

Memo

To: Governor Gretchen Whitmer

cc: Jennifer Floor, Director of Legislative & Public Affairs – Governor Gretchen Whitmer
Rachel Eubanks, Treasurer – State of Michigan
Jeffrey Guilfoyle, Deputy Treasury – State of Michigan
Robert Doyle, President & CEO – Michigan Association of Certified Public Accountants

Date: May 11, 2020

Re: Safely Reopening Tax Preparation Services

For many Michigan taxpayers and the tax preparation service providers with whom they work, Executive Order 2020-77 and predecessor “stay home, stay safe” orders have not had an impact on tax preparation services as remote work, secure client document portals, and e-filing capabilities have provided the means for transactions to continue. For many others, however, tax preparation services have had to wait.

The reality is that many taxpayers rely on the more traditional level of tax preparation services. These taxpayers either do not have the means or ability to utilize remote capabilities or chose not to. The same can be said for some tax preparation service providers. Further, many individual income tax filers are among those eligible for income tax refunds from the United States or State of Michigan. Returning these funds to Michigan citizens in a timely manner has been recognized as a significant priority.

In recognition of this reality, both the United States and State of Michigan have appropriately extended some filing deadlines for taxpayers. This included individual income tax returns for 2019, estimated income tax payments for the first quarter of 2020, and sales, use, and withholding returns for businesses.

The extension of these and other deadlines is unquestionably appropriate; however, as the extended deadlines now become closer, we must begin to provide the means for all taxpayers to file. And from the service provider perspective, planning and preparation for deadline-associated services, such as tax preparation, is imperative to avoid workload compression and ensure compliance with associated deadlines.

Many of the services traditionally provided by CPAs certainly fall into “critical” workforce definitions under the Executive Orders and referenced CISA guidance. This includes services related to access to lending and other capital market activities, and traditional accounting and payroll services, etc. All efforts have been made by CPA firms to provide services remotely whenever possible and to only engage in in-person work where completely necessary; and it has been done so in a safe manner and in compliance with all

restrictions and guidelines from the State of Michigan, the CDC, and other sources. Tax preparation services can be safely added to those services provided in-person, when necessary.

Further, the Michigan Association of Certified Public Accountants (MICPA) will be providing resources in coming days to members who may not have engaged in any level of in-person operations these past few weeks, to ensure full compliance with all safety guidelines as well as the provisions of applicable Executive Orders.

Tax preparation services can be safely conducted while adhering to social distancing and other health and safety guidelines through the management of document drop-off, appointment, and sanitizing processes and we ask you to please consider including these services among resumed activities very soon. The health and safety of employees and the taxpayers with whom these professionals interact is the most important issue in moving toward more traditional levels of operations.

Thank you for your consideration of this important issue. If you have any questions or would like further information, please do not hesitate to contact the Association directly via the information below, or you may contact me at lindley@paaonline.com or 517.449.0487.

Michigan Association of Certified Public Accountants (MICPA)
Robert (Bob) Doyle, President & CEO
Email: bdoyle@micpa.org
Phone: 248.267.3730