

119TH CONGRESS
1ST SESSION

H. R. 5346

IN THE SENATE OF THE UNITED STATES

DECEMBER 2, 2025

Received; read twice and referred to the Committee on Finance

AN ACT

To amend the Internal Revenue Code of 1986 to reform
certain penalty and interest provisions.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

1 **SECTION 1. SHORT TITLE.**

2 This Act may be cited as the “Fair and Accountable
3 IRS Reviews Act”.

4 **SEC. 2. PROCEDURAL REQUIREMENTS FOR ASSESSMENT**
5 **OF PENALTIES.**

6 (a) **APPROVAL OF ASSESSMENT.**—Section 6751(b)(1)
7 of the Internal Revenue Code of 1986 is amended to read
8 as follows:

9 “(1) **IN GENERAL.**—No penalty under this title
10 shall be assessed or entered unless, before any writ-
11 ten communication with respect to such penalty (in-
12 cluding proposal of a penalty as an adjustment) is
13 sent to the taxpayer, the initial determination of
14 such assessment is personally approved (in writing)
15 by the immediate supervisor of the individual mak-
16 ing such determination or such higher level official
17 as the Secretary may designate.”.

18 (b) **IMMEDIATE SUPERVISOR DEFINED.**—Section
19 6751(b) of such Code is amended by adding at the end
20 the following new paragraph:

21 “(3) **IMMEDIATE SUPERVISOR.**—For purposes
22 of this subsection, the term ‘immediate supervisor’
23 means, with respect to an individual making a deter-
24 mination under paragraph (1), the person to whom
25 such individual reports.”.

1 (c) EFFECTIVE DATE.—The amendments made by
2 this section shall apply to notices issued, and penalties as-
3 sessed, after December 31, 2025.

Passed the House of Representatives December 1,
2025.

Attest: KEVIN F. MCCUMBER,
Clerk.