



Florida Institute of Certified Public Accountants

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February 26, 2019

The Honorable Charles P. Rettig  
Commissioner  
Internal Revenue Service  
1111 Constitution Avenue, NW  
Washington, DC 20224

Dear Commissioner Rettig,

On behalf of more than 18,000 FICPA members and specifically our members from the panhandle region of our state, I am writing to ask you to extend the same relief granted under Revenue Procedure 2018-09 to residents impacted by Hurricane Michael and other 2018 federally declared disaster areas.

Individuals affected by Hurricane Michael have the extreme challenge of determining their casualty losses in accordance with IRC Section 165 for their upcoming tax returns. The process of assessing casualty losses can be tedious, costly and in many cases require volumes of paperwork from homeowners who are simply trying to determine the decrease in fair-market value of their property. The cost indexes under Revenue Procedure 2018-09 would provide straightforward tables that allow for a mathematical unbiased approach to determine personal residence losses. A homeowner's ability to use this method eliminates one of the many burdens residents experience as they look to recover.

Again, we ask that the Internal Revenue Service either expand the eligibility of Revenue Procedure 2018-09 or author a new rule specifying that individuals affected by the 2018 natural disasters are able to use the "Cost Indexes Safe Harbor Method".

Thank you in advance for your consideration and for the hard work your agency has done as part of your effort to help these individuals.

Sincerely,

A handwritten signature in black ink, appearing to read 'DLC 1/18', is written over a light blue horizontal line.

Deborah Curry, CPA, CGMA  
President/CEO

DLC/JT/kn

cc: Joanna Trebat  
Congressman Neil Dunn  
Congressman Matt Gaetz  
Congressman Vern Buchanan