

Submitter: Angela Horst  
On Behalf Of:  
Committee: House Committee On Revenue  
Measure, Appointment or Topic: SB1510

Dear Representatives,

I am an Oregon Licensed Tax Consultant and Enrolled Agent. I recently moved out of Oregon to TN. I still work for my Oregon based employer (also OR LTCs and EAs) and prepare tax returns for many Oregon residents, as well as OR part-year and non-resident returns.

My Enrolled Agent status, as well as that of thousands of EAs in the country, is recognized nationwide and by the Federal Government. I do not feel that Oregon, or any state, should be able to nullify the value of our education, experience, and certification by requiring that we function the same as those who have not earned their EA.

I studied for many months to earn my EA through the IRS. The IRS has a strong requirement for continuing education (at least 16 credits per yr and 72 in 3 yrs.) I mentioned to a client last year that we were required to have 30 credits a year in Oregon. This gentleman is a long time engineer. He was amazed that we have a higher CE requirement than he and his fellow engineers. (I believe about twice as many hours.)

My employer has worked hard the last 5-10 years to function within the current licensing rules (no employing non-licensed people, etc.) However, the current rules have made it very difficult for my employer to find and hire individuals that are interested in the field. Few people are willing to take a 40-80 hour class, pass a test or two, and wait for a license to be issued, before even being hired for a minimum wage data entry type position-- all to maybe decide that they really don't like it after they do it for a while. I know the Legislature has recently approved a lower requirement license for beginning preparers, but I do not think it is enough.

I went through H&R Block's 80 hour course so I could be eligible to apply for my initial OR LTP license. They teach the course on proprietary software, so anyone going to work for someone other than Block must re-learn much of what their 80 hours was spent on. If EAs could supervise non-licensed preparers, they could learn on the software they will be using long term. I believe this means much of the tax related learning will be able to retained better as it will be applicable to the current tax prep year and linked to currently used memories & client information, rather than linked to a software your brain needs to forget, and tax prep from the prior filing season, for pretend clients with unlikely round figures. During our 80-hour courses, I and my coworkers found several instances where Block's information in the class was outdated or just plain incorrect (especially the Oregon related items). The

instructor has no ability to change the curriculum- simply to mention to someone up the line that there is an error and hope that it gets to the programmers. After 3 years, the errors still hadn't been fixed.

When I was a student at Clackamas CC I took many online courses. Getting errors corrected was the only way to make sure students didn't learn erroneous information thinking that they understood it correctly.

I want Oregon taxpayers to have the option of getting a great preparer, who knows what they are doing. I understand why the OBTP wants to have EAs register in OR and encourage EAs to take OR specific CE. However, the last couple years we've had taxpayers and/ or their out of state prepares asking us to prepare the OR-40, since their preparer couldn't. They are asking us to prepare a return based on a federal return we didn't prepare. That is not fair to them or to us as preparers. We either charge them a second time for preparation of a federal return or sign our name to a return that we have not really spent the time with to be able to say it is true, correct, and complete. Neither option is good for Oregon taxpayers.

I know there are many components of this bill. I urge you to pass the parts related to allowing Enrolled Agents to supervise employees without their needing to be supervised, and without meeting OR's 30 hr/ year CE requirement.