

rights of American taxpayers, whose interests we must continue to look out for.

Mr. Speaker, I encourage my colleagues to vote "yes" on the Fair and Accountable IRS Reviews Act, and I yield back the balance of my time.

The SPEAKER pro tempore. The question is on the motion offered by the gentleman from Missouri (Mr. SMITH) that the House suspend the rules and pass the bill, H.R. 5346, as amended.

The question was taken; and (two-thirds being in the affirmative) the rules were suspended and the bill, as amended, was passed.

A motion to reconsider was laid on the table.

## TAX COURT IMPROVEMENT ACT

Mr. SMITH of Missouri. Mr. Speaker, I move to suspend the rules and pass the bill (H.R. 5349) to amend the Internal Revenue Code of 1986 to improve services provided to taxpayers by the Internal Revenue Service by providing greater judicial review, as amended.

The Clerk read the title of the bill.

The text of the bill is as follows:

H.R. 5349

*Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,*

### SECTION 1. SHORT TITLE; ETC.

(a) **SHORT TITLE.**—This Act may be cited as the "Tax Court Improvement Act".

(b) **AMENDMENT OF 1986 CODE.**—Except as otherwise expressly provided, whenever in this Act an amendment is expressed in terms of an amendment to a section or other provision, the reference shall be considered to be made to a section or other provision of the Internal Revenue Code of 1986.

(c) **TABLE OF CONTENTS.**—The table of contents of this Act is as follows:

Sec. 1. Short title; etc.

Sec. 2. Authorization of subpoenas before hearings to facilitate settlements.

Sec. 3. Authorization of special trial judges to hear additional cases and address contempt.

Sec. 4. Disqualification of judges and special trial judges.

Sec. 5. Clarification of Tax Court jurisdiction to apply equitable tolling in deficiency cases.

### SEC. 2. AUTHORIZATION OF SUBPOENAS BEFORE HEARINGS TO FACILITATE SETTLEMENTS.

Section 7456(a) is amended to read as follows:

"(a) **IN GENERAL.**—

"(1) **ADMINISTRATION OF OATHS.**—For the efficient administration of the functions vested in the Tax Court or any division thereof, any judge or special trial judge, the clerk or the clerk's deputies, as such, or any other employee of the Tax Court designated in writing for the purpose by the chief judge, may administer oaths or affirmations.

"(2) **SUBPOENA AUTHORITY.**—Any judge or special trial judge may examine witnesses and require, by subpoena ordered by the Tax Court or any division thereof and signed by the judge or special trial judge (or by the clerk of the Tax Court or by any other employee of the Tax Court when acting as deputy clerk), any of the following:

"(A) The attendance of parties or witnesses.

"(B) The production of books, papers, documents, electronically stored information, or tangible things from any place in the United States

by any party or witness having custody or control thereof for purposes of discovery or for use of the things produced as evidence in accordance with the rules and orders of the Tax Court. Any such subpoena shall be issued and served, and compliance therewith shall be compelled, as provided in the rules and orders of the Tax Court.

"(3) **DEPOSITIONS.**—Pursuant to rules and orders of the Court, the deposition of a witness may be taken before any designated individual competent to administer oaths under this title. Any deposition testimony shall be reduced to writing by the individual taking the deposition, or under such individual's direction, and shall be subscribed by the deponent."

### SEC. 3. AUTHORIZATION OF SPECIAL TRIAL JUDGES TO HEAR ADDITIONAL CASES AND ADDRESS CONTEMPT.

(a) **CONSENT TO ASSIGNMENT.**—Section 7443A(b) is amended by striking "and" at the end of paragraph (6), by redesignating paragraph (7) as paragraph (8), and by inserting after paragraph (6) the following new paragraph:

"(7) upon the consent of the parties, and pursuant to rules promulgated by the Tax Court, any proceeding not described in paragraphs (1) through (6), and", and

(b) **AUTHORIZING SPECIAL TRIAL JUDGE.**—Section 7443A(c) is amended by striking "or (6)" and inserting "(6), or (7)".

(c) **CONTEMPT AUTHORITY.**—Section 7443A is amended by adding at the end the following new subsection:

"(f) **INCIDENTAL POWERS.**—A special trial judge appointed under this section shall have the power to punish for contempt of the authority of the Tax Court as provided in section 7456(c), except the sentence imposed by such a special trial judge for any contempt shall not exceed the penalties for a Class C misdemeanor as set forth in sections 3571(b)(6) and 3581(b)(8) of title 18, United States Code. This subsection shall not be construed to limit the authority of a special trial judge to order sanctions under any other statute or any rule of the Tax Court prescribed pursuant to section 7453."

