanded on. Taxpayers

should be able to request first time or reasonable cause penalty abatements on line. Taxpayers should be able to set up a payment plan on line even if there are unfiled tax returns because it makes sense to get people paying right away.

- There is a site on SERP – ILA with tax law information, but again, need someone to answer the questions.
- There is not security on cell phones especially if you are doing Wi-Fi.
- These examples are so futuristic and too advanced for the general population dealing with taxes. Like the idea of being able to send information electronically, but not everyone would be able to use this.
- This isn't a one or the other situation, IRS must have many options for taxpayer correspondence in order to service all taxpayers.
- Transcript system when it works and they are able to authenticate.
- Transcripts.
- Trust is an issue - think of security breach opportunities tied to online services.
- A very real potential is that we are placing new burden on the taxpayer.
- Not all services and transactions are equally suited to online delivery.
- Online services can only supplement and can never replace or supplant telephone and face-to-face services.
- Sometimes nothing can replace the sound and the tone of a human voice especially in a crisis situation. IRS must present a human side to the agency to foster and keep voluntary compliance.
- Useful for some things such as checking status of return, making payments, requesting transcripts. Least useful for tax obligation. Wondered if they've ever considered an email line? There was an email service for a while in Seattle, that was very helpful, but it was discontinued. Still have to have staff.
- Useful: Those who are computer/tech savvy. The online service is very useful in the IRS example. It would be useful for making simple corrections or changes such as typos and simple math errors. It could be used to eliminate unnecessary 1040Xs. Could be useful for some disabled individuals by allowing them freedom to communicate directly instead of through an interpreter.
- Virtual assistance should have some kind of scanning document option.
- We are extremely unpersuaded that EITC audits or OIC should be conducted online.
- We believe online services could supplement but not completely replace telephone and face-to-face services.
- We can see online account resolution as a starting point, but there would need to be a way out; if someone started an online I/A but it turns out they don't meet streamlined, there should be a way to directly opt out and be assigned to a collection rep; similar for an ID theft issue or any other issue.

- We feel strongly that online services should supplement, not fully replace, telephone and F2F services. The tax law is simply too complex to cover all taxpayer inquiries in an online setting. We need to have kiosks available for taxpayers to print forms needed to comply with the tax law, without having to pay for the forms. We recommend adding additional services to the VSD system. Other work systems, such as correspondence exam and AUR, should include a way for taxpayers to consent or appeal online. Security must remain a priority in all online services.
- We should consider some type of online Form 433 for Currently Not Collectible.
- We should not replace or seek to replace face-to-face interactions, but at least offer more access to Virtual Service Delivery/Kiosks for customers.
- We strongly think “options” are critical. We agree that online services would be good to provide. However, it needs to be an option, not a replacement for telephone or face-to-face service. It is important to provide "options" to meet the needs of all customers
- Where’s my refund.
- Where’s my refund issues.
- While some things are easier online, sometimes nothing can replace the sound and the tone of a human voice just to hear the urgency or to express the concern. In addition, some taxpayers are not computer literate or have access or easy access to online services.
- Work force won’t have skills for face-to-face and phone anymore. (If online goes down or is compromised.)
- Yes, but there would need to be Public Service Announcements (PSAs in a variety of languages).

#### **Future State Question 4**

How do you think taxpayers will benefit by giving their preparers access to their online account?

#### ***Q4 Analysis Results***

While TAS employees could identify some benefits to the taxpayers, there was an overall expression of resistance to accepting this privilege by the preparers. There was much concern regarding identity theft, lack of regulations over practitioners and concern for the taxpayers.

*The Future State meetings were conducted in group settings, responses may be from one employee or a group of employees. Responses included the following:*

- The benefit will be quicker and more accurate service.
- I am sure there are benefits but we don't have clear regulations over preparers, we open up more exploitation of the taxpayer. Especially when they are giving their information to preparer that may do them harm
- There could also be a cost factor. They could charge the taxpayer a fee for that service.
- A benefit is that preparers can easily see what is going on with an account. That is their profession and they are not necessarily comfortable having their clients go on because that is part of their revenue stream.
- We hear about the old practitioner's line where they could call in and get information quickly but it was dedicated to practitioners.
- Fraud.
- They have made the assumption that all preparers are honest and doing the right thing for their taxpayers. We know that is not always true.
- Provides customer answer to questions through preparer and customer receives a comprehensive response from preparer
- Depends on what they are getting billed and preparer trust.
- Questions:
  - Will the online service be able to authentic the POA?
  - Will the POA have regulated access?
- Concerns:
  - Preparer fraud
- Benefits: Easier to make payments, verify estimated payments, and see payments were made.
- Drawbacks: Scammers, security, will 3rd party access have expiration?
- It is a bad idea.
- Identify theft.
- Fraud.
- Provide public service announcements advising customers how to select a "good" preparer
- Warn the customer, advise them of the PTIN.
- Preparer access to taxpayer online accounts can be helpful if the preparer can make corrections and possibly upload information that could facilitate faster resolution.
- The preparer could obtain and relay information and account status to taxpayer directly

- Preparers should not be given access to online accounts. There are many dishonest preparers.
- Some taxpayers (especially the ones that don't understand or speak English) would probably benefit from giving their tax preparers access to their on-line account.
- The drawback is that there are many tax preparers that already take advantage of taxpayers who don't understand (cannot read) English. If these tax preparers are given access to the taxpayer's on-line account there is huge potential for preparer misconduct and fraud.
- The taxpayers could benefit from giving their preparers access to their online account if they really do not understand what is going on with their account and needs a professional to assist them.
- A main concern is this access should not be included with the Form 2848 or 8821, etc. The taxpayer should be able to permit the person they want to have access and can take it away at any time. The taxpayers must have control of this access and only give the access to one person, not a firm.
- Preparers will have a complete record of all of taxpayer's financial documents filed by third parties. Many times taxpayer's forget to give preparer's certain documents and then the IRS will issue taxpayers a "math error notice" or a "notice of deficiency" because the return was incomplete.
- Preparers will be able to know the status of the taxpayer's account instead of relying on taxpayers or the IRS to send certain notices to the taxpayer. Preparer's will be able to determine the history of taxpayer's account.
- Although there are circumstances where it would be beneficial to give preparers access to online account, to help with an account question for example, it could lead to difficulties. In some situations, unscrupulous preparers would find a way to gain access, perhaps provide false credentials. Also a taxpayer may not realize how much access they are giving to a preparer, they may intend to only provide minimal access and yet preparer gains access to other years tax return information. If a taxpayer wants to revoke access, there could be delays.
- At this moment I we do not recommend this feature, until the IRS can hold the preparers liable for any mishandling of taxpayers information. If the IRS is willing to fully penalize the preparer or whomever the taxpayer authorized to access their account, this will work. Otherwise, the victims will be the taxpayers, especially the elderly who trust and rely on professional. The taxpayer will benefit enormously if the preparer are held accountable for their actions on the taxpayer's account.
- Benefit: Preparers will respond to notices and provide information taxpayers might overlook and if the IRS makes a change to the account. Unlike some taxpayers the preparers will respond timely to IRS inquiries.

