

Memorandum

IRS Defers Tax Filing and Payment Dates Due to Coronavirus Concerns

March 23, 2020

On March 20, the Internal Revenue Service ("IRS") released Notice 2020-18 ("Notice"), which extends the deadline for payments and filing of federal income taxes for the 2019 taxable year as well as any estimated income tax payments for the 2020 taxable year that would have been due on April 15, 2020. The Notice, made as part of the White House's response to the ongoing coronavirus disease 2019 pandemic, pushes the due date for federal income tax filings and payments to July 15, 2020. The new rules are promulgated under authority granted to the IRS by President Trump's issuance of an emergency declaration under the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

Tax Return Deferral

The details of the IRS Notice are as follows:

- **Eligibility:** The terms of the Notice apply to any individual, trust, estate, partnership, association, company, or corporation with a federal income tax return or payment due April 15, 2020.
- **Postponement:** The due date for all tax returns and payments originally due April 15, 2020 is now postponed to July 15, 2020.
 - **Estimates:** This postponement also applies to federal estimated income tax payments (including payments on self-employment taxable income) previously due on April 15, 2020.
- Interest and Penalties: Interest will not accrue on taxes owed, and penalties will not apply, for the postponement period beginning April 15, 2020, and ending on July 15, 2020. Such interest and penalties will only begin to accrue on July 16, 2020.
- **No Actions Needed:** No additional filing is required to grant applicable taxpayers the July 15, 2020 extension. The due date changes are automatically in effect.
- **No Limit:** There is no limit on the amount of taxes owed to grant the extension.

These changes do not apply to any federal payment other than income tax payments or to state filings or payments unless a taxpayer's state independently implements similar changes.

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