1	UNITED STATE TREASURY
2	INTERNAL REVENUE SERVICE
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7	ELECTRONIC TAX ADMINISTRATION ADVISORY
8	COMMITTEE (ETAAC)
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LO	
L1	PUBLIC MEETING
L2	
L3	
L 4	9:00 a.m.
L5	Wednesday, June 26, 2024
L 6	
L7	
L8	Internal Revenue Service
L9	
20	1111 Constitution Avenue, NW
21	Washington, DC 20224
22	

1 ETAAC MEMBERS PRESENT

- 2 Timur Taluy, ETAAC Chair
- 3 Vernon Barnett, ETAAC Vice Chair
- 4 Peter Barca
- 5 Jerry Gaddis
- 6 Ronald Gilson
- 7 Mark Godfrey
- 8 Doug Harding
- 9 Jihan Jude
- 10 Carol Lew
- 11 Jonathan Lunardini
- 12 Amy Wang Miller
- 13 Argi O'Leary
- 14 James Paille
- 15 Hallie Parchman
- 16 RaeAnn Pilarski
- 17 Stephanie Plaza
- 18 Keith Richardson
- 19 Mark Steber

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21

1	ALSO PRESENT							
2	Doug O'Donnell, Deputy Commissioner of the IRS							
3	Mel Hardy, Director, National Public Liaison							
4	Jim Clifford, Director, Return Integrity and							
5	Compliance Services							
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- 2 (9:02 a.m. EST)
- 3 Welcome
- 4 MR. HARDY: Well, good morning, everyone. How
- 5 is everyone doing? Come on. You can do better
- 6 than that. All right. Well, welcome
- 7 to the 2024 ETAAC public meeting.
- 8 You know, I want to give you guys a new name.
- 9 You are tax professionals. You are CPAs. You have
- 10 all of that. But one thing, I think, that you all
- 11 are, are good stewards of tax administration. Your
- 12 work here today, throughout this year, has been
- 13 invaluable to the IRS, and we really appreciate it,
- 14 and we want to honor you today.
- So my name is Mel Hardy. I'm the Director, as
- 16 you know, of NPL, and this is our public meeting.
- 17 So I am going to bring up the chair of the ETAAC,
- 18 the honorable Timur Taluy.
- 19 [Applause.]
- 20 ETAAC Report Overview and Significant Issues
- MR. TALUY: Thanks Mel, and Deputy
- 22 Commissioner, thanks for being here today.

- 1 I told a story at CERCA a couple of weeks ago
- 2 where my daughter got to stand up, and see her
- 3 elementary school talent show. It was pretty
- 4 exciting. What she taught me is when I get up on
- 5 stage is I am supposed to tell a joke, so here we
- 6 go. This is on the public record, right, Mel?
- 7 MR. HARDY: Yeah. It's always a risk.
- 8 [Laughter.]
- 9 MR. TALUY: So how do you know you just got
- 10 told a dad joke? The punchline is always apparent.
- 11 [Laughter.]
- MR. TALUY: Wait for it. Wait for it.
- 13 Anyway, Thanks for being here, and, you know,
- 14 I just want to thank the Committee. We did an
- 15 amazing job this year. I think our report is
- 16 fantastic. I mean, obviously I am partial. But I
- 17 think we did a really good job getting together
- 18 kind of a concise report, to the point, and really
- 19 talk about what we want to talk about.
- 20 And I also want to take a minute and thank the
- 21 IRS and staff. Deputy Commissioner, you have a
- 22 fantastic team here. I mean, without them getting

- 1 the information that we needed and working with the
- 2 contacts, and the support, and the meeting
- 3 scheduling, and so on, we couldn't deliver this
- 4 report. So thank you, Deputy Commissioner, and all
- 5 of the IRS staff for being out there for us. And I
- 6 thank you for being here.
- 7 One of the other things I want to talk about
- 8 is a lot of times it's advisory committees. But
- 9 coming to this report, like "IRS shall," "Congress
- 10 needs to," right, and no one recognizes the fact
- 11 that when you look at the OECD, the IRS is one of
- 12 the most efficient tax collectors in the world.
- 13 What they do is simply amazing.
- 14 You look at the stats, with 235 million
- 15 individual and business tax returns come in, 58
- 16 billion contacts, calls, walk-in centers, stuff
- 17 like that. I mean, they issue \$359 billion in tax
- 18 refunds, in addition to revenue they collect. It's
- 19 a pretty amazing feat when you think of the broad
- 20 breadth and diversity of the American population
- 21 and how IRS serves them. Obviously they work
- 22 together with the states, work together with the

- 1 tax industry, and altogether I think we create that
- 2 efficiency and that amazing organization that is
- 3 the American tax system.
- 4 To our report, I think our report is, again,
- 5 fantastic. It's actionable and timely. I think,
- 6 you know, if you look at last year's report, for
- 7 example, we encouraged the IRS to build awareness
- 8 of free services. And if you go and look at our
- 9 report this year, the Free File Program grew almost
- 10 11 percent, excluding the fillable forms, of
- 11 254,000 returns. VITA grew 202,000 returns. And
- 12 that's almost 500,000 taxpayers served for free
- 13 through the legacy and traditional IRS free
- 14 services. And then obviously we have Direct File,
- which brought another 140,000 returns.
- 16 So when you look at what IRS did to build
- 17 awareness of the free programs at IRS.gov, we saw a
- 18 material impact. I mean, it was a 10, 12 percent
- 19 increase in taxpayers who benefitted from free
- 20 services through IRS. I don't like to toot ETAAC's
- 21 horn, but when you listen to ETAAC the magic
- 22 happens.

- 1 And so this year again, too, I think our first
- 2 recommendation here is to talk about -- it is very
- 3 timely. I mean, yesterday, in Las Vegas, the
- 4 Commissioner Werfel was talking about interdicting
- 5 scams and schemes, actually trying to get in there.
- 6 I think Jim Clifford is going to speak later. He
- 7 talked about a story at the Detroit Taxpayer
- 8 Assistance Center, where a bunch of tax filers had
- 9 made frivolous claims on their tax returns, whether
- 10 it was trying to claim fuel tax credit or trying to
- 11 claim increased withholdings. That's where you
- 12 have a W-2 for \$1,000 of withholdings and you put
- 13 \$10,000 in there, hoping the IRS is going to slip
- 14 up and give me an extra \$9,000 refund. And these
- 15 taxpayers were holding frivolous filer penalties,
- 16 like \$5,000 penalties, for filing a frivolous tax
- 17 return.
- And they were in line because they were told
- 19 that if they took that \$5,000 letter to the
- 20 Taxpayer Assistance Center the IRS would cut them a
- 21 check on the site.
- 22 And so Jim Clifford, you know, some of the

- 1 folks from different areas of the IRS, are walking
- 2 around, saying, "What's going on? Why are you
- 3 doing that?" And like, "My preparer sent me here.
- 4 He said I need to get the money because I need to
- 5 pay him."
- 6 So our recommendation, the first
- 7 recommendation, is a repeat recommendation of what
- 8 we've said before, is share information with
- 9 trusted parties, whether it's the tax software
- 10 provider, it's your state. Whoever it is, if we
- 11 had transcript data at the time of filing the
- 12 return we could tell taxpayers, "You don't have a
- 13 \$10,000 withholding. You have a \$1,000
- 14 withholding." That's what the third-party data
- 15 says from IRS. And we could help them. Same thing
- 16 with fuel tax credit. You've never filed a fuel
- 17 tax credit claim before. Why are you doing that
- 18 today? And as a tax practitioner, face to face, or
- 19 the tax software, interacting with that taxpayer,
- 20 we can help get in front of those schemes and
- 21 scams.
- 22 So again, really timely that the Commissioner

- 1 was talking about it yesterday, and here we are
- 2 talking about that today.
- 3 The other option, you know, I think is free
- 4 options. We have a recommendation in here that IRS
- 5 look at the free options again, kind of do a cost-
- 6 benefit analysis and see where taxpayers are
- 7 getting value, where IRS is getting value. Again,
- 8 yesterday at the Latino Tax Fest, the Commissioner
- 9 was talking about free options and how that
- 10 develops out.
- 11 So again, I think our report is in really good
- 12 shape and really timely, and hopefully some
- 13 actionable stuff.
- 14 We also talk about successful initiatives.
- 15 This is a kind of culmination, in my mind, of three
- 16 years of reports. Two years ago we talked about
- 17 what a successful initiative is. I'm going to read
- 18 this out of here because I don't remember what it
- 19 is saying. But that's something that includes
- 20 collaboration, modern, iterative, flexible design,
- 21 appropriate prioritization.
- 22 And that's the biggest thing. I think ETAAC,

