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Dear Mark

SAICA SUBMISSION: PROPOSED ENHANCEMENTS TO TAX PRACTITIONER ONLINE CAPABILITIES

1. The SARS/RCB National Stakeholder Meeting held on 28 July 2022 and the follow up email from Ms C Davis, on 10 August 2022, refers.
2. At the 28 July meeting, SARS introduced a proposal to replace telephonic services for Tax Practitioners by providing additional online capabilities.
3. SARS requested feedback from recognised controlling bodies on the below aspects:
 - Proposed enhancements to tax practitioner online capabilities; and
 - Reasons why tax practitioners believe the dedicated telephonic services for Tax Practitioners should be retained.
4. We have engaged tax practitioner members and on behalf of the SAICA National Tax Operations subcommittee, we present the requested input in Annexure A to this letter.

Please feel free to contact us should you wish to clarify any of the above comments.

Yours sincerely

Somaya Khaki
Projector Director: Tax

Colin Wolfson
Chairman: SAICA National Tax Ops Subcommittee



PROPOSALS FOR ENHANCEMENTS TO TAX PRACTITIONER ONLINE CAPABILITIES	
1.	An overarching request is for the enforcement of timelines provided in the legislation and/or the SARS Service Charter which is likely to eliminate the need for multiple follow ups which may be contributing to the strain on the tax practitioner contact centre.
2.	<p>Ability to do an online real time escalation to SARS when there are delays by SARS in the finalisation of cases (e.g. 21 day turnaround period exceeded by SARS).</p> <p>This escalation should not have a delayed response like other channels and should be immediate if the call centre practitioner line is to be removed by SARS. A chat option to facilitate this may be useful.</p>
3.	Functionality that allows one to request copies of SARS letters that have gone 'missing' in cyberspace or with the SA Post Office or when sent to the taxpayer instead of the tax practitioner.
4.	Ability to update taxpayer details online.
5.	All disputes should be online and where the system is not working for some reason, there must be a dedicated channel to which to send such disputes with a requirement that proof of the error be included (e.g. screenshot of error message).
6.	Improved account maintenance services on eFiling – many times not all relevant transactions are available for allocation.
7.	Consider enhancements to the Online Query system to make it more user friendly.
8.	Create an online chat option for instant assistance with SOQS, or a 'call back' option if there is no available agent online.
9.	Channel to address misallocation of documents submitted via the online query system.
10.	Foreign-based tax practitioners should be able to request a Call Back Option.
11.	Online requests for Estate Compliance and Estate Duty Compliance letters – currently the request is emailed and it is very difficult to follow up on the status.
12.	Online submission of Request for reduced assessment to be able to track the process better.
13.	Online deferment of payment requests.
14.	Online application for tax exemption status and section 18A approval.
15.	Allow a bigger file size (more than 5mb) and more documents to be uploaded.
16.	Update the EBooking Tool where documents must be uploaded to give less "Tax Ref Nr" Errors.
17.	Income tax returns, IT14SDs, EMP501 recons etc should automatically save while it is being prepared, as time is wasted when the site times out (often multiple times during



	the preparation of one return) and sometimes necessitates calls to the Contact Centre to log the issue.
18.	When saving income tax returns during the preparation of the return, the return closes and goes back to the return issued page and the document has to be re-opened to continue. Saving the document should not close the return. We suggest that should the user click 'save', the user must be able to continue with the return (similar to the above).
19.	File and save buttons should not be located next to each other on the return to prevent erroneous filing of returns instead of saving, due to the close proximity of the command options.
20.	Tailored letters being issued for specific requests as currently generic letters are issued and one has to follow up with SARS to obtain further information. This has been rolled out for individual taxpayers and should be extended to all taxpayers and/or tax types.
21.	To be able to check for tax directives from TP profiles for individual taxpayers.
22.	Complaints functionality should be improved to be able to follow up and escalate on ALL tax affairs. In certain cases, complaints are rejected automatically without being looked at. The complaint is valid but something on SARS' system triggers it to be rejected for no good reason.
23.	Option for the tax practitioner to give the individual taxpayer shared access to their own tax profile instead of the taxpayer having to log in from their side to do it.
24.	The progress on and response to the request for confirmation on non-residence status should be made available via eFiling.
25.	Faster response time on the 'Challenge Status' function on the Tax Compliance Status system and/or chat option to quickly address the issue as this process seems to work when explaining the matter to a tax practitioner Contact Centre agent.
26.	OTHER: When a SARS Appointment is made – the SARS Official should review documents uploaded and call beforehand to see if specific, necessary documents are missing rather than waiting to address this at the Appointment. This will ensure more effective and efficient engagement and fewer or no follow up appointments on the same issues.