(d) **EFFECTIVE DATE.**—The amendments made by subsections (a) and (b) shall take effect on the date the United States Tax Court adopts rules implementing the consent procedures of section 7443A.

### SEC. 4. DISQUALIFICATION OF JUDGES AND SPECIAL TRIAL JUDGES.

(a) **IN GENERAL.**—Part II of subchapter C of chapter 76 is amended by adding at the end the following new section:

#### "SEC. 7467. DISQUALIFICATION OF JUDGE OR SPECIAL TRIAL JUDGE.

"Section 455 of title 28, United States Code, shall apply to judges, special trial judges, and proceedings of the Tax Court."

(b) **CLERICAL AMENDMENT.**—The table of sections for such part is amended by adding at the end the following new item:

"Sec. 7467. Disqualification of judge or special trial judge."

### SEC. 5. CLARIFICATION OF TAX COURT JURISDICTION TO APPLY EQUITABLE TOLLING IN DEFICIENCY CASES.

(a) **IN GENERAL.**—Section 7451(b) is amended to read as follows:

"(b) **TOLLING OF TIME.**—

"(1) **IN GENERAL.**—The Tax Court shall have jurisdiction to toll the period for filing a petition under section 6213(a) in cases in which the Tax Court determines based on the facts and circumstances that equity warrants such tolling.

"(2) **RULES FOR INACCESSIBLE FILING LOCATIONS.**—

"(A) **IN GENERAL.**—Notwithstanding any other provision of this title, in any case (including by reason of a lapse in appropriations) in which a filing location is inaccessible or otherwise unavailable to the general public on the date a petition is due, the relevant time period for filing

such petition shall be tolled for the number of days within the period of inaccessibility plus an additional 14 days.

"(B) **FILING LOCATION.**—For purposes of this paragraph, the term 'filing location' means—

"(i) the office of the clerk of the Tax Court, or

"(ii) any on-line portal made available by the Tax Court for electronic filing of petitions."

(b) **CONFORMING AMENDMENT.**—Section 7459(d) is amended—

(1) by striking "If a petition" and inserting the following:

"(1) **IN GENERAL.**—If a petition", and

(2) by adding at the end the following new paragraph:

"(2) **EXCEPTION.**—Paragraph (1) shall not apply with respect to any dismissal which is solely based on a determination of the Tax Court not to toll the period for filing a petition under section 6213(a)."

(c) **EFFECTIVE DATE.**—The amendments made by this section shall apply to filings made after the date of the enactment of this Act.

(d) **NO INFERENCE.**—The amendment made by subsections (a) shall not be construed to create any inference with respect to the jurisdiction of the Tax Court with respect to any petition filed on or before the date of the enactment of this Act.

The SPEAKER pro tempore. Pursuant to the rule, the gentleman from Missouri (Mr. SMITH) and the gentleman from Alabama (Ms. SEWELL) each will control 20 minutes.

The Chair recognizes the gentleman from Missouri.

GENERAL LEAVE

Mr. SMITH of Missouri. Mr. Speaker, I ask unanimous consent that all Members may have 5 legislative days to revise and extend their remarks and include extraneous material on the bill under consideration.

The SPEAKER pro tempore. Is there objection to the request of the gentleman from Missouri?

There was no objection.

Mr. SMITH of Missouri. Mr. Speaker, I yield myself such time as I may consume.

□ 1730

Mr. Speaker, I rise in support of the Tax Court Improvement Act, bipartisan legislation introduced by Representatives NATHANIEL MORAN and TERRI SEWELL. As a former judge, Congressman MORAN knows the importance of fully protecting Americans' legal rights and due process, and I appreciate his leadership on this issue.

This bill strengthens taxpayer rights during judicial proceedings before the U.S. Tax Court.

The court will be able to more expeditiously resolve cases as the legislation enhances the efficiency of its judicial review to the benefit of the taxpayer. This will increase the court's productivity, and Tax Court judges will also be held to the same disqualification standards as other judges. Finally, the court will now have the ability to extend taxpayer deadlines where timely filing is impractical.

The U.S. Tax Court is the only venue where taxpayers can dispute a tax estimate without first paying that tax. Taxpayers must stand on equal footing when going toe-to-toe with the IRS. Without the guarantee of rights, taxpayers are put in a situation where the

IRS is essentially saying: Heads, I win. Tails, you lose.