- 1 for years, has just talked about collaboration.
- 2 How do you collaborate with states, how do you
- 3 collaborate with industry, and how do you build a
- 4 better process?
- 5 And what I did in the report, and the
- 6 Committee did, was kind of talk about some of those
- 7 really successful programs that were built out of
- 8 that kind of initiative. Like the eFile system. I
- 9 was here when you built and modernized eFile. It's
- 10 certainly not modernized anymore, I guess, but it's
- 11 still out there. And it connects taxpayers, the
- 12 tax industry, state, like nothing else. You know,
- 13 our tax system is different than a lot of other
- 14 nations or states, and cities, and so on and so
- 15 forth. So having that modernized eFile system to
- 16 do it I think is amazing.
- 17 The next program we called out was Free File.
- 18 Free File has delivered over 73 million returns to
- 19 taxpayers in its history, which is fantastic.
- I want to talk about eFile, amended returns.
- 21 Jim Clifford is going to be here later. He was
- 22 kind of one of the architects working with industry

- 1 to get that built up. In just three years we
- 2 transitioned 77 percent of paper amended returns
- 3 into eFile amended returns, and that's phenomenal
- 4 when you work together with constituents to
- 5 actually build that adoption so quickly.
- And finally, who doesn't love VITA? It's in
- 7 our communities. It's our neighbors and our
- 8 friends. I was on a board meeting of our United
- 9 Way, and delivering VITA out to our community,
- 10 which is a fantastic thing, another collaborative,
- 11 innovative program that IRS runs.
- 12 So about our report, I'm going to get off the
- 13 stage because everybody says they have to get to
- 14 their planes or they want to get lunch or
- 15 something. But one of the things that we did
- 16 different this year, we all know that tax
- 17 provisions are expiring. And my friend likes to
- 18 call it the "Super Bowl of tax legislation" coming
- 19 up. So just out of convenience for our legislative
- 20 friends, we made these little tear-off sheets,
- 21 where it's simple, repeat recommendations ETAAC has
- 22 made that hopefully a tax writing group can grab

- 1 onto and include in legislation.
- 2 So the first one we talk about is authorize
- 3 the IRS to regulate non-credentialed tax preparers.
- 4 It is a recommendation of this report that you will
- 5 hear more about later, so I don't want to steal
- 6 that thunder.
- 7 The second one is support good tax
- 8 administration. Who here loves late legislation,
- 9 right? Amy is going to talk about that later
- 10 today, because that is a recommendation in here
- 11 too.
- 12 And the last one is to accelerate some of the
- 13 information returns, especially those that have
- 14 withholding on them. Again, we've got scams and
- 15 schemes out there, people reporting additional
- 16 withholding they don't have. So getting
- 17 information to the IRS early so it can make it into
- 18 the transcript, it can make it into the IRS
- 19 filters, and so on and so forth, are going to be
- 20 invaluable for us.
- 21 And with that our report, we have 12
- 22 recommendations. Some people say you can judge a

- 1 report by the number of recommendations. I say no.
- 2 I say we want substantive, good, clean
- 3 recommendations. I think we started with 30 of
- 4 them, and we whittled them down to these 12,
- 5 combining some and doing a lot so we could get,
- 6 again, actionable, timely things for IRS.
- 7 So hot topics, like I said, information via
- 8 API, look at the free options at IRS, enabling
- 9 access to eFile. Again, ETAAC's mission, keep
- 10 people eFiling. All the report is talking about
- 11 that. And you know, there are more technical
- 12 recommendations than the team is going to give us.
- 13 So that -- they told me I had 20 minutes. How
- 14 did I do? I don't know. But I appreciate you guys
- 15 being here. I really do. And I appreciate all the
- 16 support. And with that I would like to turn it
- 17 over to the Deputy Commissioner, Doug O'Donnell.
- 18 [Applause.]
- 19 Opening Remarks
- 20 MR. O'DONNELL: Thank you, Timur. Good
- 21 morning, everyone. I am super happy to be here,
- 22 and grateful to have all of you here with us

- 1 participating today on this important endeavor.
- 2 I want to welcome members of the ETAAC and
- 3 thank everyone that has worked on this effort for
- 4 the past year for the report. Timur touched on it.
- 5 I told him when I came in I spent part of
- 6 Juneteenth holiday reading the document from cover
- 7 to cover. It is really well done, very thoughtful,
- 8 and I very much appreciate the hard work that went
- 9 into that. I am looking forward to hearing a
- 10 little bit about the recommendations in the
- 11 discussion. Yeah, but thank you all very much.
- 12 And a big thank-you to Timur Taluy and to
- 13 Vernon Barnett for being chair and co-chair and
- 14 driving this to completion. Thank you, guys, very
- 15 much.
- 16 It is clear you are excited with the effort.
- 17 Timur ran into one of my family members this week,
- 18 and I got a text. He's like, "He's coming in to
- 19 see you guys." I'm like, what is this? I didn't
- 20 know what it's about. So when I came in here I was
- 21 like, what did my cousin say to you?
- [Laughter.]

- 1 MR. O'DONNELL: We are contemporaries, so I'm
- 2 always worried about what family could say about
- 3 the past. Apparently it was all good.
- 4 And before I go any further I do want to say -
- 5 I mean, you mentioned it -- but the Commissioner
- 6 committed last year, right after Latino Tax Fest,
- 7 that he would be there, so he sends his regrets.
- 8 He is out there, so I am pinch-hitting. I am glad
- 9 to be here.
- 10 So I'm going to share some observations about
- 11 the ETAAC and about some of what we have going on
- 12 here. First off, you bring a critical perspective
- 13 to the work that we do. Whether it's software,
- 14 industry, whether it's preparers, whether it's
- 15 states, you have a perspective that's super helpful
- 16 in shaping the way that the tax administration for
- 17 the United States works. And we are grateful for
- 18 that effort. Without it, we could not administer
- 19 the way we do and the numbers that Timur was
- 20 referring to earlier, present the challenge that we
- 21 have. We are very efficient, but we need to stay
- 22 up. We need to keep evolving and improving as we

- 1 move forward. Lots of big challenges. So again,
- 2 thank you all for all of that work.
- 3 Again, reading through the report, super well
- 4 done. I was going to touch on something that you
- 5 touched on, which I had not seen before, but it's
- 6 the formula for success. And there are four items
- 7 that are laid out up front. I will repeat them
- 8 because they are important, and I will get to that
- 9 in a second. But it's this notion of the
- 10 collaboration -- I have to read it, as well,
- 11 because I can't remember it -- collaboration,
- 12 prioritization, modern, iterative, flexible design,
- 13 and a balance of machines and people.
- 14 And this is very helpful for us in the
- 15 environment we are working currently to invest the
- 16 Inflation Reduction Act in improving the IRS.
- 17 We've got our Strategic Operating Plan that we are
- 18 currently going through an update. That effort
- 19 involves a real deep look at all of the work that
- 20 we could undertake -- and I say "could" because the
- 21 list of things, the catalogue of items we could
- 22 take on is enormous. So being very thoughtful

- 1 about what we're going to do, the prioritization
- 2 which is important, obviously.
- 3 But the sequencing. Some of the things that
- 4 we will have to do themselves don't seem so
- 5 important, but they have to happen before something
- 6 else can. So we're going through a very
- 7 intentional process of determining what we're going
- 8 to do going forward, and this type of thinking is
- 9 very useful in framing up how do we approach the
- 10 work we have, how do we evaluate these things that
- 11 we are going to take on, how do we make the best
- 12 progress for our tax administration in the country
- 13 and be wise stewards of the investments that have
- 14 been made in the IRS.
- So I'm pleased to report this, and you've
- 16 heard it 100 times, I'm sure maybe more, but I'm
- 17 going to say it because it's really important.
- 18 With Inflation Reduction Act investment we had, in
- 19 2024, likely the best filing season we had, and
- 20 that's on top of 2023, which was really good.
- 21 Namely the level of service that we had was super
- 22 good on our main 1-800 line. I recognize that

- 1 there are other parts of our call centers that need
- 2 to improve in, but we were running above 85 percent
- 3 level service throughout the filing season. Wait
- 4 times were, on average, around three minutes. And
- 5 that was when we compared to 2023, which was really
- 6 good. But when you compare it to 2022, where our
- 7 level of service was like 17 percent and wait times
- 8 were edging up close to a half hour.
- 9 So that, to me, is the most persuasive
- 10 argument for investment in the IRS. We can do
- 11 better if we have the capacity to do so. Our
- 12 people that do the work, our leaders, they are
- 13 shaping where we are going to go, want to improve,
- 14 and with investment we can make huge progress
- 15 there.
- We answered a million more calls in 2024 than
- 17 2023, and three million more than we did in 2022.
- 18 So lots of capacity built, lots of improvements.
- 19 We don't say a lot, but it also enabled us to
- 20 work out from underneath of the inventory of paper
- 21 that we've gotten in. While we've made good
- 22 progress on electronic filing, with amended

- 1 returns, a lot of that back-end work is still
- 2 manual, on the 1040, all the business. Any amended
- 3 return we are still having to have individuals go
- 4 in and key in the adjustments to our system.
- 5 Having observed it, it is, for a really easy
- 6 return, it can take a couple few minutes. For a
- 7 more complicated return, where you're adjusting
- 8 several items, it can take a half hour. And one,
- 9 where there was a 1045 filed by an individual,
- 10 carrying back an NOL, it was like they worked on it
- 11 for 18 hours already and it was not done.
- So it's a very manual-intensive process that
- 13 we've got to figure out how to automate. I think
- 14 all of you that work in this arena, especially
- 15 those that prepare returns, know how complicated it
- 16 is to go through and make all those adjustments.
- 17 And for us to be able to systemically do that would
- 18 be huge, but it is not without difficulty. But
- 19 we're going to work on it, and we're going to try
- 20 to make that happen because it is something that,
- 21 for me, can alleviate a lot of the stress and
- 22 challenges that we have.