- If TAS participates they will be able to email through the online accounts to preparers and taxpayers. It would do away with having to mail contacts, save on postal fees, and reduce "lost" correspondence.
- Taxpayers who use online assistance get faster service and are more efficient.
- Negative: Abuse of the system and increase potential for fraud in taxes and opens up the taxpayer's personal information to fraud in other areas of taxpayer's life besides taxes.
- The taxpayer may forget to "authorize" a preparer who has been dropped/changed. If you switch a preparer mid-year, the old preparer might still have access.
- A taxpayer might not realize what they are agreeing to when setting up a third party account online. (access costs and fees)
- It will cost the taxpayers fees to use preparers.
- Concerned with giving access to preparers will increase identity theft and preparer fraud.
- Benefits could be the preparer spends less time on the phone waiting to talk to someone and can take immediate action through the online account to address issues on behalf of the client, saving the client money being billed.
- Taxpayers need to be aware and need to be educated about what they are granting to another individual to handle through their online account. Will the person who has access to this online account be able to transfer payments, amend returns? Notices, etc.?
- There should be limits to what preparers can do, especially making adjustments to the account. There should be some checks and balances that are in place to ensure the taxpayers are protected from fraudulent actions by others.
- Bottom line - it's critical that there be good EDUCATION to the public.
- Drawback to tax preparers having access to taxpayer records equals tax preparer fraud and ID theft
- Drawback: giving preparer's information access online opens up for fraud.  
Benefits: expedite resolution for simple problems
- Preparers explain better as they know most of the information about taxpayer
- Taxpayer should be able to decide how they want to get it, i.e. in the mail or online
- Easy issue = easy fix (i.e. math error);
- Drawbacks = ID theft and preparer fraud concerns.
- Employees felt the drawbacks of allowing preparers access to their accounts could be more costly if the preparer has to access the account numerous times. It will also promote more stolen identity, missed payments on the preparer's part which could result in additional charges to the taxpayers, not making timely payments and missing other deadlines.

- Employees' unanimously stated without stricter regulations, the customer could be subjected to increased preparer fraud.
- For taxpayers who hire reputable taxpayer it will be fine. For those who hire unenrolled preparers, no. We feel this is too dangerous. We deal with many unenrolled preparers who do not understand much about tax preparation and who sometimes inflate taxpayers' refunds so they can justify their high tax preparation fees. Some of these preparers are involved in preparer misconduct.
- Giving tax preparers access to a taxpayer's online account could free up taxpayers' time and taxpayers would have less confusion with understanding the online accounts.
- ID Theft will increase due to online account access.
- If preparers are granted access to taxpayer's online accounts, then strong security measures need to be established. Possible an email or other automated communication can be sent the taxpayer to verify and/or approve changes before they are processed.
- If taxpayers hire others to take action on their behalf, they should be able to authorize them to interact with IRS online. For return preparers, they need access to real-time information concerning the status of return processing to be able to assist their customers, when authorized to do so. However, security must be considered. If/when there are security breaches, such as occurred with the TDS, it shouldn't take months to address the situation and get the system back online. (With decreased F2F and phone assistance available, systems going offline leaves taxpayers with virtually no way to get transcripts or other assistance. This causes a significant, adverse impact on TAS.
- If representatives are going to be given online access, we recommend adding a checkbox to the 2848.
- If the preparer is conscientious and trustworthy, the taxpayer could benefit from having their return processed, credit transferred or account adjusted correctly right away. There are clear benefits to having immediate processing take place by a trusted and knowledgeable tax professional.
- If the tax preparers are given access to the taxpayers' maybe corrections/amended returns can be processed faster. They would be able to answer the questions and possibly provide the required information in a more efficient manner.
- If the taxpayer is unable to manipulate the on line system or does not have access to the on line system the taxpayer could benefit. On the other hand, if the preparer is unscrupulous the taxpayer could be taken advantage of through RPM.
- In most cases the taxpayer would benefit if their preparer was competent. Our concern would be states where they are unlicensed. Also, would the preparer

charge extra every time they received a notification from the IRS? This may add costs to the taxpayer and discourage using it.

- In no positive manner. We believe it would only increase instances of identity theft and preparer fraud.
- In this day and age of identity theft, it is NOT in the taxpayer's best interest to give anyone access to their on-line accounts. Many taxpayers use unregulated preparers and many issues have arisen from false returns filed claiming improper credits and deductions to identity theft.
- In this time of increased id and other theft, there may be limited benefit of a preparer having access to the taxpayer's tax data.
- It could benefit the taxpayer so they can have ready access to assist on behalf of their client, however, if taxpayers give their preparers access to their online account, they may bear some responsibility with who they share information with.
- It is not a good idea giving their preparer access to their online account. Then could allow more fraud and harm to the taxpayer.
- It may be helpful for elderly taxpayers and for taxpayers who don't have a good understanding of what is happening.
- It may speed up the time required to resolve issues. However it may also cost the customers additional fees for the service. And again they can be subject to unscrupulous preparers which can result in other issues.
- It will benefit taxpayers who use good preparers, because they will have the ability to make corrections or adjustments to accounts. The downside is large volumes of information may not work with this system (i.e. financial statements and examination documentation).
- It would not benefit if the preparers aren't regulated. There is ID Theft, fraud, and embezzlement. It may hurt some of the taxpayers more than it would help them.
- It's not a good idea, Dangerous; it could lead to more preparer misconduct. In addition, taxpayer's are responsible for the filing of their returns and payments. The more taxpayers that rely on tax preparers from interacting with the IRS for them, the less responsibility they will feel to make certain their returns are true and correct. It'd too easy as it is to say that is how my tax preparer filed the return.
- It would be better to have interactive returns the taxpayers may complete right online and saved to their computer. It would be better if the taxpayer's engage more with the IRS than less. Why make them buy software? Have an interactive online site and a designated phone line for taxpayer's to file by phone.
- Little benefit and too much danger. Preparers are not regulated and preparer misconduct is too common to allow all preparers to have access to a customer's full IRS account.

- Most people are worried that this will actually increase fraud. They do see a benefit in particular for BMF taxpayers because if alerts go out when deposits haven't been made or when a return is late it would be very beneficial for both the 3rd party and the business owner to know/be reminded.
- Most people were concerned about this because it could increase fraud.
- My team felt that the "self-correct" option could resolve some taxpayer's issues expediently. However, an online system could lead to an increase in fraud/identity theft. It could also lead to taxpayer not receiving notification if someone else has access to their account. People pay less attention to email; not receiving a hard copy notice is concerning.
- NO WAY!!! The taxpayer doesn't benefit and this leaves to many opportunities for preparer fraud.
- People need to be aware of what the limitations are? Will they be able to transfer payments, amend returns? Notices, etc.
- No, preparers should not be able to adjust the account! Educate the taxpayer on what the preparers can do if online services and granting the preparer access.
- We don't think it would be a benefit.
- Tax preparer fraud would increase and become easier.
- There should be no preparer access or the access should be very limited.
- Open for more fraud. It is not good. There are trust issues.
- Preparers are being hacked so if they have taxpayer passwords, etc., information could be compromised.
- Preparers should not be given access to online accounts. There are many dishonest preparers.
- Change the ability for the Direct Deposit refund to go to the preparer and bypassing the taxpayer. In a lot of instances, the taxpayer does not understand the refund is going to preparer first. There also is a problem if a manual refund is needed.
- Preparers should not be given access to online accounts. There are many dishonest preparers.
- Change the ability for the Direct Deposit refund to go to the preparer and bypassing the taxpayer. In a lot of instances, the taxpayer does not understand the refund is going to preparer first. There also is a problem if a manual refund is needed.
- If being audited on a past year and the taxpayer is a high dollar filer there could be some benefit.
- Preparers should not have complete access to a taxpayer's online account. Rather a similar software to RTS where the taxpayer will be able to view all the accesses/history made by the preparer, letters issued or transcripts requests would all be notated so that the taxpayer can see what the preparer is doing or

working on. They would be able to revoke them on the system as well and that would update our system on IDRS. Dates and times, and short histories regarding the actions taken or requested on the account so that taxpayers can view for themselves.

