

RÉSUMÉ DIGEST

ACT 234 (SB 205)

2020 Regular Session

Allain

Prior law required taxpayers to notify the department of revenue of changes to the taxpayer's federal income tax return within 180 days of a final determination by the Internal Revenue Service.

New law defines final determination to mean any of the following:

- (1) The taxpayer's execution of federal Form 870, or its equivalent, agreeing to the final and complete disposition of all outstanding issues.
- (2) The expiration of the statutory time period to petition the U.S. Tax Court for a redetermination.
- (3) The execution of a closing agreement between the taxpayer and the IRS that results in a final determination of all items in the federal audit.
- (4) The issuance of a final, nonappealable decision of the U.S. Tax Court, U.S. District Court, U.S. Court of Appeals, or U.S. Federal Claims, or a decision of the U.S. Supreme Court.
- (5) The taxpayer's filing of an amended federal income tax return that changes any state tax attribute.

Effective January 1, 2021.

(Amends R.S. 47:287.614(C))