

IRS EXTENDS MORE TAX DEADLINES TO COVER INDIVIDUALS, TRUSTS, ESTATES, CORPORATIONS

IR 2020-66, 4/9/2020; Notice 2020-23, 2020-18 IRB

In a Notice, the IRS has extended more tax deadlines to cover individuals, estates, corporations and others. This extension includes a variety of tax form filings and payment obligations that are due between April 1, 2020 and July 15, 2020, including estimated tax payments due June 15 and the deadline to claim refunds from 2016. The Notice also suspends associated interest, additions to tax, and penalties for late filing or late payment until July 15, 2020.

Background. On March 18, 2020, IRS issued Notice 2020-17, which postponed the due date for certain Federal income tax payments from April 15, 2020 until July 15, 2020 due to the novel coronavirus (COVID-19) emergency. See [IRS provides extension for federal income tax payments due April 15](#).

On March 20, 2020, the IRS issued Notice 2020-18, which also postponed until July 15, 2020 the filing date for 2019 federal income tax returns and 2020 federal estimated income tax payments that would otherwise be due on April 15, 2020. See IRS makes official announcement of filing deadline postponement (03/23/2020).

On March 27, 2020, the IRS issued Notice 2020-20, which extended recent income tax filing and payment relief to those taxpayers who have gift tax or GST tax obligations otherwise due by April 15 to July 15, 2020. This Notice also announced that this 3-month period would be disregarded for purposes of calculating interest and penalties. See Gift and GST tax returns and payments postponed to July 15 (03/30/2020).

More tax deadlines extended. The new Notice expands upon the relief provided in Notice 2020-18 and Notice 2020-20. The new relief includes extending the following filing and payment deadlines:

- Individual income tax payments and return filings on 1040-NR, U.S. Nonresident Alien Income Tax Return, 1040-NR-EZ, U.S. Income Tax Return for Certain Nonresident Aliens With No Dependents, 1040-PR, Self-Employment Tax Return - Puerto Rico, and 1040-SS, U.S. Self-Employment Tax Return (Including the Additional Child Tax Credit for Bona Fide Residents of Puerto Rico);
- **Calendar year or fiscal year corporate income tax payments and return filings on Form 1120,** U.S. Corporation Income Tax Return, 1120-C, U.S. Income Tax Return for Cooperative Associations, 1120-F, U.S. Income Tax Return of a Foreign Corporation, 1120-FSC, U.S. Income Tax Return of a Foreign Sales Corporation, 1120-H, U.S. Income Tax Return for Homeowners Associations, 1120-L, U.S. Life Insurance Company Income Tax Return, 1120-ND, Return for Nuclear Decommissioning Funds and Certain Related Persons, 1120-PC, U.S. Property and Casualty Insurance Company Income Tax Return, 1120-POL, U.S. Income Tax Return for Certain Political Organizations, 1120-REIT, U.S. Income Tax Return for Real Estate Investment Trusts, 1120-RIC, U.S. Income Tax Return for Regulated Investment Companies, **1120-S, U.S. Income Tax Return for an S Corporation,** and 1120-SF, U.S. Income Tax Return for Settlement Funds (Under Code Sec. 468B);
- **Calendar year or fiscal year partnership return filings on Form 1065, U.S. Return of Partnership Income, and Form 1066,** U.S. Real Estate Mortgage Investment Conduit (REMIC) Income Tax Return;

- Estate and trust income tax payments and return filings on Form 1041, U.S. Income Tax Return for Estates and Trusts, 1041-N, U.S. Income Tax Return for Electing Alaska Native Settlement Trusts, and 1041-QFT, U.S. Income Tax Return for Qualified Funeral Trusts;
- Estate and generation-skipping transfer tax payments and return filings on Form 706, United States Estate (and Generation-Skipping Transfer) Tax Return, 706-NA, United States Estate (and Generation-Skipping Transfer) Tax Return, 706-A, United States Additional Estate Tax Return, 706-QDT, U.S. Estate Tax Return for Qualified Domestic Trusts, 706-GS(T), Generation-Skipping Transfer Tax Return for Terminations, 706-GS(D), Generation-Skipping Transfer Tax Return for Distributions, and 706-GS(D-1), Notification of Distribution from a Generation-Skipping Trust (including the due date for providing such form to a beneficiary);
- Form 706, United States Estate (and Generation-Skipping Transfer) Tax Return filed pursuant to Revenue Procedure 2017-34;
- Form 8971, Information Regarding Beneficiaries Acquiring Property from a Decedent and any supplemental Form 8971, including all requirements contained in Code Sec. 6035(a);
- Gift and generation-skipping transfer tax payments and return filings on Form 709, United States Gift (and Generation-Skipping Transfer) Tax Return 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 Code Sec. 6166, Code Sec. 6161, or Code Sec. 6163 and annual recertification requirements under Code Sec. 6166;
- Exempt organization business income tax and other payments and return filings on Form 990-T, Exempt Organization Business Income Tax Return (and proxy tax under Code Sec. 6033(e));
- Excise tax payments on investment income and return filings on Form 990-PF, Return of Private Foundation or Code Sec. 4947(a)(1) Trust Treated as Private Foundation, and excise tax payments and return filings on Form 4720, Return of Certain Excise Taxes under Chapters 41 and 42 of the Internal Revenue Code; and
- Quarterly estimated income tax payments calculated on or submitted with Form 990-W, Estimated Tax on Unrelated Business Taxable Income for Tax-Exempt Organizations, 1040-ES, Estimated Tax for Individuals, 1040-ES (NR), U.S. Estimated Tax for Nonresident Alien Individuals, 1040-ES (PR), Estimated Federal Tax on Self Employment Income and on Household Employees (Residents of Puerto Rico), 1041-ES, Estimated Income Tax for Estates and Trusts, and 1120-W, Estimated Tax for Corporations.

This relief is automatic. Taxpayers do not have to call the IRS or file any extension forms, or send letters or other documents to receive this relief.

The relief provided in the Notice includes extending the time for filing all petitions with the Tax Court, or for review of a decision rendered by the Tax Court, filing a claim for credit or refund of any tax, and bringing suit upon a claim for credit or refund of any tax. However, the Notice does not provide relief for the time period for filing a petition with the Tax Court, or for filing a claim or bringing a suit for credit or refund if that period expired before April 1, 2020.

In the Notice, the IRS has also provided additional time for the IRS to perform certain time-sensitive actions during this period and the application date to participate in the Annual Filing Season Program.

The Notice also suspends associated interest, additions to tax, and penalties for late filing or late payment until July 15, 2020.

References. For extension of tax-related deadlines for taxpayers affected by disasters, see FTC 2d/FIN ¶S-8502; United States Tax Reporter ¶75,08A4.

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