- Pro: Tax professional can handle the account issue and explain it to the taxpayer. Con: Security & disclosure, additional cost, preparer fraud.
- Quicker answers.
- Taxpayer able to allow a professional to work issue.
- Accountability.
- Drawbacks: preparer fraud, security (ID), holds information due to lack of payment.
- Risks: Identity Theft, preparer fraud, added cost for the taxpayer.
- Suggestions were to limit the amount of access Circular 230 preparers have and to revise form 8821. Also, there should be an "opt-out" clause for taxpayers.
- Taxpayers already benefit from POA access, this will be helpful. Taxpayer should be able to indicate level of access for POA/3rd party.
- Taxpayers who have ability to hire reputable assistors may benefit, as online accounts may result in quicker resolution since there won't be a delay in mailing documents. Necessary resolution documents, we assume, will be able to be uploaded and forwarded quickly. However, for low income taxpayers who can't afford reputable assistors, online accounts could result in additional burden and result in them utilizing low cost, unregulated preparers who aren't CPA's or enrolled agents or attorneys which don't have any qualifications at all. This could result in additional tax issues, return/account errors, and even IDT.
- Taxpayers will benefit as preparers can perform more actions to more promptly resolve issues with the taxpayer's accounts. There are concerns that this could be used to steal taxpayer information for identity theft purposes as IRS systems have a history of being compromised by bad actors. Also, anyone in Idaho can be a tax preparer without any training or certification, so unscrupulous "preparers" would have access to their clients' information.
- Taxpayers will benefit by preparation of their returns will be more accurate, and preparers will be able to review and respond to notices quicker by accessing them online.
- Drawbacks to providing access to prepare would be a greater risk of identity theft and the possible cost increase to the taxpayer.
- Taxpayers will benefit if the preparer is worthy of their trust. Otherwise, you have given the preparer too much Personally Identifiable Information (PII), which may result in an increase of return preparer fraud and/or identity thief.
- The IRS should impose serious penalties to anyone who miss uses taxpayers information online without or without their permission.

- IRS should consider special pins in order to access the information.
- Taxpayers would benefit by giving their preparers online access to their accounts because the preparer could be more proactive to resolve any issues. Account access would also eliminate factual inconsistencies by providing the practitioner with the same information as the IRS. The downside to this access is it might help a preparer commit fraud on the taxpayer, an unlicensed person may be able to get access, and a practitioner's staff or unwanted hacker may also gain unauthorized access to harm taxpayers.
- The benefit if the taxpayer lacks knowledge of taxes, tax law, and needs the aid of his preparer, it would be good that the preparer can go online and quickly take care of it. The drawbacks are the Preparer Misconduct and the open door to Identity Theft.
- The employees stated: Can you trust the preparer? Are they an accredited preparer? Attorneys, CPAs, and Enrolled Agents are accredited. The preparer could have an operator error. Not preparer fraud, just an error. Would there be protection if your return preparer's computer was hacked? Do the preparers have to be bonded? As far as a computer being hacked, that could be an issue.
- Giving access to the return preparer could be beneficial but considerations need to be given to potential fraud on the part of the return preparer that is not credentialed.
- The following are potential drawbacks to taxpayers giving their preparers access to their online account. We see more drawback than benefit...
  - Fraud potential;
  - Mistakes/Mishaps (honest on part of the preparer);
  - Identity Theft vulnerabilities; and
  - Power of Attorney revocation issues
- The group majority agreed that preparers in general should not have access to the taxpayer accounts. Due to verification of the preparer and new heightening preparer fraud we are opening too many doors. The example was given, that in no other avenue of our life, medical bills, banking, etc.; do we hand over our passwords and trusted online information and give someone else control.
- The IRS will need to be very diligent in keeping the site secure. Hackers have already proven that they can bypass IRS processes and steal taxpayer's information. They even received over 100,000 IPINs last filing season and that is supposed to be the only way a taxpayer can file their return if they have been a victim of identity theft. This theft defeated the whole purpose of the IPIN. The thieves even hacked the IRS website where taxpayers could request a transcript online and the thieves stole thousands of taxpayer personal information. Electronic security needs to be one of the highest priorities.

- The only benefit that taxpayer would have is that the preparers would have more access and perhaps a better understanding of what is going on with the taxpayer's account. Perhaps they would make less phone calls or contacts with the IRS or TAS if they know what is going on and the time it takes to process whatever request they submitted. However, we also think that it increases the chances for misconduct since now they will have access to entire account information. We also feel that some taxpayers may give access to other people that are not preparers for help. For instance, they may ask their relative, neighbor or friend for help. We would not be able to stop that. This could cause more ID theft in the long run. So, there are some good points but also some not so good.
- There are unscrupulous preparers.
- There could be discrepancies with accounts.
- There needs to be a way to monitor and remove account authorizations.
- They have the knowledge to assist, just as they do now by giving POA authorization.
- This should reduce TAS case work because they come to TAS because they know they will get assistance.
- The preparer may choose not to assist due to complexity, lack of payment by the taxpayer, increased cost to the taxpayer. POA should be able remove themselves if they are not going to assist the client. Then a notification would be sent to the taxpayer advising that they need to address the issue.
- Form many accounts, the CPA should have authorization for all BMF forms for them to properly work the case. If the problem relates to more than what the CPA is authorized, what is the IRS process going to be? This could also relate to IMF.
- This can be very helpful and would be welcome by the practitioner community who has been very frustrated with the service decline in the regular toll free service and the practitioner hotline. They don't like waiting to have their call answered, and then getting someone who cannot help. However, the office felt strongly that there is a risk to allowing all preparers access: there would be more preparer fraud and mischief.
- This could increase the chance of Preparer Fraud and abuse. In addition, the preparers may charge a fee for setting up the access and for each use. There should be multiple levels of use such as "read only" vs. authority to make changes to the account or submit documentation. Many taxpayers currently have several POAs. There needs to be an option similar to the Form 2848 for granting and revoking the POA. Need to determine how the third party will access the account and type of interaction allowed. Normally the level of

knowledge of tax law is higher with the POA so this may reduce resolution time but there is the possibility of higher fees for the taxpayer.

- This question is similar to a double edge sword. While it would be time saving and less of a hassle to delegate someone else the capability of retrieving your personal tax information, it also opens up the taxpayer to the many negative aspects of having someone knowing your PII. Preparer fraud, lack of proper disposal of PII information and Stolen ID. If the IRS tightens up the POA's accountability for having the ability to access their client's online tax accounts, then it could be less worrisome for the taxpayer. One idea is for the taxpayer to automatically receive an email from the IRS whenever their online account is accessed. That way, they can monitor their account to ensure that the delegated person/persons are accessing their account for business reasons only.
- Too much unscrupulous preparers. They may possibly open the online account on behalf of their less informed clients and redirect refunds, etc. We would question the security and certain populations being taken advantage of (i.e. elderly, ESL and low income families).
- Suggestion: create permission levels for preparers. For example; preparers may not change address or add bank information, or contact info for taxpayer. Those items are restricted to the taxpayer only.
- Taxpayer needs to be careful and limit access to preparers to avoid possible fraud.
- Taxpayer will not benefit.
- Want to revoke.
- Increase in taxpayer preparer fraud.
- Stolen refunds, IDT.
- Taxpayer would be more educated.
- Too much temptation for preparers to change taxpayer's information for online account.
- We are suggesting this is a problem. Return preparers (RP) in many of our cases are the genesis of the taxpayer's problem. They have access to the taxpayer's filing information and may get access to taxpayer's account. The examples provided about the future state vision have taxpayers resolving account issues online. Unscrupulous RPs could create significant issues for a taxpayer with access to the account. We suggest that RPs be required to log in through a separate portal so the IRS has a record of access. In addition, we realize this is inconsistent with current law, but we would suggest requiring taxpayer consent to significant changes to the taxpayer's online account by someone other than the taxpayer (e.g., changes to bank information or significant increases in refund amount, etc.).

