

FEDERAL TAX DEADLINES EXTENDED DURING COVID-19

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In response to the COVID-19 crisis, the Internal Revenue Service (the "IRS") has initiated programs to help taxpayers during these difficult times. As of the date of this publication, all income tax returns and payments due April 15, 2020 are extended to July 15, 2020.

On March 20, 2020, the IRS published [Notice 2020-18](#), granting an extension for both filing and payment of income tax returns for Affected Taxpayers. Notice 2020-18 defines Affected Taxpayers as those with income tax returns normally due April 15, including "individual[s], trust[s], estate[s], partnership[s], association[s], compan[ies] or corporation[s], as provided in section 7701(a)(1) of the Code." Notice 2020-18 supersedes Notice 2020-17, which only granted an extension for payment of tax liability. On March 27, 2020, the IRS issued [Notice 2020-20](#), further expanding the relief granted in Notice 2020-18. Notice 2020-20 includes taxpayers required to file returns and payments for gifts and generation-skipping transfer taxes (reported on Form 709) among those eligible for the July 15, 2020 deadline.

This relief provided by Notice 2020-18 and Notice 2020-20 is automatic, there is no need to file for an extension to be eligible for an extended due date. A taxpayer needing more time may still choose to file a Form 4868, Form 7004, or Form 8892 (the Applications for Automatic Extensions of Time to File Individual Income Tax, Business Income Tax, and Gift and Generation-Skipping Tax, respectively). All tax payments normally due April 15 will be still due July 15, even if an extension is granted until October 15 for filing the return itself.

After the publication of Notice 2020-20, the following tax returns and payments that were originally due on April 15 are now due on July 15, 2020:

- Form 1040, 1040-SR, 1040-NR, 1040-NR-EZ, 1040-PR, 1040-SS (Individual Income Tax)
- Form 1041, 1041-N, 1041-QFT (Income Tax for Trusts and Estates)
- Form 1120, 1120-C, 1120-F, 1120-FSC, 1120-H, 1120-L, 1120-ND, 1120-PC, 1120-POL, 1120-REIT, 1120-RIC, 1120-SF (Income Tax for Corporations, REITs, RICs, etc.)
- Fiscal year corporate returns with an original or extended due date of April 15, 2020
- Form 8960 (Net Investment Income Tax)
- Form 8991 (Base Erosion Payment Tax)
- Form 990-T due on April 15th. (Those required to file Form 990-T by May 15 do not receive an extension)
- Form 709 (United States Gift and Generation-Skipping Transfer Tax Return)
- Quarterly estimated tax from January 1 – March 31

As of the date of this post, the following returns and payments are still due as regularly scheduled:

- Form 706 (Estate Tax)
- Any return with regular filing due dates after April 15 (for example, Form 990s originally due May 15, 2020)
- Form 720, 940, 941, 943, 944, 945 (Payroll and Excise tax)
- Quarterly estimated tax from April 1 – May 31 is due on June 15
- Notice 2020-18 has no effect on state income tax filings; state income tax may not be extended – changes are being made on a state-by-state basis (a list of announcements by state is available on the [AICPA website](#))

About Carolyn Ohlsen



Carolyn Ohlsen is Managing Partner of Lowenhaupt & Chasnoff, a law firm has been providing counsel to families of substantial wealth. Carolyn leads a team of attorneys advising individuals and families on all phases of estate, trust and business entity planning including tax, administration and legacy development. Carolyn represents taxpayers in private letter rulings and transfer tax audits, and received the designation of Accredited Estate Planner (AEP) from the National Association of Estate Planners and Councils, in 2007 and the Global Fiduciary Strategist (GFS) designation and a Certificate in Fiduciary Governance from the Thunderbird Walker Center for Global Entrepreneurship, in 2012. Carolyn has lectured and chaired numerous professional level courses and other programs on sophisticated estate planning topics, structuring for retirement assets, and transfer taxes. Carolyn earned an MBA from Saint Louis University and a law degree, cum laude, from Saint Louis University. She also earned a Bachelor of Science degree, magna cum laude, from Saint Louis University.

About Matthew Scheidker



Matthew Scheidker is a Law Clerk at Lowenhaupt & Chasnoff. Matthew conducts legal research and drafts memoranda for complex client matters. Matthew earned a law degree from Saint Louis University. He also earned a Bachelor of Science degree, cum laude, from University of Missouri – Columbia. During law school, Matthew worked as a student extern for the IRS in the Office of the Chief Counsel, where he inspected audit reports and evaluated tax issues.