



December 6, 2022

Douglas W. O'Donnell
Acting Commissioner
Internal Revenue Service
1111 Constitution Avenue, NW
Washington, D.C. 20224

Dear Acting Commissioner O'Donnell:

I am writing to you today on behalf of the National Association of Enrolled Agents (NAEA) to stress the dire situation tax professionals and taxpayers currently find themselves in with regards to the nearly non-existent phone service at the IRS. In particular, the IRS's Practitioner Priority Service (PPS) phone system, which has the very purpose of providing efficiency and ease for tax professionals, has become nearly inoperable in recent weeks. With the recent funding for the IRS in the Inflation Reduction Act (IRA), we call on the IRS, as their first action in expending these funds, to immediately begin demonstrating concrete improvement to the phone situation and as a result begin restoring confidence in customer service.

NAEA represents the interests of nearly 60,000 enrolled agents worldwide. As you know, enrolled agents are federally licensed tax practitioners who may represent taxpayers before the IRS when it comes to collections, audits and appeals. NAEA is the nation's leading community for enrolled agents – from aspiring agents to experts with decades of experience, playing a vital role on behalf of taxpayers.

As NAEA has stated on numerous occasions, we are excited for the opportunity presented to the IRS by the funding in the IRA and what it can mean for the transformation of the agency moving forward. In the short-term, however, it is essential that the IRS address the urgent issue of the PPS lines. The credibility of the agency is on the line, and it is important that the IRS demonstrate to the American taxpayer that it has the ability to utilize these new resources and quickly improve the taxpayer experience.

The IRS has touted their efforts in recent months to improve customer service issues and extensive backlogs that resulted from the COVID-19 pandemic. We understand the vast challenges faced by the agency in recent years and applaud you for the steps that have been taken. Unfortunately, despite these efforts, the telephone service provided through the PPS lines has significantly deteriorated over the last month to the point that tax practitioners cannot get through no matter how extreme their efforts.

The daily complaints and examples we receive from enrolled agents about the problems with the PPS line are numerous. A few examples include:

I have tried no less than 15 times during the day. Today was the last straw. I placed the first call at 6:59 AM and got the message "Due to extremely High call volume we are unable to take your call. Please call back later or tomorrow." How can there be extremely high call volume at 7:00 AM when they first open? I tried 4 more times and still got the same message. This is happening even with the new challenge calls which were implemented to stop the robo calls from tying up the lines. – Enrolled Agent from South Carolina

It took me 35 calls today to get in the hold line today! I noticed that I got the verbal authentication about 1 in every 4 attempts. Had to either repeat 3 words, repeat sentences and sum 2 numbers correctly. It now takes longer to still get the "high call volume" message. – Enrolled Agent from Indiana

Haven't gotten through on the practitioner hotline in over a year. – Enrolled Agent from Virginia.

I don't even try to get through anymore. – Enrolled Agent from Texas.

I was put through this verbal authentication 3 times today, and each time I got the "high call volume" message. It now takes twice as long to get hung up on by the IRS. This is more frustrating than ever before. – Enrolled Agent from Arizona.

As you can see from the sentiments of enrolled agents across the country, accessing the PPS lines has become nearly impossible for tax professionals to gain the help they need from the IRS. We have received anecdotal evidence that less than one percent of callers can get through the PPS individual line.

The decline in service comes at a time when the IRS is under more scrutiny than ever, as many have questioned whether the IRA funds will be focused on more audits or improving the taxpayer experience. The window of opportunity for the IRS to truly show it will use these funds to dramatically improve customer service is limited, and the IRS should use this opportunity to tackle the phone problems head on.

NAEA calls on the IRS to immediately execute the following steps to alleviate the issue:

- Set a goal with metrics for immediate improvement to the phone system
- On a monthly basis, measure and report on wait and response times and customer service satisfaction
- Utilize private sector expertise to initiate improvements
- Re-assign more staff to answer the PPS phone lines
- Pause the auto-dial pilot that has only increased wait times

The IRS has stated on several occasions that they are seeking to hire and train more staff to address the phone backlogs. However, since those efforts have begun earlier this year, the



situation on the PPS lines has significantly worsened. One contributing factor and source of frustration is a recent pilot that was put into place to prevent auto-dialers, with the goal of freeing up lines. While we understand the goals of the pilot, it has unfortunately had the opposite effect of making the waits even longer.

The IRS has also suggested that tax professionals utilize a Tax Pro Account or other online tools while the phones are not operable. While we appreciate the sentiment and have longed pushed for more robust online tools for tax professionals, there are a variety of circumstances where Tax Pro Accounts are currently not an option and tax professionals are forced to call the IRS for assistance on tax issues or for transcripts.

The NAEA believes there are other long-term solutions that could help reduce call volume, such as having better online tools for tax professionals and reducing the Centralized Authorization File (CAF) wait time for a transcript, but immediate action must be taken to address this issue and improve customer service. By implementing these steps, the IRS can be better equipped to aid tax professionals across the country.

Sincerely,

A handwritten signature in black ink that reads "Megan Killian". The signature is written in a cursive, flowing style.

Megan Killian, CAE
Executive Vice President
National Association of Enrolled Agents

cc: Chairman Ron Wyden, Senate Finance Committee
Ranking Member Mike Crapo, Senate Finance Committee
Chairman Richard Neal, House Committee on Ways & Means
Ranking Member Kevin Brady, House Committee on Ways & Means
Members of the Senate Finance Committee
Members of the House Committee on Ways & Means
All other Members of the 117th Congress