1 Again, we made huge improvements, but there

- 2 are areas where we've got work to do. Phone
- 3 centers, we've got to up our game in some areas
- 4 where we've got priority practitioner lines, we've
- 5 got the other ACS lines, the automated collection
- 6 system, and other lines that come in where we've
- 7 got high volume. We're hiring in those areas, and
- 8 we expect to see improvement in the level of
- 9 service in that space.
- 10 And I do want to highlight an area, although
- 11 Timur has already touched on it but I think it's
- 12 really important to talk about, and it is the focus
- 13 on scams and schemes. The Commissioner heard a lot
- 14 about this coming into the role, and we've seen
- 15 more of it, and it's been sort of growing. We saw
- 16 it with the Employee Retention Credit. I mean,
- 17 we've been very open about that. You will have
- 18 seen the press release that came out on Friday.
- 19 We've got north of 1.4 million claims. And then
- 20 we've got the fuel tax credit issue and the over-
- 21 withholding. We've got a few other interesting
- 22 items that are out there.

- 1 It's this combination of too good to be true,
- 2 and then those who would push an idea that is just
- 3 flat out wrong. And in some instances there is
- 4 absolutely no basis for what taxpayers are doing,
- 5 but they are able to be convinced through some
- 6 means that they are eligible for, they can file in
- 7 a certain manner. And what ends up happening is
- 8 they get caught in our system, and then they end up
- 9 in a sort of, depending on which way it goes, an
- 10 elongated process where maybe they're entitled to
- 11 some refund but not the one that they claimed. And
- 12 it takes a very long time to sort it out. It's
- 13 likely going to be expensive, and they can end up
- 14 with less as a result of the compliance costs that
- 15 they incurred than they would have if they had just
- 16 filed a straight return.
- 17 For the very worst, they could end up with
- 18 criminal investigation. And they are very active
- 19 in this space with us. We've got them working very
- 20 heavily in the Employee Retention Credit space. So
- 21 we're going to continue to deploy criminal
- 22 investigation in ways that can help us get in front

- 1 of these things as quickly as possible, and that's
- 2 part of what I expect Jim to talk about. It's
- 3 identifying early these evolving schemes, get in
- 4 front of them, and make it known why it is
- 5 possible, noting your point about we need to get
- 6 information out quickly so that as many partners in
- 7 this space understand what's happening, and we can
- 8 all work together to make good progress.
- 9 Okay. So the role of ETAAC in this space.
- 10 Very important work done with the Security Summit
- 11 in helping us work through a number of different
- 12 identity theft issues beginning back in 2015. That
- 13 problem has been reduced, but it is not eliminated.
- 14 So it sort of ebbs and flows.
- But we've been working with the Security
- 16 Summit recently, and many of you will be involved
- in that, to up our game in the scams and schemes
- 18 area. The Commissioner participated in a call with
- 19 the team, I think it was mid last week, and I think
- 20 a lot of folks that were involved in it were
- 21 surprised at how much progress had been made since
- 22 the team started working on it, until we had this

1 discussion last week where we described some of the

- 2 recommendations moving forward. I think they were
- 3 widely appreciated by the group. I'm not going to
- 4 unveil them here because there's going to be some
- 5 sort of news release at some point.
- 6 But suffice it to say that a lot of good
- 7 thinking went into it, and it's the collaboration
- 8 of the ecosystem that worked together, both in this
- 9 space, Security Summit, and others, where we're all
- 10 interested in improving tax administration for
- 11 everyone. So thank you all very much for that.
- Okay. I'm looking forward to the discussion
- 13 on the recommendations. I know the folks that have
- 14 to go through that are probably a little bit
- 15 anxious about how it's going to be received. I
- 16 will tell you I read them and they are all really
- 17 well thought out, if that helps at all, and very
- 18 interested in hearing a little bit more detail on
- 19 them, and then maybe saying a few words at the
- 20 conclusion.
- 21 Again, thank you all very much for being here
- 22 today. I am very happy to see you all here and

- 1 grateful for the work. And thank you too, very
- 2 much, to the chair and co-chair, and we'll get into
- 3 the details. Thank you.
- 4 [Applause.]
- 5 MR. TALUY: Deputy Commissioner, thank you for
- 6 those words, and we definitely appreciate that you
- 7 read the report and you found it interesting. So
- 8 thank you for that.
- 9 Response and Thank You to Departing Members
- 10 MR. TALUY: I think what we are going to move
- 11 into now is we have Mel Hardy, who has some
- 12 certificates for graduating ETAAC members. As you
- 13 know, the ETAAC has a three-year term -- I'm in my
- 14 fourth year.
- MR. HARDY: He twisted my arm.
- MR. TALUY: Do I have five, Mel?
- 17 MR. HARDY: No.
- 18 MR. TALUY: So I think what we're going to do
- 19 is go through and recognize those folks that are
- 20 graduating, and Deputy Commissioner, I think we're
- 21 going to pose for some pictures with you. And then
- 22 I think once we complete that we're going to have

- 1 Jim Clifford on the line.
- MR. HARDY: Well, we want to thank the members
- 3 who are rolling off of your service. It truly has
- 4 been valuable and memorable you being a part of
- 5 this.
- 6 Our first certificate goes to Mr. Mark
- 7 Godfrey.
- 8 [Applause.]
- 9 MR. HARDY: Our next certificate is Ms. Terri
- 10 Steenblock.
- 11 [Applause.]
- MR. HARDY: Our next certificate is Andrew
- 13 Phillips. I don't think Andrew is here.
- 14 Hallie Parchman.
- 15 [Applause.]
- MR. HARDY: Next, Jim Paille.
- 17 [Applause.]
- MR. HARDY: Deputy Commissioner Doug O'Donnell
- 19 asked me if I knew how to pronounce everybody's
- 20 name, and I told him affirmatively yes. So
- 21 Jonathan, please --
- [Laughter.]

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1 MR. HARDY: I know it's Lunardini. There we
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- 2 go.
- 3 [Applause.]
- 4 MR. HARDY: Jihan Jude.
- 5 [Applause.]
- 6 MR. HARDY: Next up, Bob Grennes. Is Bob
- 7 here?
- 8 Mr. Peter Barca.
- 9 [Applause.]
- 10 MR. HARDY: Mr. Jared Ballew.
- 11 [Applause.]
- MR. HARDY: You know, I mentioned this
- 13 yesterday, and some people didn't know this, but
- 14 it's really an honor for me to call this last name
- 15 because I had the privilege and honor to call his
- 16 dear father, Atilla Taluy. Timur Taluy.
- 17 [Applause.]
- MR. HARDY: So are we going to do the picture
- 19 or are you going to do the --
- 20 MR. TALUY: I think they want to take a little
- 21 break real quickly, and then make sure we have Jim
- 22 on the phone.

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1 MR. HARDY: And do the recommendations.
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- 2 MR. TALUY: And with the group picture, yeah.
- 3 MR. HARDY: We can do the recommendations now.
- 4 MR. TALUY: I think we need the group picture.
- 5 The picture and then the break. They trained me on
- 6 this yesterday.
- 7 MR. HARDY: I was just trying to see if you
- 8 remembered.
- 9 [Pause.]
- 10 MR. TALUY: Even though we did practice
- 11 yesterday, even though we do have a lovely agenda,
- 12 the Deputy Commissioner can only stay with us for a
- 13 half hour. So what we wanted to do was kind of
- 14 restructure the schedule a little bit, perhaps have
- 15 Jim Clifford more towards the end, and we can run
- 16 through the recommendations while he's here, since
- 17 you said you were interested in hearing some more
- 18 color commentary around them.
- 19 So I'm going to introduce our vice chair,
- 20 Vernon Barnett, to lead us through the
- 21 recommendations.
- [Applause.]

