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20 May 2020

Mr Chris Jordan AO  
Commissioner of Taxation  
Australian Taxation Office  
52 Goulburn Street  
SYDNEY NSW 2000

By email: [chris.jordan@ato.gov.au](mailto:chris.jordan@ato.gov.au)

CC:

Jeremy Hirschhorn, Second Commissioner – Client Engagement  
Jeremy Geale, COVID-19 Response Committee Chair

Dear Chris

## COVID-19 and lodgment deferrals

CPA Australia's Public Practice Advisory Committee (PPAC) provides the Board of Directors with advice and a forum for consultation on issues relating to the provision of professional accounting services to the public, including taxation services and advice. It also advises on the potential arrangements, practices and reforms that can enhance the reputation of our members working in public practice (i.e. public practitioners) and enhance the trust that the public can have in the services provided.

The Government's COVID-19 economic and financial support responses have been a great fillip for businesses in Australia, but at the same time have significantly increased the demand for professional accounting services and tax advice. Public practitioners have been inundated with requests for accounting, business and tax advice, including support to access JobKeeper and cash flow boost. The pace with which these measures are being introduced, and the complexity of them, has meant that many public practitioners are diverting their resources away from tax services to focus on COVID-19 stimulus packages. As a result, tax planning and reporting obligations are not being given the priority attention that they typically would, at this time of the year.

As a profession, we recognise and value the critical role we play as intermediaries in Australia's tax and transfer systems and are committed to assisting the ATO and Government to ensure businesses receive appropriate, relevant and high-quality advice in relation to the stimulus packages. However, in fulfilling this critical role, we, and many of our members, are experiencing unsustainably long working hours, high levels of stress, significant emotional toll and excessive workloads.

The ATO's decision to extend income tax return lodgment due dates to 5 June was gratefully welcomed. However, it has become apparent to us that further administrative relief is required to assist in the management of lodgment programs and tax compliance obligations.

With this in mind, we request a further extension of 2019 income tax return lodgment due dates to 30 June. This will assist public practitioners to adjust work programs and remove a key stressor that has prevented them from

undertaking usual business activities for over six weeks, due to COVID-19 and the delivery of the stimulus measures.

Where a deferral is not feasible for all public practitioners, we seek your consideration of:

- deferrals for affected smaller public practitioners with a good lodgment history
- extension of agent-assessed deferral timeframes from four to eight weeks, shifting the deferred due date from 12 June to 10 July
- streamlined ATO-assessed deferral request processing for requests beyond 10 July
- waiver of lodgment penalties for late lodgments, and
- lodgment program performance calculated using a 30 June 2020 due date.

A statement from you and your executive to public practitioners on the ATO's approach to tax agent lodgment performance during this period would assist in publicising the existing relief and alleviate the uncertainty and stress currently being experienced.

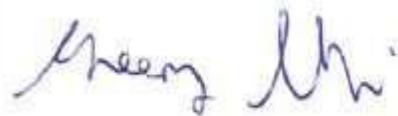
If you wish to discuss further, please contact Andrew Pearce Chair, PPAC at [APearce@collinssba.com.au](mailto:APearce@collinssba.com.au) or Keddie Waller, Head of Public Practice on 03 9606 9816 or [keddie.waller@cpaaustralia.com.au](mailto:keddie.waller@cpaaustralia.com.au)

Yours sincerely



Andrew Pearce FCPA

**Chair**  
**Public Practice Advisory Committee**  
**CPA Australia**



Terrence Cheong FCPA



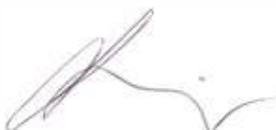
Shanna Hunter FCPA



Gavin Swan FCPA



Brent Szalay FCPA



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**Public Practice Advisory Committee Members**