



Working for Tax & Accounting Professionals

March 24, 2021

The Honorable Charles P. Rettig
Commissioner
Internal Revenue Service
1111 Constitution Avenue, NW
Washington, D.C. 20224

Mr. Mark J. Mazur
Acting Assistant Secretary for Tax Policy
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

RE: Postponement of April 15, 2021, Tax Returns and Payments Deadline to June 15, 2021

Dear Commissioner Rettig and Acting Assistant Secretary Mazur:

The National Society of Accountants (NSA) applauds, in part, the IRS's recent deadline postponement of individual tax returns and payments ordinarily due April 15 to May 17, 2021. Such relief, however, falls woefully short of adequately addressing the ongoing complexities of the 2021 tax filing season.

NSA serves not only as an advocate for its members but also as a facilitator of communication between tax and accounting professionals and the IRS, working toward the shared goal of a smooth tax filing season. And while we acknowledge the IRS's Herculean responsibilities during this complicated, ever-evolving filing season and its recent effort to offer some tax relief for certain individuals, we urge you to appreciate the onerous impact that the IRS's own set of administrative challenges continues to have upon return preparers and taxpayers alike.

The IRS's one-month postponement is not only insufficient, it is severely undercut by the fact that the IRS is still requiring first quarter estimated tax payments to be submitted by April 15 (Form 1040ES). As the IRS is aware, determining appropriate estimated tax payments usually occurs at the time of tax return preparation. Thus, postponing the deadline for an individual tax return to May 17, yet still requiring an April 15 submission of the first estimated tax payment helps neither taxpayers nor practitioners and ultimately creates more complications than relief.

Moreover, during last week's March 18 House Ways and Means Subcommittee on Oversight hearing in which you testified, Commissioner, you stated: "[t]here is a large contingent of wealthy individuals in this country who do not make their estimated payments." While that may be true, many small businesses and self-employed individuals also make estimated tax payments. And though, as you testified, small businesses may have certain remedies for avoiding associated penalties and interest, it is an unnecessary burden on both taxpayers and their tax practitioners to expect such complicated compliance during these unprecedented times.

Further, the IRS did not postpone the April 15 filing and payment deadline for the following:

- Trust and estate income tax payments and returns (Form 1041); and
- Corporate income tax payments and returns (Forms 1120).

While NSA understands your testimony stating that you had serious discussions about this issue and how and where to “draw a line” to solely benefit individual taxpayers, it is apparent that your decision’s momentous effect upon return preparers and small businesses alike has not been fully appreciated.

As noted in our recent correspondence dated March 9 and February 1, it has become wholly undeniable that tax professionals and taxpayers are facing unprecedented and steadily mounting challenges this filing season through no fault of their own. There, we outlined several persistent concerns shared by our members and the tax and accounting practitioner community as a whole. Those concerns are a direct result of the IRS’s lack of resources and adequate communication with taxpayers, coupled with numerous legislative tax law changes.

Thus, NSA again strongly recommends that *all* payments and returns with an April 15, 2021, deadline be promptly postponed to June 15, 2021.

Thank you for your consideration of these important matters. We welcome the opportunity to discuss these issues further. Please direct any inquiries or information related to this letter to NSA’s Director of Public Policy Jessica L. Jeane at 571-982-7360 or jjeane@nsacct.org.

Sincerely,



John Rice
CEO



Curtis Lee, Jr., ATA, ATP
President



Jessica L. Jeane, J.D.
Director of Public Policy



Kathy Hettick, EA, ABA, ATP
Chair, Federal Taxation Committee