1 ETAAC Report Recommendations

- 2 MR. BARNETT: Thank you so much, Timur, and
- 3 thanks to all of you. And for those of you who are
- 4 joining us by phone, thank you for being here with
- 5 us today. We have worked very hard over the last
- 6 year on this report. We have some great
- 7 recommendations. So I'm excited to introduce you
- 8 to Mark Godfrey, who is going to lead us off. And
- 9 we'll be going through all of those recommendations
- 10 over the next hour.
- MR. GODFREY: Good morning. My name is Mark
- 12 Godfrey, and it is an honor to be here today.
- 13 There are the actions that the IRS must take
- 14 in order to fulfill its foundational duties. Among
- 15 these are data security, fraud control, and
- 16 enforcement. Then there are the actions that the
- 17 IRS can take to meet rising customer expectations.
- 18 Foremost among these are accuracy, clarity, and
- 19 turnaround time. The IRS is well served by
- 20 pursuing opportunities that meet all six of these
- 21 actions.
- One such opportunity exists with computer-to-

- 1 computer communications, or application programming
- 2 interfaces, also known as APIs. The IRS's
- 3 Transformation and Strategy Office has done an
- 4 exceptional job at directing, organizing, and
- 5 communicating the initiatives brought about by the
- 6 Inflation Reduction Act. Their efforts have led to
- 7 a firm foundation for future transformation
- 8 efforts.
- 9 APIs' efforts can easily plug into this TSO
- 10 framework. With APIs, the service can develop a
- 11 strategy to organize efforts around their
- 12 foundational duties, data security, fraud control,
- 13 and enforcement. Such efforts will promote secure
- 14 and authenticated exchanges of information that
- 15 disrupt scams and schemes.
- And the IRS can also develop a strategy for
- 17 organizing their API efforts around customer
- 18 expectations -- accuracy, clarity, and turnaround
- 19 time. Such efforts would provide clear, efficient,
- 20 and accurate information that gets exchanged, such
- 21 as data transcripts, information that would be
- 22 exchanged between the IRS and between taxpayers.

- 1 APIs can provide that framework that can be
- 2 replicated across different cross-cutting
- 3 opportunities that cut across different SOP
- 4 objectives and initiatives. This framework can
- 5 provide a clear foundation for how the IRS can
- 6 continue its transformational opportunities.
- And now I'd like to introduce Stephanie Plaza
- 8 to share Recommendation 2.
- 9 [Applause.]
- 10 MS. PLAZA: Hello. Good morning. I'm
- 11 Stephanie. I'm very happy to be here today.
- 12 The second recommendation is to remove
- 13 barriers to electronic filing while enhancing
- 14 security by developing an alternative to the self-
- 15 selected PIN process with a more secure IRS eFile
- 16 PIN. That is a mouthful. So what does that mean?
- 17 What does that mean for you? What does that mean
- 18 for a taxpayer?
- 19 Every year when you file an individual tax
- 20 return you are required to self-select a five-digit
- 21 PIN. It can almost be anything. I think it can't
- 22 be five zeros. If you don't have that or you don't

1 have the prior year PIN you need your ATI. That is

- 2 also confusing.
- I find myself to be a very organized person.
- 4 I couldn't tell you where my last year's tax return
- 5 it, and then that opens another door into going
- 6 into the portal and getting your transcripts. It's
- 7 a very clunky and confusing process.
- 8 It's also not secure. This is a weak spot
- 9 that is known to fraudsters and bad actors, and
- 10 they continuously exploit it. This has also been a
- 11 repeat recommendation from ETAAC. I believe it was
- 12 first introduced in 2017. And while the IRS has
- 13 made really great strides towards solving for this,
- 14 doing so some within direct file, we are really
- 15 recommending a broader adoption of a new
- 16 authentication model to solve for these issues.
- 17 Thank you.
- 18 And I'm going to introduce Peter Barca and
- 19 Keith Richardson, who are going to take on
- 20 Recommendation 3.
- 21 [Applause.]
- 22 MR. BARCA: Good morning. I'm Peter Barca,

- 1 the former Secretary of Revenue from the great
- 2 state of Wisconsin, former FTA president. I see
- 3 our executive director is here, which is terrific.
- 4 Our Recommendation 3 has to do with promoting
- 5 greater information sharing with states and
- 6 industry partners of homogenized tax data, metrics,
- 7 year-over-year metrics, and seasonal information.
- 8 What does this mean? The goal is really to
- 9 have greater transparency and sharing of
- 10 information across the spectrum in order to
- 11 increase tax administration efficiency and reducing
- 12 taxpayer burdens. Who cannot rally around that
- 13 call?
- 14 The IRS has numerous stakeholders, states, of
- 15 course, financial industry partners, software
- 16 companies, preparers, and so many others that have
- 17 a stake in taxpayer administration and compliance.
- 18 When it comes to sharing confidential information,
- 19 we want to make sure that states have better tax
- 20 compliance impact for taxpayers, their
- 21 practitioners, their partners, and in the IRS we
- 22 are asking to investigate changes to ensure that

- 1 data be provided on more of a punctual manner.
- 2 Greater transparency and sharing of information
- 3 will certainly lead to better tax administration
- 4 efficiency.
- 5 So now let me turn it over to my revenue
- 6 partner, FTA partner and revenue superstar, Keith
- 7 Richardson.
- 8 [Applause.]
- 9 MR. RICHARDSON: Good morning. I'm Keith
- 10 Richardson. Thank you for that, Peter.
- 11 A couple of things that we came up with this
- 12 recommendation, one being we would like to see the
- 13 IRS partner with our state agencies in regard to
- 14 criminal enforcement actions. We recognize that it
- 15 is an impact because there are specific taxpayers
- 16 that maybe you're looking at, at the same the state
- 17 jurisdictions are looking at, as well, and there
- 18 may be funds owed to them in local governments.
- 19 Again, best practices and compliance and other
- 20 activities could forge a much stronger relationship
- 21 around criminal enforcement.
- 22 Hopefully we would like to see the IRS

- 1 Commissioner and his leadership team work with the
- 2 Federation of Tax Administrators, meeting maybe
- 3 semi-annually, twice a year. In those meetings we
- 4 know there would be opportunities to build upon
- 5 state concerns with the filing season, post-filing
- 6 season, best practices around the upcoming filing
- 7 seasons, and sharing of confidential information in
- 8 a group setting. We know the Federation of Tax
- 9 Administrators has their annual conference in June,
- 10 and then there is another conference that is held
- 11 during the fall season that could be held with the
- 12 leadership team from FTA.
- We are asking the IRS to consider also real-
- 14 time data and analytics around the programs of
- 15 EOAD, the CP 2000, and Levy information. I think
- 16 the states could get that information more timely.
- 17 Right now some states are getting information six
- 18 months to a year out. That has an impact on their
- 19 revenue collections and compliance matters, as
- 20 well. During that time frame people can leave
- 21 their state that they're currently in and move
- 22 somewhere else, so that has an impact. And I think

1 relationships working with you all, getting the

- 2 data more timely, would be beneficial.
- 3 Also thinking about with the IRS you're doing
- 4 more on corporate audits and high income and
- 5 looking at high-income personal income audits. It
- 6 may be an opportunity to forge some relationships
- 7 working with state jurisdictions around that,
- 8 learning from you all best practices, doing some
- 9 training with the auditors from different
- 10 jurisdictions. They could be in person at your
- 11 facilities or at state facilities, and again, it
- 12 could be done virtually. But it would be more
- 13 cohesive and more opportunities for revenue
- 14 enhancements and relationships and sharing of
- 15 information across the board.
- I would now like to present my colleague, Mark
- 17 Steber, who will do Recommendation 4 to the group.
- 18 [Applause.]
- 19 MR. STEBER: Good morning. My name is Mark
- 20 Steber.
- 21 With Recommendation 4 we have looked at the
- 22 long and successful history of free options and

- 1 alternatives for tax return preparation. Many
- 2 herald with much success, and even this year
- 3 growth. So our Recommendation 4 is merely to take
- 4 a more data-centric, comprehensive look and have
- 5 the IRS do a cost-benefit ratio of the easy, half
- 6 dozen current service offerings, including Free
- 7 File Alliance that Timur and others have cited,
- 8 which had a tremendous year this year, the VITA
- 9 program, another long, historically successful
- 10 program, the Tax Counseling for the Elderly
- 11 program, also successful, Free File fillable forms,
- 12 perhaps a lesser free offering, and even in many
- 13 locations the ability to still go get paper forms.
- 14 And then, of course, the new pilot program, Direct
- 15 File.
- So in summary, our Recommendation 4 is with
- 17 all of these different options, and with the
- 18 Inflation Reduction Act funding being spent and
- 19 being closely monitored by our elected officials,
- 20 it's probably a good idea to take an enterprise-
- 21 wide, comprehensive look across the board at all of
- 22 the offering on a data basis, both historical with