- We feel they won't in all cases. We feel there are too many unscrupulous preparers out there for this to be a viable and healthy solution. The only benefit would be for those too scared to deal with IRS alone but there must be a way figured out to keep these preparers monitored and accountable.
- While there are some possible advantages, such as a taxpayer being able to rely on their preparer for essentially ALL interactions with the IRS, the potential disadvantages are much more obvious. In the era of so many data breaches and identity theft situations, the taxpayers would really be taking a risk to provide all that access and information to a preparer. It could work out fine in many situations, but the potential for catastrophic consequences seems quite great.
- The benefit of preparer access probably is time compression and possibly some reduction in demand for information.
- A concern, however, is the lack of standards for preparers, the unscrupulous nature of some and the changing use of various preparers from year to year. There will be a very distinct need to identify who took what actions to an online account. If the taxpayer lacks knowledge of tax processing/tax law, and needs the aid of his preparer, it would be good that the preparer can go online and quickly take care of it.
- Nevertheless, we believe the risks are great. The drawbacks are the preparer misconduct and the open door to Identity Theft.

### **Future State Question 5**

Should IRS limit account access to Circular 230 preparers (attorneys, CPAs, enrolled agents, enrolled retirement plan agents)?

### **Q5 Analysis Results**

The comments were mixed. Overall the answer was yes, but additional comments were included.

*The Future State meetings were conducted in group settings, responses may be from one employee or a group of employees. Responses included the following:*

Some positives:

- Quicker action/results to fix a problem if preparers are knowledgeable.
- Taxpayers may benefit giving their preparers access to their online account for math error issues.
- Our group felt that the main benefit taxpayers will derive by giving their practitioners access to their online accounts is saving time and money. Their tax

preparer will have instant access to all of their records so the need for them to gather and submit lots of paper documents will be significantly reduced. In addition, their preparer can resolve many errors for them online without even needing to contact the taxpayer.

- Overwhelmingly, the group felt that yes, a taxpayer is going to a preparer since they do not understand taxes and would rather have that person interact with the IRS. Availability to their online account would reduce the preparers need to call or write the IRS if certain corrections could be made online – especially quick math error corrects like SSN transposition errors or to send missing information (returns in ERS).
- Taxpayers will benefit as preparers can perform more actions to more promptly resolve issues with the taxpayer's accounts.
- Quicker answers.
- Taxpayer able to allow a professional to work issue.
- Accountability.
- The benefit will be quicker and more accurate service.
- Benefits could be the preparer spends less time on the phone waiting to talk to someone and can take immediate action through the online account to address issues on behalf of the client, saving the client money being billed.
- If the preparer is conscientious and trustworthy, the taxpayer could benefit from having their return processed, credit transferred or account adjusted correctly right away. There are clear benefits to having immediate processing take place by a trusted and knowledgeable tax professional.
- Tax professional can handle the account issue and explain it to the taxpayer.
- It will benefit taxpayers who use good preparers, because they will have the ability to make the corrections or adjustment to accounts.
- The taxpayers could benefit from giving their preparers access to their online account if they really do not understand what is going on with their account and needs a professional to assist them.
- Giving tax preparers access to a taxpayer's online account could free up taxpayers' time and taxpayers would have less confusion with understanding the online accounts.
- Benefit: Preparers will respond to notices and provide information taxpayers might overlook and if the IRS makes a change to the account. Unlike some taxpayers the preparers will respond timely to IRS inquiries.
- Taxpayers who use online assistance get faster service and are more efficient.
- Benefits: Easier to make payments, verify estimated payments, and see payments were made.
- It may be helpful for elderly taxpayers and for taxpayers who don't have a good understanding of what is happening.

Some negatives:

- There would be the convenience of allowing preparers access. However, the main drawback would be that there are unethical preparers out there who could exploit the access.
- The drawback to taxpayers giving their preparers access to their online account is the possibility of fraud, identity theft, and stealing of refunds by rerouting the refund to the preparer's account.
- The potential problem we identified was an even greater risk of preparer fraud as preparers will have immediate access to even more taxpayer information and for multiple years.
- The drawback is if the preparer is unscrupulous or is elderly and becomes (or is) incompetent or senile - many case advocates have seen the impact of this set of circumstances.
- We believe the drawbacks will be opening the taxpayer up to additional fraud and scams.
- If taxpayers hire others to take action on their behalf, they should be able to authorize them to interact with IRS online. For return preparers, they need access to real-time information concerning the status of return processing to be able to assist their customers, when authorized to do so. However, security must be considered. If/when there are security breaches, such as occurred with the TDS, it shouldn't take months to address the situation and get the system back online. With decreased F2F and phone assistance available, systems going offline leaves taxpayers with virtually no way to get transcripts or other assistance. This causes a significant, adverse impact on TAS.
- There are concerns that this could be used to steal taxpayer information for identity theft purposes as IRS systems have a history of being compromised by bad actors. Also, anyone in Idaho can be a tax preparer without any training or certification, so unscrupulous "preparers" would have access to their clients' information.
- "NO WAY!!! The taxpayer doesn't benefit and this leaves to many opportunities for preparer fraud.
- No, preparers should not be able to adjust the account! Educate the taxpayer on what the preparers can do if online services and granting the preparer access.
- Concerned with giving access to preparers will increase the identity theft / preparer fraud.
- Most people were concerned about this because it could increase fraud.
- ID Theft will increase due to online account access.
- Drawbacks: preparer fraud, security (ID), hold information due to lack of payment

- In most cases the taxpayer would benefit if their preparer was competent. Our concern would be states where they are unlicensed. Also, would the preparer charge extra every time they received a notification from the IRS? This may add costs to the taxpayer and discourage using it.
- Preparers should not be given access to online accounts. There are many dishonest preparers.
- Taxpayer needs to be careful and limit access to preparers to avoid possible fraud.
- Tax preparer fraud would increase and become easier.
- Security & disclosure, additional cost, preparer fraud.
- It is a bad idea - Identify theft, Fraud.
- The drawback is that there are many tax preparers that already take advantage of taxpayers who don't understand (cannot read) English. If these tax preparers are given access to the taxpayer's online account there is huge potential for preparer misconduct and fraud.
- Negative: Abuse of the system and increase potential for fraud in taxes and opens up the taxpayer's personal information to fraud in other areas of taxpayer's life besides taxes.
- The taxpayer may forget to "unauthorized" preparers who have been dropped or changed. If you switch a preparer mid-year, the old preparer might still have access.
- It will cost the taxpayers fees to use preparers.
- Too much unscrupulous preparers. They may possibly open the online account on behalf of their less informed clients and redirect refunds, etc. We would question the security and certain populations being taken advantage of (elderly, ESL, and low income families).
- It would not benefit if the preparers aren't regulated. There is ID Theft, fraud, and embezzlement. It may hurt some of the taxpayers more than it would help them.
- While there are some possible advantages, such as a taxpayer being able to rely on their preparer for essentially ALL interactions with the IRS, the potential disadvantages are much more obvious. In the era of so many data breaches and identity theft situations, the taxpayers would really be taking a risk to provide all that access and information to a preparer. It could work out fine in many situations, but the potential for catastrophic consequences seems quite great.
- We are suggesting this is a problem. Return preparers (RP) in many of our cases are the genesis of the taxpayer's problem. They have access to the taxpayer's filing information and may get access to taxpayer's account. The examples provided about the future state vision have taxpayers resolving account issues online. Unscrupulous RPs could create significant issues for a taxpayer with access to the account. We suggest that RPs be required to log in

through a separate portal so the IRS has a record of access. In addition, we realize this is inconsistent with current law, but we would suggest requiring taxpayer consent to significant changes to the taxpayer's online account by someone other than the taxpayer (e.g., changes to bank information or significant increases in refund amount, etc.).

