

FEDERAL TAX FILING DATES POSTPONED
- Questions Answered -

The due date for filing Federal income tax returns and making income tax payments is postponed until July 15, 2020, under IRS Notice 2020-18, issued on March 20, 2020. Not only does this Notice impact filing and payment, it affects a wide range of areas such as retirement account contributions and IRA distribution rules. On March 24, 2020, the IRS released answers in response to frequently asked questions about Notice 2020-18. There are currently answers to twenty-four questions on the IRS website (<https://www.irs.gov/newsroom/filing-and-payment-deadlines-questions-and-answers>), and five of those answers deal with IRAs, qualified retirement plans and HSAs. In summary:

- The deadline for making contributions to IRAs for 2019 is extended to July 15, 2020.
- The deadline for employers to make contributions to qualified retirement plans for 2019 is extended to July 15, 2020.
- Under Notice 2020-18, employers are considered “Affected Taxpayers.” As such, employers with a due date of April 15, 2020, for filing Federal income tax returns and paying Federal income tax now have until July 15, 2020. (The Notice does not address the regular 6-month extension. Nor does it address the filing date for fiscal year employers.)
- Those that made excess elective deferrals to a workplace-based retirement plan in 2019 still need to remove excess deferrals and income from their retirement plan by April 15, 2020, if they wish to exclude the distribution from income.
- The deadline to pay the 10% additional early distribution tax on amounts includible in gross income from distributions from an IRA or workplace-based retirement plan in 2019 has been extended to July 15, 2020.
- The deadline for making contributions to Health Savings Accounts (HSAs) and Archer Medical Savings Accounts (MSAs) is also extended to July 15, 2020.

The IRS plans to update their questions and answers periodically, and we will provide updates as they become available.

Please note, the State of Michigan has NOT made any provisions to delay filing of State returns or payment of State taxes.

If you would like to discuss the federal tax filing and payment extension, or how it impacts contributions to, or distributions from, your IRAs, retirement plans, or HSAs, our attorneys at Loomis, Ewert, Parsley, Davis & Gotting, P.C. are happy to help. Please contact J.V. Anderton at jfanderton@loomislaw.com or call us at 517-482-2400.