Mr. Speaker, I ask my colleagues to stand with American taxpayers and support this legislation, and I reserve the balance of my time.

Ms. SEWELL. Mr. Speaker, I yield myself such time as I may consume.

Mr. Speaker, I thank Chairman SMITH for bringing this bill to the floor.

I rise in support of H.R. 5349, the Tax Court Improvement Act, which passed the Committee on Ways and Means with overwhelming bipartisan support.

Mr. Speaker, I thank my cosponsor and colleague, Mr. MORAN of Texas, for his leadership and for working with me on this important legislation. I also thank the gentleman from Texas for the smoked turkey he sent to several members of our committee.

The Tax Court has a very important impact on everyday Americans. It provides individuals and businesses with an opportunity to be heard in court to challenge the Internal Revenue Service before paying a disputed tax. Our committee is always looking for ways to make the Tax Court more efficient and fairer for the taxpayer, and that is why we are here today.

The Tax Court Improvement Act will strengthen Tax Court procedures and practices by making four commonsense reforms. The act will accelerate the collection of documents, expand the types of cases assigned to special trial judges, hold Tax Court judges to the same recusal standards as other Federal judges, and allow the deadline for petitions to be extended in certain circumstances.

These improvements to the Tax Court will have a tangible impact on thousands of taxpayers, and it will raise \$6 million over the next 10 years.

Given the importance of the Tax Court, I urge my colleagues on both sides of the aisle to support this important legislation.

Mr. Speaker, I reserve the balance of my time.

Mr. SMITH of Missouri. Mr. Speaker, I yield such time as he may consume to the gentleman from Texas (Mr. MORAN).

Mr. MORAN. Mr. Speaker, I rise today in strong support of the Tax Court Improvement Act. This taxpayer-friendly bill significantly improves the critical Tax Court process available to Americans who find themselves in a dispute with the IRS.

Mr. Speaker, I thank specifically Representative TERRI SEWELL, who joined me in coauthoring this bill, for recognizing that taxpayers deserve a court process that is clear, timely, efficient, and just. Her work on this bill reflects our joint commitment to the people we serve.

For too long, the Tax Court has operated under preexisting rules that do not mirror many of the well-established procedures for other courts and rules that are antiquated in their application.

In short, changes need to be made so that the Tax Court process works better for the people that it serves. When a system is slow or confusing, the burden falls on taxpayers, often at moments when they are already under stress. This bill provides practical updates that help the court do its job more effectively, and it helps taxpayers find resolution more easily and quickly.

First, this bill modernizes the court's subpoena rules. Today, if someone is subpoenaed to produce documents before the Tax Court, they must show up in person. This wastes time, adds expense, and clogs an already full docket. Other Article I and Article III courts already allow documents to be submitted, at times, without requiring physical appearance. This bill, likewise, gives the Tax Court the same commonsense flexibility, allowing judges to decide when someone truly needs to appear in person.

Second, the bill helps the court address its growing case backlog. It does this by allowing special trial judges, who are experienced legal professionals who already handle much of the court's work, to take on additional responsibilities with the consent of the taxpayer. If the taxpayer agrees, these special trial judges can hear certain additional matters, issue final decisions in specific cases, and use limited contempt authority to maintain order. This is similar to how magistrate judges currently assist Federal district court judges to streamline their dockets when consent of the parties exists. The result is simple: faster resolution for taxpayers without sacrificing expertise on the bench, fairness in the process, or integrity in the result.

Third, the bill strengthens public trust by creating clear ethical standards for Tax Court judges. Article III judges already have statutory recusal rules. Currently, Tax Court judges do not. Codifying disqualification requirements ensures that taxpayers know that their case will be heard by a judge who is impartial and above reproach. This change helps to take away any indicia of impropriety in the process, again giving weight to the soundness of the final judgment.

Finally, this legislation clarifies the court's authority to use equitable tolling in deficiency cases. Today, if a taxpayer misses a filing deadline, even due to illness, natural disaster, or being given incorrect information, the court often has no ability to offer relief to that taxpayer. Cases can be dismissed before the merits are even heard, putting taxpayers at risk for losing their claim when they are not at fault for missing the deadline. That is not a just result. This bill ensures the court can make determinations based on the substance of claims, not just procedural technicalities, especially when a taxpayer is acting in good faith.