- 1 the programs that have been in place for decades
- 2 and successful, and even the new pilot program with
- 3 Direct File. See what worked, see what needs to be
- 4 expanded, see what needs to be better monitored for
- 5 expansion or perhaps consideration for other
- 6 service delivery considerations, for those most
- 7 challenged and underserved persons in the
- 8 community.
- 9 So, in short, a data-centric, comprehensive
- 10 cost-benefit analysis of the half dozen current
- 11 free and vibrant service offerings for free tax
- 12 preparation for individuals, and its time has
- 13 probably come.
- 14 For our next recommendation I want to turn it
- over to Doug Harding for Recommendation 5.
- 16 [Applause.]
- 17 MR. HARDING: Good morning. I am Doug
- 18 Harding. I am here to present Recommendation 5,
- 19 which is to implement standardized validation rules
- 20 of user-provided data to enhance the accuracy and
- 21 integrity of the data received by the IRS. So
- 22 basically what we're looking at here is there's a

- 1 way to reduce the spending returns that come into
- 2 the IRS and make sure that they are getting
- 3 accurate date during filings.
- 4 This recommendation would be to have
- 5 standardized validation rules at the time of filing
- 6 on common types of data that is entered in by
- 7 taxpayers and tax practitioners during the time of
- 8 filing. These validation rules, such as name,
- 9 address, withholding and wage information, et
- 10 cetera, may help reduce the errors made during
- 11 filing. Data entry errors can result in returns
- 12 being suspended, which requires manual intervention
- 13 by IRS staff. Preventing these errors could result
- 14 in taxpayers receiving their refunds faster. It
- would also have the added benefit of potentially
- 16 fewer errors in the tax returns received by state
- 17 tax agencies.
- 18 So really our goal with this recommendation is
- 19 to reduce the backlog of suspended returns that the
- 20 IRS has to deal with during the filing season.
- 21 I would like to now introduce Hallie Parchman,
- 22 who will be presenting Recommendations 6 and 7.

- 1 [Applause.]
- 2 MS. PARCHMAN: Hey, everyone. I'm Hallie
- 3 Parchman. Good morning. I'm going to be
- 4 presenting Recommendations 6 and 7.
- 5 ETAAC recommends that all third-party
- 6 authorization forms, such as the 2848, the 8655,
- 7 and the 8821, to be submitted and verified online.
- 8 And then once submitted, third-party authorization
- 9 forms should be available in a centralized
- 10 location, by entity, period, form type, and tax
- 11 matter, so they can be easily accessed by
- 12 representatives.
- 13 And then once somebody has proper
- 14 authentication, tax professionals should be able to
- 15 access things such as name controls, transcripts,
- 16 filing frequency, and notices in a centralized
- 17 location. In order to do this, the IRS should be
- 18 able to easily authenticate authorized
- 19 representatives online instead of by fax and phone.
- 20 So you might notice a theme online, online,
- 21 online, and centralized location. Doing these
- 22 things will make it more efficient, effective, and

- 1 convenient for taxpayers, taxpayer administrators,
- 2 and taxpayer representatives to access the
- 3 information they need and reduce the burden on the
- 4 IRS phone lines.
- 5 And now I'm going to pass it to Carol to
- 6 present Recommendation 8.
- 7 [Applause.]
- 8 MS. LEW: Hi. I'm Carol Lew. I'm a partner
- 9 with Stradling, Yocca in California. I'm pleased
- 10 to be here this morning. And my recommendation
- 11 relates to electronic filing, and encouraging it,
- 12 an important subject.
- We know that the Commissioner is attempting to
- 14 encourage electronic filing of forms. This is all
- 15 about picking up a lot of what I'll call the non-
- 16 cyclical filings, filings such as election,
- 17 information returns that are all over the code,
- 18 dear to my heart, that file information returns
- 19 after completion of transactions or making
- 20 elections.
- 21 Some examples of these forms are the Forms
- 22 8038 series in the tax [unclear] bond area, the

- 1 Section 83B elections, different forms in the
- 2 nonprofit area, and employee benefits. Often these
- 3 forms are done by attorneys and others that are
- 4 expert in filing these complex returns. Presently,
- 5 many of the forms are done on paper because there's
- 6 no electronic version that's available. The IRS
- 7 wants these forms to be efficiently processed.
- 8 It's important for taxpayers to have ease in
- 9 filing. In situations where there are emergencies,
- 10 having paper filings is grossly inefficient.
- 11 Because of lower volumes of some of these
- 12 forms or the fact that they're non-cyclical, there
- 13 may be few qualified software providers that may be
- 14 available to offer the service for doing electronic
- 15 filing, or the actual product might be at a non-
- 16 competitive price. An example of that is the Form
- 17 8038-CP filings, where there were only two
- 18 providers available, one of which required an EFIN
- 19 for the taxpayer, which was a state and local
- 20 governmental entity.
- 21 If the cost is too high or the product is
- 22 unavailable to a taxpayer they are going to file

- 1 paper, which is inefficient for everyone. So to
- 2 encourage electronic filing, ETAAC is making the
- 3 following recommendations:
- 4 Establish a portal for electronic filing of
- 5 these types of returns or other filings, similar to
- 6 IRIS or the 990 postcard. A single portal for
- 7 filings for taxpayers is always generally
- 8 beneficial, recognizing multiple capacities for the
- 9 user.
- 10 Recognize that many of these forms may involve
- 11 less security needs than others, similar to the 990
- 12 postcard.
- 13 Encourage ease in filing for the taxpayer.
- 14 Allow electronic signatures for these types of
- 15 forms.
- And lastly, permit software providers access
- 17 so that taxpayers that need the service will be
- 18 able to access it.
- 19 Thank you very much. I'd like to introduce
- 20 Ron Gilson.
- 21 [Applause.]
- MR. GILSON: Thanks, Carol. My name is Ron

- 1 Gilson. I am excited to present Recommendation 9,
- 2 which builds on many of the other recommendations
- 3 that you've heard so far today.
- 4 Recommendation 9 is to create a sunset project
- 5 plan for the FIRE system and the AIR, Affordable
- 6 Care Act Information Systems, and integrate those
- 7 into the IRIS, Information Returns Intake System.
- 8 Currently with all of these systems the
- 9 taxpayer needs to have three different
- 10 identification numbers to utilize them, and they
- 11 don't necessarily support all of the same
- 12 functions. So getting things into one efficient
- 13 system will help the taxpayer to not have confusion
- 14 with the different numbers that they may need to
- 15 use, knowing where to go. And again, as we
- 16 encourage more electronic filing it will also help
- 17 with fraud protection.
- 18 It was 1986, the year that the Atari 7800 was
- 19 created, that FIRE was also created. And so while
- 20 it does a very good job and is a great workhorse,
- 21 the IRIS system is the new kid on the block. It's
- 22 our virtual headset. And we want to be able to

- 1 utilize that to be able to have more information
- 2 that is going out to the states on a regular basis.
- 3 Again, we want to create efficiencies by
- 4 having a sunset plan. It will allow software
- 5 developers to be able to comply and help integrate
- 6 that into their systems, whereas right now without
- 7 having a sunset plan many of the software
- 8 developers are reluctant to support the IRIS
- 9 system. So that hindrance to those efficiencies is
- 10 not only hindering the taxpayer but it is also
- 11 hindering the IRS. So we would like to see them
- 12 get out of that legacy system and then be able to
- 13 deliver more transparent information to the states
- 14 and the taxpayers by utilizing the IRIS system.
- And with that I will turn the time back over
- 16 to Mark Steber for Recommendation 10.
- 17 [Applause.]
- 18 MR. STEBER: All right. Home stretch. Only
- 19 two more to go after this one. And similar to some
- 20 of Ron's comments, Recommendation 10 is really the
- 21 culmination, and similar to other recommendations,
- 22 and it, unlike some of the others, is a relatively

