



NATIONAL SOCIETY of TAX PROFESSIONALS

The Federal Tax Alert

FALL ISSUE 2025

IN THIS ISSUE

IN THE NEWS

One Big Beautiful Bill Act (OB3)	1
Projected 2026 Tax Brackets	8

FROM THE BENCH

ATAYA V. Commissioner, T.C. MEMO. 2025-55.....	6
Roger T. Richter v. The United States, NO. 22-1690.....	7

PRACTICE MANAGEMENT

Section 174A Guidance Provided.....	9
-------------------------------------	---

ETHICS

Self-Reporting of Practitioners Misconduct	10
--	----

ETCETERA

Using Artificial Intelligence in Your Tax Practice.....	11
--	----

INFORMATION

From the Editor	2
Tax Helpline	2
NSTP Calendar.....	4
From the Board President.....	5
NSTP Fall Calendar.	5
NSTP Member Benefits	9

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IN THE NEWS

One Big Beautiful Bill Act (OB3)

Some updates and clarifications have been issued by the IRS and Treasury since the passage of the bill. In this issue we will focus on the new, Schedule 1-A, Additional Deductions, which has been released by the IRS to report four of the provisions of OB3:

- Part II No Tax on Tips
- Part III No Tax on Overtime
- Part IV No Tax on Car Loan Interest
- Part V Enhanced Deduction for Seniors

Part II: No Tax on Tips (Sec. 70201)

Effective for 2025 through 2028, employees and self-employed individuals may deduct qualified tips received in occupations listed by the IRS as customarily and regularly receiving tips on or before December 31, 2024, and that are reported on a Form W-2, Form 1099, or other specified statement furnished to the individual or reported directly by the individual on Form 4137, Social Security and Medicare Tax on Unreported Tips.

- The \$25,000 “qualified tips” limit under the new No Tax on Tips law applies generally per tax return regardless of filing status, but there are some filing-status differences in eligibility and phase-outs. “Qualified tips” are voluntary cash or charged tips received from customers or through tip sharing
- For self-employed individuals, the deduction cannot exceed the net income from the trade or business in which the tips were received

The \$25,000 cap itself does not change with filing status—the law treats the limit the same regardless of single, married filing jointly, head of household, etc.

But filing status shows up in other ways:

1. Phase-out threshold
 - ◇ For single filers, the deduction begins to phase out when modified adjusted gross income (MAGI) exceeds \$150,000 and tops out at \$400,000
 - ◇ For married filing jointly, the deduction begins to phase out when MAGI is \$300,000 and tops out at \$550,000
2. Eligibility limitations
 - ◇ Married individuals who file separately are not eligible for this particular deduction.

3. The deduction is only available to taxpayers who include their Social Security number on the return.



Deduction is available for both itemizing and non-itemizing taxpayers. Self-employed individuals in a Specified Service Trade or Business (SSTB) under section 199A are not eligible. Employees whose employer is in an SSTB also are not eligible.

The regulations clarify that for employees, the determination is based on the employer's trade or business. If an employee works for an employer whose business is an SSTB, any tips received by that employee are not qualified tips, even if the employee's specific occupation is on the approved list. For example, a comedian (an entertainer in the performing arts SSTB) who is self-employed would not have qualified tips. However, a pianist employed by a hotel (which is not an SSTB) would have qualified tips, as the determination is made at the employer level.

Employers and other payors must file information returns with the IRS (or SSA) and furnish statements to taxpayers showing certain cash tips received and the occupation of the tip recipient. The IRS will provide transition relief for tax year 2025 for taxpayers claiming the deduction and for employers and payors subject to the new reporting requirements.

Note that the regulations explicitly provide that amounts received for services constituting a felony or misdemeanor under applicable law, as well as amounts from prostitution or pornographic activities, are not qualified tips.

There is a three-digit code and descriptions for the occupations listed within the proposed regulations. Which group the occupations into eight categories:

- 100s – Beverage and food service
- 200s – Entertainment and events
- 300s – Hospitality and guest services
- 400s – Home services
- 500s – Personal services
- 600s – Personal appearance and wellness
- 700s – Recreation and instruction
- 800s – Transportation and delivery

... continued on page 3

FROM THE EDITOR



We just wrapped up the IRS Nationwide Tax Forums, and it was a pleasure to meet members in every city we visited. We look forward to seeing you all at upcoming NSTP events in Daytona Beach,

FL; various locations around the country for our Federal Tax Update and Review Seminars; and our final update seminar in Las Vegas, NV. Check into all of our education offerings at NSTP.org and select the Education tab.

If you are already registered for Daytona Beach, we have several special events scheduled. The Meet and Greet on Monday evening, and the 40th anniversary celebration on Tuesday night. On Wednesday, we have arranged for a bus to St. Augustine and a walking tour for those interested. Otherwise, St. Augustine also boasts an extensive pedestrian walkway with shopping and restaurants.

Our special guest includes the Director of the Stakeholder Liaison (SL), Derek Ganter, and Eryka Nolan, who represents the NSTP with the SL team.

For those who attended the IRS Nationwide Tax Forums and were disappointed that the Case Resolution Room was not available, be assured that the IRS heard you. It was the most common complaint registered on the evaluations and with the IRS staff on-site. The staff has indicated that the inclusion of the Case Resolution Room was already on the agenda of the planning team for the 2026 IRS Nationwide Tax Forums.

The IRS staff is accepting suggestions to improve the IRS Nationwide Tax Forums. If you attend currently, or have attended in the past, please send your comments about the content, format, or logistics to Nina@NSTP.org to be shared with the IRS. Especially if you no longer attend, what change would have to happen in order for you to check out the IRS Nationwide Tax Forums again?

The most prevalent tax topic of the year is the One Big Beautiful Bill Act (otherwise referred to as OB3). The second biggest complaint at the IRS Nationwide Tax Forums was the lack of information for the attendees regarding OB3. As guidance and information start to trickle out from the IRS, Treasury officials are still finalizing the regulations before scheduling education sessions. As you may remember, we do not have a commissioner for the IRS, and the Secretary of the Treasury is acting commissioner in the meantime.

NSTP is celebrating its 40th year. We are proud to have provided excellence in education over the past 40 years and look forward to the next 40 years. As we prepare the next generation, be sure to welcome Rodney and Amber to the team of instructors. Our instructor team also includes Henry and Tammy, teaching online classes, and Isaac, one of our instructors for the EA Bootcamp. NSTP is actively recruiting for the next team of instructors. If you, or anyone you know, is interested in teaching and/or writing, reach out to the office at Taxes@NSTP.org for information.

Nina Tross, MBA, EA
Nina Tross

Take Your Next Step: San Antonio, TX EA Boot Camp



November 3–7, 2025
EA Boot Camp
Riverwalk Plaza Hotel

Take your tax career to the next level.



