

**National Association of Enrolled Agents (NAEA) Written Statement  
In Support of the Enrolled Agent Parity Proposal in the -2 amendment to SB 1510  
Before the Senate Finance and Revenue Committee  
Wednesday, February 11, 2026**

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**Chair Broadman, Vice-Chair McLane, and Members of the Committee:**

Thank you for the opportunity to submit written testimony on the Enrolled Agent (EA) Parity proposal on behalf of the National Association of Enrolled Agents (NAEA).

This proposal was developed in close consultation with legislators and is guided by two core principles: **no fiscal impact to the State of Oregon** and **no disruption to existing professional licensing frameworks**.

**Problem**

Oregon statute currently imposes layers of unnecessary and duplicative requirements on federally licensed enrolled agents, effectively deterring them **from representing taxpayers and practicing in Oregon**.

Specifically:

- Oregon is **the only state in the nation** that requires enrolled agents—who are already licensed by the Internal Revenue Service—to pass a **state-specific examination** in order to practice.
- Oregon law **prohibits enrolled agents from supervising trained staff**, even though supervision is expressly permitted under federal law and allowed in other states.
- These requirements go beyond consumer protection and instead create regulatory barriers that discourage qualified professionals from serving Oregon taxpayers.

As a result, Oregon taxpayers experience reduced access to both tax preparation and taxpayer representation, particularly in complex matters and disputes with tax authorities. By discouraging enrolled agents from practicing in Oregon, the current law limits the availability of qualified professionals and creates unnecessary administrative friction for state agencies. These barriers disproportionately affect small businesses, rural taxpayers, and lower-income filers who depend on enrolled agents for affordable, specialized tax preparation and representation.

Oregon's approach is a national outlier. Oregon's treatment of enrolled agents is also inconsistent with its treatment of other tax professionals. Certified Public Accountants and attorneys licensed in other states may practice and represent taxpayers in Oregon through

reciprocity or recognition of their existing credentials, without an additional state examination. Enrolled agents—despite being federally licensed exclusively for tax practice—are uniquely subject to duplicative testing requirements. No other state imposes a second, state-specific licensing examination on federally credentialed enrolled agents, nor prohibits them from supervising trained staff. This divergence creates confusion, inefficiency, and unnecessary regulatory friction.

## **Solution**

The proposal does not expand the scope of practice for enrolled agents; it simply aligns Oregon statute with the authority they already hold under federal law, resolves these issues while preserving state oversight, and avoids a fiscal impact.

### **(1) Allows Enrolled Agents to Practice Under the Full Scope of Their Federal IRS Licensure**

As in every other state in the United States, the proposal aligns Oregon law with the federal enrolled agent credential.

This includes:

- **Defining “enrolled agent” in statute** and eliminating the requirement that an enrolled agent also obtain state licensure as a licensed tax consultant.
- **Eliminating the state-specific examination** requirement for enrolled agents, recognizing the comprehensive federal testing and regulation already in place.
- **Allowing enrolled agents to supervise unlicensed tax preparers**, consistent with federal standards and common state practice.

### **(2) Preserves State Oversight Through Registration with the Board of Tax Practitioners**

Rather than removing the state’s role, the proposal **requires both in-state and out-of-state enrolled agents to register with the Oregon Board of Tax Practitioners**.

This approach:

- Maintains the Board’s oversight and disciplinary authority,
- Ensures accountability and consumer protection, and
- Preserves fee revenue through a registration fee paid by enrolled agents.

### **(3) Allows Enrolled Agents to Represent Taxpayers Before the Oregon Department of Revenue**

The proposal clarifies that a registered enrolled agent may represent taxpayers before the Oregon Department of Revenue to the same extent as a licensed Oregon tax consultant.

This aligns with:

- Existing federal practice,
- Taxpayer expectations, and
- Administrative efficiency for the Department.

### **Consumer Protection Through Registration and Oversight**

The Oregon Board of Tax Practitioners has stated that licensing requirements for tax consultants are necessary for consumer protection. We agree that **consumer protection must remain paramount**. However, for federally licensed enrolled agents, **registration—not duplicative licensure—is the appropriate and effective consumer protection model**.

Enrolled agents are:

- **Federally tested** on individual, business, and representation matters,
- **Subject to ongoing federal continuing education requirements**,
- **Bound by enforceable ethical standards**, and
- **Disciplined by the Internal Revenue Service**, including suspension or revocation of practice rights.

These protections are robust and comparable to, and in many cases exceed, those applicable to other professionals authorized to represent taxpayers.

This proposal does not eliminate oversight. Instead, it **focuses on Oregon's regulatory role, where it adds value**:

- Verifying that an enrolled agent is in good standing with the IRS,
- Requiring registration with the Board of Tax Practitioners,
- Maintaining a public record of registered enrolled agents, and
- Preserving the Board's authority to discipline misconduct under ORS 673.700.

In this context, **registration is a form of consumer protection**. It ensures accountability without imposing duplicative exams or licensure requirements that do not enhance public safety.

### **Evidence-Based Consumer Protection**

Importantly, enrolled agents have demonstrated a strong record of consumer protection nationwide, with comparatively low rates of disciplinary action and consumer complaints, despite representing taxpayers in complex, high-risk matters.

This record reflects:

- The narrow tax-focused nature of the EA credential,
- Continuous federal oversight, and
- A professional culture centered on compliance and taxpayer advocacy.

Oregon's current approach does not improve upon these protections—it merely restricts access to them.

### **Why Licensing Is Not the Right Tool Here**

Licensing is most appropriate where a profession lacks an existing credentialing framework. That is not the case for enrolled agents.

Requiring state licensure in addition to federal enrollment:

- Duplicates testing already performed by the IRS,
- Creates barriers to practice without enhancing consumer safety, and
- Discourages qualified practitioners from serving Oregon taxpayers.

By contrast, **registration preserves oversight, improves transparency, and protects consumers—without unnecessary regulatory burden.**

### **Fiscal Impact**

The proposal is drafted to be **fiscally neutral**.

Enrolled agents would pay a **registration fee to the Board of Tax Practitioners**, ensuring there is **minimal revenue impact** to the state. No new programs, staffing, or systems are required.

The Oregon Department of Revenue has also reviewed the legislative concept, including for potential fiscal impacts.

### **Conclusion**

This proposal is a narrow, targeted fix to an outlier statute. It removes unnecessary barriers, aligns Oregon with national practice, preserves consumer protections, and respects the Legislature's fiscal and policy priorities.

By allowing federally licensed enrolled agents to practice under their existing credentials—while maintaining state registration and oversight—Oregon can improve taxpayer access and administrative efficiency without cost or disruption.

For these reasons, we respectfully urge the committee's support of the -2 amendment to SB 1510.

Thank you for your consideration.