- Although there are circumstances where it would be beneficial to give preparers access to online account, to help with an account question for example, it could lead to difficulties. In some situations, unscrupulous preparers would find a way to gain access, perhaps provide false credentials. Also a taxpayer may not realize how much access they are giving to a preparer, they may intend to only provide minimal access and yet preparer gains access to other years tax return information. If a taxpayer wants to revoke access, there could be delays.
- We feel they won't in all cases. We feel there are too many unscrupulous preparers out there for this to be a viable and healthy solution. The only benefit would be for those too scared to deal with IRS alone but there must be a way figured out to keep these preparers monitored and accountable.
- Drawback to tax preparers having access to taxpayer records equals tax preparer fraud and ID theft.
- Employees felt the drawbacks of allowing prepares access to their accounts could be more costly if the preparer has to access the account numerous times. It will also promote more stolen identity, missed payments on the preparer's part which could result in additional charges to the taxpayers, not making timely payments and missing other deadlines.
- This question is similar to a double edge sword. While it would be time saving and less of a hassle to delegate someone else the capability of retrieving your personal tax information, it also opens up the taxpayer to the many negative aspects of having someone knowing your PII. Preparer fraud, lack of proper disposal of PII information and Stolen ID. If the IRS tightens up the POA's accountability for having the ability to access their client's online tax accounts, then it could be less worrisome for the taxpayer. One idea is for the taxpayer to automatically receive an email from the IRS whenever their online account is accessed. That way, they can monitor their account to ensure that the delegated person/persons are accessing their account for business reasons only.
- The employees stated: Can you trust the preparer? Are they an accredited preparer? Attorneys, CPAs, and Enrolled Agents are accredited. The preparer could have an operator error. Not preparer fraud, just an error. Would there be protection if your return preparer's computer was hacked? Do the preparers have to be bonded? As far as a computer being hacked, that could be an issue.

- Giving access to the return preparer could be beneficial but considerations need to be given to potential fraud on the part of the return preparer that is not credentialed.
- It's not a good idea, dangerous; it could lead to more preparer misconduct. In addition, taxpayer's are responsible for the filing of their returns and payments. The more taxpayers that rely on tax preparers from interacting with the IRS for them, the less responsibility they will feel to make certain their returns are true and correct. It'd too easy as it is to say that is how my tax preparer filed the return.
- Drawbacks: Scammers, security, will 3rd party access have expiration?
- Nevertheless, we believe the risks are great. The drawbacks are the preparer misconduct and the open door to Identity Theft.
- This could increase the chance of Preparer Fraud and abuse. In addition, the preparers may charge a fee for setting up the access and for each use. There should be multiple levels of use such as "read only" vs. authority to make changes to the account or submit documentation. Many taxpayers currently have several POAs. There needs to be an option similar to the Form 2848 for granting and revoking the POA. Need to determine how the third party will access the account and type of interaction allowed. Normally the level of knowledge of tax law is higher with the POA so this may reduce resolution time but there is the possibility of higher fees for the taxpayer.
- Risks: Identity Theft; Preparer fraud; added cost for the taxpayer.
- No because doing so could cause an additional financial burden to the taxpayer.
- Little benefit and too much danger. Preparers are not regulated and preparer misconduct is too common to allow all preparers to have access to a customer's full IRS account.

#### Other Comments

- Limitation to 230 - we can't limit people who aren't qualified to prepare returns. But can the IRS say the only access is allowed to Cir 230. For privacy the taxpayer should only be able to get permissions.
- Preparers should not be given access to online accounts. There are many dishonest preparers.
- The benefit if the taxpayer lacks knowledge of taxes, tax law, and needs the aid of his preparer, it would be good that the preparer can go online and quickly take care of it.
- The IRS should limit account access to 230 preparers. Access should not be allowed to just anyone, to many fraudulent companies and preparers.
- Yes, limit it to only those for account access.

- Yes. And regulate them.
- Yes, Circular 230 designees in good standing should have limited account access, actually a different kind of access than the taxpayer. We can see the use of this as a perk to reward those who come in under the Annual Filing Season Program-Record of Completion Holders umbrella. OPR would need to be heavily involved with a roll-out first to circular 230. Results there should then be reviewed for access to AFSPRCHs. No other access is recommended.
- 2848's needs to be updated to allow/restrict access based on level of authority
- A benefit is that preparers can easily see what is going on with an account. That is their profession and they are not necessarily comfortable having their clients go on because that is part of their revenue stream.
- A main concern is this access should not be included with the Form 2848 or 8821, etc. The taxpayer should be able to permit the person they want to have access and can take it away at any time. The taxpayers must have control of this access and only give the access to one person, not a firm.
- A system needs to be in place that can determine if the preparer is a legitimate preparer by having them pass a test or provide adequate information about themselves where the IRS can take action against them should they commit fraud against the taxpayers.
- A taxpayer might not realize what they are agreeing to (i.e. access costs and fees) when setting up third party account online.
- Ability to handle online volumes without crashing the system.
- Access should be limited to Circular 230 Preparers only.
- Account access should be limited to the taxpayer, Circular 230 preparers, and annual filing season program /record of completion holders for the reasons mentioned in the previously answered questions. We also recommend IRS be required to notify preparers when their PTIN has been used by someone other than the preparer and possibly even assign a new PTIN to the good preparer.
- Although allowing access to taxpayer's online account information to only these types of 3rd parties limits who and from where the taxpayer can seek assistance, spreading access to other individuals or organizations could substantially increase the opportunity for more fraud and account errors.
- Although the group generally agreed a practitioner should practice under Circular 230 to gain access to taxpayers' accounts, it could create a financial boon for circular 230 practitioners. These practitioners could use the benefit to attract and charge higher fees to their clients. This rule could lead to the creation of IRS account mills, which would have many assistants working under a Circular 230 practitioner to provide poor service at a high price. Organizations such as H&R Block and Jackson Hewitt that already have infrastructure in place could force

feed tax service to millions of taxpayers and take over services, such as tax law questions that were routinely provided by the IRS in the past.

- At this moment I we do not recommend this feature, until the IRS can hold the preparers liable for any mishandling of taxpayers information. If the IRS is willing to fully penalize the preparer or whomever the taxpayer authorized to access their account, this will work. Otherwise, the victims will be the taxpayers, especially the elderly who trust and rely on professional. The taxpayer will benefit enormously if the preparer are held accountable for their actions on the taxpayer's account.
- Benefit: Preparers will respond to notices and provide information taxpayers might overlook and if the IRS makes a change to the account. Unlike some taxpayers the preparers will respond timely to IRS inquiries.
- Benefits:
  - Bottom line - it's critical that there be good EDUCATION to the public.
  - Change the ability for the Direct Deposit refund to go to the preparer and bypassing the taxpayer. In a lot of instances, the taxpayer does not understand the refund is going to preparer first. There also is a problem if a manual refund is needed.
  - Change the ability for the Direct Deposit refund to go to the preparer and bypassing the taxpayer. In a lot of instances, the taxpayer does not understand the refund is going to preparer first. There also is a problem if a manual refund is needed.
- Concerns: Prepare fraud.
- Customers should have access to their own online account and IRS should limit access to the individuals indicated above.
- Depends on what they are getting billed and preparer trust.
- Difficulty (it should be kept simple enough for everyone to understand/navigate)
- Do we create a system where only those that can afford to have someone represent them get quality service?
- Drawback: giving preparer's information access online opens up for fraud
- Drawbacks - ID theft and preparer fraud concerns.
- Drawbacks to providing access to prepare would be a greater risk of identity theft and the possible cost increase to the taxpayer."
- Easy issue = easy fix (i.e. math error).
- Employees' unanimously stated without stricter regulations, the customer could be subjected to increased preparer fraud.
- Employees' were concerned with the educational level of the customer and that more IRS outreach needs to be accomplished.