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Opinions expressed in The Federal Tax Alert are those of the editor and contributors

Did you know?

The tax profession offers a variety of career paths, including tax preparation and representation. Tax preparers assist individuals and businesses in filing accurate returns, while tax representation allows a qualified professional—such as a CPA, enrolled agent, or tax attorney—to represent clients before the IRS. Each of these areas presents unique opportunities for growth and specialization, making the tax profession both dynamic and rewarding. Still unsure which path to take? Visit nstp.org or, even better, join one of our in-person events where you can network with other tax professionals and explore your options.

Step 1

EA Boot Camp

Take your tax career to the next level by becoming an Enrolled Agent (EA)!

Step 2

Business Entity Series

Assist your business clients by staying updated on tax implications & regulations.

Step 3

Federal Tax Update & Review Course

Keep yourself up to date for the 2025 Tax Season.

Step 4

Las Vegas Grand Event

Stay ready for 2025: Ethics & key insights from tax court cases.

Start your journey to success today!

TAX HELPLINE — DIRECT LINE: 360-695-0556

When contacting the NSTP Helpline, you will either connect with a representative or be placed on hold in the queue. If no connection is made within 5 minutes, the system will prompt you to leave a detailed message. An NSTP Helpline representative will typically return your call within 24–48 hours after leaving your message. Please leave your message, as your call will be returned.

Tax Season: February 1 – April 15

Monday, Tuesday & Thursday	Wednesday & Friday
6:00 AM–2:00 PM PT	9:00 AM–5:00 PM PT
7:00 AM–3:00 PM MT	10:00 AM–6:00 PM MT
8:00 AM–4:00 PM CT	11:00 AM–7:00 PM CT
9:00 AM–5:00 PM ET	12:00 PM–8:00 PM ET

April 16 – January 31

Monday, Wednesday & Friday
9:00 AM–2:00 PM PT
10:00 AM–3:00 PM MT
11:00 AM–4:00 PM CT
12:00 PM–5:00 PM ET

Technical Tax advice provided by NSTP Helpline representative is based upon specific information conveyed by the member. Members should take special care in relying upon recommendations and opinions that reflect the understanding of the Helpline representative. NSTP and the Helpline representatives are not responsible for misapplication of information given. Members are responsible for the ultimate verification and application of any information provided by NSTP.

ONE BIG BEAUTIFUL BILL ACT (OB3)

... continued from page 1

The Treasury has posted a preliminary list of occupations that customarily and regularly received tips on or before December 31, 2024, for purposes of the "no tax on tips" provision of the One, Big, Beautiful Bill Act.

The first page of the list of occupations reads as follows:

Set forth below is a preliminary list of occupations that customarily and regularly received tips on or before December 31, 2024, for purposes of the "no tax on tips" provision of the One, Big, Beautiful Bill Act (OB3 Act). The official proposed list of such occupations will be published in the Federal Register as part of forthcoming proposed regulations from the Treasury Department (Treasury) and the Internal Revenue Service (IRS). Treasury and the IRS anticipate that the official proposed list will be substantially the same as this preliminary list. Public comments will be requested on the official proposed list of occupations and other aspects of the proposed regulations.

In addition to requiring that qualified tips must be received in an occupation that customarily and regularly received tips on or before December 31, 2024, the OB3 Act provides that tips do not qualify for the deduction if they are received in the course of certain specified trades or businesses—including the fields of health, performing arts, and athletics. Treasury and the IRS anticipate issuing additional guidance on the types of occupations and trades or businesses that are subject to this carve-out. (Following is page one of the listing)

Treasury Tipped Occupation Code (TTOC)	TTOC Occupation Title	TTOC Occupation Description	TTOC Illustrative Examples	Related Standard Occupational Classification (SOC) System Code(s) ¹
Beverage & Food Service				
101	Bartenders	Mix and serve drinks to patrons, directly or through waitstaff.	Barkeep, mixologist, taproom attendant, sommelier	35-3011
102	Wait Staff	Take orders and serve food and beverages to patrons at tables in dining establishment.	Cocktail waitress, dining car server	35-3031
103	Food Servers, Nonrestaurant	Serve food to individuals outside of a restaurant environment, such as in hotel rooms, residential care facilities, or cars.	Room service food server, boat hop, beer cart server	35-3041

Then what follows is an additional 12 pages of occupations that customarily and regularly received tips on or before December 31, 2024.

Part III: No Tax on Overtime (Sec. 70202)

Effective for 2025 through 2028, individuals who receive qualified overtime compensation may deduct the pay that exceeds their regular rate of pay (such as the "half" portion of "time-and-a-half" compensation) that is required by the Fair Labor Standards Act (FLSA) and reported on a Form W-2, Form 1099, or other specified statement furnished to the individual.

- Maximum annual deduction is \$12,500 (\$25,000 for joint filers).
- Deduction phases out for taxpayers with modified adjusted gross income over \$150,000 and is fully phased out at \$400,000 for single filers.

- For joint filers, the phase out begins at \$300,000, and is fully phased out at \$550,000.

Calculating qualified overtime:

Example 1: Single Employee with Overtime

- Hourly rate: \$20/hour
- Regular workweek: 40 hours
- Overtime worked: 10 hours in a week

Step 1: Overtime Pay (per FLSA)

- Regular pay = $40 \times \$20 = \800
- Overtime is paid at "time-and-a-half": $10 \times (\$20 \times 1.5) = 10 \times \$30 = \$300$

Step 2: Split Regular vs Qualified Portion

- Of that \$300 overtime pay:
 - ◊ \$200 = the "regular rate" portion ($10 \times \$20$)
 - ◊ \$100 = the "premium" portion ($10 \times \$10 = 0.5 \times \text{regular rate}$)
→ this is the qualified overtime compensation

Step 3: Deduction Limit

- Suppose over the year the employee accumulates \$6,000 of qualified overtime premiums.
- Under OB3, they can deduct up to \$12,500 (single), so the full \$6,000 is deductible.

Example 2: Married Filing Jointly, High Income

- Couple has combined qualified overtime premiums of \$30,000.
- Maximum allowed = \$25,000 (MFJ cap).
- But their MAGI is \$320,000.

Phase-out rule:

- Deduction phases out above \$300,000 for MFJ.
- $\$20,000 \text{ over threshold} \div \$1,000 = 20 \text{ units} \times \$200 = \$4,000 \text{ reduction.}$

Allowed deduction:

- $\$25,000 \text{ cap} - \$4,000 \text{ phase-out} = \$21,000 \text{ deduction.}$

Part IV: No Tax on Car Loan Interest (Sec. 70203)

Effective for 2025 through 2028, individuals may deduct interest paid on a loan used to purchase a qualified vehicle, provided the vehicle is purchased for personal use and meets other eligibility criteria. (Lease payments do not qualify.)