- 1 new one. It really is to expand and support a much
- 2 unrecognized but very similar program to the ETAAC
- 3 program. The Deputy Commissioner talked about how
- 4 ETAAC provides a good rail of recommendations and
- 5 collaborations.
- I put forth a similar offering by the Taxpayer
- 7 Advocate Office. They were created many years ago,
- 8 in 1996 officially, but even before that, in 1977,
- 9 with the Problem Resolution Office, to identify
- 10 areas of opportunity within the IRS for improvement
- 11 and betterment. And even though their current
- 12 report is not nearly as nice as Timur's -- it's
- 13 like 350 pages; I think their executive summary is
- 14 tantamount to ours -- they do a wonderful job over
- 15 there. And their role has expanded, and I won't
- 16 regale all of the successes of the Taxpayer
- 17 Advocate Office, but they do a remarkable job of
- 18 identifying areas of opportunity. They also do a
- 19 tremendous job of serving taxpayers who are at an
- 20 otherwise end-of-the-road problem resolution
- 21 situation.
- 22 So it has grown and expanded its role, and we

- 1 recommend that that role continues to be expanded
- 2 and supported and funded, because the good work
- 3 that they do and the great support that they
- 4 provide and the collaborative information that they
- 5 provide to the improvement of tax administration by
- 6 the IRS.
- 7 And with that I want to turn it over to Jerry
- 8 for one of the last two recommendations,
- 9 Recommendation 11.
- 10 [Applause.]
- MR. GADDIS: Man, being up here makes me feel
- 12 tall.
- 13 [Laughter.]
- 14 MR. GADDIS: The next recommendation should
- 15 sound familiar because ETAAC has made it before,
- 16 for many years, as has IRSAC, as has the National
- 17 Taxpayer Advocate, and many other stakeholders.
- 18 That recommendation is for Congress to provide
- 19 statutory authority to the IRS to regulate non-
- 20 credentialed tax return preparers to standardize
- 21 knowledge, capability, and data security in the tax
- 22 system.

- 1 Depending on where you live, your barber
- 2 probably has a license to practice, your florist
- 3 may have a license to practice, and even your pool
- 4 cleaner probably has a license to practice. But
- 5 your tax professional, probably not. Right now
- 6 only about 25 percent of tax professionals are
- 7 credentialed, and that's kind of a problem.
- 8 In addition, most consumers don't understand
- 9 the lack of credentials and the lack of regulation,
- 10 and go in to get their taxes prepared and assume
- 11 it's someone who is credentialed and licensed and
- 12 has authority and knowledge. That may or may not
- 13 be true.
- 14 Bad tax preparers exist all over the place,
- 15 and they can be a threat both to the consumer, who
- 16 can be defrauded, and to the Treasury Department.
- 17 Non-credentialed preparers are responsible for a
- 18 disproportionate share of erroneous returns, and
- 19 the data backs that up. By one study in the 2021
- 20 filing season, about \$20 billion in excess earned
- 21 income tax credit claims were issued, and that is
- 22 \$20 billion straight out of the Treasury.

- 1 Hopefully having credentials would make that be
- 2 less likely to happen.
- 3 Credentialing can sound like a heavy lift and
- 4 it can sound complicated, but it doesn't have to be
- 5 that hard. The IRS currently has voluntary
- 6 compliance programs in place, and they have the
- 7 associated resources to enforce them. So things
- 8 like the VITA exam, the Special Enrollment exam,
- 9 the old RTRP exam, the ASFP, all of these training
- 10 programs are already in place, already exist, and
- 11 would not have to be recreated.
- 12 Also, the IRS has the infrastructure through
- 13 RPO and OPR, which I believe is the Return Preparer
- 14 Office and the Office of Professional
- 15 Responsibility. So they already have the resources
- 16 in place to do the enforcement for the people who
- 17 are voluntarily complying so it would not be a
- 18 heavy lift.
- 19 It can save money for the Treasury, and it can
- 20 protect the consumers. We think it is a really
- 21 important thing, and we encourage Congress to act
- 22 as quickly as possible.

- 1 And to wrap us up I'd like to turn it over to
- 2 Ms. Amy Wang Miller.
- 3 [Applause.]
- 4 MS. MILLER: Good morning, everyone. My name
- 5 is Amy Miller, and I'm here to present the 12th and
- 6 final recommendation from ETAAC, and that is ETAAC
- 7 recommends that Congress supports good tax
- 8 administration.
- 9 With Congress' support and Inflation Reduction
- 10 Act funding, the IRS embarked on a transformational
- 11 modernization project, the Strategic Operating
- 12 Plan, or the SOP, an enormous initiative that will
- 13 take years of consistent management, leadership,
- 14 and support. If successful, it could truly reshape
- 15 the IRS, and everyone within the ecosystem would
- 16 experience long desired and much needed
- 17 transformation benefits.
- Our ETAAC recommendation on good tax
- 19 administration consists of two parts. The first
- 20 part is, as Timur mentioned earlier, late
- 21 legislation and tax extenders. If Congress seeks
- 22 to improve the tax filer experience for their

- 1 constituents they must pass legislation with the
- 2 sufficient time needed for implementation. Late
- 3 changes in legislation delay many of the activities
- 4 necessary to conduct a smooth tax filing season.
- 5 For example, many states that have income tax are
- 6 unable to process tax returns until they update
- 7 their systems based on these late changes, and tax
- 8 software companies cannot complete the work to
- 9 deliver tax compliance until after all of the
- 10 taxing agencies finish their upstream work.
- 11 Late legislation also causes many tax filers
- 12 to file their return prior to when final changes
- 13 are made, purposely leaving items off their tax
- 14 returns so that they may receive their refunds. In
- 15 many if not most cases this is an intentional
- 16 decision with the expectation of filing an amended
- 17 return after all the new changes are properly
- 18 implemented. And as Deputy Commissioner Doug
- 19 O'Donnell mentioned earlier, amended returns cause
- 20 a lot of manual updates and manual inefficiencies.
- Our second portion of this recommendation for
- 22 good tax administration is what the IRS needs to

- 1 successfully modernize, because we wanted to offer
- 2 a roadmap. And specifically ETAAC recommends
- 3 several key items.
- 4 First, members of Congress should meet
- 5 regularly with the IRS modernization project
- 6 leadership. The IRS modernization team should
- 7 produce and widely distribute a quarterly
- 8 modernization progress report that highlights SOP
- 9 progress, successes, and challenges.
- 10 Third, Congress should sustain appropriated
- 11 IRA funding and provide the IRS with the funding,
- 12 advocacy, and support the agency needs to be
- 13 successful throughout the execution of the SOP.
- 14 And finally, Congress should provide the IRS with
- 15 the authority to dynamically allocate their
- 16 appropriated funding, where it will have the most
- 17 impact on the IRS operations, IT, modernization,
- 18 and its service to taxpayers.
- 19 The success of the IRS modernization project
- 20 is contingent upon Congress' unwavering support,
- 21 which includes funding authority and advocacy.
- 22 ETAAC strongly recommends close collaboration,

- 1 transparency, and communication, and strategic
- 2 engagements to ensure that timely and successful
- 3 execution of the transformative SOP initiative
- 4 occurs.
- 5 And with that I will turn things back over to
- 6 our vice chair, Vernon Barnett.
- 7 [Applause.]
- 8 MR. BARNETT: Thank you so much, Amy, and
- 9 thank you all for being here. This concludes our
- 10 presentation of the 2024 report. We are going to
- 11 take a short, five-minute break, and come back --
- MR. HARDY: Before you do that I think, Deputy
- 13 Commissioner, did you want to make some remarks?
- 14 MR. O'DONNELL: Yeah. I will just say a few
- 15 words quickly because I know I'm up against a break
- 16 and I never want to be in the way of that.
- 17 First off, thank you for rearranging and
- 18 allowing me to be part of the discussion. I read
- 19 the report, but hearing you all reinforce the
- 20 specific points that you were making was very
- 21 important. A lot of fantastic work going into
- 22 these recommendations.

1 We have a daily meeting with the Commissioner,

- 2 so last Thursday, after having read this on
- 3 Wednesday, I came in and I was sort of putting out
- 4 there some good ideas in here we need to think
- 5 about in terms of taking the work forward and the
- 6 strategic operating plan.
- 7 So the thought here is already resonating with
- 8 leadership. Very much appreciate the work and look
- 9 forward to being able to report back to you on
- 10 progress we're making, because it sounds like
- 11 you're keeping the running report part on us.
- 12 [Laughter.]
- 13 MR. O'DONNELL: Your recommendation, like on
- 14 frequent updating of the Hill, is a really good
- one. We'll see where that goes. There are a lot
- 16 of challenges in that space, but I think it's the
- 17 right thing for us to try to do, so thank you for
- 18 that.
- 19 Thank you all very much. I appreciate it.
- 20 [Applause.]
- 21 MR. BARNETT: Five minutes.
- [Recess.]