- Ensure taxpayers in other countries will be able to access IRS.gov from their respective countries. All countries don't have the same freedom when it comes to internet access.
- Expedite resolution for simple problems.
- For taxpayers who hire reputable taxpayer it will be fine. For those who hire unenrolled preparers, no. We feel this is too dangerous. We deal with many unenrolled preparers who do not understand much about tax preparation and who sometimes inflate taxpayers' refunds so they can justify their high tax preparation fees. Some of these preparers are involved in preparer misconduct.
- For many accounts, the CPA should have authorization for all BMF forms for them to properly work the case. If the problem relates to more than what the CPA is authorized, what is the IRS process going to be? This could also relate to IMF.
- Fraud potential.
- Fraud.
- Full account access should be limited because of potential return preparer fraud risks.
- Generally yes, this is based on concerns regarding preparer fraud. However, there should be an exception for family members. A child helping an elderly or disabled parent.
- I agree. Those are the types of professionals that do year-round accounting work – they would be helping their clients year-round. An unenrolled preparer is probably only submitting a return – those are probably the ones who would be fraudulent. This would also be an incentive for them to get some level of certification.
- I am sure there are benefits but we don't have clear regulations over preparers, we open up more exploitation of the taxpayer. Especially when they are giving their information to preparer that may do them harm.
- ID Theft vulnerabilities.
- If a client is sitting with an unenrolled preparer, assuming that is an ethical preparer, the taxpayer could gain access and allow the preparer to look on. I guess there is a way to make it work.
- If a taxpayer gives rep on-line access to their account does that give those rights to discuss case with IRS? Can TAS talk to the POA? How does the on-line system work - is TAS going to have access to this.
- If being audited on a past year and the taxpayer is a high dollar filer there could be some benefit.
- If preparers are granted access to taxpayer's online accounts, then strong security measures need to be established. Possible an email or other automated

communication can be sent the taxpayer to verify and/or approve changes before they are processed.

- If representatives are going to be given online access, we recommend adding a checkbox to the 2848.
- If TAS participates they will be able to email through the online accounts to preparers and taxpayers. It would do away with having to mail contacts, save on postal fees, and reduce "lost" correspondence.
- If the tax preparers are given access to the taxpayers' maybe corrections/amended returns can be processed faster. They would be able to answer the questions and possibly provide the required information in a more efficient manner.
- If the taxpayer is unable to manipulate the online system or does not have access to the on line system the taxpayer could benefit. On the other hand, if the preparer is unscrupulous the taxpayer could be taken advantage of through RPM.
- In no positive manner. We believe it would only increase instances of identity theft and preparer fraud.
- In this day and age of identity theft, it is NOT in the taxpayer's best interest to give anyone access to their on-line accounts. Many taxpayers use unregulated preparers and many issues have arisen from false returns filed claiming improper credits and deductions to identity theft.
- In this time of increased id and other theft, there may be limited benefit of a preparer having access to the taxpayer's tax data.
- Increase in taxpayer preparer fraud.
- IRS should consider special pins in order to access the information.
- Is it really going to regulate them and hold them accountable? Ultimately the taxpayer is responsible for their taxes, and access should be limited.
- It could benefit the taxpayer so they can have ready access to assist on behalf of their client, however, if taxpayers give their preparers access to their online account, they may bear some responsibility with who they share information with.
- It is not a good idea giving their preparer access to their online account. Then could allow more fraud and harm to the taxpayer.
- It may speed up the time required to resolve issues. However it may also cost the customers additional fees for the service. And again they can be subject to unscrupulous preparers which can result in other issues.
- It would be a good way to limit the potential for identity theft.
- It would be better to have interactive returns the taxpayers may complete right online and saved to their computer. It would be better if the taxpayer's engage more with the IRS than less. Why make them buy software? Have an interactive online site and a designated phone line for taxpayer's to file by phone.

- It's a slippery slope. How "certified" preparers would be vetted and certified.
- It's unclear what authorities can be granted to the account access. How does the authorization to "online" accounts effect discussing the case with the IRS employees? Is it similar to "check the box" concept of tax return filing?
- Limitations on Circular 230 preparers means taxpayers lose right to be informed; IRS should consider updates of Power of Attorney every 2,3 or 4 years or have an expiration date.
- Limiting POA access to 2848 holders may prevent fraud from occurring.
- Low income taxpayer's could be harmed if they cannot afford an attorney, CPS, EA.
- Mistaken/Mishaps (honest on the part of the preparer).
- More details are needed about the future state to gain better understanding.
- Most people are worried that this will actually increase fraud. They do see a benefit in particular for BMF taxpayers because if alerts go out when deposits haven't been made or when a return is late it would be very beneficial for both the 3rd party and the business owner to know/be reminded.
- Most people said yes, it should be limited
- Most people want to the option of speaking to a human. At least offer the taxpayer the option of having callback.
- My team felt that the "self-correct" option could resolve some taxpayers' issues expediently. However, an online system could lead to an increase in fraud/identity theft. It could also lead to taxpayer not receiving notification if someone else has access to their account. People pay less attention to email; not receiving a hard copy notice is concerning.
- Need to find a way to validate if a POA, CPA are legit, a list should cross reference known preparers and filter out any disbarred or suspended preparers.
- No it should not be limited but if it is, the taxpayer should have the option to grant permission if they choose to.
- No, I think it's the taxpayer's decision whom to give information to Not all Taxpayers created equally.
- No, just like any other online service, however with the condition that whoever access the account is liable for any misrepresentation, errors, or false information provided. IRS must make it clear and ensure that anyone that access someone else's account they know the penalties of perjury. They need to provide their own information also. The reason we say this is because family members, friend can help friends with tax issues, but the moment they know they will be liable and penalized directly for any misrepresentation or errors, that itself will reduce the amount of people that would want to access somebody else's account.
- No, some taxpayers are unable to afford preparers and may get help from a family member that they have authorized to receive information on their behalf.

- No. Too many variables which could lead to more fraud. No access should be given.
- No. We also felt that family members should also be included.
- Notify the taxpayer if anyone accesses their account. Possibly have a video recording of access similar to an ATM.
- Often disabled, uneducated, ESL taxpayers are taken advantage of because they do not understand the tax laws. They should be barred if they are found to be guilty of misrepresenting or committing fraud. RAL/RAC refunds should not be offered. Preparers call and demand assistance when they have charged an arm and leg and get TAS assistance for free. How do we know that the taxpayer wasn't charged extra for getting something done quicker?"
- Online access should be limited to circular 230 preparers.
- Only Circular 230 preparers, with a valid PTIN, should be able to access any taxpayer information.
- Open for more fraud. It is not good. There are trust issues.
- Opinions varied. Some employees feel this would be best. Others can see the need to allow for example a friend to have access in order to solve a problem.
- Our Group felt strongly that online account access should be limited to Circular 230 tax practitioners with valid PTINs. The online account site is controlled by IRS regardless of the lack of a national requirement for return preparers to be registered. The system should have a "terms of access and use" statement that both individual taxpayers and preparers must read and check a box to indicate they agree to the rules before being granted system access. This will significantly reduce the risk of online return preparer fraud. In addition, if an individual taxpayer allows an unenrolled preparer to access their online account and that preparer commits fraud-the IRS will be protected as that individual taxpayer violated the terms of access and use by allowing this. This would resolve the ongoing debate as to whether or not the IRS is responsible for reimbursing victims of preparer fraud as they would clearly not be if the fraud was done due to a taxpayer providing their unenrolled preparer their personal user ID/password.
- People need to be aware of what the limitations are? Will they be able to transfer payments, amend returns? Notices, etc.
- Perhaps online chat (live chat) would benefit to taxpayers"
- POA revocation issues.
- Preparer access to taxpayer online accounts can be helpful if the preparer can make corrections and possibly upload information that could facilitate faster resolution.
- Preparers are being hacked so if they have taxpayer passwords, etc., information could be compromised.