- Maximum annual deduction is \$10,000.
- Deduction phases out for single taxpayers with modified adjusted gross income over \$100,000 and is fully phased out at \$150,000
- Deduction phases out for married taxpayers with modified adjusted gross income over \$200,000 and is fully phased out at \$250,000

To qualify for the deduction, the interest must be paid on a loan that is:

- Originated after December 31, 2024
- Used to purchase a vehicle originally used by the taxpayer (used vehicles do not qualify)
- For a personal use vehicle (not for business or commercial use)
- Secured by a lien on the vehicle
- If a qualifying vehicle loan is later refinanced, interest paid on the refinanced amount is generally eligible for the deduction.

A qualified vehicle is a car, minivan, van, SUV, pick-up truck or motorcycle, with a gross vehicle weight rating of less than 14,000 pounds, and that has undergone final assembly in the United States.

To determine if a vehicle had final assembly in the U.S., check one of these:

- The information label attached to the vehicle on a dealer's premises
- The vehicle identification number (VIN)

... continued on page 4

NSTP

2025 CALENDAR

IN-PERSON SEMINARS:

EA Boot Camp 11/3–7/2025
San Antonio, TX: 12 CE

ONLINE COURSES:

Federal Tax Update and Review: 12/8–9/2025
2 Part Webinar 8 CE

Federal Tax Update and Review: 12/18–19/2025
2 Part Webinar 8 CE

Federal Tax Update and Review: 1/8–9/2026
2 Part Webinar 8 CE

BUSINESS ENTITIES SERIES:

Partnership Update & Review 11/6/2025
Course: 2 CE

The Sole Proprietor: 11/7/2025
2 CE

Filing the Fiduciary Form 1041: 11/13/2025
2 CE

Subchapter S Corporation: 11/14/2025
2 CE

Form 1120 Update and Review: 11/19/2025
2 CE

Tax-Exempt Organizations: 11/21/2025
2 CE

UPCOMING EDUCATION

Webinars:



View Only Courses:



On Demand Courses:



Annual Federal Tax Refresher Study Session:



Complete information is posted on NSTP.org.

ONE BIG BEAUTIFUL BILL ACT (OB3)

... continued from page 3

- The National Highway Traffic Safety Administration (NHTSA) VIN Decoder

Part V: Enhanced Deduction for Seniors (Sec. 70103)

Effective for 2025 through 2028, individuals who are age 65 and older may claim an additional deduction of \$6,000. The taxpayer must attain age 65 on or before the last day of the taxable year. This new deduction is in addition to the current additional standard deduction for seniors under existing law.

- The \$6,000 senior deduction is per eligible individual (or \$12,000 total for a married couple where both spouses qualify).
- Deduction phases out for taxpayers with modified adjusted gross income over \$75,000 (\$150,000 for joint filers).
- The Social Security number of the qualifying individual(s) on the return must be included
- File jointly, if married, to claim the deduction

This is an age-based deduction, not on whether or not they are collecting Social Security benefits. Individuals under the age of 65 collecting early Social Security benefits are not eligible for this deduction.

The deduction begins to be limited at higher income levels:

Filing Status	Phase-out Begins	Fully Phased Out
Single / Head of Household	\$75,000 MAGI	\$175,000 MAGI
Married Filing Jointly	\$150,000 MAGI	\$250,000 MAGI

- Phase-out works gradually: deduction is reduced as income rises in the range.
- If income is below the threshold → full deduction.
- If income is above the upper limit → no deduction.
- Married filing separately is not eligible for the deduction

Join us in celebrating the 40th Anniversary of NSTP!



This milestone marks four decades of promoting the education and professional development of tax professionals. To commemorate this special occasion, we're offering exclusive 40th Anniversary Swag, allowing you to be part of the celebration. Don't miss out on these limited-edition items, so grab yours today and show your support for NSTP's legacy of service and commitment to the tax profession!



Grab your own NSTP swag!

A MESSAGE FROM THE PRESIDENT OF THE NSTP BOARD OF DIRECTORS



First and foremost, I thank each of you for staying informed with tax issues affecting tax professionals through the NSTP updates, whether it is via the weekly Tax Tidbits and/or our quarterly FTA—Federal Tax Alert. While attending the 2025 IRS Nationwide Tax Forums, we asked many members, 'Why NSTP?' Although there were many responses, topping the list was NSTP's LIVE Help Line (not AI), our instructors being the best of the

best, and NSTP's never-ending relevant information contained in NSTP's Tax Tidbits, emailed weekly, and this FTA publication, emailed quarterly to all members. So, a huge Shout-Out to all of NSTP's LIVE Helpline team, the instructors, and of course, the NSTP writers. Your time and dedication to NSTP are priceless.

In previous notes to the members, I've mentioned change and how it is not only inevitable, but sometimes necessary and/or unexpected. But as they say, the show must go on. With that, I'd like to inform the membership that Ryan Pierce, NSTP's Treasurer and an instrumental Board member for many years, found it necessary to step down from the Board and as Treasurer for personal reasons effective September 15th. It was with sadness across the Board to accept Ryan's resignation from the Board, but with every turn, new opportunities present themselves. Answering the call, Nina Tross stepped down as NSTP Secretary to fill Ryan's role as Treasurer, Amber Groberg, a current Board member, stepped up to the Secretary position, LJ Fay, who was NSTP's Board Member at Large, stepped up to fill Ryan's vacated Board position, and Jose Albert Collado, a very active

NSTP member, was voted by the Board to fulfill the Member at Large position through December 31, 2026. As President, I not only welcome these changes with open arms but am excited to be surrounded by a Board of highly qualified, competent, and dedicated individuals who will lead NSTP into fiscal year 2026. I believe this is a strong Board, and I see great things happening at the helm of NSTP in the coming year(s). This will significantly benefit the organization and its members simultaneously. When you see any of these individuals, including Paul La Monaca and Mary Schneider, who were re-elected to the Board for another three-year term, please extend a warm congratulations to them.

Lastly, I look forward to seeing everyone who will be attending the NSTP's 40th Anniversary conference in Daytona, Florida, this October 28, 29, and 30. We have a robust conference and celebration planned, inclusive of a guest speaker from the IRS, Mr. Derek Ganter, Stakeholder Liaison / National Public Liaison. Derek is an excellent IRS partner with NSTP, and all attendees will greatly appreciate his intuitive knowledge and presentation. The One Big Beautiful Bill Act (nicknamed OB3), with newly released proposed regulations, will be covered along with many other exciting tax matters. Mixers, parties, Celebrations, bus trips, Education, food & cocktails, Networking, Florida sunshine, beaches, and ocean, Sightseeing—AN ALL-IN-ONE conference. Register NOW, or call the office if you haven't already. Seats are still available!

