



Return Preparer Office

# **ENROLLED AGENT RENEWAL**

## **How to Avoid CE Deficiencies**



# Introduction

- During the EA CE audit that IRS completed in September 2022, we discovered a concerning rate of CE shortfall. IRS is working to communicate more effectively and directly to EAs. EAs must understand their annual CE and ethics minimum requirements and thresholds that they must meet for the enrollment cycle, which is typically 3-years.
- CE providers and EA organizations can partner with the IRS by linking to or explaining EA requirements that we cover on IRS.gov. CE providers may want to offer CE packages designed to help EAs meet their annual and enrollment cycle requirements. Our audit shows that there is significant room for CE growth for the enrolled population.



# Overview

- Enrolled agent status is the highest credential the IRS awards. Individuals who obtain this elite status must adhere to ethical standards and complete 72 hours of continuing education courses every three years.
- All enrolled agents (EAs) must apply for renewal between November 1 and January 31 prior to credential expiration in every subsequent third year per the last number of their Social Security Number.
- Section 10.6 of [Circular 230](#) contains the regulations governing practice before the Internal Revenue Service and provides the Internal Revenue Service (IRS) with the authority to conduct a review of an EA's continuing education (CE) records to ensure they have satisfied the requisite number of CE hours.



# Continuing Education Requirements

- In order to qualify for renewal as an enrolled agent or enrolled retirement plan agent, an individual must certify, in the manner prescribed by the Internal Revenue Service, that the individual has satisfied the requisite number of continuing education hours.
- EAs are required to have a minimum of 72 hours of continuing education credit, including 6 hours of ethics or professional conduct. A minimum of 16 hours of continuing education credit, including two hours of ethics or professional conduct, must be completed during each enrollment year of an enrollment cycle.



# Meeting the minimum CE requirements

In this example, the Enrolled Agent met the minimum CE requirements of 16 hours including 2 hours of Ethics for each enrollment year, as well as the total of 72 hours of continuing education credit for the three-year enrollment cycle.

CE Type	Year 1	Year 2	Year 3	Total
Federal Tax Law	14	38	14	66
Ethics	2	2	2	6
Total CE hours	16	40	16	72

In this example, the Enrolled Agent met the minimum CE requirements of 72 hours of continuing education credit for the three-year enrollment cycle, however, **did not meet the minimum requirements** for each enrollment year.

CE Type	Year 1	Year 2	Year 3	Total
Federal Tax Law	14	38	14	66
Ethics	0	6	0	6
Total CE hours	14	44	14	72



# Meeting the minimum CE requirements (continued)

In this example, the Enrolled Agent met the minimum CE requirements of 72 hours of continuing education credit for the three-year enrollment cycle, however, **did not meet the minimum Ethics CE requirements of 2 hours Ethics CE per year, or 6 hours total for the renewal cycle.**

CE Type	Year 1	Year 2	Year 3	Total
Federal Tax Law	14	38	16	68
Ethics	2	2	1	5
Total CE hours	16	40	17	73

In this example, although the Enrolled Agent met the minimum Ethics CE requirement for each year, the minimum of 72 hours of continuing education credit for the three-year enrollment cycle **was not met.**

CE Type	Year 1	Year 2	Year 3	Total
Federal Tax Law	14	24	14	52
Ethics	2	2	2	6
Total CE hours	16	26	16	58



# Renewal application period

You must renew your EA credential every 3 years based on the last digit of your SSN.

SSN Ending	Renewal Cycle	Renewal Application Period		Renewal Cycle Expiration	
		EA	ERPA	EA	ERPA
7, 8, 9 & No SSN	2021-2024	November 1, 2023 through January 31, 2024	April 1, 2024 through June 30, 2024	March 31, 2024	September 30, 2024
0, 1, 2, 3	2022-2025	November 1, 2024 through January 31, 2025	April 1, 2025 through June 30, 2025	March 31, 2025	September 30, 2025
4, 5, 6	2023-2026	November 1, 2025 through January 31, 2026	April 1, 2026 through June 30, 2026	March 31, 2026	September 30, 2026





# Enrollment during a renewal cycle

An individual who receives initial enrollment during the three years of the renewal cycle must complete two hours of qualifying continuing education credit for each month enrolled during the enrollment cycle. Enrollment for any part of a month is considered enrollment for the entire month. **This chart from Publication 5186 shows the minimum requirements for the most recent preceding enrollment periods:**

CE Requirements for an Enrollee's First Renewal Cycle														
SSN Ending	Year of Enrollment	Calendar Month Enrollment Granted											Renewal Cycle	
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov		Dec
7, 8, 9 & No SSN	2021	72	70	68	66	64	62	60	58	56	54	52	50	2021-2024
	2022	48	46	44	42	40	38	36	34	32	30	28	26	
	2023	24	22	20	18	16	14	12	10	8	6	4	2	
0, 1, 2, 3	2022	72	70	68	66	64	62	60	58	56	54	52	50	2022-2025
	2023	48	46	44	42	40	38	36	34	32	30	28	26	
	2024	24	22	20	18	16	14	12	10	8	6	4	2	
4, 5, 6	2023	72	70	68	66	64	62	60	58	56	54	52	50	2023-2026
	2024	48	46	44	42	40	38	36	34	32	30	28	26	
	2025	24	22	20	18	16	14	12	10	8	6	4	2	





