

Clarification of Federal Tax Filing and Payment Extension to July 15 Due to COVID-19

Eligibility for Extension

The due date for filing Federal income tax returns and Federal income tax payments otherwise due on April 15, 2020, is extended to July 15, 2020, as a result of the ongoing Coronavirus (COVID-19) emergency. A taxpayer does not have to be sick, quarantined, or have any other impact from COVID-19 to qualify.

The income tax return only must be due on April 15, 2020, including a fiscal-year taxpayer. The relief does not apply to Federal income tax returns and payments due on any other date. Businesses and other entities that have filing due dates on May 15, June 15, or some other date have not been granted relief at this time. The filing and payment extension applies to the following forms:

- Form 1040, 1040-SR, 1040-NR, 1040-NR-EZ, 1040-PR, 1040-SS (for individuals);
- Form 1041, 1041-N, 1041-QFT (for estates and trusts);
- Form 1120, 1120-C, 1120-F, 1120-FSC, 1120-H, 1120-L, 1120-ND, 1120-PC, 1120-POL, 1120-REIT, 1120-RIC, 1120-SF (for corporations);
- Form 990 (for the net investment income tax (NIIT) of individuals, estates, and trust); and
- Form 991 (for BEAT erosion payments).

Not Eligible for Extension

The due date for partnerships and S corporations whose returns were required to be filed on March 16, 2020, has not been postponed.

There is no postponement for 990-T filers unless the original due date for the return is April 15, 2020. 990-Ts with original due dates other than April 15, 2020 are not extended.

The filing extension does not apply for filing payroll, excise, or any other information return even if due on or before April 15, 2020.

The filing extension does not apply for filing estate and gift tax returns. Normal filing and payment dates continue to apply to these returns.

Second quarter 2020 estimated income tax payments are still due on June 15, 2020. First quarter 2020 estimated income tax payments are postponed from April 15 to July 15, 2020.

Businesses, other entities or any taxpayer that have filing or payment due dates on May 15, June 15, or some other date other than April 15 have not been granted relief at this time.

Additional Extensions

The extension of the filing and payment due date from April 15 to July 15 is automatic. Taxpayers do not need to file any form or call the IRS to receive the extension. Taxpayers that need more time to file their income tax returns after July 15, 2020 can request an additional extension using Form 4868 or Form 7004. Any additional extension must be requested by July 15, 2020 (it does not need to be made by April 15, 2020). If the taxpayer properly estimates 2019 tax liability using the information available to them and file for an extension by July 15, 2020, the tax return will be due on October 15, 2020 (and an additional 3 months, not an additional 6 months).

Payment of Taxes

The deadline for making Federal income tax payments is also extended to July 15, 2020, for payments otherwise due on April 15, 2020. This includes tax on self-employment income, estimated tax payments for the 2020 tax year, Code Sec. 965 installment payments, and estimated payments of the BEAT erosion tax.

Taxpayers have until July 15 to make the tax payments, even if they already filed their 2019 Federal income tax return that would have been due on April 15 but have not paid yet. Interest and penalties will not accrue until after July 15. Any tax payments that are already scheduled will not be automatically rescheduled. **Taxpayer must actively cancel any scheduled payment through IRS Direct Pay, the Electronic Federal Tax Payment System (EFTPS), or their financial institution if they authorize an electronic fund withdrawal.**

If you scheduled a payment as part of filing your tax return (authorizing an electronic funds withdrawal), you may revoke (cancel) your payment by contacting the U.S. Treasury Financial Agent at 888-353-4537. You must call to make a payment cancellation request no later than 11:59 p.m. ET two business days prior to the scheduled payment date.

Contributions to IRAs and HSAs

The extension of the filing deadline also extends the deadline for making contributions to individual retirement accounts (IRAs), as well as health savings account (HSA) and Archer medical savings accounts (MSAs).

Because the due date for filing Federal income tax returns is now July 15, 2020, taxpayers may make contributions to IRAs, HSAs, and Archer MSAs for 2019 at any time up to July 15, 2020. Excess deferrals to qualified retirement plan must still be withdrawn (including income) by the April 15, 2020, due date.

Workplace-Based Retirement Plans

For employers with a federal income tax return due date of April 15, 2020, the end of the grace period under section 404(a)(6) to make contributions to their qualified workplace-based retirement plans on account of 2019 is extended to July 15, 2020.

CironeFriedberg, LLP

info@cironefriedberg.com

24 Stony Hill Rd, Bethel, CT 06801

(203) 798-2721

6 Research Dr, Suite 450, Shelton, CT 06484

(203) 366-5876