Thank you, and God Bless America!

Keith Huebel, CPA

NSTP

FEDERAL TAX UPDATE & REVIEW & GRAND EVENTS

FEDERAL TAX UPDATE & REVIEW:

Online Streaming Course: 4 Part Webinar	November 10, 11, 17, & 18, 2025 8 CE
Atlanta, GA:	November 24, 2025 8 CE
Long Island, NY:	December 1, 2025 8 CE
Dallas, TX:	December 1, 2025 8 CE
Seattle, WA:	December 2, 2025 8 CE
San Antonio, TX:	December 3, 2025 8 CE
Boston, MA:	December 3, 2025 8 CE
Chicago, IL:	December 4, 2025 8 CE
Atlantic City, NJ:	December 5, 2025 8 CE
Houston, TX:	December 5, 2025 8 CE
Tampa, FL:	December 11, 2025 8 CE
Ft Lauderdale, FL:	December 12, 2025 8 CE
Long Beach, CA:	December 17, 2025 8 CE
College Park, MD:	December 19, 2025 8 CE
Phoenix, AZ:	December 19, 2025 8 CE

GRAND EVENTS:

Natchitoches Grand Event:	12/8–9/2025 16 CE
Springfield Grand Event: (1.5-day event)	12/8–9/2025 12 CE
Orlando Grand Event:	12/15–16/2025 16 CE
Las Vegas Grand Event:	1/5–7/2026 20 CE

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Complete information is posted on NSTP.org.

ATAYA V. Commissioner, T.C. MEMO. 2025-55

Petitioners are Hani G. Ataya and Inaam Ataya (mother and son), California residents.

- IRS filed Notices of Deficiency for tax years 2015 and 2016. The IRS asserted deficiencies based on unreported qualified dividends and disallowed business receipts/deductions (Schedule C) from their business "Cost U Less Cars".
- Cost U Less was a used-car resale business. Hani was largely running the buying operations, and Inaam joined in later. They used cashier's checks and had corporate bank accounts.
- Key problems in recordkeeping:
 - ◊ Unused cashier's checks were not redeposited or accounted for; sometimes checks would be put back in a drawer.
 - ◊ Bookkeepers managed many of the records, but many records went missing (one bookkeeper passed away, etc.), and the petitioners did not review many of the returns carefully; they generally trusted the preparer.
- They reported business operations on Schedule C, but did not report dividends from the C corporation (Cost U Less). IRS used bank deposits analysis to reconstruct income

Legal Issues

1. Burden of Proof / Production

- ◊ The IRS's base determinations (on unreported income, disallowed deductions) are presumed correct. For unreported income, though, IRS must make a minimal evidentiary showing. Once that is done, burden shifts to taxpayer to show error.
- ◊ For penalties (accuracy-related under IRC §6662), IRS has burden of production under §6751(b) which includes obtaining written supervisory approval before the deficiency notice is issued.

2. Accuracy-related penalty under IRC §6662(a), (b)(1)

- ◊ These apply to underpayments due to negligence or disregard of rules/regulations.

3. Reasonable Cause & Good Faith Exception under IRC §6664(c)(1)

- ◊ Even if underpayment exists and penalties are otherwise appropriate, taxpayer may avoid penalties by showing that some portion is due to reasonable cause and good faith. That depends on facts & circumstances (education, sophistication, efforts to comply, etc.).
- ◊ Part of this includes reliance on professionals. Key cases like Neonatology Associates set out criteria for reliance defense: adviser must be competent, taxpayer must provide full & accurate info, taxpayer must actually rely in good faith.

The Court's Findings & Outcome

- The IRS met its burden for establishing the deficiencies: linkages via bank records, cashier's checks, etc.
- The IRS also satisfied the requirement for supervisory approval before issuing the Notice of Deficiency.
- Petitioners failed to meet the standard for reasonable cause / good faith. Among reasons:
 - ◊ Poor recordkeeping. The cashier's-check "drawer system," missing or lost records, absence of reliable internal controls.
 - ◊ Though they had business experience (Hani's years in car sales; Inaam's education and past payroll tax work), they did not show that they made appropriate efforts to monitor their records, verify the preparer's work, or ensure that returns were accurate.
 - ◊ Reliance on bookkeepers/tax preparer was insufficiently supported: lack of evidence about the books' competence, that full/accurate info was given to them, or that the petitioners undertook review.
- Conclusion: The Court sustained the accuracy-related penalties under §6662(a) & (b)(1). Petitioners lost.

Analysis / Commentary

- Higher standard for sophisticated taxpayers—The Court expected more from them given Hani's long experience in business and Inaam's background. The more educated/experienced a taxpayer is, the more the Court expects them to know about recordkeeping norms, to check their preparer's work, etc. The "sophistication" factor cut against petitioners in this case.
- Recordkeeping: it is not enough to have a bookkeeper—The case reinforces that simply hiring a bookkeeper or preparer does not automatically shield a taxpayer. Key is whether the taxpayer ensures there are reliable records, routine oversight, and controls. Missing records, and especially lack of documentation of how funds moved (unused checks, unaccounted-for inventory/bank movements) weaken defenses.
- Reliance on professional advice defense is difficult—To succeed, taxpayer must show (a) the professional was competent; (b) the taxpayer gave full and accurate information; (c) the reliance was in good faith (not blind trust). As shown here, failure in any of those prongs can doom the defense.
- Importance of procedural requirements for penalties—The IRS must do its homework: supervisory approval must be in writing and prior to issuing the notice. Petitioners might have tried to challenge that, but the IRS met that test in this case.

Lessons / Takeaways for Tax Professionals & Taxpayers

1. Maintain solid documentation—bank records, invoices, reconciliation of cash/cheques, inventory records, etc. Use reliable internal controls to track business transactions.
2. Do not just "hire and trust"—even if using professionals (bookkeepers, preparers), the taxpayer needs to stay involved: provide complete info, ask questions, review drafts of returns.
3. Lost records are risky—death of bookkeeper, office misplacement, etc., are not sufficient excuses unless there is very strong evidence.
4. Know your business experience works against you sometimes—higher expected standard for those with business background or tax exposure.
5. IRS procedural compliance matters—penalties can (and do) fail if the IRS has not complied with supervisory approval rules etc., but it's not always a winning issue for the taxpayer.

Conclusion

Ataya v. Commissioner is a cautionary tale. It shows that even with business experience and professional help, failing in basic recordkeeping and oversight can lead to sustained penalties. The case emphasizes that the tax system imposes not just formal duties (file returns, etc.) but also expects a degree of proactive diligence.