- 1 MR. TALUY: Ladies and gentlemen, boys and
- 2 girls. Please direct your attention to the center
- 3 stage. We're really fortunate today to have on the
- 4 phone with us Jim Clifford, the Director of RICS.
- 5 He is obviously one of the leaders at the IRS of
- 6 the Security Summit, and I mentioned, I call him
- 7 the grandfather of the electronic amended return,
- 8 and scams and schemes that the Commissioner was
- 9 talking about yesterday in Vegas, the Deputy
- 10 Commissioner talked about today, headlined our
- 11 report, he is overseeing that too. So hopefully he
- 12 star-6'ed himself so we can hear him, and I'm going
- 13 to turn it over to Jim Clifford.
- 14 MR. CLIFFORD: Timur, it's none of your
- 15 business what I do for myself, but let's just check
- 16 the audio.
- 17 [Laughter.]
- MR. TALUY: No. Can't hear you at all, Jim.
- 19 Remarks to ETAAC
- 20 MR. CLIFFORD: I did want the audience to hear
- 21 that opening gate.
- MR. TALUY: We can hear you fine, Jim. And

- 1 Mel said "Go Yankees" or something. Was that what
- 2 you said?
- 3 MR. HARDY: Yeah.
- 4 MR. CLIFFORD: Thank you so much, Timur.
- 5 Based on that introduction I think I should get
- 6 paid more, so I want to put that on the table right
- 7 away. I appreciate the recognition of the work
- 8 that I have had the opportunity to influence in my
- 9 career, but certainly none of it accomplished
- 10 without the strong support of the people on my
- 11 staff, the people from within the IRS and across
- 12 the IRS, and not anything that we've done, I think,
- 13 would be accomplished without the strong
- 14 partnership that we have with organizations like
- 15 CERCA, like the FTA that represents our state tax
- 16 administrators, and certainly like the Electronic
- 17 Tax Administration Advisory Committee and the work
- 18 that you all have done to ensure forms in 1998.
- 19 As Timur mentioned, I am Jim Clifford, and I
- 20 am IRS Director of Return Integrity and Compliance
- 21 Services. The RICS organization has two components
- 22 to it really. One is identity theft and refund

- 1 fraud. We do everything we can to protect the tax
- 2 system and our taxpayers from the identity thieves
- 3 who are out there trying to rob our coffers by
- 4 filing bogus returns, claiming refunds under the
- 5 name of taxpayers, and trying to steal billions and
- 6 billions of dollars by doing that.
- 7 The Security Summit is a key element of that,
- 8 and ETAAC is a fundamental part of the Security
- 9 Summit. The Security Summit was formed in 2015
- 10 under IRS Commissioner John Koskinen, and with the
- 11 full support of state partners and industry
- 12 partners we came together and recognized that we
- 13 could not solve a problem like identity theft and
- 14 refund fraud without looking at it with a 360-
- 15 degree view that was only achievable by all of us
- 16 coming to the table and putting our perspectives on
- 17 the table, and sharing what we were seeing from our
- 18 perches across tax administration.
- 19 I think we are facing a similar crisis point
- 20 where we talked about the first-party fraud
- 21 proliferation, a first-party fraud that we're
- 22 seeing to a frightening degree, and I'll talk about

- 1 that in just a bit more detail as I get into my
- 2 remarks. And don't worry. I won't be on it for
- 3 too long.
- 4 I'll get back to ETAAC. And as a fundamental
- 5 player in the Security Summit, it's actually also
- 6 been a foundational player in effective tax
- 7 administration in the country since it was formed
- 8 in 1998, at which time the purpose for Congress to
- 9 form the ETAAC was to help support IRS in achieving
- 10 our goal of having 80 percent of all tax returns
- 11 filed electronically. And at the time, believe it
- 12 or not, that was an ostentatious goal for us to
- 13 achieve. I don't remember exactly where we were at
- 14 at the time but it was pretty low.
- In 2012, we actually achieved the goal of just
- 16 over 80 percent of all returns being filed
- 17 electronically. So since we achieved the goal in
- 18 2012, it might cause one to wonder, what are you
- 19 guys still doing here? You're a little bit like
- 20 Kramer in that Seinfeld episode when you keep
- 21 showing up for work despite the fact you don't work
- 22 here anymore. But since we don't pay you, much

- 1 like the company in the Seinfeld episode didn't pay
- 2 Kramer, we'll let you keep coming as long as you
- 3 can contribute something, as well.
- In all seriousness, I think the leaders over
- 5 the course of the history of ETAAC and the
- 6 membership have recognized, and certainly in 2012
- 7 this was the case, that digital and electronic tax
- 8 administration was evolving, and digital services,
- 9 in general, across society and industry was
- 10 evolving at such a rapid pace that our work
- 11 certainly wasn't done, when we hit a benchmark of
- 12 80 percent of returns being filed electronically.
- 13 I commend Timur and Vernon for their
- 14 chairmanship and their stewardship of ETAAC, and I
- 15 know towards the end of the session I think now
- 16 we'll be prepared to announce new chairs, and I
- 17 welcome you in advance and encourage you to accept
- 18 the baton that is being passed to you, and to
- 19 remember that you will pass it on again to the next
- 20 stewards of this important committee that will help
- 21 to inform IRS and support us along our journey
- 22 through electronic tax administration. That

- 1 certainly is not at an end.
- In fact, when I think about where we are in
- 3 our evolution of digital and electronic tax
- 4 administration I might use an analogy like the
- 5 founding of the United States. Right now, or maybe
- 6 I'll go back to 2012, in 2012, we were in Plymouth,
- 7 Massachusetts. We might have expanded out to other
- 8 communities across the East Coast, but the rest of
- 9 it was a vast wilderness that we did not yet
- 10 explore. And even now I would say I don't think
- 11 we're any further than the Ohio River.
- So we've got a long way to go. We have a lot
- 13 of brush to cut. We have a lot of trails to blaze.
- 14 And the only way that we're going to do that
- 15 effectively is through full partnership around all
- 16 the sectors of tax administration, coming together
- 17 like we did through the Security Summit, coming
- 18 together like we do through ETAAC and through CERCA
- 19 and other gatherings, and then coming together,
- 20 like we recently did, through this Protecting
- 21 Taxpayers Task Force, protecting taxpayers from
- 22 scams and schemes, that I think was mentioned.

- 1 Timur mentioned it, I think, in his opening remarks
- 2 and then in his introduction, and I think Doug
- 3 mentioned it in his opening remarks as well.
- 4 Back in December, this past December, the
- 5 Commissioner asked to convene a gathering of the
- 6 key leaders from across all the sectors of tax
- 7 administration. So FTA was there to represent the
- 8 state, and we had CEOs from our industry partners
- 9 were there, our different advocacy groups, and the
- 10 advisory committees were represented. And they
- 11 wanted to come together as the leaders of tax
- 12 administration to have some dialogue about the
- 13 important work that the Commissioner kept
- 14 emphasizing when he asked Terry Lemons and I to put
- 15 this together, that he wanted this to be an open
- 16 dialogue amongst the leaders of tax administration
- 17 to deal with the thorniest issues that we are
- 18 facing as tax administrators in this country, much
- 19 like, I think, following the approach that one of
- 20 his mentors, John Koskinen, took in 2015 with the
- 21 Security Summit.
- In that first gathering, our leaders

- 1 identified the proliferation of misinformation and
- 2 disinformation being spread across social media
- 3 platforms, street corners, and kitchen tables that
- 4 were encouraging taxpayers to commit first-party
- 5 fraud. There's no other way to say it. It is
- 6 first-party fraud. They are claiming exorbitant
- 7 credit and benefit on their tax return that
- 8 constitutes fraud, and it's coming from our most
- 9 vulnerable populations. It's coming from young
- 10 people, first-time filers, it's coming from low-
- 11 income people, people who are novices, to say the
- 12 least, at understanding tax code and tax
- 13 consequences, and they may be a bit vulnerable to
- 14 believing the too-good-to-be-true story being
- 15 promoted across social media and on the street
- 16 corners and sometimes at the kitchen table, telling
- 17 you that you can get a big payoff through a tax
- 18 loophole that the IRS doesn't want you to know
- 19 about.
- 20 And these are not just life changing. They
- 21 are life-ruining decisions that these people are
- 22 making. There is an enormous penalty at the other

- 1 end of this journey for them. There are not big
- 2 payoffs. There is the potential for criminal
- 3 investigation to be knocking on the door. There is
- 4 a lot of expense and pain in front of them if they
- 5 continue to believe this.
- 6 So the Commissioner put out there, and the
- 7 other leaders from across all the sectors, agreed
- 8 wholeheartedly that we had a responsibility to do
- 9 something about that. And so we formed the
- 10 Protecting Taxpayers Tax Force that was co-led by
- 11 Thomas Bruce and Jamie Shaw from the IRS, but had
- 12 representation from across all the sectors, that
- 13 they put forth resources. And the teams came
- 14 together really not until the beginning of March
- 15 with a challenge to come up with a set of
- 16 recommendations of what we could do in time for
- 17 filing season 2025. So we gave them about a six-
- 18 week sprint.
- 19 Many of us, in what we called the Steering
- 20 Committee, which was the partners at my level
- 21 across all the sectors, had some skepticism on what
- 22 the team could accomplish in such a short period of