- Preparers could be costly and during their busy season, they could charge more for their services
- Preparer's explain better as they know most of the information about taxpayer
- Preparers should not have complete access to a taxpayer's online account. Rather a similar software to RTS where the taxpayer will be able to view all the accesses/history made by the preparer, letters issued or transcripts requests would all be notated so that the taxpayer can see what the preparer is doing or working on. They would be able to revoke them on the system as well and that would update our system on IDRS. Dates and times, and short histories regarding the actions taken or requested on the account so that taxpayers can view for themselves.
- Preparers will be able to know the status of the taxpayer's account instead of relying on taxpayers or the IRS to send certain notices to the taxpayer. Preparer's will be able to determine the history of taxpayer's account.
- Preparers will have a complete record of all of taxpayer's financial documents filed by third parties. Many times taxpayer's forget to give preparer's certain documents and then the IRS will issue taxpayers a "math error notice" or a "notice of deficiency" because the return was incomplete.
- Provide public service announcements advising customers how to select a "good" preparer. Warn the customer, advise them of the PTIN.
- Provides customer answer to questions through preparer and customer receives a comprehensive response from preparer.
- QUESTIONS: Will the online service be able to authentic the POA? Will the POA have regulated access?
- Resounding "yes" from my team, especially at initial roll out if you want the system to have any chance of success. However, with allowing additional parties access, security and authentication procedures must be strong and the taxpayer needs the option to change who has access easily, if they want to terminate their POA. My team wanted to make sure POAs would have separate access, so that taxpayers weren't encouraged to share their personal PINs or other log-in information with their POAs.
- Security.
- Some concerns were voiced regarding online services.
- Some said yes and others said no. The Yes's. felt Circular 230 preparers (attorneys, CPAs, enrolled agents, enrolled retirement plan agents, and enrolled actuaries with a valid PTIN would better interpret the IRS's instructions and procedures, and would be most benefits with more online interaction. The No's feel taxpayer's need more engagement not less. Good taxpayer engagement will limit fraudulent tax returns.

- Some taxpayers (especially the ones that don't understand or speak English) would probably benefit from giving their tax preparers access to their on-line account.
- Split opinion on limiting preparer access.
- Stolen refunds, IDT.
- Suggestion: create permission levels for preparers. For example: Preparers may not change address or add bank information, or contact info for taxpayer. Those items are restricted to the taxpayer only. "
- Suggestions were to limit the amount of access Circular 230 preparers have and to revise form 8821. Also, there should be an "opt-out" clause for taxpayers.
- Taxpayer should be able to decide how they want to get it, i.e. in the mail or online.
- Taxpayers already benefit from POA access - this will be helpful. Taxpayer should be able to indicate level of access for POA/3rd party.
- Taxpayers need to be aware and need to be educated about what they are granting to another individual to handle through their online account. Will the person who has access to this online account be able to transfer payments, amend returns? Notices, etc.?
- Taxpayers who have ability to hire reputable assistors may benefit, as on-line accounts may result in quicker resolution since there won't be a delay in mailing documents. Necessary resolution documents, we assume, will be able to be uploaded and forwarded quickly. However, for low income taxpayers who can't afford reputable assistors, online accounts could result in additional burden and result in them utilizing low cost, unregulated preparers who aren't CPA's or enrolled agents or attorneys which don't have any qualifications at all. This could result in additional tax issues, return/account errors, and even IDT.
- Taxpayers will benefit by preparation of their returns will be more accurate, and preparers will be able to review and respond to notices quicker by accessing them online.
- Taxpayers will benefit if the preparer is worthy of their trust. Otherwise, you have given the preparer too much PII, which may result in an increase of return preparer fraud and/or identity thief.
- Taxpayers would benefit by giving their preparers online access to their accounts because the preparer could be more proactive to resolve any issues. Account access would also eliminate factual inconsistencies by providing the practitioner with the same information as the IRS. The downside to this access is it might help a preparer commit fraud on the taxpayer, unlicensed person may be able to get access, and a practitioner's staff or unwanted hacker may also gain unauthorized access to harm taxpayers.

- The access should be the same as on the Form 2848. This may result in a sharp learning curve for many individuals who have limited IT skills.
- The benefit of preparer access probably is time compression and possibly some reduction in demand for information. A concern, however, is the lack of standards for preparers, the unscrupulous nature of some and the changing use of various preparers from year to year. There will be a very distinct need to identify who took what actions to an online account. If the taxpayer lacks knowledge of tax processing/tax law, and needs the aid of his preparer, it would be good that the preparer can go online and quickly take care of it.
- The downside is large volumes of information may not work with this system (i.e. financial statements and examination documentation).
- The drawbacks are the Preparer Misconduct and the open door to Identity Theft.
- The following are potential drawbacks to taxpayers giving their preparers access to their online account. We see more drawback than benefit...
- The general consensus was no, because it would eliminate many qualified tax preparers and because taxpayers should be able to choose who has access to their account information. That said, everyone strongly believes that all preparers need to be certified by the IRS.
- The group majority agreed that preparers in general should not have access to the taxpayer accounts. Due to verification of the preparer and new heightening preparer fraud we are opening too many doors. The example was given, that in no other avenue of our life, medical bills, banking, etc.; do we hand over our passwords and trusted online information and give someone else control.
- The IRS should impose serious penalties to anyone who miss uses taxpayers information online without or without their permission.
- The IRS should limit account access to attorneys and CPAs only.
- The IRS should limit account access to Circular 230 preparers.
- The IRS should not be issuing the pin. Taxpayers should be given good instructions and the pros and cons of giving access to their account to a preparer or any other person other than an IRS employee.
- The IRS will need to be very diligent in keeping the site secure. Hackers have already proven that they can bypass IRS processes and steal taxpayer's information. They even received over 100,000 IPINs last filing season and that is supposed to be the only way a taxpayer can file their return if they have been a victim of identity theft. This theft defeated the whole purpose of the IPIN. The thieves even hacked the IRS website where taxpayers could request a transcript online and the thieves stole thousands of taxpayer personal information. Electronic Security needs to be one of the highest priorities.
- The majority of answers to this question were a resounding yes. The limiting of account access reduces risks to taxpayer's accounts as well as having a practical

span of control. As long as the steps to access accounts are monitored and that anyone with access has the proper training held by the IRS, this could be a successful endeavor for the IRS' Future state.

- The only benefit that taxpayer would have is that the preparers would have more access and perhaps a better understanding of what is going on with the taxpayer's account. Perhaps they would make less phone calls or contacts with the IRS or TAS if they know what is going on and the time it takes to process whatever request they submitted. However, we also think that it increases the chances for misconduct since now they will have access to entire account information. We also feel that some taxpayers may give access to other people that are not preparers for help. For instance, they may ask their relative, neighbor or friend for help. We would not be able to stop that. This could cause more ID theft in the long run. So, there are some good points but also some not so good.
- The preparer could obtain and relay information and account status to taxpayer directly.
- The preparer may choose not to assist due to complexity, lack of payment by the taxpayer, increased cost to the taxpayer. POA should be able remove themselves if they are not going to assist the client. Then a notification would be sent to the taxpayer advising that they need to address the issue.
- The preparer who has access should have a PTIN and NO past offenses.
- The taxpayers should have total control of who they give access to.
- There are unscrupulous preparers.
- There could also be a cost factor. They could charge the taxpayer a fee for that service.
- There could be discrepancies with accounts.
- There needs to be a way to monitor and remove account authorizations.
- There should be an access log so the taxpayer always knows who accessed the account.
- There should be a way for taxpayers to restrict or block preparers.
- There should be an entry that the taxpayer enters for the pin for that one person and once that person is removed, the pin cannot be used again.
- There should be different levels of access (EX: view-only access).
- There should be limits to what preparers can do, especially making adjustment to the account. There should be some checks and balances that are in place to ensure the taxpayers are protected from fraudulent actions by others.
- There should be mandatory IRS oversight of circular 230 preparers and limitations on how much they can charge.
- There should be no preparer access or the access should be very limited.

