



Comments Received by the Department of Consumer Affairs

on

Proposed Rule related to Information Required to be Provided by Tax
Preparers

as made available for public inspection

IMPORTANT: The information in this document is made available solely to inform the public about comments submitted to the agency during a rulemaking proceeding and is not intended to be used for any other purpose



October 13, 2017

Casey Adams
Deputy Director of Legislative Affairs
New York City Department of Consumer Affairs
42 Broadway
New York, NY 10004
Submitted to Rulecomments@dca.nyc.gov

Re: Information Required to be Provided by Tax Preparers

Dear Deputy Director Adams,

Thank you for the opportunity to comment on the proposed amendments to §5-66 of Part 5 of Subchapter A of Chapter 5 of Title 6 of the Rules of the City of New York.

H&R Block is a global consumer tax services provider, having prepared more than 750 million tax returns by and through retail locations and digital solutions since 1955. We have nearly 180 offices located within New York City.

We write to comment on one provision in the proposed rule, specifically the proposed change to § 5-66 (c)(1)(ii)(a) which, in general, requires tax preparers to post a sign that states taxpayers are entitled to receive a written estimate of all fees before receiving services from the tax preparer.

Every taxpayer's situation is unique. We can provide taxpayers with information about the fees we charge for our services, but without taking time to understand each taxpayer's unique situation, we cannot provide them with a reasonable estimate of all fees they will incur for our services. However, we do not charge a "sitting fee" to perform a review of a taxpayer's situation, or "tax interview," so we can provide them with an estimate of all fees after completing their tax interviews, but before they are obligated to pay fees for our services.

We ask the Department to amend this section to mimic the language found in § 20-740.1(a)(5) of Subchapter 8 of Chapter 5 of Title 20 of the Administrative Code of the City of New York, clarifying that consumers have the right to receive a written estimate of the fees *before they are obligated to compensate the tax preparer for services rendered in connection with filing their returns.*

If you would like to discuss this further, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Andrew Jennison".

Andrew Jennison
Vice President, Government Relations