

CLIENT ALERT

April 13, 2020

1

IRS ANNOUNCES EXTENSION OF CERTAIN TAX FILING AND PAYMENT OBLIGATIONS

by Julie Rhoades and J. Troy Terakedis

The U.S. Internal Revenue Service has announced the extension of certain tax filing and payment obligations in response to the ongoing COVID-19 pandemic. Pursuant to IRS Notice 2020-23, the due date is automatically postponed to July 15, 2020, for the following federal tax payment obligations, federal tax return or other form filing obligations, and time-sensitive actions due to be performed (originally or pursuant to a valid extension) on or after April 1, 2020, and before July 15, 2020:

Subject	Applicable Form	Additional Comments
Individual income tax	Form 1040, Form 1040-SR, Form 1040-NR, Form 1040-NR-EZ; Form 1040-PR, Form 104-SS	
Corporate income tax (Applies to calendar year or fiscal year corporate income tax payments and return filings)	Form 1120, Form 1120-C, Form 1120-F, Form 1120-FSC, Form 1120-H, Form 1120-L, Form 1120-ND, Form 1120-PC, Form 1120-POL, Form 1120-REIT, Form 1120-RIC, Form 1120-S, Form 1120-SF	
Partnerships (Applies to calendar year or fiscal year partnership return filings)	Form 1065, Form 1066	
Estate and trust income tax	Form 1041, Form 1041-N, Form 1041-QFT	
Estate and generation-skipping transfer tax	Form 706 (including Forms 706 filed pursuant to Rev. Proc. 2017-34), Form 706-NA, Form 706-A, Form 706-QDT, Form 706-GS(T), Form 706-GS(D), Form 706-GS(D-1)	For Form 706-GS(D-1), <i>Notification of Distribution from a Generation-Skipping Trust</i> , postponement to July 15, 2020, also applies to the due date for providing such form to a beneficiary

Subject	Applicable Form	Additional Comments
n/a	Form 8971 and any supplement Form 8971, including all requirements contained in Internal Revenue Code Section 6035(a)	
Gift and generation-skipping transfer taxes	Form 709	Applies to payments and return filings that are due on the date an estate is required to file Form 706 or Form 706-NA
Estate tax payments of principal or interest due as a result of an election made under Internal Revenue Code Sections 6166, 6161, 6163 and annual recertification requirements under Internal Revenue Code Section 6166	n/a	
Exempt organization business income tax	Form 990-T	Includes proxy tax under Internal Revenue Code Section 6033(e)
Private foundation excise taxes	Form 990-PF, Form 4720	
Quarterly estimated income taxes	Form 990-W, Form 1040-ES, Form 1040-ES (NR), Form 1040-ES (PR), Form 1041-ES, Form 1120-W	Applies to quarterly estimated income tax payments with respect to tax-exempt organizations, individuals, nonresident alien individuals, self-employed individuals and household employees who are residents of Puerto Rico, estates and trusts, and corporations.

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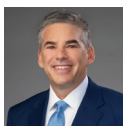
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Subject	Applicable Form	Additional Comments
Petitions filed with the Tax Court or for review of a decision rendered by the Tax Court	n/a	Deadline to file petitions with the Tax Court or for review of a Tax Court decision automatically extended
Claims for credit or refund	n/a	Deadline to file claims for credit or refund of any tax automatically extended
Suits for credit or refund	n/a	Deadline to file suits for credit or refund automatically extended

IRS Notice 2020-23 also provides the following:

- Taxpayers who need additional time to file (beyond the July 15, 2020, extension) their returns or other forms may file the appropriate extension by July 15, 2020, but the extension date may not go beyond the original statutory or regulatory extension date. Any extension will not extend the time to pay federal income tax beyond July 15, 2020.
- The above relief applies to the forms listed above as well as all schedules, returns, and other forms that are filed with the above-listed forms as attachments (including any elections that are made or required to be filed with one of the above listed forms).
- The period beginning on April 1, 2020, and ending on July 15, 2020, will be disregarded in the calculation of any interest, penalty, or addition to tax with respect to the above-listed tax payment obligations and forms.

ABOUT THE AUTHORS



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