

# AMERICAN PAYROLL ASSOCIATION

September 21, 2018

Ms. Kirsten Wielobob  
Deputy Commissioner for Services and Enforcement  
Internal Revenue Service  
1111 Constitution Avenue, NW  
Washington, DC 20224

Dear Deputy Commissioner Wielobob:

Thank you on behalf of the American Payroll Association (APA) for delaying the issuance of major changes to the Form W-4, *Employee's Withholding Allowance Certificate*, until 2020.

APA's Government Relations Task Force Subcommittee on IRS Issues has been working closely with the IRS and Treasury Department on the many changes created by the Tax Cuts and Jobs Act (TCJA). We commend you and the IRS team for increasing stakeholder involvement and considering APA's recommendations. These efforts will return dividends for U.S. employers by reducing the cost of compliance and easing the transition burden on American businesses.

Of critical importance is ensuring that payroll managers and IRS employees have sufficient time to upgrade software systems and adjust processes before these changes are implemented. APA's comments on the preliminary draft 2019 Form W-4 also raised concerns about employees' ability to understand the form and related instructions along with the IRS's Withholding Calculator, especially considering the significant change from an allowance system to dollar amounts reflecting withholding by household and highest paying job. We all have an interest in getting this right, and we look forward to further collaboration with the IRS and Treasury on these issues.

APA continues to offer support to the IRS in implementing the agency's Strategic Plan that reflects a commitment to strengthening and expanding partnerships with stakeholders. APA is grateful for the full consideration that the IRS is giving to developing a Form W-4 that makes sense for employers, employees, and the IRS and Treasury Department.

Sincerely,



Alice P. Jacobsohn, Esq.  
Senior Manager, Government Relations

Cc: Ken Corbin, Commissioner, Wage and Investment Division; Dietra Grant, Director, Customer Assistance, Relationships and Education; Terry Lemons, Chief, Communications and Liaison; Melvin Hardy, Director, National Public Liaison Office