- 1 time, particularly being in the middle of filing
- 2 season. But they really blew us away with what
- 3 they came forward with. Around the end of April
- 4 they presented 41 recommendations that they thought
- 5 were feasible to be submitted in time for filing
- 6 season 2025.
- 7 The Steering Committee maybe encouraged them
- 8 that that was a lot to digest between the end of
- 9 April and the beginning of the next filing season,
- 10 and so they went away with some feedback from us.
- 11 I think there was wholehearted agreement that there
- 12 wasn't one recommendation that we didn't all agree
- 13 was a good idea, but it was maybe a little bit too
- 14 much to digest. So they winnowed that down to a
- 15 set of 12 recommendations that were approved by the
- 16 Commissioner and his peers across all the sectors
- 17 on June 18th, and the team has now pivoted to
- 18 implementation. And we are streaking forward to
- 19 once again cut brush, blaze trails, and do
- 20 something that the skeptics will be shocked by, the
- 21 things that we can put in place in time for filing
- 22 season 2025, to help protect taxpayers from

- 1 believing that too-good-to-be-true scams and
- 2 schemes that are being promoted all across social
- 3 media and through other mechanisms, to help
- 4 potentially educate them, stepping up our
- 5 communication and outreach, which I, for one, think
- 6 that IRS has always done an outstanding job with
- 7 the way we use communication, outreach, and
- 8 education as a component of tax administration, and
- 9 we are only effective with that through the
- 10 partnership with all of you in getting the word out
- 11 through your platforms to reach those target
- 12 audiences with the key information.
- But in addition to communication and
- 14 education, we've got to do a little bit more
- 15 intentional work to flag issues at the point of
- 16 filing, to warn taxpayers when they're about to hit
- 17 Send on something that can send them down that path
- 18 to ruin. And we've got some good recommendations
- 19 in there that are feasible, that are agreeable to
- 20 all the parties that we can execute on these. Time
- 21 is our only enemy at this point, and we are racing
- 22 against it to try to put some things in place for

- 1 this coming filing season or maybe even before,
- 2 doing some user testing, maybe around the October
- 3 filing deadline.
- 4 I'm not going to share details on the
- 5 recommendations at this point because I know the
- 6 Commissioner and his peers are putting together a
- 7 joint press release that will come out shortly.
- 8 However, I will say that there is extremely strong
- 9 alignment between the recommendations that task
- 10 force came up with and the recommendations that I
- 11 see in the ETAAC annual report.
- 12 And I'll just throw some not so seemingly
- 13 veiled hints out there. I think Recommendations 1,
- 14 2, and 3 are prominent amongst the task force
- 15 recommendations, as are several of the other
- 16 recommendations in there. And again in the body of
- 17 the report, I noted a full acknowledgement of that
- 18 tension between the demand from taxpayers and tax
- 19 professionals to get easy access to information and
- 20 services, but our responsibilities to protect their
- 21 information and to protect them from being
- 22 victimized by the people that want that information

- 1 because that information is worth billions of
- 2 dollars to them.
- 3 So it is a difficult task, but again, it's a
- 4 task that the IRS could not possibly achieve alone.
- 5 We can only do it because of entities like the
- 6 ETAAC, and because of those of you who are willing
- 7 to step forward and volunteer to serve in a chair,
- 8 in the vice chair position, and those of you who
- 9 are willing to serve as members and participate in
- 10 the drafting of some really well thought-out
- 11 recommendations.
- 12 So I thank you, and I commend you, and I
- 13 appreciate you offering me just a little time on
- 14 the agenda. I hope I didn't eat up too much.
- 15 [Applause.]
- MR. TALUY: Jim, thanks so much for that and
- 17 those comments. You know, the agenda has us here
- 18 till 11:15, so I'm just going to start speaking
- 19 more slowly, maybe go back through some of the
- 20 recommendations.
- 21 MR. CLIFFORD: You mean I could've taken up
- 22 more time?

1 <u>Closing Remarks</u>

- 2 MR. TALUY: Yeah, you had 45 minutes there.
- 3 But, you know, my flight's already delayed, so I'm
- 4 in a plan to get out of here as soon as possible.
- 5 But before I did, I just want to go through and
- 6 just thank our ETAAC members. Obviously, our
- 7 outgoing members Terry Steenblock, Andy Phillips,
- 8 and Bob Grennes couldn't be here. But Mark
- 9 Godfrey, Hallie Parchman, Jim Paille, John
- 10 Lunardini, Jihan Jude, Peter Barca, we enjoyed some
- 11 great times together with everybody. And Jared
- 12 Ballew, our chair emeritus, thank you for leading
- 13 us and all the great advice and counsel, Jared.
- 14 Really, this report is a testament to your support
- 15 and your help. And all the outgoing committee
- 16 members, thank you guys for just wonderful work in
- 17 the committee.
- 18 And I also want to recognize our committee
- 19 members who are staying on. We have Mark Steber,
- 20 Keith Richardson. Was that a revenue superstar?
- 21 Is that what title is there? Austin couldn't make
- 22 it today. Jerry Gaddis, thanks for everything.

- 1 Rob Gettemy, Ron Gilson, thanks for helping be one
- 2 of our committee co-chairs with Mark Steber and Amy
- 3 Miller Wang. Doug Harding, thank you. Andrew
- 4 Jenison, you couldn't be here today, but thank you
- 5 for your help. Carol Liu, wonderful support. It's
- 6 nice to have another Californian out here so we can
- 7 make time zones work out properly. Amy, recognized
- 8 you earlier for being one of our co-leads. Argi
- 9 O'Leary, fantastic support these last couple years.
- 10 Thanks for everything.
- 11 Rae Pilarski, thanks for being here. You
- 12 didn't come to dinner last night, though, and I
- 13 remember that. A little inside joke. We have team
- 14 dinners, ETAAC, on Tuesdays and my goal was to get
- 15 Rae out with us today. But thanks for being there.
- 16 And Stephanie Plaza, thanks for all your help.
- 17 And, you know, one person I just want to
- 18 recognize, Vernon Barnett. Vernon and I came
- 19 together a couple years ago. We were appointed as
- 20 co-vice chairs and, you know, I was like, oh, no,
- 21 I'm an industry guy and I've got to work with a
- 22 state guy. What's going to happen? And I can't

- 1 tell you what a fantastic relationship we've built.
- 2 Vernon's a fantastic leader at the states, leader
- 3 at the FTA, and he's just done a wonderful job.
- 4 And I couldn't have asked for a better co-vice
- 5 chair, and I couldn't have asked for a better vice
- 6 chair this year. Vernon, without your help, this
- 7 report wouldn't have made it out the door and
- 8 wouldn't have done that. So I just really want to
- 9 recognize you and appreciate your help and support
- 10 through this process.
- 11 And with that, I'm not going to cry, but this
- 12 has been really fun. It's been a great ride. I
- 13 just truly appreciate all your support, all the IRS
- 14 team. Like I said earlier, you guys are fantastic.
- 15 We couldn't do without you. And with that, like,
- 16 he opened it, hopefully he'll close it. And Jim
- 17 said he had something to announce today?
- 18 [Applause.]
- MR. HARDY: So all good things must come to an
- 20 end, and end they must, and end they shall. This
- 21 has been a real pleasure this year to work -- every
- 22 year is, but, and I say it every year, each of the

- 1 advisory groups takes on its own DNA. It becomes
- 2 sort of this living body of minds that come
- 3 together and it's always just great and fascinating
- 4 to watch, and our leadership in IRS truly
- 5 appreciates it. As you saw, Doug stayed here to
- 6 listen to the recommendations. By the way, we had
- 7 to sort of switch on the fly, but I thought that
- 8 that worked out really nice.
- 9 [Applause.]
- 10 MR. HARDY: Really crisp and concise. Great
- 11 job.
- 12 So this brings us to the end. And before I
- 13 conclude and adjourn our public meeting, ETAAC
- 14 2024, I want to announce our new chair, mister
- 15 Vernon Barnett.
- 16 [Applause.]
- MR. HARDY: And our vice chair for next year
- 18 is none other than Amy Miller.
- 19 [Applause.]
- 20 MR. HARDY: Ladies and gentlemen, this
- 21 concludes the ETAAC 2024 public meeting. Thank
- 22 you.

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1
         [Applause.]
          (Whereupon, at 11:22 a.m., the Electronic Tax
 2
 3
    Administration Advisory Committee meeting was
 4
    adjourned.)
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