Chairperson   Members of the committee, my name is Cathy Baker, I am from Albany, I am a Licensed Tax Consultant for the State of Oregon and an Enrolled Agent at the Federal level. I am here opposing the proposed bill HB 2338 as written.

I am opposing section 3, parts (d), (e), (f), it is not what we originally proposed. If left unchanged it is still the barrier it has been for the last 12 years, licensing will still be required, we still won't be able to find entry level data entry. We don't want them paying anything out of pocket or testing, to see if this is a life time fit.

Background, until 2013 we were able to have someone work in our office doing data entry from copies of originals. This was a huge help to our offices. It also provided an opportunity for someone to see if this was something they would want to do before spending several hundred dollars, and 80 hours of class time to get a LTP license. The Director of the Board of Tax Practitioners decided in 2013 he did not want this to be an option for us.

 (This was a rule change that did not go before the legislature in the first place)

This immediately presented a problem for us and many of us continued using data entry personal as we had before because there were not enough LTP's or anyone interested in becoming LTP'S due to the time and money involved. When this rule changed it was the start of the end of getting people interested in becoming Tax preparers.

My office was turned in for using unlicensed preparers and I immediately called the board and presented my case, that there were not enough LTP's and no one passing the test. Laura Kardokus the new Director, asked what we needed. This is where the new rules started.

We went to Dan Rayfield to start the bill process.

 Our original proposal was to allow unlicensed people to work up to 2 years, taking education classes along the way and helping with data entry and if they liked it then take the 80-hour course and test. They would understand better what was being taught as they would have already had hands on. This is how I learned 35 years ago. I worked for a CPA, they have different rules that allow them to use data entry personnel. I don't know why this wouldn't work for us.

The tax board went to the two Tax Preparer groups OSTC and OATC, they changed the direction of our intent by putting in requirements to take a 40-hour class and still take a test. First there are no 40-hour classes available, only 80 hours, so they would have to pay for the 80-hour class but take 40 hours and at this time there is no mid-term test for them to take, so what test would they take. We would be in the same position we are now, no one passing a test and getting licensed.

The Tax Preparers in the state are in agreement with our original proposal as they also were using unlicensed people to get the work done. OATC is also willing to go with the original proposal. We just want to be legal and hire people to get the job done.

There are many licensed groups that get on the job training before they have to get licensed, this is what we need in this field as many do not want to fork out hundreds of dollars and time to something they don't know if they will like.

We need help to staff our offices!