

April 10, 2013

The Honorable Lynn Jenkins
House Committee on Ways & Means
Tax Reform Working Group on
Income and Tax Distribution
1102 Longworth House Office Building
Washington, DC 20515

The Honorable Joseph Crowley
House Committee on Ways & Means
Tax Reform Working Group on
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1102 Longworth House Office Building
Washington, DC 20515

RE: Income and Tax Distribution Tax Reform Working Group

Dear Congresswoman Jenkins and Congressman Crowley:

The AICPA strongly supports the leadership taken by the House Committee on Ways & Means in studying a variety of topical areas as part of comprehensive tax reform. The proliferation of new income tax provisions since the 1986 tax reform effort has led to complex compliance hurdles for taxpayers, administrative complexity and enforcement challenges for the Internal Revenue Service. According to the National Taxpayer Advocate's 2012 Annual Report to Congress, "individuals and businesses spend about 6.1 billion hours a year complying with the filing requirements of the Internal Revenue Code." It also noted "the costs of complying with the individual and corporate income tax requirements for 2010 amounted to \$168 billion – or a staggering 15 percent of aggregate income tax receipts." We consistently have supported tax reform simplification efforts because we are convinced such actions will significantly reduce taxpayers' compliance costs, encourage voluntary compliance through an understanding of the rules, and facilitate enforcement actions.

We are available to assist you in this process, and will be providing comments to several of the working groups that have been established. This letter specifically provides comments on adopting a uniform approach to determine whether an annual adjustment for inflation is necessary to the various dollar amounts provided in the Internal Revenue Code. A brief summary of our analysis and recommendation on inflation is enclosed for your consideration. We also suggest that you review the <u>AICPA's Tax Policy Concept Statement #1: Guiding Principles for Good Tax Policy</u> to assist you in identifying problems in the Code as well as analyzing any new proposals against the principles of good tax policy. A copy of that concept statement is also enclosed.

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<sup>&</sup>lt;sup>1</sup> National Taxpayer Advocate's 2012 Annual Report to Congress, Volume One, MSP #1 "The Complexity of the Tax Code."

<sup>&</sup>lt;sup>2</sup> *Id*.

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The AICPA is the world's largest member association representing the accounting profession with nearly 386,000 members in 128 countries and a 125-year heritage of serving the public interest. Our members advise clients on federal, state and international tax matters and prepare income and other tax returns for millions of Americans. Our members provide services to individuals, not-for-profit organizations, small and medium-sized businesses, as well as America's largest businesses.

We appreciate your attention to this important matter. If you have any questions, please contact me at (304) 522-2553, or <a href="mailto:jporter@portercpa.com">jporter@portercpa.com</a>; or Melissa M. Labant, AICPA Director — Tax Advocacy & Professional Standards, at (202) 434-9234, or <a href="mailto:mlabant@aicpa.org">mlabant@aicpa.org</a>.

Sincerely,

Jeffrey A. Porter, CPA

Chair, Tax Executive Committee