Taken together, these reforms make the Tax Court more efficient, responsive, and just for the American tax-

payer. They reflect these values that guide our work in this Chamber: strong institutions, fair treatment for taxpayers, and renewed trust in our government processes.

This is a measured, practical bill that passed unanimously in committee, and it deserves the support of this House on both sides of the aisle.

I urge my colleagues to vote for the Tax Court Improvement Act to help strengthen a court process that plays a vital role in protecting our taxpayers' rights and ensuring accountability of the IRS within our tax system.

Ms. SEWELL. Mr. Speaker, I yield myself the balance of my time.

Mr. Speaker, in closing, in support of H.R. 5349, the Tax Court Improvement Act, is the fact that we want more commonsense, bipartisan efforts to modernize our Tax Court system.

At its heart, this bill strengthens taxpayer rights and removes unnecessary procedural roadblocks. Specifically, it authorizes the Tax Court to issue subpoenas before hearings. That means third parties can be compelled to produce relevant documents, electronic records, and other evidence early, facilitating settlement, reducing the need for protracted litigation, and helping to resolve disputes sooner rather than later.

This bill also expands the role of special trial court judges, allowing them to hear additional cases and act when there are issues such as contempt, thereby helping to clear backlogs and improving the court's overall input.

It holds Tax Court judges and special trial judges to the same ethical and disqualification standards as other Federal judges, ensuring transparency and integrity in every case.

This bill also clarifies that the Tax Court has the jurisdiction to grant equitable tolling in deficiency cases. In other words, the court can expand and extend deadlines when timely filings were impossible and impractical to make.

These reforms are not radical. They are commonsense improvements designed to deliver timely justice, lower court costs, and greater access for everyday Americans, small businesses, and those who currently face intimidating and burdensome procedures.

In a system where there are high stakes for individuals, families, and entrepreneurs, there is nothing uncommon or unreasonable about expecting a fair shot, swift resolution, and procedures that reflect modern realities. That is exactly what H.R. 5349 delivers.

□ 1740

Passing this legislation is a statement that we believe in a tax system where accountability, transparency, and due process matter, not just for the wealthy or well-connected, but for all Americans.

Mr. Speaker, I urge my colleagues on both sides of the aisle to support H.R. 5349 and deliver on commonsense Tax Court reform.

Mr. Speaker, I yield back the balance of my time.

Mr. SMITH of Missouri. Mr. Speaker, I yield myself the balance of my time.

Mr. Speaker, the Ways and Means Committee has been working tirelessly to strengthen taxpayer rights. This year alone, the committee has approved several pieces of legislation giving taxpayers fairer treatment. The Tax Court Improvement Act is another one of these solutions.

The IRS is the most feared Federal agency for good reason, but we are working to change that. In addition to pursuing partisan aims, it has a long-documented history of treating taxpayer rights as mere suggestions.

This bill will give taxpayers more confidence and greater protections when litigating their case before the U.S. Tax Court.

Mr. Speaker, I thank Congressman MORAN and Congresswoman SEWELL for championing taxpayer rights. This bill received total support in the Ways and Means Committee, and I urge all my colleagues to do the same here in the House.

Mr. Speaker, I yield back the balance of my time.

The SPEAKER pro tempore. The question is on the motion offered by the gentleman from Missouri (Mr. SMITH) that the House suspend the rules and pass the bill, H.R. 5349, as amended.

The question was taken; and (two-thirds being in the affirmative) the rules were suspended and the bill, as amended, was passed.

A motion to reconsider was laid on the table.

#### HUD TRANSPARENCY ACT OF 2025

Mr. DAVIDSON. Mr. Speaker, I move to suspend the rules and pass the bill (H.R. 225) to require the Inspector General of the Department of Housing and Urban Development to testify before the Congress annually, and for other purposes, as amended.

The Clerk read the title of the bill.

The text of the bill is as follows:

H.R. 225

*Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,*

#### SECTION 1. SHORT TITLE.

*This Act may be cited as the "HUD Transparency Act of 2025".*

#### SEC. 2. CONGRESSIONAL TESTIMONY.

*Not later than October 1 of each year, the Inspector General of the Department of Housing and Urban Development shall appear before the Committee on Financial Services of the House of Representatives and the Committee on Banking, Housing, and Urban Affairs of the Senate and present testimony on the Office of Inspector General's—*

*(1) efforts to detect and prevent fraud, waste, and abuse;*

*(2) ability to conduct and supervise audits, investigations, and reviews;*

*(3) actions to identify opportunities for the programs of the Department of Housing and Urban Development to progress and succeed;*

*(4) recommendations to improve overall efficiency and public accountability of the Department of Housing and Urban Development;*

*(5) assessment of the extent to which the Department of Housing and Urban Development has resources sufficient to carry out its statutory mission; and*

*(6) ongoing activities regarding any such additional work, as appropriate.*

The SPEAKER pro tempore. Pursuant to the rule, the gentleman from Ohio (Mr. DAVIDSON) and the gentlewoman from California (Ms. WATERS) each will control 20 minutes.