# Biennial Audit

Biennially, the Return Preparer Office (RPO) Enrolled Agent Policy & Management (EAP&M) and Continuing Education (CE) departments work conjointly to conduct a random audit with a selected sample of EA's continuing education records. This review is to ensure compliance with the requirements and standards for renewal.

Moreover, a review of the information in the Tax Professional PTIN System (TPPS) is completed to confirm the CE hours submitted by CE providers matches the information obtained from the EA.



# The Return Preparer Office has shared audit findings with the EA community.

**GENERALLY**, some enrolled agents:

- Failed to ensure CE was a qualifying IRS Program Number from an IRS Approved Continuing Education Provider. For example – counted state accountancy continuing education as EA CE credit.
- Failed to take the minimum 16 hours, including 2 hours of Ethics, in each of the calendar years.
- Failed to provide the correct PTIN to the CE Provider.
- Counted AFTR course CE as enrolled agent continuing education.

**UNFORTUNATELY**, some enrolled agents:

**Provided false or misleading information concerning the completed continuing education on their EA Renewal Form 8554. This resulted in being placed in the Inactive Status.**



# General EA renewal reminders

- Your IRS Preparer Tax Identification Number (PTIN) must be renewed **every year**, regardless of when your EA renewal is due. Visit [IRS.gov/ptin](https://www.irs.gov/ptin) to renew your PTIN.
- Your EA credential must be renewed every 3 years and is based on the last digit of your SSN. Refer to Publication 5186 for more information.
- Electronic renewals can be completed at <https://www.pay.gov/public/form/start/19304437>.

*If submitting a paper EA application:*

## Do Not

- Staple, tape, glue or use sticky notes, etc. to any part of your application **or** check.
- All documents should be on standard size paper (8.5" x 11").



# Continuing education (CE) reminders:

- **It is the EA's responsibility to track and maintain the CE hours they complete and ensure they are properly reported to the IRS.**
- **Your CE hours must be taken by an IRS approved CE provider. CE records must be maintained for four years and include the following:**
  - The name of the CE Provider organization
  - The location of the program
  - The title of the program, approval number received for the program, and copy of the program content
  - Written outlines, course syllabi, textbook, and/or electronic materials provided or required for the program
  - The date(s) attended
  - The credit hours claimed
  - The name(s) of the instructor(s), discussion leader(s), or speaker(s), if appropriate; and
  - The certificate of completion and/or signed statement of the hours of attendance obtained from the continuing education provider



# What can the enrolled agent do?

- Prior to renewal opening on November 1, the EA should verify that all continuing education is properly credited in their PTIN account.
- Contact the CE Provider if an IRS approved CE course is not properly credited – be sure they have recorded the correct name, attendance date and time, and the correct PTIN.
- If CE credit for the current year is deficient, there is still time to complete the required CE prior to December 31. Programs/courses must be completed by midnight local time of the student on December 31 to count for credit in the current calendar year. Follow up to be sure the CE is credited appropriately to the PTIN account.
- If CE credit for the first two prior years of the renewal period is deficient, see the next slide.





# What if the CE hours are deficient for prior years?

- Refer to Section 10.6(i) of Treasury Department Circular 230 to determine if you meet the qualifications to request a waiver of continuing education requirements. A request for waiver must be filed no later than the last day of the renewal application period.
- Contact Enrolled Agent Policy and Management if there are compelling reasons the appropriate CE was not completed within each calendar year of the renewal period – but you will complete the deficient hours prior to the end of the year. This will be considered on a case-by-case basis.





# **The Taxpaying Public relies on the EA credential to hold up for professionalism and integrity. The EA community should expect the same from its members.**

*The Internal Revenue Service is committed to helping you promote the enrolled agent profession and increase visibility of your professional credential and specialized expertise. An important part of promoting your business, services, or yourself as an enrolled agent (EA) is the use of the profession's enrolled agent logo. We offer the enrolled agent logo for use in your professional communications and marketing materials.*







# Resources

- <https://www.irs.gov/tax-professionals/enrolled-agents>
- <https://www.irs.gov/pub/irs-pdf/p5186.pdf>
- [Enrolled Agent Logo – Black/White \(JPG\)](#)
- [IRS.gov/ptin](https://www.irs.gov/ptin)
- <https://www.irs.gov/pub/irs-pdf/f14392.pdf>
- <https://www.irs.gov/tax-professionals/circular-230-tax-professionals>
  - Section 10.6