Ataya is very consistent with how the Tax Court has lately treated accuracy-related penalties under §6662: strong emphasis on recordkeeping, documentation, taxpayer involvement, and proper oversight.

The failure in Ataya is much like the failure in Swift (and others): even when professional preparers/bookkeepers are used, just using them is not enough. The taxpayer must show the adviser is competent, that they provided full/accurate data, and that the taxpayer actually reviewed or monitored returns—not a blind trust.

Ataya also illustrates how failing recordkeeping (unused checks in drawers, missing documents, lack of internal control) is a severe vulnerability. That tends to tip the balance against reasonable cause.

The supervisory approval requirement under §6751(b) is increasingly being scrutinized. In Swift and others, that has become a potential escape for taxpayers when IRS fails the procedural step. In Ataya, from what is reported, the IRS did satisfy the required supervisory sign-off.

Roger T. Richter v. The United States, NO. 22-1690



Roger T. Richter v. United States is a decision from the United States Court of Federal Claims issued September 10, 2025. It involves a civil suit by Roger T. Richter seeking a refund for allegedly overpaid federal income taxes, along with a government counterclaim that Richter is liable for trust fund recovery penalties under §6672 of the Internal Revenue Code for failure to remit withheld payroll taxes. The case sheds light on when an individual is a “responsible person,” what constitutes “willfulness,” and the procedural timeliness for refund claims.

Facts of the Case

- Richter, with business partners Jim and Frank Cutler, was involved in Mobile Environmental Technologies (MET). MET merged with COBIT-USA, Inc. to form MECO Environmental LLC in 2007.
- After the merger, the board of MECO included representatives of both firms, and Richter held an indirect ownership interest (roughly 5%) via MET. He served as President of MECO starting in 2009.
- A wholly-owned subsidiary, ICI Process Technologies LLC (“ICIPT”), was formed with the same management structure; Richter also served as its President.
- MECO and ICIPT failed to pay federal payroll taxes (trust fund taxes) for all four quarters of 2010 and for the first quarter of 2011.
- Richter filed a complaint on November 14, 2022, alleging overpayment of federal income taxes (overpayments in those quarters) and seeking a refund of about \$411.23 plus interest.
- The government counterclaimed, seeking recovery of unpaid trust fund taxes under IRC §6672 (a “trust fund recovery penalty”), claiming Richter was a responsible person who willfully failed to pay. In their response, the government filed an answer and a counterclaim on March 20, 2023, asserting that Richter was liable for unpaid trust fund taxes totaling \$212,454.31 plus interest under 26 U.S.C. §6672 for the same periods.

Statutory Authority

- The Internal Revenue Code mandates employers to withhold income and FICA taxes from employee paychecks, known as “trust fund taxes,” and remit them to the IRS. These funds, while permissibly intermingled with an employer’s other funds, are nonetheless credited to the employees regardless of whether the employer remits them.
- Two distinct requirements must be met for the Section 6672 penalty to apply: first, the individual must be a “responsible person” who was under a duty to collect, truthfully account for, and pay over taxes; and second, that responsible person must have “willfully” failed to perform this duty.
- IRC §6672 allows the IRS to impose penalties on “responsible persons” who willfully fail to collect, account for, or pay over withheld income and employment taxes. Such persons are personally liable.
- “Responsible person” is a heavily fact-specific determination: factors often include whether the person had authority over financial affairs, check-signing authority, authority to hire/fire or direct financial decisions, ability to control payments to creditors vs. tax obligations. Courts often look at all relevant indicia.
- The government presented several facts suggesting Richter was a responsible person, including his titles as President and shareholder of MECO and ICIPT, his signatory authority on company bank accounts, and his ability to hire employees, direct payments, use a company debit card without preauthorization, and negotiate contracts.

- “Willfulness” under §6672 has been interpreted to require knowledge of the unpaid taxes (or reckless disregard), plus voluntary failure to act despite having that responsibility. Courts have held that pulling monies to pay other creditors while not paying trust fund obligations can show willfulness.
- The government argued for summary judgment on willfulness, asserting that Richter knew of ICIPT’s tax liabilities but failed to remit them. Critically, Richter failed to directly respond to the government’s willfulness argument in his thirty-nine-paragraph statement of disputed facts. Furthermore, Richter also failed to address willfulness during oral argument, despite the Court explicitly giving him the opportunity to do so.
- Refund claims under 26 U.S.C. §6511 must generally be filed within 3 years from the date the return was filed or 2 years from the date the tax was paid, whichever is later. If a claim is outside that window, courts lack subject matter jurisdiction to entertain it.

Considerations

- Importance of “responsible person” facts: The Richter case reaffirms that holding a title (e.g., “President”) is not sufficient by itself. What matters is actual authority over financial control—authority to prioritize payments, sign checks, etc. Because Richter disputed those facts, summary judgment could not be entered against him on that issue. This underscores that in §6672 cases, courts often need a full factual record.
- Willfulness standard and conceding factual issues: Richter’s case also shows that failing to respond to government assertions can result in conceding key issues—here, willfulness. Even if one disputes responsibility, if one acknowledges or fails to dispute knowledge and behavior (paying other creditors while not remitting trust fund taxes), courts may find willfulness as a matter of law.
- Timeliness matters: The dismissal of the refund claim for first quarter 2010 highlights that statutory deadlines are strictly enforced. For tax practitioners and businesses, it’s crucial to track when returns were filed and taxes paid, because missing the statutory windows (3 years after return or 2 years after payment) can foreclose refund claims entirely.
- Strategic implications for litigants: If you are defending or prosecuting such cases, gathering clear evidence of who in the organization had the power to make decisions about paying taxes vs. other debts is critical. Also, keeping up with internal documentation (board minutes, bank account signatory logs, payment authorizations) will be important.

Conclusion

Richter v. United States presents a useful benchmark for tax law practitioners, particularly with respect to §6672 trust fund recovery penalties. The case confirms:

- The “responsible person” determination is a fact-intensive inquiry; summary judgment is inappropriate on that issue if material facts are in dispute.
- Willfulness may be found as a matter of law if the factual record (including what the plaintiff fails to contest) supports knowledge and voluntary nonpayment.
- Refund claims are strictly time-limited; judicial review is unavailable once statute of limitations windows have closed.

For clients (or businesses), this case underscores the importance of corporate governance, clear delegation of authority, keeping trust fund obligations front of mind, and maintaining good records to show who made what decisions.

Projected 2026 Tax Brackets

The U.S. Bureau of Labor Statistics reported that the consumer price index (CPI) increased by 0.4% on a seasonally adjusted basis in August and over the last 12 months, the index increased just 2.9% before the seasonal adjustment. That means that inflation is holding steady—and you'll see the result on your tax return in 2026.