The Chair recognizes the gentleman from Ohio.

#### GENERAL LEAVE

Mr. DAVIDSON. Mr. Speaker, I ask unanimous consent that all Members may have 5 legislative days to revise and extend their remarks and include extraneous material on this bill.

The SPEAKER pro tempore. Is there objection to the request of the gentleman from Ohio?

There was no objection.

Mr. DAVIDSON. Mr. Speaker, I yield myself such time as I may consume.

Mr. Speaker, I rise in support of H.R. 225, the HUD Transparency Act.

I thank the gentlewoman from Texas, Congresswoman DE LA CRUZ, for sponsoring this legislation.

The HUD Transparency Act of 2025 is a piece of commonsense legislation that strengthens accountability, enhances oversight, and ensures the American people have a clear view into how Federal housing dollars are spent.

For years, the Department of Housing and Urban Development, HUD, has administered programs that touch millions of families, seniors, and veterans in communities across our Nation. These programs are critical. They support affordable housing development, combat homelessness, and help communities recover after disasters.

Unfortunately, over the years, in my view, the agency has shown time and time again they are unable to perform some basic functions. The agency continually fails to hold local public housing authorities responsible for providing safe housing.

Reports from the inspector general, the Government Accountability Office, and our own committee have repeatedly identified some of the same issues: outdated and incomplete reporting, inconsistent and unverifiable data, missed deadlines, and major programs operating without clear evidence of effectiveness.

As the branch with the power of the purse, it is Congress' responsibility to ensure tax dollars that go toward HUD's programs are managed effectively, efficiently, and transparently. H.R. 225 delivers on that responsibility.

This bill requires the Office of the Inspector General of the Department of Housing and Urban Development to annually testify before Congress so we can ensure the Department is meeting its performance reporting and management standards. By requiring the HUD Inspector General to appear in front of Congress, Ms. DE LA CRUZ's bill makes HUD take the necessary steps to publish key performance information, re-

port program outcomes in a timely manner, and makes the data available so Congress and the public can better ensure Federal housing programs are meeting their goals.

The HUD Transparency Act is a straightforward, bipartisan solution to a longstanding problem. HUD needs to use consistent reporting formats so Congress can compare outcomes across programs and track progress over time. It ensures that the American people can see how their tax dollars are being used.

These are basic principles of good governance. Transparency strengthens public trust and improves program performance. It allows Congress to address problems early instead of after tax dollars have been wasted or ones in need have been left behind.

Importantly, this bill does so without imposing new burdens on State or local governments and without slowing down the delivery of critical housing assistance. H.R. 225 simply ensures that HUD operates with the openness and accountability the American people expect and deserve.

Mr. Speaker, I thank Ms. DE LA CRUZ for this important measure, and I urge our colleagues to support it.

Mr. Speaker, I reserve the balance of my time.

Ms. WATERS. Mr. Speaker, I yield myself such time as I may consume.

Mr. Speaker, I rise in support of H.R. 225, the HUD Transparency Act of 2025, sponsored by Representative DE LA CRUZ.

Oversight is a core function of the Financial Services Committee. Inspectors general also play a critical role in providing transparency about the functions of government, as well as holding government officials accountable.

They are able to do this because they are independent of the officials they oversee, and until recently, were only removed for cause.

However, since taking office, President Trump has fired over 20 IGs across the government. The majority of these IG firings took place in the first week President Trump took office and violated lawful removal procedures as they came with no warning or rationale.

In fact, the Trump administration has kept more than three in four presidentially appointed inspector general positions vacant and without Senate-confirmed leadership.

These actions not only silence future IGs but leave the public less informed about critical activities happening across agencies.

Dangerously, Trump's actions, combined with Republican House leadership who are unwilling to investigate anything Trump's team does, enable the Trump administration to be entirely unaccountable.

Notably, the HUD Inspector General this bill would require to testify before our committee was one of the people Trump arbitrarily fired earlier this year.