- There was a very mixed reaction on this. In general everyone feels that anyone with access to an account should be licensed, but that in the case of a family member a 2848 should be sufficient.
- They have made the assumption that all preparers are honest and doing the right thing for their taxpayers. We know that is not always true.
- They have the knowledge to assist, just as they do now by giving POA authorization.
- They should follow Circular 230, because this shows they are in good standing with the IRS. If at any time they lose this standing they should be removed update CAF, remove their ability to access on-line accounts and the taxpayer should be notified.
- They should have their own login system that only grants them access to the information they would normally have access to base on their level of authority.
- Think the quality of service is impacted on this IRS future state.
- This can be very helpful and would be welcome by the practitioner community who has been very frustrated with the service decline in the regular toll-free service and the practitioner hotline. They don't like waiting to have their call answered, and then getting someone who cannot help. However, the office felt strongly that there is a risk to allowing all preparers access: there would be more preparer fraud and mischief.
- This may be a disservice by having only "certified" preparers having access.
- This should reduce TAS case work because they come to TAS because they know they will get assistance.
- Those In favor of replacing assistors with online services stated that with the current budget reductions, the amount of work is draining on the employees. Those not in favor of replacing assistors with online services stated its too many buttons to push and that nothing can replace the human touch.
- Too much temptation for preparers to change taxpayer's information for online account.
- Taxpayer will not benefit.
- Taxpayer would be more educated
- Taxpayers will be further away from getting help.
- Usually yes but there are concerns for a durable power of attorney.
- Want to revoke.
- We all agree that account access should be limited to professionals with some sort of certification.
- We believe it should be limited to Circular 230 preparers since there is no oversight whatsoever on unenrolled preparers and therefore no consequences for inappropriate access/actions.

- We don't think it would be a benefit.
- We have been saying for years that we should not allow folks without Circular 230 certification prepare taxes. Yes, we should limit it.
- We hear about the old practitioners' line where they could call in and get information quickly but it was dedicated to practitioners.
- What about those with a language barrier that depend on their spouses, children, or friends to act on their behalf?
- Yes (2).
- Yes - Limit account access to individuals who are Circular 230 preparers and those with an Annual Filing Season Record of Completion holder.
- Yes, access should be limited to those who can provide specific credentials.
- Yes, access to taxpayer's account should be limited to circular 230 preparers. However, these types of preparers charge taxpayers a lot of money to prepare returns. Thus, low income taxpayers will not have affordable preparers. This is a high burden for low income taxpayers. They need to comply with the tax laws but they do not have the financial means to pay a qualified tax return preparer. LITCs are overwhelmed and Volunteer Income Tax Assistance (VITA) sites have limited availability. Low income taxpayers need assistance with the preparation of their tax returns but they cannot afford it.
- Yes, if there is preparer access, the access should be limited to those who are "certified".
- Yes. IRS has a responsibility to ensure that the taxpayer is protected from potential fraud and disclosure.
- Yes, it should be limited to Circular 230 preparers.
- Yes, it should with restrictions.
- Yes, the IRS should limit account access to Circular 230 Preparers.
- Yes, we feel they should limit account access until which time the IRS figures out a way to create a paper trail back to taxpayer that their account was accessed. Also, we feel a fingerprint technology might be the only way to make sure access is granted to exactly who it is that should have it.
- Yes, we think access should be limited to representatives on file with Form 2848. Their access would be through the existing e-services portal. The Form 2848 could be updated to include a checkbox for the taxpayer to allow or not allow the representative to have online access to information.
- Yes, account access permissions should be limited.
- Yes, account access should be limited to Circular 230 preparers. This would restrict the amount of individuals a person might allow to have on-line access to their accounts. There should be a tracking system that identifies who accesses the account in the event of fraud or other unscrupulous acts. The on-line access

should only be allowed annually or a limited period of time and should specify years and issues for taxpayer protection.

- Yes, however this may have an unintended consequence of negatively affecting low income taxpayers who cannot afford these types of preparers.
- Yes, IRS should limit account access to Circular preparers. Could create further delays for the taxpayer. May help to reduce some of the ID-Theft issues IRS is currently faced with as well as reduce RPM.
- Yes, it should be limited to EAs, CPAs, and Attorneys. It could potentially limit the ability of taxpayers with non-licensed preparers to resolve account issues, but the actions these preparers can perform before the IRS are already limited so the impact would likely be low.
- Yes, limit access, streamline and make it easier for revocation and add automatic link to the CAF Unit.
- Yes, that has been recommended.
- Yes, the IRS should limit access to taxpayers' accounts only to those that have a POA on file or circular 230 preparers.
- Yes, there should be a limit and serious penalties to anyone who misuses any online permission to your information. Also, there should be a certain specialty pin in order to access others information.
- Yes, they have accountability, lessons chance of fraud; limitations may include inability to change address; phone number of taxpayer; taxpayer should always receive a copy of 3rd party responses."
- Yes, they should have limited account access, actually a different kind of access than the taxpayer.
- Yes, this access should be limited to Circular 230 preparers. After seeing the fraudulent preparer cases in TAS and that damage that was done through those cases, limiting online access to preparers that meet Circular 230 requirements seems like a very wise decision.
- Yes. And regulate them. It also should be made clear to the taxpayer what the limits are.
- Yes. However, to prevent possible fraud, they should be required to get or prove they have the credentials.
- Yes. The IRS should limit account access. Our Taxpayers will continue to go to these other preparers who are inflating their income, expenses, etc. TAS will see an increase in Congressional cases, and that will negatively affect Case Advocates because TAS will receive more cases.
- Yes. The unenrolled preparers are causing taxpayer account issues by making many errors, tax law misinterpretations, and engaging in intentional misconduct. These preparers are not going to do the follow-through to resolve issues they have caused anyway. The CPAs, tax attorneys, and EAs (all under Circular 230)

offer a more comprehensive type of service, not just return preparation, and would benefit from another tool to resolve issues.

- Yes. We are concerned about the scope of access to the taxpayer's online accounts and suggest the more limited the access the better the account security. Our suggestion is that only "regulated" (for this purpose, only those with a professional license) persons be permitted to make changes in a taxpayer's account (others would be read only). We also propose that the scope of this regulated group would expand if the IRS is provided the authority to regulate return preparers.
- Yes. Absolutely.
- Yes. If the IRS allows preparers who have not certified with the Annual Filing Season Program, it will increase Preparer Fraud cases. It will cause more taxpayer returns to kick out for Examination Review. The Circular 230 ensures that ALL preparers are aware of the laws governing preparation of tax returns. This could reduce fraud, Examination and collection cases. A neighbor or friend who prepares a return for a taxpayer is not always properly trained and sometimes not honest based on the investigations that the IRS has conducted. Identity theft cases will increase.
- Yes. This would add some security since the IRS cannot enforce more stringent preparer regulation. Of course a taxpayer should always be able to access their own account information online.