



March 4, 2021

The Honorable Charles P. Rettig
Commissioner
Internal Revenue Service
1111 Constitution Avenue, NW
Washington, DC 20224

Mr. Mark J. Mazur
Acting Assistant Secretary for Tax Policy
Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Re: Postponement for the Filing and Payment Deadline for the 2020 Tax Year

Dear Commissioner Rettig and Acting Assistant Secretary Mazur:

The American Institute of CPAs (AICPA) recognizes and appreciates the efforts the Department of the Treasury (“Treasury”) and the Internal Revenue Service (IRS) have made to provide various forms of relief to taxpayers affected by the Coronavirus Disease 2019 pandemic (commonly known as “Coronavirus”) during 2020 (the 2019 tax year). However, in the current environment, it is simply not possible for many taxpayers and their tax advisers to meet their filing and payment obligations that are due on April 15.¹

We now urge Treasury and the IRS to act immediately to provide tax filing and payment relief for taxpayers and tax professionals affected by the ongoing pandemic. **Specifically, we request that all 2020 Federal income tax, information returns, and payments (e.g., extension and estimated payments) originally due April 15, 2021 be granted additional time to file and pay until June 15, 2021.**

Though we are concerned that a postponement of the filing and payment deadlines will create additional burdens on taxpayers and tax professionals, such as systemic failures in processing the extended returns and subsequent erroneous notices, the AICPA is compelled by surrounding circumstances to request a postponement until June 15, 2021. Those circumstances include:

- A delayed start of the 2020 filing season. Many IRS forms are still not available for electronic filing which has also caused a state delay in releasing forms.
- A second round of Paycheck Protection Program (PPP) loans that required a significant amount of assistance to small business clients. Also, a challenging rollout of the program added to the burdens. Tax professionals continue to assist clients with the PPP first draw loan forgiveness process.
- Changes to the Employee Retention Credit (ERC), which required possible amendment of 2020 payroll tax returns prior to filing 2020 income tax returns, so that the gross income accurately reflects the ERC amount.
- A delayed processing by the IRS of 2019 returns that resulted in a rash of erroneous notices.

¹ See AICPA’s previous letter, “[Certainty and Relief Needed for the 2020 Tax Year](#),” February 23, 2021.

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- Effects on IRS’s staffing, due to the Coronavirus, that affects its ability to respond to questions and notices and generally to provide taxpayer assistance.

Additionally, there is still confusion in understanding why some taxpayers are eligible or not to receive a stimulus payment or if it is taxable. There are also continued stay-at-home orders that make it difficult to access taxpayer data, particularly amongst certain populations such as the elderly.

Furthermore, based on state revenue considerations, a postponed due date by June 30 provides states with the ability to conform to a Federal deadline and maintain state revenue levels within their current fiscal years.² A July 15 postponed Federal due date, for example, does not achieve the same result.

Maintaining the April 15 filing and payment deadline does not reflect the real-world hardship and challenges imposed on taxpayers and tax professionals. Therefore, we urgently request that the 2020 Federal income tax, information returns, and payments (e.g., extension and estimated payments) originally due April 15, 2021 be granted additional time to file and pay until June 15, 2021.

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The AICPA is the world’s largest member association representing the CPA profession, with more than 431,000 members in the United States and worldwide, and a history of serving the public interest since 1887. 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 consideration of these comments and welcome the opportunity to discuss these issues further. If you have any questions, please feel free to contact Melanie Lauridsen, Senior Manager – AICPA Tax Policy & Advocacy, at (202) 434-9235 or Melanie.Lauridsen@aicpa-cima.com; or me at (612) 397-3071 or Chris.Hesse@CLAconnect.com.

Sincerely,



Christopher W. Hesse, CPA
Chair, AICPA Tax Executive Committee

cc: The Honorable Ron Wyden, Chairman, U.S. Senate Committee on Finance
The Honorable Richard Neal, Chairman, U.S. House Committee on Ways and Means
The Honorable Mike Crapo, Ranking Member, U.S. Senate Committee on Finance
The Honorable Kevin Brady, Ranking Member, U.S. House Committee on Ways and Means

² 46 states have a June 30 fiscal year end. NCSL.org, “[Quick Reference Fiscal Table](#),” November 18, 2020.