Bloomberg Tax & Accounting released its 2026 Projected U.S. Tax Rates, which reflect slightly higher numbers as compared to 2025. Those bumps will push out deduction limitations and result in upward adjustments to tax brackets and increases to other key thresholds. Throw in changes as a result of the One Big Beautiful Bill Act (OB3) passed in July, and the 2026 return may look a little different than before.

Caution that these are only projections; but can be used for some proactive tax planning.

Single Taxpayers

2026 Projected Tax Brackets

If Taxable Income Is:	The Tax Due Is:
0 - \$12,400	10% of taxable income
\$12,401 - \$50,400	\$1,240 + 12% of the amount over \$12,400
\$50,401 - \$105,700	\$5,800 + 22% of the amount over \$50,400
\$105,701 - \$201,775	\$17,966 + 24% of the amount over \$105,700
\$201,776 - \$256,225	\$41,024 + 32% of the amount over \$201,775
\$256,226 - \$640,600	\$58,448 + 35% of the amount over \$256,225
\$640,601 and over	\$192,979.25 + 37% of the amount over \$640,600

Married Taxpayers Filing Jointly

2026 Projected Tax Brackets

If Taxable Income Is:	The Tax Due Is:
0 - \$24,800	10% of taxable income
\$24,801 - \$100,800	\$2,480 + 12% of the amount over \$24,800
\$100,801 - \$211,400	\$11,600 + 22% of the amount over \$100,800
\$211,401 - \$403,550	\$35,932 + 24% of the amount over \$211,400
\$403,551 - \$512,450	\$82,048 + 32% of the amount over \$403,550
\$512,451 - \$768,700	\$116,896 + 35% of the amount over \$512,450
\$768,701 and over	\$206,583.50 + 37% of the amount over \$768,700

Married Taxpayers Filing Separately

2026 Projected Tax Brackets

If Taxable Income Is:	The Tax Is:
\$0 - \$11,925	10% of taxable income
\$11,926 - \$48,475	\$1,193 + 12% of the amount over \$11,925
\$48,476 - \$103,350	\$5,579 + 22% of the amount over \$48,475
\$103,351 - \$197,300	\$17,651 + 24% of the amount over \$103,350
\$197,301 - \$250,525	\$40,199 + 32% of the amount over \$197,300
\$250,526 - \$375,800	\$57,231 + 35% of the amount over \$250,525
\$375,801 and over	\$103,291.75 + 37% of the amount over \$384,350

Heads Of Household

2026 Projected Tax Brackets

If Taxable Income Is:	The Tax Due Is:
0 - \$17,700	10% of taxable income
\$17,701 - \$67,450	\$1,770 + 12% of the amount over \$17,700
\$67,451 - \$105,700	\$7,740 + 22% of the amount over \$67,450
\$105,701 - \$201,750	\$16,155 + 24% of the amount over \$105,700
\$201,751 - \$256,200	\$39,207 + 32% of the amount over \$201,750
\$256,201 - \$640,600	\$56,631 + 35% of the amount over \$256,200
\$640,601 and over	\$191,171 + 37% of the amount over \$640,600

Table: Kelly Phillips Erb • Source: Bloomberg Tax • Created with Datawrapper

Maximum Capital Gains Rates

2026 Projected Tax Brackets

Filing Status	Maximum Zero Rate Amount:	Maximum 15% Rate Amount:
Single Taxpayers	\$49,450	\$545,500
Married Filing Jointly & Surviving Spouses	\$98,900	\$613,700
Married Filing Separately	\$49,450	\$306,850
Heads of Household	\$66,200	\$579,600
Trusts and Estates	\$3,300	\$16,250

Table: Kelly Phillips Erb • Source: Bloomberg Tax • Created with Datawrapper

Standard Deduction Amounts

2026 Projected Tax Brackets

Filing Status	Standard Deduction Amount
Single	\$16,100
Married Filing Jointly & Surviving Spouses	\$32,200
Married Filing Separately	\$16,100
Heads of Household	\$24,175

Table: Kelly Phillips Erb • Source: Bloomberg Tax • Created with Datawrapper

Section 199A Amounts

2026 Projected Tax Brackets

Filing Status	Threshold Amount	Phased-In Amount
Married Filing Jointly	\$403,500	\$553,500
Married Filing Separately	\$201,775	\$276,775
All Other Taxpayers	\$201,750	\$276,750

Table: Kelly Phillips Erb • Source: Bloomberg Tax • Created with Datawrapper

Section 174A Guidance Provided

Rev. Proc. 2025-28 has been released by the IRS that provides guidance and clarity for taxpayers regarding the treatment of research expenses. OB3 changes the deductibility of research & experimental expenses under §174 and new §174A. This is important for small businesses that want to retroactively deduct their research expenses, any business that has been amortizing research expenses and now must decide how to handle the treatment going forward.

New §174A applies to expenses paid or incurred in tax years beginning after December 31, 2024; however, transition rules provide many options (and planning opportunities).

Automatic extension for 2024

One of the most important updates in this Revenue Procedure was the automatic extension granted, “an automatic six-month extension of time... for eligible taxpayers to file a superseding tax return.” This allows most any entity to file a superseding tax return, claim the immediate deduction under 174A, claim the 280C(c) election, and claim the R&D tax credit without the increased documentation requirements of a claim on an amended return. This extension is restricted to eligible taxpayers, or only those eligible for small business elections under the transition rules, not to all taxpayers.

FYI: A superseding tax return is a revised return filed after the original return but before the filing deadline, including extensions. Unlike an amended return, a superseding return completely replaces the original filing and is treated as the official return for all purposes. You can reverse or make certain tax elections that are irrevocable on an amended return. This might include: changing the election to apply a refund to next year's taxes or reversing a penalty for failing to file a required form with the original return. The statute of limitations for assessment and refunds starts on the filing date of the original return, not the superseding one.

Application of Rev. Proc. 2025-28

As an example, a company making a change from amortizing §174 expenses under the TCJA requirement to immediate deduction under the new §174A(a) does not need to include a Form 3115 with its tax return if it is making the change on its first taxable year beginning after December 31, 2024. Instead, the company should include a statement with the following:

- Name and taxpayer identification number,

- Designated automatic accounting method change number (in this case, 273),
- A declaration that the applicant is changing the method of accounting for domestic research expenses on a cut-off basis, and
- A declaration that the company deducts expenses under §174A(a) deduction method.

Rev. Proc. 2025-28

.06 Treatment of domestic research or experimental expenditures previously subject to TCJA § 174.

(1) In general.