REASONS WHY A DEDICATED TAX PRACTITIONER CONTACT CENTRE LINE SHOULD BE RETAINED	
1.	<p>An overarching point is that this is necessary for the very reasons expressed on the SARS website, namely:</p> <ul style="list-style-type: none"> • Constructive engagement. • Providing direct access. • Specific service. • Specific communication. <p>Other reasons include to create and maintain a healthy professional relationship, with filtered and focused resolution to problems.</p> <p>Tax practitioners have to be suitably qualified and have to fulfil stringent requirements, set by SARS, in to maintain their ongoing registration. Taking away an additional direct contact point may create the perception that the services provided by the tax practitioner is not valued, despite their integral role in assisting SARS with ensuring tax compliance and revenue collections.</p>
2.	<p>From experience, better service delivery has been received from the dedicated tax practitioner contact centre and email address.</p> <p>If a Tax Practitioners calls on the Tax Practitioner Contact Centre Line, the person assisting the Tax Practitioner or a person working under the Tax Practitioner immediately knows that he/she is assisting a Tax Practitioner and will know what Rights/Access the Tax Practitioner has and what documentation is needed for the SARS Official to communicate with the Tax Practitioner.</p>
3.	<p>It is the appointed tax practitioners' responsibility to handle queries on behalf of their taxpayer clients. Many clients are not able to attend to these queries themselves either telephonically or by means of consultation at a SARS branch. Therefore, even though the taxpayer contact centre will still be available, tax practitioners still require a dedicated line.</p> <p>Further, tax practitioners know exactly what to do to resolve a query or submit documents. It would be much easier for a tax practitioner to communicate to SARS via the Tax Practitioner Contact Centre rather than the client engaging SARS themselves.</p>
4.	<p>The contact centre is sometimes used in order to obtain payment reference numbers in certain circumstances where these cannot be accessed via e-filing.</p>
5.	<p>SARS does not always comply with its own deadlines for resolving queries, thus access to the contact centre is required in order to follow up on queries for which no feedback has been received. The contact centre is the only way for tax practitioners to escalate queries not attended to by SARS via other platforms.</p>

ANNEXURE A
PROPOSED ENHANCEMENTS TO TAX PRACTITIONER ONLINE CAPABILITIES



	Until such time that SARS complies with the legislative timelines and/or the Service Charter timelines, there will remain a need for a dedicated Contact Centre.
6.	Tax practitioners make use of the contact centre for general queries regarding required information/supporting documents necessary for various tax matters as not all information can be found online. There have been many changes in the required documents over the last year with regards to public appointments and registrations etc and the website is not always up to date
7.	As practitioners there is access to an email platform for queries pcc@sars.gov.za , but responses are often delayed or not sent at all and it is not practical or reasonable to expect tax practitioners to wait a further 21 business days when dealing with time sensitive matters that have already passed the resolution deadline.
8.	To follow up supporting document status after 21 working days and to escalate this, if no other quick channel is available for this.
9.	To follow up on the deregistration of VAT, IT, PAYE, Estates etc as feedback from SARS is very limited and/or delayed.
10.	To follow up as to why refunds are delayed, unless this information can be obtained quickly via another platform (21 days is not considered reasonable).
11.	Online channels are often slow to respond and in some instances, it is not practical to wait 21 days for an answer to a query that can be resolved almost immediately if the tax practitioner can get hold of a consultant via the contact centre.
12.	To confirm supporting documents needed for a New Registration, Bank detail update etc as this level of detail is not always on eFiling.
13.	It is useful to engage a contact centre agent in respect of general queries with regards to E-filing and Easyfile errors and to clarify communication that is not always clear.
14.	To enquire and Validate details on particular Taxpayers.
15.	Tax practitioners deal with a large amount of taxpayers and do not have the time available to wait for a long time to get through to the general contact centre, if it is SARS' intention that there will be one contact centre to be used by all. Due to dealing with multiple taxpayers a dedicated channel should be available which is separate from the public line due to the length of time and frequency of contact/queries requiring a SARS consultants feedback.
16.	Breakdown on assessments issued by SARS as these sometime comprise multiple amounts and assessments do not reflect the individual amounts but merely reflect a total of the amount assessed.
17.	Following up on disputes raised for which tax practitioners have not received a response on eFiling.



18.	To obtain more detail regarding rejections of registration/application/other audit documents requested by SARS. SARS merely issues a generic letter stating that the application was rejected. The call centre assists tax practitioners in terms of specifying why the application was rejected. Unless the rejection communication includes this detail, the contact centre is still needed to clarify such matters.
19.	<p>Technical queries may only be addressed via direct communication lines with competent agents. It is believed that SARS would be eroding its service offering further by disallowing Tax Practitioners access to competent agents.</p> <p>It is also felt that the SARS agents assisting on the tax practitioner contact centre may provided a better service to the general service consultants, resulting in a higher level of satisfaction in resolving queries – provided that the tax practitioner does actually reach a consultant and even with the long waiting times, it would be appreciated if the service could be retained.</p>
20.	Tax practitioners, need the 'human touch' in order to communicate client problems. It is also helpful for those times where the online system does not work effectively or at all.
21.	Tax status requests: In come cases tax practitioners do need to talk to a contact centre agent, as there is often not enough information from the "tax status challenge" feedback platform when submitting a query to SARS regarding a disagreement in the tax compliance status. Direct engagement with a contact centre agent results in much quicker resolution.