(a) Notwithstanding the effective date provided in OBBBA § 70302(e) (1), which provides that the OBBBA amendments apply to amounts paid or incurred in taxable years beginning after December 31, 2024, OBBBA § 70302(f) provides transition rules for domestic research or experimental expenditures that allow an election to change the amortization period over which any remaining unamortized amount arising from the application of TCJA § 174 is taken into account, as well as an election for retroactive application of OBBBA § 70302 by certain eligible taxpayers.

(b) OBBBA § 70302(f)(2)(A) provides that, in the case of domestic research or experimental expenditures paid or incurred in taxable years beginning after December 31, 2021, and before January 1, 2025, and which were charged to capital account under TCJA § 174, a taxpayer may elect to amortize any remaining unamortized amount with respect to such expenditures in full in the first taxable year beginning after December 31, 2024, or alternatively, amortize such remaining unamortized amount with respect to such expenditures ratably over the 2-taxable year period beginning with the first taxable year beginning after December 31, 2024.

(c) OBBBA § 70302(f)(2)(B) provides that a taxpayer that makes an election under OBBBA § 70302(f)(2)(A) is treated as initiating a change in method of accounting for purposes of § 481 with respect to the expenditures to which the election applies. Further, the change is treated as made with the consent of the Secretary and must be applied only on a cut-off basis for such expenditures, and no adjustments under § 481 may be made. The procedures in section 7.02 of Rev. Proc. 2025-23, as modified by this revenue procedure, provide an automatic change in method of accounting for amortizing the remaining unamortized amount previously capitalized under TCJA § 174 under OBBBA § 70302(f)(2).

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Self-Reporting of Practitioners Misconduct

The Internal Revenue Service's Office of Professional Responsibility (OPR) recently issued an OPR Alert, Issue Number: 2025-12 "Fessing Up Can Be in Your Own Best Interests: Self-Reporting of Practitioner Misconduct," on August 6, 2025. This communication offers crucial insights for Certified Public Accountants (CPAs) and Enrolled Agents (EAs) who practice before the IRS, emphasizing the framework of Circular 230 and the potential advantages of proactive self-reporting of misconduct. As tax professionals, understanding these dynamics is paramount to maintaining our privilege of practice and managing potential disciplinary actions effectively.

Most of the rules in Circular 230 are ones that apply to practitioners when they appear before or engage with the IRS on behalf of taxpayers. Many of them are fundamental and longstanding principles of professional practice—for example, duties of diligence; competence; promptness; informing clients of errors or omissions made on submissions to a governmental authority (such as on a tax return previously filed with the IRS); and avoiding conflicts of interest. See generally Subpart B of Circular 230, Duties and Restrictions Relating to Practice Before the Internal Revenue Service. These rules share commonality with ethical and professional responsibility standards and requirements of the legal, accounting, actuarial, and other professions.

However, Circular 230 also includes provisions on disreputable conduct for which a practitioner can be sanctioned. For example, section 10.51(a) includes certain criminal convictions (notably, any state or federal felony conviction (§10.51(a)(3))). Also included is disbarment or suspension from practice as an attorney, CPA, public accountant, or actuary "by any duly constituted authority of any State, territory, or possession of the United States, including a Commonwealth, or the District of Columbia, any Federal court of record or any Federal agency, body or board." Section 10.51(a)(10).

These instances of disreputable conduct are routinely reported to the OPR by various internal (IRS) and external sources or are uncovered by our office. For example, a revenue agent might send a referral to the OPR about a practitioner's personal tax noncompliance determined in an audit, and after receiving the referral, the OPR caseworker learns through research that the practitioner was convicted of a state felony two years ago for a financial crime involving dishonesty and is serving a probationary sentence.

Additionally, there are similar provisions in section 10.82, Expedited Suspension. The section authorizes the Director of the OPR, as the Commissioner's delegate, to use "expedited procedures" described in the section to indefinitely suspend a practitioner, after notice and an opportunity to respond and have a conference with the OPR. Expedited suspension is limited to five bases. They include:

- Suspension or revocation of a license to practice law, certified public accountancy, or actuarial services.
- Conviction of any crime "involving dishonesty or breach of trust, or any felony for which the conduct involved renders the practitioner unfit to practice before the Internal Revenue Service."
- Imposition of a sanction by a court, in a civil or criminal proceeding (one that's related to either a taxpayer's or the practitioner's tax liability), for the following conduct: commencing or maintaining the case for the purpose of delay, advancing groundless or frivolous arguments, or failing to pursue administrative remedies.

Self-Reporting - As Licensees

Practitioners, in particular, attorneys and CPAs, convicted of crimes, or found to have engaged in misconduct by a government entity, are usually required to report the matter to their state bar, board of accountancy, or other licensing authority. They also may be required to report civil judgments, court-imposed sanctions, or

other adverse actions. Self-reporting requirements, as a subset of the full requirements attendant to having and maintaining a license and to status as a licensee, vary by state or comparable jurisdiction (i.e., the District of Columbia or a U.S. territory, possession, or Commonwealth). See Cir. 230 §§ 10.2(a)(1), (2), & 10.3(a), (b) (reflecting that the states determine an individual's good standing and if they're currently quailed to practice there).³ See also 5 USC §500(a)(2).

Although a practitioner is not required to self-report misconduct, it may be in their best interest to do so. Anytime a matter rises to the level of professional discipline enforced by a licensing agency or authority, the OPR will virtually always be notified. Where a practitioner involves the OPR from the outset, it may be possible to arrange, for example, to serve twin suspension periods simultaneously or as concurrently as possible. Otherwise, the OPR may learn about the state suspension months later, and by the time the OPR investigates and acts on the matter, the state suspension has already been served or mostly served, but the practitioner may still face a reciprocal Circular 230 suspension, pursuant to section 10.51(a)(10) or, more likely, the expedited-suspension authority in section 10.81(a) and (b)(1) (see above). In such circumstances, a state suspension of, say, six or nine months could result in an equivalent or lengthier term suspension (perhaps 12 months) or an indefinite suspension by the OPR. And the suspension begins on a later date, one that is well into the running of the underlying state suspension or even after it has expired. Additionally, the OPR often enters into agreements with practitioners that do not impose any immediate sanction but rather defer a sanction, suitable to the factual background, for a probationary period.

Conclusion

If you, as a Circular 230 practitioner, encounter a situation that could lead to professional discipline by a licensing agency or authority, or involves civil sanctions, criminal convictions, or tax-related penalties or liabilities, consider the following proactive steps:

- Do not summarily rule out self-reporting to OPR. Recognize that OPR is likely to be notified eventually through other channels.
- Evaluate the timing of your disclosure. Earlier engagement with OPR offers the best chance for concurrent or synchronized resolution with other disciplinary actions, potentially avoiding separate and consecutive suspensions.
- Proactively contact OPR. If you have committed sanctionable misconduct, especially if you have already been sanctioned by another authority, consider informing OPR.
- Prepare to accept responsibility for your conduct and demonstrate a genuine intention to reform your behavior. This posture is crucial for OPR to consider a deferred discipline agreement or a favorable settlement.
- Compile and be ready to present any persuasive mitigating evidence. Your cooperation in obtaining and ascertaining needed or useful information will be taken into account.

By thoughtfully engaging with OPR and considering self-reporting when appropriate, tax professionals can potentially mitigate the severity and duration of disciplinary actions, ensuring a more predictable and manageable outcome for their privilege to practice before the IRS.

Using Artificial Intelligence in Your Tax Practice



A Timely Tip
From
Ennis T. Pea

In broad terms, AI is technology that helps computers gather information and find solutions in ways that imitate human thinking. AI uses data to learn—the more data it has, the “smarter” the AI. AI can automate basic business processes, boosting speed, ensuring accuracy, and reducing costs. When employees can use AI tools to help streamline their workflow and complete time-consuming tasks, they are more productive and efficient.

AI can “learn” different skills, like how to make predictions, create new content, and communicate conversationally. Artificial Intelligence is an umbrella term that covers a wide range of AI subsets and approaches, including machine learning, generative AI, large language models, and agentic AI. Following is a snapshot of how these different types of AI work. Choose the one(s) that work best with your practice and/or business model.

Key Applications of AI in Tax Practice

- AI-powered Optical Character Recognition (OCR) and machine learning can scan documents like W-2s, 1099s, and receipts to automatically extract and populate tax forms. This eliminates manual data entry, reducing errors and saving preparation time.
- Generative AI tools, like those integrated into professional tax software, can instantly scan massive amounts of tax laws, codes, and rulings to provide concise summaries. This significantly cuts down the time spent on complex tax research.
- AI continuously monitors evolving tax laws and regulations, automatically updating workflows to ensure compliance. It can also analyze large datasets to detect anomalies, inconsistencies, and potential audit risks.
- AI automates the workflow for tax return preparation, from receiving client data to managing revisions and filing returns. It can assign tasks based on priority and complexity, streamlining the entire process.
- By analyzing a client's financial data, AI can identify tax-saving opportunities and predict future tax liabilities. This provides data-driven insights that allow tax professionals to offer more personalized and strategic advice.
- AI can power chatbots to answer routine client questions or draft personalized communications explaining complex tax issues in clear, simple language. This strengthens client relationships while freeing up professionals.

Benefits for Tax Professionals and Firms

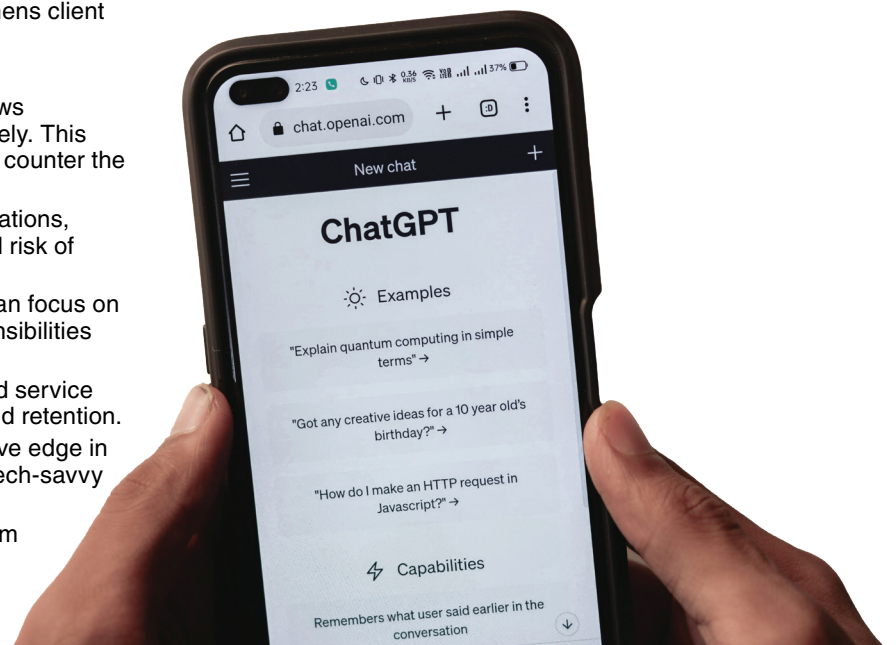
- Automation of time-consuming, manual tasks allows professionals to work more efficiently and accurately. This allows the staff to serve more clients, which helps counter the industry's talent shortage.
- AI minimizes human error in data entry and calculations, leading to more accurate tax filings and a reduced risk of penalties.
- By shifting routine tasks to AI, tax professionals can focus on more strategic, analytical, and client-facing responsibilities which can help improve profitability.
- AI enables firms to provide proactive, personalized service and advice, leading to higher client satisfaction and retention.
- Firms that embrace AI gain a significant competitive edge in efficiency, cost savings, and the ability to attract tech-savvy talent.
- By embracing forward thinking technology their firm is better situated to predict and respond to clients' changing needs.

Risks and Challenges of Using AI

- Public-facing generative AI can “hallucinate” or provide inaccurate information. For this reason, professional-grade AI systems trained on proprietary, vetted data are essential.
- Sensitive client data must be protected from security breaches when transferred to AI platforms. Firms must implement strict data governance policies and robust security measures.
- Overreliance on AI can lead to a lack of human oversight and judgment, which is critical for interpreting complex tax scenarios and preventing errors. AI can enhance human interaction, but will not replace analysis of many situations.
- AI models can produce biased outputs if trained on biased or incomplete datasets. Firms need to monitor and audit AI systems to ensure fair and impartial results.
- Clear policies must be established to determine who is responsible when AI-generated advice leads to negative consequences for a client.
- Firms may encounter staff expertise gaps, resistance to change, and data integration issues when adopting AI.

The Future of AI in Tax—AI's role in tax practice will continue to evolve, moving toward more advanced capabilities.

- Predictive AI will enable real-time adjustments to tax planning based on changing regulations and client circumstances.
- AI-powered systems will offer more sophisticated scenario analysis and optimization strategies, including for complex areas like digital assets.
- Agentic AI, which mimics human decision-making, will enable hyper automation to replace entire sequences of manual tasks.
- Tax authorities like the IRS are also adopting AI to improve operations and identify audit risks, making it crucial for firms to keep pace.
- With AI handling more routine work, the tax professional's role will shift. Future success will depend on professionals' ability to leverage AI, analyze its output, and apply strategic judgment.



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This course provides a comprehensive review of the key changes and developments from the 2025 tax season. It ensures tax professionals are up to date and fully prepared to navigate the upcoming filing year with confidence.